



BULLET

Bullet AI: Quit Coach – Privacy Notice



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1. Overview

This Privacy Notice explains how personal data is processed in connection with **Quit Coach**, an AI-powered smoking cessation support service that helps residents access stop smoking support through WhatsApp.

Quit Coach is provided by **Bullet AI** (trading name of Bullet AI Ltd) ("we," "us," or "our") and is built on Bullet AI's proprietary Brava platform. Quit Coach is deployed by local authorities (typically by their public health and stop smoking teams) and integrated with local stop smoking services. The deploying council acts as **data controller** for resident data. Bullet AI acts as **data processor** on behalf of each deploying council.

This notice describes how Quit Coach processes personal data. It should be read alongside the deploying council's own Privacy Notice for stop smoking and public health services, which sets out how the council collects and uses public health information more broadly.



2. Information Processed Through Quit Coach

Unlike a general information service, Quit Coach is designed to support residents through their personal quit journey. To do that, it needs to collect and process some personal information, including health information. We collect only what is necessary to deliver the service, and special category (health) data is treated with appropriate safeguards.

The following categories of personal data are processed through Quit Coach:

Identity and contact data:

- Name
- Contact details (WhatsApp phone number, email address)
- Date of birth
- Gender
- Address or postcode
- GP practice (where relevant for prescription referral)

Health data (special category):

- Smoking habits and history
- NRT (Nicotine Replacement Therapy) product selection
- Quit attempts and outcomes
- Health conditions affecting service delivery
- Support preferences and requirements

Equality monitoring data (where collected):

- Ethnicity
- Sexual orientation
- Disabilities

This data is collected for equality monitoring and to help councils ensure the service reaches residents fairly. Provision of equality monitoring data is voluntary.

Interaction data:

- WhatsApp / web message content and metadata
- Conversation transcripts with the AI
- Session timestamps and duration
- Response patterns and engagement metrics
- Outbound telephone call recordings and call notes (bureau follow-up service)
- Call outcome status (e.g. confirmed quit, confirmed relapse, unable to reach, opted out)
- SMS / notification content and delivery status (bureau follow-up service)



Technical data:

- IP addresses (temporary, for security)
- Device type and identifiers (via WhatsApp)
- Session tokens and authentication data
- Error logs and system events

Where data is captured (for example during registration or for prescription referral), residents are directed to a secure web interface rather than asked to share personal information directly within WhatsApp. Bullet Armour middleware filters inputs and outputs and prevents Quit Coach from inadvertently soliciting or retaining information beyond what is needed for the service.



3. How Information is Collected

Information is collected directly from residents when they:

- Register for Quit Coach
- Use the service's features (including chatting with the AI quit coach via WhatsApp or web)
- Complete questionnaires or provide information for prescription referral
- Respond to scheduled check-in messages about their quit status
- Receive an outbound telephone call or SMS as part of the bureau follow-up service (see Section 7)
- Interact with customer support

Information may also be received from, or shared with, the council's stop smoking back-end systems where integration is in place for example, to support prescription referral pathways or outcome reporting.



4. How Information is Used

Personal data processed through Quit Coach is used solely for the purposes of:

- **Service delivery:** Supporting residents through their quit journey, including personalised guidance, scheduled check-in messages, and signposting to local stop smoking services, prescription support, and other resources.
- **Outcome confirmation and re-engagement:** Contacting residents by telephone or SMS who have not responded to scheduled automated check-in messages, to confirm their quit status, offer support, and capture outcome data for service reporting (the bureau follow-up service — see Section 7).
- **Safety monitoring:** Operating Bullet Armour guardrails that detect interactions where a user may be in distress or expressing safeguarding concerns, so that these can be escalated to council staff or appropriate support services rather than handled by an AI response.
- **Quality assurance and human-in-the-loop review:** AI interactions and bureau service calls are subject to review for monitoring, safeguarding, and service improvement.
- **Training and analysis:** The deploying council retains chat transcripts and call records for analysis and service improvement (typically for up to 12 months, or another period agreed in the council's Data Processing Agreement with Bullet AI). Statistical information about the service is also held; this does not contain personal data.
- **Legal and regulatory compliance:** Meeting obligations under UK GDPR and the Data Protection Act 2018.

