

# Breeze Intelligence FAQs for Solutions Partners

**Partner Use Only**

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## Breeze Intelligence:

### How does Breeze Intelligence relate to the Clearbit acquisition HubSpot made last year?

In December 2023, HubSpot acquired Clearbit (you can read about the acquisition [here](#) and [here](#)). Since the acquisition, HubSpot has been able to offer our customers the ability to bring rich third-party company data into their CRM -- making HubSpot the central source of truth for go-to-market professionals.

Throughout 2024 HubSpot rebuilt and expanded the Clearbit functionality on HubSpot's code base and, at INBOUND 2024, launched it as a completely HubSpot-native offering called Breeze Intelligence.

### Why is HubSpot packaging Breeze Intelligence under the AI brand "Breeze"? How is this part of HubSpot's AI offerings, and what are the AI capabilities of Breeze Intelligence?

Breeze Intelligence heavily leverages LLM technology to help turn vast amounts of unstructured data from public sources, third-party vendors, and from across the Internet into structured facts about companies and buyers. HubSpot's LLMs extract, normalize, and categorize data we collect to create up-to-date company and buyer

profiles and summarize all data we have on a given company into a clear 500 character description.

### **How many companies and contacts does Breeze Intelligence have indexed?**

Breeze Intelligence has over 200 million buyer and company profiles.

### **How does Breeze Intelligence collect this data? Is HubSpot using data scraped from websites to train its AI models?**

Breeze Intelligence combines data from public sources, third-party vendors, and from across the Internet to create the most comprehensive enriched profile for each contact and company in your portal.

Breeze Intelligence is built on public data, data from third-party vendors, and from across the Internet. HubSpot's LLMs and AI extract, normalize, and categorize data we collect to create up-to-date company and buyer profiles. Then, humans verify the accuracy of the AI models and improve them over time. For more information about HubSpot AI models and how we train our models, see our [AI Trust FAQs](#).

### **How does Breeze Intelligence verify the quality and accuracy of its data?**

Breeze Intelligence dynamically weighs and scores its sources to choose the most reliable data for each property. When a company or contact record is created, data undergoes a series of checks to verify accuracy and freshness regularly. Furthermore, a human quality assurance team of specialists reviews data for consistency and accuracy.

### **What makes Breeze Intelligence unique compared to other providers?**

HubSpot prioritizes data accuracy over quantity, only publishing data that has gone through QA processes. For that reason, Breeze Intelligence has made significant advancements in using LLMs to increase global coverage and uncover more companies than ever before.

### How comprehensive is international and global data coverage from Breeze Intelligence?

Advancements in AI technology have enabled HubSpot to expand the international coverage significantly as we are now able to normalize data across more languages across the globe.

### Can I use Breeze Intelligence if I have to comply with data protection laws (e.g., GDPR, CCPA, etc.)?

We make Breeze Intelligence available globally and to customers impacted by many different data protection laws. While compliance determinations and configurations are up to each, individual customer, HubSpot has implemented processes to maintain transparency around our processing of personal data and provide individuals with easy mechanisms to exercise their data protection rights.

**Direct Notices for Individuals in Europe.** HubSpot provides individuals in Europe a notice when we've collected their data to enhance our Breeze Intelligence commercial database. The notice provides information required under Article 14 of the General Data Protection Regulation (GDPR), including information about the type of data we collect, the fact that we share that data with our customers, and instructions on how to exercise their data protection rights. Notice is sent to individuals in Europe before we share that information with our customers. In other words, customers won't receive data about individuals in Europe unless we've determined successful delivery of the notice to the individual's business email address.

**Exercising Data Protection Rights.** Individuals may exercise their data protection rights at any time by filling out [this form](#), which can be found in our [Privacy Policy](#) and in our direct notice to individuals in Europe. Individuals in the U.S. may also opt out of the "sale" of their information (as defined under the California Consumer Privacy Act), which they can exercise by navigating to the "Your Privacy Choices" footer link at the bottom of our U.S. websites. HubSpot deletes an individual's data from our commercial database when we receive a request to delete or opt out of a "sale" of data.

If an individual communicates to Hubspot that they would like to delete their data from the Breeze Intelligence commercial database, customers will see in their CRM that the contact will be tagged as “enrichment opt out”. Super admins will receive an email notification when a contact that has been enriched has requested to have their data deleted. Upon receiving an enrichment deletion request, customers must delete only the enriched data Hubspot provided to comply with data privacy best practices and laws. Customers can keep enriched data if they’ve established their own separate, independent legal basis for keeping such data (e.g., you received data about the contact during your direct interactions with them).

