

Data Protection Information and Consent Notice **(Privacy and Research Information for Career Coaching)**

Version: 1

Effective date: 27 April 2026

This Data Protection Notice explains how we collect, use, store, protect and retain personal data when you use our AI-assisted career coaching services.

We take data security and privacy seriously

and are committed to protecting privacy, limiting data use to defined purposes and transparency.

We process personal data only for clearly defined and documented purposes and apply strong technical and organizational safeguards to keep your data secure.

This notice applies to all users of the service, including users who:

- register an account,
- participate in the coaching interview,
- upload documents,
- receive a generated Career Development Plan (CDP),
- provide feedback
- take part in anonymized research or service improvement activities.

Contents

- [1. Who we are](#)
- [2. What this service does](#)
- [3. Purposes of processing](#)
- [4. What data we process](#)
- [5. Legal basis for processing](#)
- [6. How we protect your data](#)
- [7. AI Processing](#)
- [8. Retention periods](#)
- [9. Sharing and processors](#)
- [10. Your rights](#)
 - [11. Withdrawal of consent](#)
 - [12. Complaints](#)
- [13. Contact](#)

1. Who we are

The controller responsible for the processing of personal data in connection with this AI Career Coaching service is Prof. Dr. Daniel Mertens.

Controller: Prof. Dr. Daniel Mertens

Address: Schweizertalstraße 22-2, 69118 Heidelberg, Germany

Email: hello@empowerpeople.ai

Website: www.empowerpeople.ai

Data protection contact: lara.uensever@schillermertens.de

f.rosamende@schillermertens.de

We determine the purposes and means of processing in connection with the service, including the coaching interview, session storage, career plan generation, and related research.

2. What this service does

This service guides you through a structured coaching interview session with multiple phases and creates a Career Development Plan (CDP) tailored to your specific experiences.

3. Purposes of processing

We process personal data for the following purposes:

- To create and manage your account.
- To authenticate access securely.
- To conduct the AI-assisted coaching session.
- To create and deliver your Career Development Plan (CDP)
- To save session state and enable continued use of the service.
- To store and retrieve uploaded documents.
- To monitor system health, security, and abuse prevention.
- To handle technical support, error analysis, and service maintenance.
- To analyze service quality and improve user experience.
- To collect and evaluate voluntary feedback.,

and, to conduct anonymized or pseudonymized research.

4. What data we process

The data we process usually includes:

- Account data: username, email, password.
- Authentication data: access tokens and related login records.
- Document data: uploaded file metadata and document references.
- Conversation data: chat messages, timestamps, roles, and phase information.
- Derived data: summaries, career objectives, action plans, and generated Career Development Plans.
- Persistence data: restore state JSON, conversation summaries, and final PDF/text plan files.
- Feedback data: survey responses and improvement notes.
- Security data: logs and technical events necessary for system protection.

We intentionally limit collection to what is necessary for coaching and service operation. For analysis and to conduct research, we will ONLY use pseudonymized or anonymized data. We do not collect data for unrelated or undisclosed purposes.

5. Legal basis for processing

We process personal data necessary to provide the service you request, to administer and secure the system, and for scientific research, for feedback, or for other additional processing as detailed here. Where we rely on consent, you may withdraw it at any time (see below [11.](#) and [12.](#)).

6. How we protect your data

We take data security and privacy seriously and use appropriate measures to protect personal data from accidental or unlawful destruction, loss, alteration, unauthorized disclosure, or access. These measures and applied safeguards include:

- hashed password storage,
- restricted access for authorized personnel only,
- secure infrastructure and server hardening,
- separation of user accounts, coaching content, and research data where possible
- limited retention and minimization of stored content,
- use of anonymization or pseudonymization for research where appropriate.

Your data is stored on Hetzner infrastructure (<https://www.hetzner.com/de/>) within the EU and protected through access controls, secure server configuration, and restricted administrative access. We minimize the data we collect and retain only what is necessary for the coaching service and related support functions.

Hosting in the EU does not by itself completely guarantee compliance, so in addition all the involved parties also apply organizational rules, access limitation, and retention controls.

7. AI Processing

The coaching experience uses Mistral AI (<https://mistral.ai/>) for language processing and structured interview support. In our setup, Mistral does not use your input or output data to train its AI models. Mistral may process data to provide, maintain, secure, debug, and improve the service in accordance with its terms.

8. Retention periods

We retain data only for as long as necessary for the purposes described in this notice or as required by law. In general:

- Account data is retained for the duration of the account and a period 5 years afterward.
- Coaching session data is kept to support the service and plan generation.
- Uploaded document data is retained only while needed for the coaching process.
- Final career development plan files may be retained for your access and download history.
- Logs are retained only for operational and security purposes.
- Research data is retained only in anonymized or pseudonymized form.

9. Sharing and processors

We may disclose personal data only to trusted service providers who support hosting, AI processing, or technical operations. These providers process data under contractual safeguards and only according to our instructions. We do not sell, rent, or otherwise commercialize personal data.

10. Your rights

You have the right to object.

You may also exercise the right of access, correction, deletion, restriction of processing, portability, and withdrawal of consent where applicable. You also have the right to lodge a complaint with a supervisory authority.

11. Withdrawal of consent

If you withdraw consent, we will stop the consent-based processing going forward. Withdrawal does not affect processing that already occurred before withdrawal, and some data may still be retained if we have another legal basis or a legal obligation to keep it.

12. Complaints

You have the right to lodge a complaint with a data protection supervisory authority if you believe your data protection rights have been violated.

13. Contact

For questions about privacy, about this notice or to withdraw consent, please contact:

lara.uensever@schillermertens.de

f.rosamende@schillermertens.de