

Privacy Notice

How Carno AI collects, uses, shares and protects personal information

Controller	William Viet Pham trading as Carno AI
ABN	52 450 548 691
Privacy contact	admin@carnoi.com
Website	carnoi.com
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Version	1.0

Carno AI provides AI-powered automation and internal workflow services for businesses. This Privacy Notice explains how Carno AI handles Personal Data when you visit our website, contact us, receive business-to-business outreach from us, book or attend a meeting, become a client or otherwise interact with Carno AI.

This notice primarily describes processing for which Carno AI decides why and how Personal Data is used and therefore acts as controller. When Carno AI processes Personal Data solely on a client's instructions as part of a client automation, the client normally acts as controller and Carno AI acts as processor under the applicable Data Processing Agreement.

No home address is published in this notice. Privacy and data-protection enquiries can be sent to admin@carnoi.com.

1. Personal Data we collect

Website and enquiries. If you contact us or book a call, we may collect your name, work email address, company, role, message, meeting details and other information you choose to provide.

Business outreach. For relevant business-to-business prospecting, we may use professional information such as your name, role, company, LinkedIn profile, business email address, business contact details, outreach history, replies and expressed interests or objections.

Meetings. We may process attendee names, email addresses, calendar information, meeting notes and, where enabled, meeting recordings and transcripts.

Clients and business contacts. We may process names, roles, work contact details, correspondence, project information, contracts, invoices, payment/accounting information and information needed to manage the commercial relationship.

Technical and security information. Our service providers and systems may generate limited technical, authentication, security and diagnostic information needed to operate and protect our services. We do not currently use website analytics or advertising tracking technologies.

2. Where Personal Data comes from

Directly from you. For example when you email us, complete a booking form, attend a meeting, respond to outreach, enter into an agreement or otherwise communicate with Carno AI.

Public and professional sources. We may obtain business contact information from public company websites, LinkedIn and other professional/publicly available sources where relevant to business development.

Business systems and providers. Information may also be generated through tools used to manage communications, meetings, customer relationships, contracts, accounting and security.

3. Why we use Personal Data and our lawful bases

Purpose	Typical lawful basis
Responding to enquiries and requested information	Legitimate interests in communicating with prospective clients; and steps at your request before entering into a contract where applicable.
Providing services and managing a client relationship	Contract where processing is necessary for an agreement with an individual; otherwise legitimate interests in delivering and administering business services.
Relevant B2B prospecting and outreach	Legitimate interests where appropriate, subject to a balancing assessment and applicable electronic-marketing rules. We do not rely on legitimate interests to override PECR consent requirements.
Scheduling and conducting meetings	Legitimate interests in communicating, documenting discussions and operating our business; contract/pre-contract steps where applicable.
Meeting recording and transcription	Legitimate interests in maintaining accurate meeting records and follow-up, taking account of attendee expectations and the ability to stop recording. Where another legal basis is required in a particular context, we will use that basis.
Invoices, accounting and legal records	Legal obligation where applicable and legitimate interests in administering, evidencing and protecting our business.
Security, fraud prevention and incident management	Legitimate interests in protecting Carno AI, clients, systems and information; legal obligation where applicable.

Where we rely on legitimate interests, we consider the purpose of the processing, whether it is necessary and whether your interests, rights and reasonable expectations override our interests. You can object to processing based on legitimate interests, and you have an absolute right to object to the use of your Personal Data for direct marketing.

4. Business-to-business outreach

Carno AI may contact relevant people at businesses where we reasonably believe our services may be relevant to their professional role. UK data-protection law can apply to this activity where we use information that identifies a business contact, even where the information is publicly available.

For electronic marketing, we distinguish between corporate subscribers and individual subscribers. Corporate subscribers include companies and limited liability partnerships. Sole traders and certain partnerships are treated as individual subscribers and have stronger protections under PECR. We do not intend this notice to authorise outreach that would require consent under PECR. If we are unsure whether contact details belong to an individual or corporate subscriber, we should apply the more protective approach.

We identify ourselves in our outreach and provide a practical way to ask us to stop. If you object to direct marketing, we will stop using your Personal Data for that purpose. We may retain a minimal suppression record so that we can respect your request in future.

5. Meetings and Fireflies

Carno AI may use Fireflies.ai to record and transcribe business meetings. Recording is not silently enabled: the Fireflies assistant is admitted/allowed into the meeting by Carno AI, and attendees receive a meeting-chat message informing them that recording is taking place and explaining how recording can be stopped if needed or wanted.

Meeting recordings and transcripts are used for accurate notes, action items, follow-up and maintaining a record of relevant business discussions. Routine Fireflies recordings/transcripts are normally retained for up to 90 days unless there is a documented reason to retain a particular record for longer. Important decisions or actions may be transferred into the appropriate business record before the recording/transcript is deleted.