**California Data Broker Registration.** HubSpot is a registered data broker in California as required under the CCPA.

### **Website Visitor Consents and Notices**

Customers using the HubSpot tracking code can customize their cookie tracking settings and consent banner to ensure that they get consent and provide notice of how data will be shared with HubSpot. See [this knowledge base article](#) to learn more about how to use the HubSpot tracking code.

While use of HubSpot products and services may enable customer’s GDPR compliance efforts, use of HubSpot products and services alone do not make the customer GDPR compliant. Like any legal issues, it’s up to the customer to review their specific situation with their legal counsel to understand how they can meet their obligations. Please review the [Trust Center](#), [Privacy Policy](#) and [Data Processing Addendum](#) for more information on how HubSpot collects, processes, and stores customer’s data.

For more context on how customer data will be used in Breeze Intelligence, check out this knowledge documentation article.

### **[Internal-Only Context]**

*The HubSpot Privacy Policy will be updated by INBOUND 2024 to clearly disclose HubSpot’s new data processing activities. Further, HubSpot will have an online form on HubSpot’s primary websites so that individuals can opt-out of being added to the commercial database.*

*After INBOUND 2024, the HubSpot Trust Center may be updated to provide privacy compliance resources and/or frequently asked questions for customers using Breeze Intelligence.*

### **How does Breeze Intelligence use data from my CRM? Are there cases where Breeze Intelligence will share my data with third-party vendors?**

Please see this knowledge documentation article to learn more about how Breeze Intelligence uses data from your CRM.

### **What happens to my data after I cancel?**

Data that has already been enriched in your CRM will remain on the record until overwritten by other sources, we won't retroactively remove any enriched data. Full visibility to the intelligence tab will be revoked upon cancellation.

We strongly recommend retrieving your Customer Data prior to the end of your Subscription Term; we will not provide you with any access after termination or expiration of your Subscription Term. If you want to export Customer Data during your Subscription Term, you can retrieve Customer Data by following the instructions at the following knowledge base articles: "[Export your Content and Data](#)"; "[Export your Records](#)"; "[Export your Ad Performance Data](#)"; "[Export your Marketing Email Performance Data](#)"; "[Perform a permanent delete in HubSpot](#)." Your export will include all data, including enriched data, reflected in the scope of the report.

### **How does the launch of Breeze Intelligence impact the company insights feature?**

HubSpot company insights will be moving to a legacy product status starting on September 18th, 2024. Starting on this date, a few notable changes will take effect:

- Any net new customers will no longer have the HubSpot insights company enrichment feature starting at INBOUND. Previously, this was offered as a free feature for all customers.

- Any customers that opt into using the new company enrichment solution launching at INBOUND will not be able to re-enable the legacy company insights feature.
- For any existing customers using the legacy company insights product, their companies will continue to be enriched on creation but we will no longer send any data updates to those domains after the first enrichment.

This is the first phase of a full sunset of the company insights feature for existing customers planned for 2025.

#### **Does Breeze Intelligence have data about all of my companies and contacts? What happens if there isn't data on a company or contact I'm trying to enrich?**

The Breeze Intelligence B2B dataset has over 200 million buyer and company profiles with continuously refreshed data.

You will only be able to enrich attributes of company and contact records that are available for those company or buyer profiles within the dataset. At HubSpot, when it comes to data enrichment we believe it's better to provide no data than data that is wrong or unverified. Please note that the contact dataset is limited to B2B emails and will not include personal emails.

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## **Data Enrichment:**

#### **How fast does enrichment occur?**

Breeze Intelligence enrichment happens in real-time, typically within seconds, but may take longer for larger list enrichments to complete.

#### **What is required to enrich a contact?**

If a contact record has a business email address and we have data for that address in Breeze Intelligence then it will be enriched.

### **What contact attributes will be provided with enrichment?**

Check out this knowledge base article to learn what attributes could be provided with data enrichment.

### **Where does HubSpot enrichment data come from?**

Breeze Intelligence combines data from a variety of sources to help HubSpot create the most comprehensively enriched profile we can for contacts and companies in your portal.

