

LITOFANE - PRIVACY POLICY

Version 0.9

1. WHO WE ARE AND WHAT THIS COVERS

1.1 This Privacy Policy explains how Litofane Limited, a private company limited by shares incorporated in Ireland (company registration number 746209), whose registered office is at Unit 4, North Road, Donaghmore, Ashbourne, Co. Meath, A84 VX89, Ireland ("Litofane", "we", "us"), collects and uses personal data when you register for and use the Litofane platform and the Litofane for Sales product.

1.2 We are the data controller for the personal data described here. Our lead supervisory authority is the Irish Data Protection Commission. This Policy applies together with the Terms and Conditions, the Terms of Sale, the Beta Access Terms, the User Account and Registration Policy, the Referral Programme Terms and the Cookie Notice.

1.3 You can contact us about privacy at contact@litofane.com.

2. THE PERSONAL DATA WE PROCESS AND WHY

We process the following personal data, for the purposes and on the legal bases shown:

- Email address, from registration: to identify your account and communicate with you. Legal basis: performance of our contract with you.
- Plan and account status, assigned by the system: to provide the service and manage your access and admission to the closed beta. Legal basis: contract.
- Content you input, for example a company name, sector and scope, and where you provide them the signal, contract-value and renewal-date fields: to generate the Outputs for you. Legal basis: contract.
- Outputs generated for you: to provide the service and keep your history. Legal basis: contract.
- Meeting transcripts, only where you choose to provide them: processed solely to generate an output and then deleted immediately; they are never stored. Legal basis: contract.
- Usage and technical data, for example your last activity time, an action log, and the IP address, browser user agent and address requested when you or your browser contact our servers: for security, rate-limiting, abuse prevention, audit, and detecting and fixing faults in the service. Legal basis: our legitimate interests.
- Security checks on registration and sign-in: your IP address and information about your browser and how you interact with the page, checked with Google reCAPTCHA to tell people from automated abuse. Legal basis: our legitimate interests in keeping the service secure.
- Records of your acceptance of our legal documents and of any consent you give or withdraw, including the date and time, the method, and the IP address and browser user agent used: to evidence agreement and consent. Legal basis: legal obligation and our legitimate interests.
- Order, billing and payment data, when you buy Credits (for example what you bought, the amount, your billing name and country, any business VAT number you give us and the result of its validation, and the status of the payment): to take payment, issue receipts and invoices, handle cancellations and refunds, and prevent fraud. Legal basis: contract and legal obligation. Our payment provider (currently Revolut) processes your card and payment details as a separate controller under its own privacy notice; we do not receive your full card details.

- Referral data, if you register through, or share, a referral link: the link between the referrer's account and the referred person's account, to attribute and pay rewards and prevent abuse. The referrer is told only whether the referral succeeded. Legal basis: contract (the Referral Programme Terms) and our legitimate interests in preventing abuse.
- Founding Tester contributions and points, if you take part in the closed beta: to run the Founding Tester prize. Legal basis: our legitimate interests.
- Feedback, bug reports and support requests you send us, with your account identifier but not your email address: to answer you, fix faults, improve the service and, during the closed beta, score the Founding Tester prize. Legal basis: our legitimate interests.
- Testimonials and case studies: used in a way that identifies you only with your separate, specific consent, which you can withdraw at any time. Legal basis: consent.
- If we contact you about the closed beta before you register: your name, business contact details and professional profile information, taken from your LinkedIn profile or from the person who introduced you, to contact you about the beta. Legal basis: our legitimate interests; you can object at any time and we will stop.

Our intelligence Outputs are drawn from public and third-party sources and mostly concern companies and markets, not identifiable individuals. Where a named individual appears (for example a named executive in public news), that comes from public sources, not from personal data you provide about that individual.

3. HOW WE USE YOUR DATA

We use your personal data to provide and secure the platform and the Products, to manage your account, admission to the closed beta and access, to communicate service and administrative messages, to prevent abuse and keep an audit trail, and to meet our legal obligations. With your separate, specific consent, we may also use your feedback in an identifying way or send you marketing; you can withdraw that consent at any time.

