

# Surface Rank

## Privacy Policy

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Effective Date: April 29, 2026

Last Updated: April 29, 2026

Surface Rank ("we", "us", or "our") is committed to protecting the privacy of our customers, website visitors, and users of our platform. This Privacy Policy explains what information we collect, how we use it, with whom we share it, and the choices you have regarding your data. It applies to all interactions with surfacerank.com and the Surface Rank platform, including client analytics portals and any related services (collectively, the "Services").

By using the Services, you acknowledge that you have read and understood this Privacy Policy. If you do not agree with our practices, please do not use the Services.

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## 1. Information We Collect

We collect information in the following ways depending on how you interact with us:

### 1.1 Information You Provide Directly

When you contact us, request a demo, or sign up for the Services, we collect information you voluntarily provide, which may include:

- Full name and job title;
- Business email address;
- Company name and website URL;
- Monthly organic traffic range (as selected in our contact form);
- Goals or requirements you describe in free-text fields;
- Billing and payment information (processed securely by our payment provider — we do not store full card details);
- Any other information you choose to share in correspondence with us.

## 1.2 Information Collected Automatically

When you visit our website or use the platform, we and our service providers may automatically collect certain technical information, including:

- IP address and approximate geographic location (country/city level);
- Browser type, version, and operating system;
- Pages visited, time spent, and navigation paths;
- Referring URL (how you arrived at our site);
- Device identifiers and screen resolution;
- Log data and error reports.

## 1.3 Customer Website Data (Edge Tracking)

As part of the Services, customers install a lightweight edge script on their websites. This script enables Surface Rank to intercept and classify web requests on behalf of the customer, distinguishing human visitors from AI crawlers and attributing traffic to its source. The data processed includes:

- Visitor request metadata (IP address, user-agent string, request path);
- Bot and crawler identification signals;
- AI engine referral attribution data;
- Page-level citation and engagement signals.

This data is processed on behalf of our customers. Customers are responsible for ensuring their own privacy disclosures and consent mechanisms cover the use of this tracking on their websites.

## 1.4 Cookies and Similar Technologies

We use cookies and similar tracking technologies on our website and platform for the following purposes:

- **Strictly necessary cookies:** Required for the platform to function, including session management and authentication;
- **Analytics cookies:** Help us understand how visitors interact with our website so we can improve it;
- **Preference cookies:** Remember your settings and preferences.

You can control cookie preferences through your browser settings. Disabling certain cookies may affect the functionality of the Services.

## 2. How We Use Your Information

We use the information we collect to:

- Provide, operate, and improve the Services;
- Process account registrations and manage your subscription;
- Process payments and send billing-related communications;
- Respond to your enquiries, support requests, and feedback;
- Send service-related notifications (e.g., platform updates, onboarding guidance, report delivery);
- Send marketing and promotional communications where you have consented or where we have a legitimate interest — you may opt out at any time;
- Monitor and analyse usage patterns to improve platform performance and user experience;
- Detect, investigate, and prevent fraudulent or unauthorised activity;
- Comply with legal obligations and enforce our Terms of Service;
- Carry out internal research and product development.

We process your personal data on the following legal bases (where applicable under GDPR or similar frameworks): (a) performance of a contract with you; (b) your consent; (c) our legitimate interests in operating and improving the Services; and (d) compliance with legal obligations.

### **3. How We Share Your Information**

We do not sell your personal data to third parties. We do not share your personal data with advertisers. We may share your information in the following limited circumstances:

#### **3.1 Service Providers**

We engage trusted third-party vendors to help us deliver the Services. These providers act as data processors on our behalf and are contractually bound to use your data only as directed by us and to protect it appropriately. Categories of service providers include:

- Cloud infrastructure and hosting providers;
- Payment processors (e.g., Stripe);
- Email delivery and communication platforms;
- Analytics and error monitoring tools;
- Customer support software.

#### **3.2 Business Transfers**

In the event of a merger, acquisition, reorganisation, or sale of all or substantially all of our assets, your information may be transferred to the acquiring entity. We will notify you by email or platform notice prior to any such transfer and inform you of any choices you may have.

### **3.3 Legal Requirements**

We may disclose your information where required to do so by law, regulation, or valid legal process (such as a court order or subpoena), or where we believe disclosure is necessary to protect the rights, property, or safety of Surface Rank, our customers, or others.

### **3.4 With Your Consent**

We may share your information with third parties when you have given us explicit consent to do so, such as in case studies or testimonials.

## **4. Data Retention**

We retain your personal data for as long as necessary to provide the Services and fulfil the purposes described in this Privacy Policy, unless a longer retention period is required by law. Specifically:

- Account data is retained for the duration of your subscription and for up to 2 years following termination for legal and audit purposes;
- Customer website tracking data (processed via the edge script) is retained for up to 24 months on a rolling basis;
- Billing records are retained for up to 7 years as required by applicable financial regulations;
- Contact form submissions are retained for up to 2 years.