Breeze Intelligence gathers data from several sources, including:

- Publicly-available sources such as public-facing websites
- Third-party data providers

Please see this knowledge documentation article to learn more about how Breeze Intelligence uses data from your CRM.

### **How does HubSpot use customer data?**

When you submit an email address to HubSpot for enrichment, Breeze Intelligence saves and stores the email address to our commercial database. The email address you submit will be used for HubSpot internal purposes such as product improvement and to enrich your contacts, but will not be shared with any other customers.

When you install the HubSpot tracking code on your website, HubSpot will also collect IP addresses and other identifiers from your end users and add that data to our commercial database. The data we collect will be used for HubSpot internal purposes

such as product improvement and powering the Buyer Intent App, but we will not share such data with any other customers.

### **Does Breeze Intelligence overwrite existing CRM data?**

Yes, it will overwrite values of mapped fields which have already been enriched by Breeze Intelligence. To prevent overwriting specific fields, simply enter data in the field yourself (any field that has been updated by a user or integration other than Breeze Intelligence will not be automatically updated by Breeze Intelligence, but will need to be manually opted-in to re-enrichment). When manually enriching records, you'll have the option to choose whether you overwrite existing data in properties or not.

### **Can I selectively enrich records?**

Yes. You can create a list to segment the records you want to enrich, then use Breeze Intelligence to enrich that list.

### **Does Breeze Intelligence provide company phone numbers, contact business phone numbers, and contact email addresses?**

Breeze Intelligence can provide a business phone number for companies, but does not provide phone numbers or email addresses for contacts. We are focusing on only enriching contacts that already have email addresses in their contact records.

At HubSpot, we believe in the power of creating meaningful customer connections. That means not just connecting with prospects that are a good fit, but getting a deeper view on existing customers as well. The features of Breeze Intelligence are designed to help you understand the context *who* it is that you're targeting (rather than how to contact them) so you can invest in building those meaningful connections with them in a thoughtful and intentional way that suits your business.

We're prioritizing fast and powerful intelligence to drive meaningful engagement. Selling email and phone numbers directly puts those engagement tactics and deliverability at risk, and therefore an omission for our offering.

## Buyer Intent:

### How many website visitors can I see in Breeze Intelligence?

For paid Breeze Intelligence customers of any tier, there is no limit for the number of visitors they see.

For free HubSpot users or paid HubSpot customers of any hub without Breeze Intelligence, they'll have a limit. They'll see the top 20 visitors per view based on the number of visits.

### Can I set up alerts for buyer intent data?

While Breeze Intelligence doesn't currently offer alerts for buyer intent data, you can set up workflows in HubSpot to automatically create tasks or alerts for account owners when companies are added via buyer intent from Breeze Intelligence.

### How does Breeze Intelligence determine intent?

Breeze Intelligence provides "first-party" intent data, which is based on a company's behavior on your website -- as opposed to search intent or other "third party" intent data. The pages a company views on your website can give you an idea of their interests and intent. You can further configure your definition of intent for your company in the buyer intent configuration tab.

### Will this report track visitors that are working from home?

Yes. One of consequences of the unfortunate onset of COVID-19 was many employees around the world transitioning to working from home. This meant that they were no longer “associated” with their offices’ IP addresses. To ensure that we adapted to the new work-from-home-era, we:

1. Fine-tuned our algorithms, retrained our machine learning models to teach them about “work from home” behaviors, and made adjustments for geography, as different cities and states announced lockdown or plans to reopen.
2. Created new proprietary approaches to matching domains to IP addresses.
3. Allows our IP intelligence technology to continue to do what it was built to do — automatically learn and improve based on the flood of signals from new IP addresses and identify the employer of visitors who used a VPN when working from home.

These measures resulted in us returning to, and now exceeding, our pre-pandemic ability to generate visitor reports that can track employees that work remotely.

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## Form Shortening:

### **Will Breeze Intelligence overwrite existing data when a known contact fills out a form?**

No. We will update existing data if it was previously enriched, or if the property is blank. If a property was last edited by a user or a different integration, we won’t overwrite it.

### **Is Breeze Intelligence form shortening compatible with conditional logic?**

While it’s possible to use both at once, it’s not recommended as the two features may counteract each other. Carefully test this combination before implementing it across your website.

### Can Breeze Intelligence form shortening provide personal phone numbers in forms?

No. (see question addressing this topic above)

### Can I only use Form Shortening in the new forms editor?

Yes, form shortening is only available in the new forms editor. If you aren't using the new forms editor yet, simply opt-into the public beta in the "Product Updates" section of your HubSpot portal.

