Hazel AI Technologies, Inc. — Privacy Policy

Effective date: November 12, 2025

Contact: support@hazelai.com

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1. Introduction

Hazel AI Technologies, Inc. ("Hazel", "we", "us", or "our") provides AI-powered procurement and compliance software and related services. This Privacy Policy explains what personal information we collect, how we collect and use it, where it is stored and how long it is retained, and when and why we share or disclose it.

This policy applies to Hazel websites (for example hazelai.com), the Hazel platform (app.hazelai.com), and other services we provide.

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2. What information we collect and how we collect it

A. Information you provide directly

- **Account & registration data:** name, business email, job title, organization, phone, and other contact details.
- **Customer content / uploads:** documents and files uploaded by customers and their users (these may contain personal data such as names, email addresses and other identifiers supplied by customers).
- **Support & communications:** messages you send to support or account staff, contract negotiation information, feedback, demo requests and other form submissions.

B. Information collected automatically

- **Log and operational data:** IP address, timestamps, request/response metadata, and audit logs.
- **Device and browser data:** browser type/version, operating system, device identifiers.
- **Usage & performance metrics:** pages visited, features used, API calls and telemetry.

C. Cookies, tracking & analytics

We and our vendors use cookies, pixel tags, local storage and similar technologies for site functionality, analytics, and product improvement. These technologies support login/session management, remembering preferences, analytics, and product optimization. You can control cookies through your browser settings and our cookie banner/consent controls.

D. Third-party sources

We may receive information from identity providers (SSO), analytics providers, payment processors and other vendors, and combine it with the information we collect.

How we collect data: via online forms, account registration, document uploads, API integrations, cookies and other tracking, SSO integrations and vendor-provided telemetry.

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3. Where data is stored and retention periods

Storage & architecture

- Hazel stores data primarily in cloud infrastructure operated by our hosting providers. Customer data is segmented into separate PostgreSQL databases and per-tenant cloud instances to ensure logical separation. Hazel's architecture and SSP document these tenancy controls.

Encryption & access controls

- **Encryption:** Data is encrypted in transit and at rest using AES-256.
- **Access control:** Tenant data is protected by role-based access controls (RBAC) and SSO (e.g., Azure/Okta). Hazel uses industry-standard operational controls including password management (Keeper) and mobile device management (MDM). Continuous monitoring and SIEM integration are used for security alerts.

Retention — defaults and exceptions

- **Model prompts and AI interactions:** Hazel enforces a **Zero Data Retention (ZDR)** approach for model payloads — prompts and model inputs are anonymized and **are not**

used for external model training or persistent model datasets beyond the immediate query.

- **Customer content & account data:** retained as necessary to provide and support the service, to meet contractual obligations or legal requirements, and per any customer-specific retention schedules (for example when a DPA or customer contract sets specific durations). Hazel honors contractual retention requirements for public-sector and other customers.
- **Operational logs & security telemetry:** retained for operational, security and compliance purposes; retention periods vary by log type and legal/regulatory requirements.

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4. Purposes for which we use personal information

We process personal information to:

- **Provide, operate and maintain our services** (authentication, document processing, storage and platform features).
- **Secure our services** — detect and respond to incidents, perform vulnerability scanning and penetration testing, enforce policies, and remediate findings. Hazel conducts penetration testing and vulnerability remediation as part of our security program.
- **Improve and develop our products** — usage analytics, product development and reliability engineering.
- **Support compliance and audits** — respond to customer audits and fulfill regulatory obligations; Hazel maps controls to recognized frameworks such as NIST SP 800-171 and is pursuing SOC 2 Type II attestation.
- **Communicate with users** — billing, account notices, security alerts and policy updates.
- **Fulfill contractual obligations** — perform under customer contracts and DPAs.

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5. Data sharing, subprocessors and third parties

Subprocessors & their access

- Hazel engages subprocessors (hosting, monitoring/analytics, backup and support vendors) to operate the service. Subprocessors may have access to encrypted customer-scoped data only to the extent necessary to perform those services. Hazel requires subprocessors to implement appropriate protections and confidentiality obligations.

Examples from Hazel's operational stack include hosted cloud infrastructure and analytics/monitoring providers.

When data may be disclosed

- **At your direction/consent,** for integrations and features you enable.
- **To vendors** performing services for Hazel under contract.
- **To customers** — where customers are controllers of uploaded content, Hazel acts as the processor and follows the customer's instructions and contractual terms. Hazel assists customers with data subject requests per our DPA.
- **For legal & safety reasons,** when required by law or to protect rights, property or safety.
- **Business transfers** — e.g., in a merger or sale, data may be transferred consistent with applicable law.