4. WHERE YOUR DATA IS PROCESSED

4.1 We store your account data, Content and Outputs in the European Union. Our database is hosted in the EU (Supabase, Ireland region), and our application servers and artificial-intelligence inference run in EU regions of Amazon Web Services; the AI inference provider does not retain your data.

4.2 A few providers process limited technical data outside the EU. Our website and app are delivered through Vercel, Inc. (United States), which processes request data such as your IP address. On the registration and sign-in pages we use Google reCAPTCHA to protect against automated abuse: Google receives your IP address and information about your browser and how you interact with the page, and processes it under its own terms and privacy policy. These transfers rely on the EU-US Data Privacy Framework or the European Commission's standard contractual clauses. Our payment provider processes payment data as a separate controller under its own privacy notice.

4.3 Keeping stored personal data in the EU is a design constraint. Before we introduce any other service that would process personal data outside the EU, we put a lawful transfer mechanism in place.

4.4 We use a small number of sub-processors to run the service, each bound by data-processing terms. A current list of sub-processors is available on request.

5. HOW LONG WE KEEP YOUR DATA

5.1 We keep personal data only as long as needed for the purposes above. Account and Content data is kept while your account is active and for the retention periods set in our configuration; transcripts are deleted immediately after processing.

5.2 Records of your acceptance of our documents and of your consents are kept for up to six years after the end of your relationship with us, to evidence agreement and to establish, exercise or defend legal claims, after which they are deleted or held in pseudonymised form. Some records are kept for six years to meet Irish company-law obligations.

5.3 If you do not use your account for 24 months, we begin an account-deletion process and warn you in advance (around 18 months, 21 months, one week before and one day before). We delete the account at 24 months unless you reactivate it. Reactivating resets the period.

5.4 Order, billing and payment records are kept for six years after the end of the financial year in which they were made, to meet Irish company-law and tax obligations, and longer only while a claim or a tax inquiry about them is open. If you ask us to erase your data, these records are pseudonymised, except that a VAT invoice issued to you is kept unchanged, as the law requires. A signed testimonial consent is kept while the testimonial is used and for up to six years after its last use or your withdrawal. If we contacted you about the closed beta and you did not register, we keep your details for 12 months after our last contact.

5.5 Server access logs, which record the IP address, browser user agent and address requested, are kept for 30 days and then deleted. Where an extract is needed to investigate a security incident or to evidence an acceptance or consent, that extract is kept only as long as the record it supports.

5.6 Feedback, bug reports and support requests are linked to your account until 12 months after the Founding Tester winners are notified, or until you delete your account if that is sooner. After that we keep only text that no longer identifies you.

6. YOUR RIGHTS

6.1 You have the right to access, rectify, erase, restrict and port your personal data, to object to certain processing, and to withdraw any consent at any time.

6.2 A deletion route is available: you can delete your account and associated personal data. On deletion we remove or pseudonymise your personal data. We keep the minimum evidence of your past acceptances and consents in pseudonymised form, under a lawful basis, so that the link to you is severed while the evidence is preserved.

6.3 To exercise a right, contact contact@litofane.com. We respond within one month of receiving your request; if a request is complex we may extend this by up to two further months, and we will tell you why within the first month. You also have the right to complain to the Irish Data Protection Commission (www.dataprotection.ie).

7. SECURITY

We protect personal data with EU hosting, access controls, an immutable audit log, and appropriate technical and organisational measures. Where a personal-data breach poses a risk to you, we will notify the Irish Data Protection Commission within 72 hours as required, and you where the law requires.

8. COOKIES

We use cookies and similar technologies as described in the Cookie Notice.

9. CHANGES TO THIS POLICY

We may update this Policy. We will make the current version available and, where a change is material, seek your acceptance or consent as appropriate.

10. CONTACT

Litofane Limited, Unit 4, North Road, Donaghmore, Ashbourne, Co. Meath, A84 VX89, Ireland. Privacy contact: contact@litofane.com. Supervisory authority: the Irish Data Protection Commission, www.dataprotection.ie.