Quit Coach does not make eligibility decisions, allocate resources, or trigger any automated high-stakes actions. It is an information, support, and signposting tool — not a clinical decision-making system. There is no profiling: all residents receive support drawn from the same council-approved content.



5. Lawful Basis for Processing (Council as Controller)

Where the deploying council acts as data controller for data processed through Quit Coach, the council typically relies on the following lawful bases under UK GDPR. The council's own stop smoking or public health Privacy Notice is authoritative for any specific deployment.

Personal data:

- **Article 6(1)(e)** — processing is necessary for the performance of a task carried out in the public interest or in the exercise of official authority vested in the controller.

Special category data (health data collected as part of the quit journey):

- **Article 9(2)(h)** — processing is necessary for the provision of health or social care, or the management of health or social care systems and services.
- **Article 9(2)(i)** — processing is necessary for reasons of public interest in the area of public health.

Official authority for stop smoking and public health processing typically derives from (non-exhaustive):

- Health and Social Care Act 2012 (public health functions of local authorities)
- NHS Act 2006
- Relevant public health regulations and local commissioning arrangements

Where the council relies on consent for any specific processing activity (for example, call recording), that consent will be freely given, specific, informed, and unambiguous in accordance with UK GDPR Article 7.



6. Data Security

Bullet AI implements the following technical and organisational security measures:

- **Encryption in transit:** TLS 1.2 minimum, TLS 1.3 preferred, across all connections.
- **Encryption at rest:** AES-256 across all data storage.
- **UK data storage:** All platform data — including conversation transcripts, account data, and backups is stored on infrastructure in the London (UK) region. Some processing operations (AI inference and WhatsApp message routing) involve transfers outside the UK; see Section 9.
- **Access controls:** Role-based access with mandatory multi-factor authentication (MFA) for all staff and system accounts. Only authorised council staff and approved Bullet AI personnel can access transcripts.
- **Bullet Armour middleware:** Real-time input/output validation and prompt injection protection.
- **Penetration testing:** Annual CREST-accredited penetration testing.
- **Certifications:** Cyber Essentials Plus and ISO 42001 (AI Management Systems).
- **Incident response:** Formal Security Incident Management Plan with a 24-hour client breach notification SLA.

The deploying council holds information securely on database and document management systems with strict access and usage rights. Quality checks are in place to ensure information is collected accurately and proportionately.



7. Channels and Contact Methods

Quit Coach is delivered to residents through the following channels:

WhatsApp and web

Residents interact with Quit Coach via the WhatsApp Business API and via a secure web interface.

- Conversation transcripts are processed on the Brava platform, hosted on UK-based infrastructure, and are encrypted in transit and at rest.
- Transcripts may be reviewed by authorised council staff and approved Bullet AI personnel for safeguarding, monitoring, and quality assurance purposes.
- Where personal data capture is required (for example, during registration or for prescription referral), residents are directed to a secure web interface rather than asked to share personal information directly within WhatsApp.

Bureau follow-up service (telephone and SMS)

Where a resident does not respond to scheduled automated check-in messages about their quit status, they may be contacted by telephone or SMS by a trained Bullet AI caller as part of the bureau follow-up service. The purpose of these calls is to confirm quit status, offer support, and signpost to further resources where needed.

- Calls are made only to residents who have not opted out of contact and who have a valid phone number on file.
- At the start of each call, the caller confirms the resident's identity and willingness to continue.
- Residents can ask to be removed from further bureau contact at any time during a call, and this is actioned immediately.
- Calls may be recorded for quality assurance and training purposes. Residents are informed of this at the start of the call.
- Call recordings, outcome data, and any notes are stored securely and subject to the same access controls and retention periods as other Quit Coach data.
- Where a resident cannot be reached after the agreed number of attempts, their outcome is recorded as unconfirmed — this is distinct from a confirmed relapse.



8. Information Sharing

Personal data processed through Quit Coach may be shared as follows. In each case, only the minimum information necessary is shared, and only when required.

With the deploying council (data controller), including:

- Council public health and stop smoking service staff — for service delivery, outcome monitoring, and reporting.
- Prescription referral partners (e.g. pharmacies, GP practices) — where the resident has been referred for NRT or other stop smoking medication through Quit Coach.
- NHS England or commissioning bodies — for anonymised or aggregated outcome reporting as required under the council's stop smoking service commissioning arrangements.