When data is no longer needed, we securely delete or anonymise it.

## **5. Data Security**

We implement appropriate technical and organisational measures to protect your personal data against unauthorised access, loss, alteration, or disclosure. These measures include encryption of data in transit (TLS) and at rest, access controls and role-based permissions, regular security reviews, and vendor security assessments.

No method of transmission over the internet or electronic storage is completely secure. While we strive to protect your data, we cannot guarantee absolute security. If you become aware of any security vulnerability or breach, please notify us immediately at [jay@surfacerank.com](mailto:jay@surfacerank.com).

## **6. International Data Transfers**

Surface Rank operates primarily from the United States. If you are located outside the United States, your information may be transferred to and processed in the United States or other countries where our service providers operate. We ensure that any such transfers are subject to appropriate safeguards, including Standard Contractual Clauses (SCCs) approved by the European Commission where required under GDPR.

## 7. Your Rights and Choices

Depending on your location and applicable law, you may have the following rights with respect to your personal data:

- **Access:** Request a copy of the personal data we hold about you;
- **Correction:** Request that we correct inaccurate or incomplete data;
- **Deletion:** Request that we delete your personal data, subject to legal retention obligations;
- **Restriction:** Request that we restrict processing of your data in certain circumstances;
- **Portability:** Request that we provide your data in a machine-readable format;
- **Objection:** Object to our processing of your data based on legitimate interests;
- **Withdraw consent:** Where processing is based on consent, withdraw that consent at any time.

To exercise any of these rights, please contact us at [jay@surfacerank.com](mailto:jay@surfacerank.com). We will respond to all verified requests within 30 days. We may ask you to verify your identity before processing your request.

### 7.1 Marketing Communications

You may opt out of receiving marketing emails from us at any time by clicking the "unsubscribe" link in any marketing email or by contacting us directly. You will continue to receive transactional and service-related communications.

## 8. California Privacy Rights (CCPA/CPRA)

If you are a California resident, you have additional rights under the California Consumer Privacy Act (CCPA) as amended by the California Privacy Rights Act (CPRA), including the right to know what personal information we collect and how it is used, the right to delete your personal information, the right to correct inaccurate personal information, the right to opt out of the sale or sharing of your personal information (we do not sell or share personal information as defined under CCPA), and the right to non-discrimination for exercising your privacy rights.

To submit a California privacy request, contact us at [jay@surfacerank.com](mailto:jay@surfacerank.com) with the subject line "California Privacy Request".

## 9. European and UK Privacy Rights (GDPR / UK GDPR)

If you are located in the European Economic Area (EEA) or United Kingdom, Surface Rank acts as a data controller for personal data you provide directly to us (e.g., account registration, contact forms) and as a data processor for customer website data processed on your behalf via the edge script.

You have the rights described in Section 7 above. You also have the right to lodge a complaint with your local supervisory authority (e.g., the Information Commissioner's Office in the UK or your national data

protection authority in the EEA) if you believe we have not handled your data in accordance with applicable law.

For enterprise customers requiring a Data Processing Agreement (DPA) under GDPR, please contact us at [jay@surfacerank.com](mailto:jay@surfacerank.com).

## 10. Children's Privacy

The Services are not directed to individuals under the age of 16, and we do not knowingly collect personal data from children under 16. If we become aware that we have inadvertently collected personal data from a child under 16, we will take prompt steps to delete it. If you believe we may have collected data from a child, please contact us at [jay@surfacerank.com](mailto:jay@surfacerank.com).

## 11. Third-Party Links and Services

Our website or platform may contain links to third-party websites or reference third-party AI platforms (such as ChatGPT, Perplexity, Google, and others). This Privacy Policy does not apply to those third-party sites or services. We encourage you to review the privacy policies of any third-party services you use. Surface Rank is not responsible for the privacy practices of third parties.

## 12. Changes to This Privacy Policy

We may update this Privacy Policy from time to time to reflect changes in our practices, technology, legal requirements, or other factors. When we make material changes, we will notify you by posting the updated policy on our website with a revised "Last Updated" date and, where appropriate, by sending you an email notification. We encourage you to review this policy periodically.

Your continued use of the Services after the effective date of any updated Privacy Policy constitutes your acceptance of the changes.

## 13. Contact Us

If you have any questions, concerns, or requests regarding this Privacy Policy or our data practices, please contact us at:

### Surface Rank

Email: [jay@surfacerank.com](mailto:jay@surfacerank.com)

Website: [surfacerank.com](https://surfacerank.com)

We aim to respond to all privacy-related enquiries within 5 business days.