Vokser

Privacy Notice

Issued by OpenBlend Ltd as Data Processor

Last updated: March 2026 (v3)

1. Who We Are

Vokser is a personalised manager development platform provided by OpenBlend Ltd (company number 10619668), registered in England and Wales.

Your employer *(the organisation that has provided you with access to Vokser)* is the **Data Controller** and determines the purposes for which your personal data is processed. OpenBlend Ltd is the **Data Processor**, processing your data on your employer's behalf in order to deliver the Vokser platform to you.

This notice explains what personal data we process, why, and how it is protected.

2. What Data We Process

When you use Vokser, we process the following categories of personal data:

2.1 Account and profile data

Your name, email address, and organisational role, provided by your employer when setting up your Vokser account.

2.2 Motivators data

When you complete the Motivators exercise, you select from 31 motivators and rate your current level of fulfilment on a scale of 1 to 5. This data is used to personalise your coaching experience and development recommendations.

2.3 Behavioural self-assessment data

Vokser uses the 3D Framework, which comprises 54 management behaviours organised across three domains (Domain, Delivery, and Development) and nine pillars. During onboarding, you select three priority behaviours and self-assess your proficiency level from Novice to Expert. This data shapes your personalised development pathway.

2.4 Coaching interaction data

Your conversations with Anna, the AI coaching companion within Vokser, are stored to provide continuity and context across your coaching sessions. This includes the questions you ask, the goals you set, and the reflections you share.

2.5 Usage and technical data

We collect standard technical data to ensure the platform functions properly, including login timestamps, device and browser information, and interaction data (such as pages visited and features used).

3. How We Use AI

The coaching experience within Vokser is powered by artificial intelligence. Your conversations with Anna are processed using OpenAI's API services.

Key points about how AI is used:

- Your data is sent to OpenAI's API solely to generate coaching responses within your Vokser sessions.
- OpenAI does not use your data to train its models. OpenBlend uses OpenAI's API services, which are covered by OpenAI's data processing terms and do not permit training on customer data.
- Your data is processed in transit and is not permanently stored by OpenAI beyond a short-term retention period required for abuse monitoring (typically 30 days), after which it is deleted.
- OpenAI acts as a sub-processor to OpenBlend. A Data Processing Agreement is in place between OpenBlend and OpenAI.

4. Lawful Basis for Processing

Your employer, as Data Controller, determines the lawful basis for processing your personal data. In most cases, the lawful basis will be one or more of the following:

- Legitimate interests: your employer has a legitimate interest in developing the management capability of its people.
- Performance of a contract: where use of Vokser forms part of your employment terms or development programme.

If you have questions about the lawful basis your employer relies on, please contact your employer's HR or data protection team.

5. Who We Share Your Data With

We share your personal data only where necessary to deliver the Vokser service:

- OpenAI (sub-processor): to power the AI coaching experience, as described in Section 3.
- Microsoft Azure (cloud hosting): your data is hosted on Microsoft Azure infrastructure within the UK.

We do not sell your personal data. We do not share your coaching conversations, motivator selections, or self-assessment data with your employer. Your employer receives only anonymised, aggregated insights at an organisational level, never individual data.

6. International Data Transfers

Your data is hosted on Microsoft Azure infrastructure within the UK. No international transfer takes place for the hosting of your data.

Where your data is processed by OpenAI to power the AI coaching experience, it may be transferred to servers located in the United States. These transfers are protected by Standard Contractual Clauses (SCCs) approved by the European Commission, and by OpenAI's data processing terms.

7. Data Retention

We retain your personal data for the duration of your employer's contract with OpenBlend, plus a short wind-down period to allow for data export or migration.

When your employer's contract ends, or when your employer requests deletion of your data, we will securely delete all personal data associated with your account within 90 days, unless we are required by law to retain it for longer.

You may request deletion of your coaching conversation history at any time by contacting your employer's HR or data protection team, who will instruct us accordingly.

8. Data Security

We take appropriate technical and organisational measures to protect your personal data, including:

- Encryption of data in transit and at rest.
- Access controls limiting who within OpenBlend can access personal data.
- Regular security reviews of our infrastructure and sub-processors.

9. Your Rights

Under UK GDPR, you have the following rights in relation to your personal data:

- The right to access your personal data.
- The right to rectification of inaccurate data.
- The right to erasure ('right to be forgotten').
- The right to restrict processing.
- The right to data portability.
- The right to object to processing.

Because your employer is the Data Controller, rights requests should be directed to your employer in the first instance. Your employer will instruct OpenBlend to act on verified requests. If you need to contact us directly, you can reach us at privacy@openblend.com.

10. Complaints

If you have concerns about how your personal data has been handled, you have the right to lodge a complaint with the Information Commissioner's Office (ICO):

- Website: ico.org.uk
- Helpline: 0303 123 1113

We would welcome the opportunity to resolve any concerns directly. Please contact privacy@openblend.com in the first instance.

11. Changes to This Notice

We may update this Privacy Notice periodically to reflect changes in our practices, sub-processors, or legal obligations. Material changes will be communicated via the platform and reflected in the updated date above. Continued use of Vokser following notification of changes constitutes acceptance of the updated notice.

12. Contact

For any questions about this notice or how your data is processed by OpenBlend Ltd:

OpenBlend Ltd

Email: privacy@openblend.com

Website: openblend.com