Form shortening from Breeze Intelligence will not work with forms used through the Forms API, although Breeze Intelligence will still enrich records created via the Forms API.

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## Pricing & Packaging:

*The best resource for pricing will be the Breeze Intelligence pricing page, once it's live. Once this launches, please refer there first and encourage prospects and customers to use it as well, as information may update after we've drafted these FAQs.*

### What is usage based pricing?

Usage based pricing is when a customer is charged for how much of a service is used. This could be measured in terms of API calls, data storage, bandwidth, or any other usage metric that reflects consumption.

### Why are we selling Breeze Intelligence based on usage of credits?

Selling Breeze Intelligence with credits allows us to serve companies of any size, maximize value across tiers, and leverage new data sets. For instance, customers can avoid paying for outdated data enrichments under our credit system, ensuring that they have more control over the value they receive.

### How does our pricing compare to our competitors?

Breeze Intelligence is priced competitively against other similar products on the market -- especially the (temporarily available) one-time portal backfill of your existing contacts and companies at the flat rate of only \$5,000.

*The best resource for pricing is the Breeze Intelligence pricing page. Please refer there first and encourage prospects and customers to use it as well.*

#### *Internal Only Context:*

*We are priced well below our competitors as this is a brand new product line that is in its early stages of development, and because we know we are not providing contact email address and phone numbers. This should be a very approachable way for customers to experience the value of intelligence data.*

*For additional information on competitive pricing, please check out the Breeze Intelligence wiki page [here](#).*

### How much does Breeze Intelligence cost?

Breeze Intelligence will be sold as an add-on to existing hubs, meaning that customers will need to have a paid subscription (Starter+) to a base hub in order to purchase Breeze Intelligence Credits.

Credits can be purchased in packs of 100, 1000, or 10000 increments.

- **100 Breeze Intelligence Credits** (recurring):

- 100 credits per capacity pack: \$0.30 per credit, \$30 per pack
- **1,000 Breeze Intelligence Credits** (recurring):
  - 1000 credits per capacity pack: \$0.15 per credit, \$150 per pack
- **10,000 Breeze Intelligence Credits** (recurring): 10000 credits per capacity pack: \$0.07 per credit, \$700 per pack

Customers can also choose to enrich all records in their entire portal once for \$5,000 with a one million record limit. Please note that this option is only available when working with a sales rep and will not be available as a touchless motion.

### Can customers mix and match credit packs from the three different plans?

Customers can only purchase from one credit pack plan. For example:

#### **Customer wants to buy 11,600 credits**

Customer can buy **one** of the following three options:

1. 116 x 100 Breeze Intelligence Credits
2. 12 x 1,000 Breeze Intelligence Credits
3. 2 x 10,000 Breeze Intelligence Credits

Customer **can not** buy:

- 1 x 10,000 Breeze Intelligence Credits + 1 x 1,000 Breeze Intelligence Credits + 6 x 100 Breeze Intelligence Credits

Customers with Starter, Professional, and/or Enterprise hubs can purchase any plan of Breeze Intelligence they would like. For example, a customer with an Enterprise tier hub can purchase the 100 Breeze Intelligence Credits, and a customer with a Starter tier hub can purchase the 10,000 Breeze Intelligence Credits.

### Will free customers be able to use Breeze Intelligence?

Breeze Intelligence will be sold as an add-on to existing hubs, meaning that customers will need to have a paid subscription (Starter+) to a base hub in order to purchase Breeze Intelligence Credits. However, free users can:

- Opt into data sharing to receive limited access to the buyer intent feature
- View the Intelligence Tab on the individual company and contact records (note they will need to upgrade to a paid subscription to see additional data)

### **What are the usage terms for credits?**

Customers' usage will reset monthly on their monthly subscription date, regardless of payment terms.

Customers will have the ability to purchase up to an annual contract commitment length (more if rep assisted), with monthly, quarterly, semi-annual, and annual payment terms available.

### **Will credits roll over to the following month?**

No, credits will not roll over to the following month.

### **How do the credits work?**

Each net new enrichment will consume 1 credit. For Starter+, each update will consume 1 credit. However, if you update an enrichment within the same usage period as the original enrichment it will not cost you additional credits.