With sub-processors (acting on Bullet AI's instructions under contract):

- AI model providers (OpenAI, Anthropic) — for AI inference only; see Section 10 (International Transfers).
- Infrastructure providers (AWS, MongoDB Atlas) — for hosting and data storage in the UK.
- Meta Platforms Ireland Limited — for WhatsApp message delivery.

Quit Coach does not monetise resident data and generates no advertising revenue.



9. Automated Decision-Making

Quit Coach does not make automated decisions about residents. It provides information, support, and signposting to services; all decisions about care, treatment, or resource allocation remain with human professionals. Quit Coach does not prescribe medication, make clinical assessments, or replace the professional judgement of stop smoking advisers.



10. International Transfers

While all Brava platform data is **stored** in the UK, the delivery of Quit Coach involves limited transfers of data outside the UK for two specific operational purposes:

AI inference (United States): The text of your message, relevant extracts from the council-approved knowledge base, and the operational instructions that guide the assistant are transmitted to OpenAI (OpenAI OpCo, LLC) and/or Anthropic (Anthropic, PBC) in the United States to generate a response. Both providers act as sub-processors, process requests ephemerally, and are contractually prohibited from using this data to train their AI models. Personal identifiers are stripped from content before transmission by Bullet AI's Bullet Armour middleware.

Message delivery (United States and other jurisdictions): Where Quit Coach is delivered via WhatsApp, messages are routed through Meta's global infrastructure, which includes servers in the United States.

How these transfers are protected: All three transfers rely on **EU Standard Contractual Clauses (Module 3 — processor to processor) with the ICO's Approved UK Addendum** as the appropriate safeguard under UK GDPR Article 46. Bullet AI has completed Transfer Risk Assessments for both transfer flows in line with ICO guidance and concluded that the residual risk to individuals is low. Supporting documentation is available to deploying councils on request.



11. Retention

Chat transcripts and associated interaction data are retained by the deploying council, typically for **up to 12 months** for training and analysis purposes, unless a different period is agreed in the Data Processing Agreement between the council and Bullet AI. Statistical information about the digital assistant service (containing no personal data) may be retained for longer.

Other categories of adult social care information held by the council are retained in line with the council's departmental retention schedule, which varies depending on the type of information (personal, financial, sensitive, etc.).



12. Data Subject Rights

Under UK GDPR, data subjects have the right to:

- **Be informed** about how their data is processed
- **Access** the personal data held about them
- **Rectification** of inaccurate or incomplete data
- **Erasure** ("right to be forgotten") in certain circumstances
- **Restrict processing** in certain circumstances
- **Data portability** in a structured, machine-readable format
- **Object** to processing, including the right to ask the council to stop processing personal data in relation to a council service
- Rights regarding **automated decision-making** (note: Quit Coach does not make automated decisions)

Where Bullet AI acts as data processor, data subjects should direct rights requests to the deploying council (the data controller). Where a request is received directly by Bullet AI, it will be referred to the relevant data controller within 5 business days. Bullet AI will assist the controller in responding within the statutory one-month timescale (extendable by up to two further months for complex requests).

For full details of how to exercise rights, residents should consult the deploying council's main Privacy Notice.



13. Contact

Bullet AI (data processor):

- Email: privacy@bullet-ai.com
- General enquiries: team@bullet-ai.com
- Written: 3rd Floor, 86–90 Paul Street, London, EC2A 4NE, United Kingdom

Deploying council (data controller): Residents should contact the deploying council using the channels published in that council's Adult Social Care Privacy Notice, including for subject rights requests.



14. Data Ownership, Controller, and Processor Roles

- **Data Controller:** The deploying council determines the purposes and means of processing personal data in connection with Quit Coach and is ultimately responsible for data subject rights.
- **Data Processor:** Bullet AI processes personal data on behalf of the council, on documented controller instructions, and in accordance with applicable data protection laws.
- **Data Processing Agreement:** A formal DPA is in place between Bullet AI and the council for every deployment, governing lawful processing under UK GDPR.
- **DPIA:** A Data Protection Impact Assessment is completed in collaboration with the council's Data Protection Officer prior to go-live.