

Effective date: 21.03.2026

Carbon Mail Ltd — Privacy Policy

This Privacy Policy explains how Carbon Mail Ltd ("we", "us", "our") collects, uses, stores, and protects your personal data when you use our AI email assistant service (the "Service"). We are committed to protecting your privacy and handling your data transparently and in accordance with the UK General Data Protection Regulation (UK GDPR) and the Data Protection Act 2018.

Please read this policy carefully. By using our Service, you confirm that you are at least 18 years of age and agree to the practices described in this policy.

At a glance: how we handle your personal data

What we collect: information you give us when you sign up (name, email, billing details), email content processed in real-time to complete your requested tasks, and technical data from your device such as IP address and browser type.

How we use it: to operate the Service, process AI tasks on your behalf, send account notifications, improve our products, and — where you consent — send marketing updates.

Who we share it with: Anthropic (AI processing), Vercel (hosting), your payment provider, and your email provider via OAuth. We never sell your data.

Your rights: access, correction, deletion, portability, restriction, objection, and withdrawal of consent. Contact us at privacy@carbonmail.com or the ICO at ico.org.uk.

Our promises: we will always keep your personal data safe. We will never sell your personal data. Email content is discarded immediately after each task — it is never stored or used to train AI models.

1. Who We Are

Carbon Mail Ltd is registered in England and Wales. We are the data controller for personal data collected through our website and Service.

You can contact us about any data protection matters at:

Email: privacy@carbonmail.com

Registered address: 2 Fitz-James Ave, London, UK, W14 0RP

2. What Our Service Does

Carbon Mail Ltd provides an AI-powered email assistant that integrates with your email account. Once connected, you can include our assistant in email conversations by tagging it. The assistant reads the relevant email thread, uses artificial intelligence to understand the context and your instructions, performs the requested task (such as drafting a reply, scheduling a meeting, or managing calendar invites), and sends responses or takes actions on your behalf.

Our Service currently integrates with:

- Gmail and Google Workspace (via OAuth 2.0)
- Standard email accounts via IMAP

3. What Personal Data We Collect

3.1 Account Data

When you register for the Service, we collect:

- Full name
- Email address
- Password (stored in encrypted form — we never store plaintext passwords)

- Billing information (processed by our payment provider — we do not store full card details)
- Company name (for Business customers)

3.2 Email Data

When you use the Service, our AI assistant processes the content of email threads in which it is tagged. This may include:

- The content of emails in the tagged thread
- Names and email addresses of email participants
- Attachments or calendar data referenced in the thread (where relevant to the task)

Important: we do not store the content of your emails. Email data is processed in real-time to perform the requested task and is discarded immediately afterwards. We do not retain, log, or analyse email content beyond what is necessary to complete the immediate task.

3.3 Usage Data

We automatically collect certain technical data when you use the Service:

- IP address
- Browser type and version
- Pages visited and actions taken within our platform
- Date and time of access
- Error logs

3.4 Communications

If you contact us for support or otherwise communicate with us, we will retain records of that correspondence.

4. How and Why We Use Your Data

We process your personal data on the following legal bases under UK GDPR:

Purpose	Legal Basis
Providing and operating the Service	Performance of a contract (Article 6(1)(b))
Processing email content to complete your tasks	Performance of a contract (Article 6(1)(b))
Creating and managing your account	Performance of a contract (Article 6(1)(b))
Processing payments and preventing fraud	Performance of a contract; Legal obligation (Article 6(1)(c))
Sending transactional emails (account alerts, receipts)	Performance of a contract (Article 6(1)(b))
Sending marketing emails and product updates	Consent (Article 6(1)(a)) — you may withdraw consent at any time
Improving and developing the Service	Legitimate interests (Article 6(1)(f))
Complying with legal obligations	Legal obligation (Article 6(1)(c))
Responding to support requests	Legitimate interests (Article 6(1)(f))

5. AI Processing and Your Email Data

Our Service uses artificial intelligence to process the content of email threads. We use the Claude API provided by Anthropic, PBC to power our AI assistant. The following points are important to understand:

No storage of email content. Email content is processed in real-time and is not stored on our servers after the task is completed.

No AI training on your data. Your emails are never used to train, fine-tune, or improve any AI model — including Anthropic's models. Anthropic's API terms confirm that data sent via the API is not used for model training.

Automated processing. Our Service involves automated processing of your emails. You retain full control — the assistant only acts when explicitly tagged by you in an email thread. You can revoke access at any time.

Human oversight. While the AI processes and responds to emails, you are responsible for reviewing and managing any actions taken. We recommend you monitor your assistant's activity, particularly for high-stakes communications.

6. Data Sharing and Third Parties

We do not sell your personal data. We share data only with the following categories of third parties, and only to the extent necessary to provide the Service:

Sub-processor	Purpose	Location
Anthropic, PBC	AI model processing (Claude API)	USA (SCCs in place)
Vercel Inc.	Cloud hosting and infrastructure	UK/EU (primary); USA (DPF certified)
Payment Provider (e.g. Stripe)	Payment processing and fraud prevention	UK/EU/USA
Google LLC / Microsoft	Email provider API access (OAuth)	As per their own policies

We may also disclose your data if required to do so by law, court order, or regulatory authority, or to protect the rights, property, or safety of Carbon Mail Ltd, our users, or others.