### **How does the initial credit backfill work?**

Customers can purchase the Breeze Intelligence Backfill Enrichment SKU with the assistance of a sales representative. Here's what will happen:

- It will backfill all records in the portal (up to 1 million records) once for the lifetime of the portal.

- If there are more than 1 million records, we will first enrich contacts, and then move onto companies, starting with the most recently updated records.

The process will initiate as soon as the customer contract becomes effective. If the customer isn't ready for the process to kick off, you can set up the deal and allow them to complete the purchase in checkout when they are ready to deploy the bulk enrichment.

#### Which data will be updated as part of the initial credit backfill?

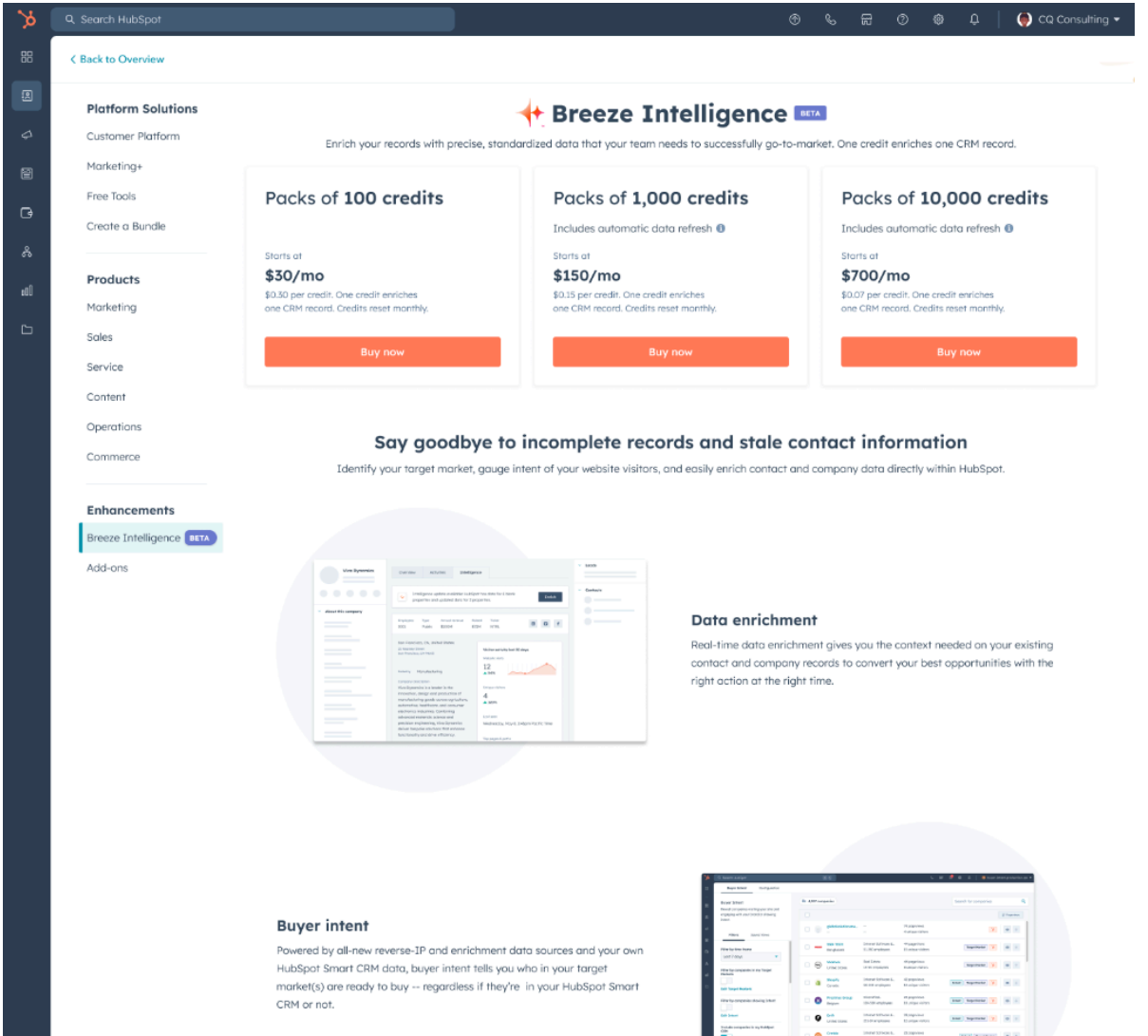
Properties that are currently empty will be updated if there is a valid value.  
Properties that were previously updated by HubSpot Enrichment (if there is a new value to overwrite it).