6. Who we share Personal Data with

We use service providers to operate Carno AI. Depending on the interaction, these may include providers of business email and productivity tools, scheduling/calendar services, meeting transcription, CRM/database services, hosting and automation infrastructure, and AI/API services. We only share information that is reasonably necessary for the relevant purpose.

For client automation work, Carno AI maintains a separate Subprocessor Register covering providers that may process client Personal Data on Carno AI's behalf. Where a provider is part of a client's own environment, that provider may instead be engaged directly by the client.

We may also disclose Personal Data where reasonably necessary to comply with law, protect legal rights, investigate security incidents, obtain professional advice, or deal with a business restructuring or transfer subject to appropriate safeguards.

7. International transfers

Carno AI operates as an Australian business and uses technology providers that may process information in the United Kingdom, European Economic Area, United States, Australia and other locations. This means Personal Data relating to people in the UK may be transferred internationally.

Where UK data-protection law requires safeguards for a restricted transfer, we seek to rely on an applicable UK adequacy regulation or appropriate safeguards such as the UK International Data Transfer Agreement, the UK Addendum to the EU Standard Contractual Clauses, or another lawful transfer mechanism, together with any assessment required by law.

8. How long we keep Personal Data

Information	Typical retention approach
Prospect/outreach CRM information	12 months after the last meaningful interaction, then review. Minimal opt-out/suppression information may be retained longer where needed to honour an objection.
Inactive prospect email correspondence	12 months after the last meaningful interaction, then review.
Calendly/calendar meeting records	Up to 24 months after the meeting, then review.
Routine Fireflies recordings/transcripts	Normally 90 days, unless a documented reason requires longer retention.
Client communications/project correspondence	During the engagement and generally up to 24 months after closure, then review.
Contracts, invoices, payment and tax-relevant records	Generally at least five years from the relevant record/transaction point, and longer where an applicable legal or tax requirement requires it.
Security incident records	At least three years after closure, then review; longer where required for legal, regulatory, insurance or dispute purposes.

These are standard retention positions rather than a promise to keep every record for the full period. We may delete information earlier where it is no longer needed and may retain it longer where a specific legal, regulatory, security or dispute-related reason requires this.

9. Cookies and website tracking

Carno AI does not currently use website analytics, advertising pixels or similar non-essential tracking technologies. The website or its hosting infrastructure may still use technologies that are strictly necessary to provide functionality, security or communications requested by the user. If Carno AI later introduces non-essential analytics, advertising or similar tracking, we will update our privacy/cookie information and implement any consent mechanism required by applicable law before using those technologies.

10. Your data-protection rights

Depending on the circumstances, UK data-protection law may give you rights to be informed about processing; access your Personal Data; correct inaccurate information; request erasure; restrict processing; receive certain data in a portable format; and object to processing. Where processing relies on consent, you can withdraw that consent without affecting processing that was lawful before withdrawal.

Direct marketing. You have the right to object at any time to the processing of your Personal Data for direct marketing. If you make that objection, we will stop processing your Personal Data for that purpose.

To exercise a privacy right or ask a question, contact **admin@carnoi.com**. We may need to verify your identity before acting on a request.

11. Complaints

Please contact Carno AI first if you have a privacy concern so that we can try to resolve it. If UK data-protection law applies to your Personal Data, you may also have the right to complain to the UK Information Commissioner's Office (ICO).

12. Security

Carno AI uses technical and organisational measures designed to protect Personal Data against unauthorised access, disclosure, alteration, loss and destruction. These measures include access controls, credential protection, encrypted transmission where appropriate, infrastructure security, data minimisation, retention controls, backups and incident-response procedures. No system can guarantee absolute security.

13. Changes to this notice

We may update this Privacy Notice when our services, systems, providers or legal obligations change. The current version will be made available through carnoi.com. Material changes will be reflected by updating the effective date and version.

14. Contact Carno AI

Data controller: William Viet Pham trading as Carno AI

ABN: 52 450 548 691

Email: admin@carnoi.com

Website: carnoi.com

Carno AI does not publish the controller's residential address in this Privacy Notice. If additional contact or representative information is legally required for a particular processing activity, Carno AI will provide it through the appropriate channel.

Important implementation note

This notice describes Carno AI's current processing as at the effective date. Before publication and periodically thereafter, Carno AI should verify that its actual website technologies, outreach practices, service providers, international-transfer arrangements and retention settings remain consistent with this notice. The need for a UK representative under the UK GDPR should also be assessed as Carno AI's UK client base and processing activities develop.