7. International Data Transfers

Our primary infrastructure is hosted in the United Kingdom and European Union (Vercel London region). However, some of your data may be transferred to or processed in the United States in the following circumstances:

- When your email content is processed by the Anthropic Claude API — this is governed by Standard Contractual Clauses (SCCs) and Anthropic's Data Processing Addendum.
- Residual network-level data (such as IP addresses) may pass through Vercel's US infrastructure for security purposes. Vercel is certified under the EU-US Data Privacy Framework.

All international transfers are subject to appropriate safeguards in accordance with UK GDPR, including Standard Contractual Clauses where applicable. You can request a copy of these safeguards by contacting us at privacy@carbonmail.com.

8. Data Retention

We retain your personal data only for as long as necessary for the purposes set out in this policy:

Data Type	Retention Period
Email content (processed by AI)	Not retained — discarded immediately after task completion

Account data (name, email, preferences)	Duration of your account, plus 30 days after deletion
Billing records	7 years (UK legal requirement for financial records)
Support communications	3 years from last contact
Usage logs and technical data	90 days
Marketing consent records	Until consent is withdrawn, plus 1 year

When data is no longer required, we delete or anonymise it securely. You may request earlier deletion of your data — see Section 10 for your rights.

9. Cookies and Tracking

We currently do not use third-party analytics or advertising cookies. We use only essential cookies necessary to operate the Service, including session cookies to keep you logged in and security cookies to protect your account.

We will update this policy if we introduce additional tracking technologies and will seek your consent where required.

10. Your Rights Under UK GDPR

You have the following rights in relation to your personal data:

Right of access. You can request a copy of the personal data we hold about you (Subject Access Request).

Right to rectification. You can ask us to correct inaccurate or incomplete data.

Right to erasure. You can ask us to delete your personal data in certain circumstances (the 'right to be forgotten').

Right to restriction. You can ask us to restrict how we use your data in certain circumstances.

Right to data portability. You can request a copy of your data in a structured, machine-readable format.

Right to object. You can object to our processing of your data where we rely on legitimate interests or for direct marketing purposes.

Rights related to automated decision-making. You have the right not to be subject to solely automated decisions that significantly affect you. Our AI assistant acts on your explicit instructions and does not make autonomous decisions without your involvement.

Right to withdraw consent. Where we process your data based on consent (e.g. marketing emails), you can withdraw consent at any time without affecting the lawfulness of prior processing.

To exercise any of these rights, please contact us at privacy@carbonmail.com. We will respond within one calendar month. We may need to verify your identity before processing your request.

You also have the right to lodge a complaint with the Information Commissioner's Office (ICO) at ico.org.uk or by calling 0303 123 1113.

11. Security

We take the security of your data seriously. Our technical and organisational measures include:

- Encryption of data in transit using TLS 1.2 or higher
- Encrypted storage of all account credentials
- OAuth 2.0 for email provider connections — we never store your email password

- Access controls limiting employee access to personal data on a need-to-know basis
- Regular security reviews of our infrastructure and third-party providers
- Incident response procedures to detect, contain, and report data breaches

In the event of a personal data breach that is likely to result in a risk to your rights and freedoms, we will notify the ICO within 72 hours and will notify you without undue delay where required.

12. B2B Customers — Data Processing Agreement

If you are using our Service as a business customer and our Service processes personal data on behalf of your organisation, you will need to enter into a Data Processing Agreement (DPA) with us. This DPA sets out the obligations of both parties under UK GDPR where we act as a data processor on your behalf.

Please contact privacy@carbonmail.com to request a copy of our standard DPA. By using the Service without a signed DPA, business customers acknowledge that our standard data processing terms (available on request) apply.

13. Children

Our Service is not directed at or intended for use by anyone under the age of 18. We do not knowingly collect personal data from anyone under 18. If you believe we have inadvertently collected data from a minor, please contact us immediately at privacy@carbonmail.com and we will delete the data promptly.

14. Links to Third-Party Services

Our Service involves connecting to third-party email providers (Gmail, Outlook, IMAP providers). This Privacy Policy does not cover how those third parties process your data. We encourage you to review the privacy policies of any third-party services you connect to our platform.

15. Changes to This Policy

We may update this Privacy Policy from time to time. When we make significant changes, we will notify you by email (to the address associated with your account) and update the effective date at the top of this document. Your continued use of the Service after such notification constitutes acceptance of the updated policy.

For minor changes (such as clarifications or corrections), we will update the policy without individual notification, but the updated date will always reflect the most recent version.

16. Contact Us

If you have any questions, concerns, or requests regarding this Privacy Policy or how we handle your data, please contact us:

Carbon Mail Ltd

Email: privacy@carbonmail.com

Registered address: 2 Fitz-James Ave, London, UK, W14 0RP

This policy is governed by the laws of England and Wales.