We will **not** update data that was populated by external sources.

#### What happens if a customer wants to move to a higher Breeze Intelligence credit SKU?

Users can upgrade to a higher Breeze Intelligence SKU touchlessly through the in-app pricing page.

This is what the page will look like. Users can switch to a higher pack touchlessly. They will not be able to move to a lower pack touchlessly.



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**Breeze Intelligence **BETA****

Enrich your records with precise, standardized data that your team needs to successfully go-to-market. One credit enriches one CRM record.

**Packs of 100 credits**

Starts at  
**\$30/mo**

\$0.30 per credit. One credit enriches one CRM record. Credits reset monthly.

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**\$150/mo**

\$0.15 per credit. One credit enriches one CRM record. Credits reset monthly.

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**Packs of 10,000 credits**

Includes automatic data refresh ⓘ

Starts at  
**\$700/mo**

\$0.07 per credit. One credit enriches one CRM record. Credits reset monthly.

[Buy now](#)

**Say goodbye to incomplete records and stale contact information**

Identify your target market, gauge intent of your website visitors, and easily enrich contact and company data directly within HubSpot.

**Data enrichment**

Real-time data enrichment gives you the context needed on your existing contact and company records to convert your best opportunities with the right action at the right time.

**Buyer intent**

Powered by all-new reverse-IP and enrichment data sources and your own HubSpot Smart CRM data, buyer intent tells you who in your target market(s) are ready to buy -- regardless if they're in your HubSpot Smart CRM or not.

## What happens if a customer exceeds their number of credits?

If the number of Enrichment Requests exceed the current tier, customers will be automatically upgraded to the tier associated with the increased usage, and they will receive a prorated charge for the current Billing Period.

Customers will be charged the increased amount for each following Billing Period remaining in their Current Term, even if they later reduce the number of credits. They can downgrade their tier at their next renewal upon signing of a new Order Form.

### Will customers be notified when they're about to exceed their number of credits?

Users who are set as a [billing contact](#) may receive notifications via email and on the Account and Billing page within 24 to 48 hours when the number of Enrichment credits:

- reaches 75% of your current tier
- reaches 90% of your current tier
- reaches 98% of your current tier
- exceeds your current tier

Or, when an upgrade occurs.

### What if a customer wants to move to a lower Breeze Intelligence Tier or Sku?

Customers cannot cancel or downgrade touchlessly until they reach the end of their commitment term. If they would like to cancel or downgrade mid-contract, they will have to contact a rep.

### What if a customer wants to decrease their credits within their existing pack size?

Customers cannot cancel or downgrade touchlessly until they reach the end of their commitment term. If they would like to cancel or downgrade mid-contract, they will have to contact a rep.

### What happens if a customer cancels or downgrades mid-contract?

Customers can downgrade your credit tier at the next renewal by signing a new Order Form.

#### ***[In the event of a dispute or other accommodation request]***

Should a cancellation occur mid-contract, we credit a customer based on a proration of time (not usage, although this will be future state). To illustrate via an example: a customer has 100 credits/ month for a monthly cost of \$30 and has in the given month

used 75 credits. If exactly halfway through the month they cancel, the customer would be credited \$15 ( $0.5 \times \$30$ ).

With respect to the customer's usage post-downgrade or cancellation: if a customer has canceled mid-contract, then they would no longer have an active subscription and would lose the associated functionality and any unused credits. In the event of a downgrade, the customer would lose any credits tokens in excess of their new limit post downgrade.

## Partner Commission & Credit:

### Can partners get revenue share (ie. commission) for selling Breeze Intelligence?

Yes, partners will have the eligibility to earn Revenue Share on the recurring SKUs for Breeze Intelligence (enrichment). However, similar to reps, partners will not be eligible for commission on the one-time backfill SKU for enrichment. This works in line with our [existing sales rules](#) where the first partner to sell a recurring Breeze Intelligence SKU will receive all future commission as the customer continues to increase their usage.

Additionally, in line with our existing rules, partners will not be eligible for starter-only deals for breeze intelligence. However, if you pair a Starter deal with a Pro+ deal, it will be eligible.

Below are a couple examples of how this works:

#### Example One:

- **Oct 2024:** Partner A sells \$1000 MH pro + \$500 SH pro + 200 tokens on Breeze (\$30 per 100 tokens) = \$1560 MRR total
  - **Outcome:** Partner A receives commission on \$1000 MH pro, \$500 SH pro, and \$60 Breeze. Tier points are awarded across all 3 product lines.
- **Dec 2024:** Customer enriches more and uses 500 tokens on Breeze
  - **Outcome:** Partner A's commission increases as the Breeze MRR value increases from \$60 to \$150. Tier points increase.

### Example Two:

- **Oct 2024:** Partner A sells \$1000 MH pro + 200 tokens on Breeze = \$1060 MRR
  - **Outcome:** Partner A receives commission on \$1000 MH pro and \$60 Breeze. Tier points are awarded across both product lines.
- **Feb 2025:** Partner B sells the same customer \$500 SH pro + 300 more tokens on Breeze (total of 500 tokens on Breeze).
  - **Outcome:** Partner A's commission increases as the Breeze MRR value increases from \$60 to \$150. Partner B is not commissioned on Breeze but they are commissioned on \$500 SH pro. Tier points are only awarded on SH to Partner B but not on Breeze (goes to Partner A) since Breeze was originally sold by Partner A. Our commission and tier model today is on a 'product-line model' which is why we can't pay or reward partners on upsell, if originally sold by another partner. We currently plan to move to a deal-based model later in 2025 that will solve for this pain point.

## Legal Considerations

When a customer uses HubSpot's Breeze AI tools such as co-pilots, does the customer's data get processed in/transferred to the US by HubSpot?

If the AI tool is using OpenAI, then yes, the customer's data may get processed in/transferred to the US. If the AI tool is powered by a HubSpot model, then data is hosted locally in the customers' Hublet. For more information about what AI models are used for the various HubSpot AI tools, partners can visit [behindhubspotai.com](https://behindhubspotai.com).

Can customers use HubSpot AI tools but opt-out of their customer data being used to train AI models?

Yes. We believe in customer choice and we wouldn't want you to share data that you wouldn't want to be used to train AI models. Users may opt out of having their Customer Data used to build and train our AI models by having a super admin on the user's account email [privacy@hubspot.com](mailto:privacy@hubspot.com). Once the customer has opted out, their data will not be used to train our internally built models, however, they can still use our AI products.

### Can customers opt-out of the prompts and inputs being used for training?

OpenAI won't use any customer data to train its models regardless of the opt-out above; the opt-out will stop prompts and inputs from being used for ML training by HubSpot. Customers can opt out of HubSpot using Customer Data to train our own AI models.

### Do the opt-outs flow down to HubSpot's in-product vendors such as Open AI? Will Open AI honor customers' opt-out selection?

Our vendors are committed to not using any data we provide for training purposes. The data is strictly for content moderation, and is deleted within thirty days to ensure confidentiality and security. This highlights our dedication to maintaining privacy and integrity while working with external partners.

### What is the mechanism by which we ensure that the opt-out notice is adhered to?

We ensure compliance with opt-out requests by maintaining an updated list of all opt-outs. This list is used to systematically exclude these individuals or entities from any training datasets, ensuring their data is not used for model training. This process effectively respects and enforces the opt-out preferences.

### How is data enrichment provided by HubSpot compliant under privacy laws in the EU?

First, we provide Direct Notices to Individuals in Europe: This means that when HubSpot gets an enrichment request from a Customer to enrichment a business email in their CRM records, HubSpot will send that business email, information required under the GDPR, including things like the type of B2B data we collect about them, the fact that we share that data with customers, and how to exercise their data protection rights. Notice is sent to individuals in Europe before we share that information with customers, meaning, customers won't receive data about individuals in Europe, until we've delivered notice to the individual's business email address.

Why not other countries? The GDPR has the clearest obligation for companies to provide direct notices to individuals. But it's important to note that we honor data protection rights requests from any individual, regardless of their location.

Second, individuals can easily exercise their data protection rights: This means that if an individual gets added to our commercial dataset, which powers Breeze Intelligence, those individuals may exercise their data protection rights at any time by filling out the HubSpot Privacy Request form, which can be found in HubSpot's Privacy Policy, and in the direct notice to individuals in Europe. Individuals in the U.S. may also opt out of the "sale" of their information by navigating to the "Your Privacy Choices" footer link at Hubspot.com.

So, here's a walkthrough of what happens when we get a deletion request:

First, HubSpot deletes the data in our commercial dataset so that we don't share it onward with other customers.

Second, the contact record will be automatically labeled as opted out, and super admins will receive a notification to delete the individual's enriched data in their CRM.

Lastly, the super admin can easily delete the contact's enriched data, if they find that they don't have a separate legal basis for having that data

That all being said, our customers still have certain compliance obligations when they use Breeze Intelligence. For example, Customers may be responsible for providing a cookie banner and updating their privacy policies, to reflect how HubSpot may collect data from their websites. HubSpot provides a cookie banner solution to help with this compliance effort. We have a ton of enablement, including [KB articles](#) and [FAQs](#) that provide more information about the data we collect, and how to help customers comply with data protection laws when using Breeze Intelligence.

#### How will HubSpot use data we collect from accounts that use data enrichment?

First, it's important to note that HubSpot collects and uses different data types from customer accounts for data enrichment, buyer intent, and form shortening.

Specifically for Contact Enrichment, HubSpot access and stores business email addresses customers submit to Hubspot for enrichment.

For Company Enrichment, HubSpot accesses and stores company domain names customers submit to Hubspot for enrichment.

HubSpot will use these data points to both provide enrichment product features and improve our products and services, including enhancing the Breeze Intelligence commercial dataset, but we won't share this raw data with other accounts. Because of how HubSpot is accessing and storing data from customers, new controller-to-controller terms in HubSpot's DPA will apply to customers using data enrichment.

#### How will HubSpot use data we collect from accounts that use buyer intent?

Specifically for buyer intent, HubSpot collects and saves data from the customer's end users, including company domains, online identifiers (including VIDs and IP addresses), timestamp of the website visit, and URL path for the visit.

Data sharing for Buyer Intent can be a bit hard to follow so I wanted to help visualize with an example:

First, a customer must install the HubSpot tracking code to launch buyer intent. When a customer's end user then browses a site with the HubSpot tracking code installed, HubSpot is able to pick up data about that end user, like their IP address. HubSpot is able to tell what company certain IP addresses are associated with, and we'll share with the customer that someone from a company was on their site. HubSpot will save and store that IP address <> domain connection to improve our dataset, but we won't have share raw data that we collected from our customers with other customers.

Again, because of how HubSpot is accessing and storing data from our customers, controller-to-controller terms in HubSpot's DPA will apply to customers using buyer intent.

#### Do customers have to share their data with HubSpot when using Breeze Intelligence?

It depends on the Breeze Intelligence feature the customer is using, and their account settings.

For data enrichment, yes. HubSpot needs to use the data collected to power the Breeze Intelligence commercial dataset, but note that HubSpot won't share the raw data we collect from customers with other customers.

For buyer intent, customers may elect to disable Intent data sharing collected from the HubSpot Tracking Code in their HubSpot account, so if they turn intent data access off, then the answer is no.

For forms, HubSpot doesn't separately collect and save data through the customers' use of forms, so the answer is no.

So this means that for the really privacy-centric customers that don't want HubSpot to use their data to improve our commercial dataset or have the controller-to-controller terms apply, these customers may choose to both disable Intent data sharing and choose to not use any enrichment products. We wanted to make sure that customers have a choice in the way that HubSpot processes their data.

#### How will HubSpot use data we collect from accounts that use form shortening?

HubSpot doesn't collect or save data from form shortening feature, but note that form shortening is a feature that's provided along with data enrichment and buyer intent, so the controller-to-controller terms in our DPA still apply when you turn this feature on.

#### Where is the available enrichment data stored by HubSpot? Is it in the US or the EU?

This question applies to all Breeze Intelligence products.

First and foremost, customer's CRM data will remain localized and we will honor customer localization preferences; however if you recall, HubSpot uses certain data points collected from customers to enhance the Breeze Intelligence commercial dataset, and the data in the Breeze Intelligence commercial dataset may be stored in the US. Data we store as a controller in connection with Breeze Intelligence and the HubSpot tracking code would be excluded under our Regional Data Hosting Policy, as that policy only applies to "Customer Data," and the data we process as a processor.

#### Where can I find more legal information about Breeze / AI?

Check out the following links:

- [Knowledge Base | Breeze Intelligence | Frequently asked questions \(BETA\)](#)
- [Buyer Intent Product Page](#)

- [Knowledge Base | Data collected by the HubSpot tracking code](#)
- [Trust Center](#)
- [HubSpot's Ethical Approach to AI](#)