Hazel executes DPAs and contractual safeguards (and will use lawful mechanisms for international transfers) to protect personal data when required by law.

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6. Model prompts & training — explicit assurance

Hazel **does not** use customer prompts or model payloads for external model training. Prompts and model payloads are anonymized under Hazel's Zero Data Retention policy. This control is a foundational privacy feature of Hazel's AI offering.

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7. Data subject rights, controllers & processors

- **Site/account users:** You may have rights to access, correct, delete, or export your personal information under applicable local law. To make a request, contact **support@hazelai.com**.
- **Customer content:** Customers are typically the data controllers of content uploaded to Hazel. Hazel acts as a processor for Customer Content and will assist customers in responding to data subject requests and will follow DPA/contractual procedures.
- **Data deletion:** Hazel provides a clear, secure process for deletion requests:

- **How to submit.** Individual users and account holders may submit deletion requests by emailing **support@hazelai.com** with the subject line **"Data Deletion Request"** and providing information sufficient to identify the data to be deleted (for example, account email or description of the content). Customers (data controllers) may delete or export Customer Content using administrative controls in their account, or by submitting deletion instructions to their Hazel account representative or to **support@hazelai.com** pursuant to the applicable DPA/contract.
- **Verification.** For security and privacy reasons, Hazel will verify the requester's identity before fulfilling deletion requests. Requests must include sufficient information to verify the requester, or be submitted via an authenticated account administrator.
- **Acknowledgement & timelines.** Hazel will acknowledge receipt within **30 calendar days**. Where feasible, Hazel will delete data from active systems within **30 calendar days** of verification and resolution of any lawful or contractual impediments. Complete removal from all backups and archival systems may take up to **90 calendar days**; Hazel will notify the requester if a longer timeframe is required and the reason for the delay.
- **Scope & exceptions.** Hazel will comply with deletion requests unless retention is required for lawful purposes, including: compliance with legal or regulatory obligations; fraud prevention; security and audit needs; litigation or investigative holds; or the establishment, exercise or defense of legal claims. In such cases, Hazel will retain only the minimum necessary information and will notify the requester where permitted by law.
- **Backups.** Copies of deleted data may persist in encrypted backups for a limited time as part of standard disaster recovery processes; Hazel will take reasonable measures to purge those copies in accordance with its backup retention schedule and contractual commitments, typically within **90 calendar days** unless otherwise required.
- **Customer-controlled deletion.** Where a customer is the data controller, Hazel will process deletion instructions in accordance with the customer's contract/DPA and will confirm completion to the customer.
- **Residual anonymized data.** Hazel may retain aggregated, de-identified or anonymized data derived from Customer Content for analytics and product improvement; such data will not be associated with personally identifiable information and will not identify an individual.

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8. Security

Hazel implements administrative, technical and physical safeguards to protect information, including AES-256 encryption, RBAC/SSO, password management, MDM, tenant segmentation, continuous monitoring and vulnerability management. Hazel performs periodic penetration testing and maintains processes for remediation. These controls are documented in Hazel's SSP and security testing reports.

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9. Cookies & tracking

Hazel and its service providers use cookies and similar technologies for site functionality, session management, analytics and improvement. You can manage cookie settings via your browser and our cookie controls; disabling cookies may reduce functionality.

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10. International transfers

Hazel is a U.S. company; personal data will be processed in the United States.

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11. Children

Our services are not directed to children under 16. We do not knowingly collect personal information from children under 16. If we learn we have collected such information without parental consent, we will delete it.

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12. Changes to this policy

We may update this policy to reflect changes in law, business practices, or product features; we will post an updated effective date. Material changes to how we treat personal data will be communicated as required by law.

13. Ownership of Customer Content

Customer ownership. Customers and their users retain all ownership rights in the content they submit, upload, or generate using the Hazel platform ("Customer Content"). Hazel does not claim ownership of Customer Content.

License to operate the service. By using Hazel, you (and your organization, if applicable) grant Hazel a limited, non-exclusive, worldwide, royalty-free license to use, copy, store, transmit, process, and display Customer Content solely as necessary to provide the services, to perform our contractual obligations (including backups, security, and troubleshooting), and to comply with legal obligations. Hazel will only access or use Customer Content as necessary to provide or improve the services, to respond to support requests, for security and audit, and as otherwise permitted by the customer's instructions or the applicable DPA/contract.

Aggregated / anonymized data. Hazel may use aggregated, de-identified or anonymized data derived from Customer Content for analytics, product improvement and other legitimate business purposes so long as such data cannot reasonably be re-identified to a natural person. This use will not result in Hazel claiming ownership of Customer Content.

Feedback. If you provide feedback or suggestions about the services, you grant Hazel a worldwide, perpetual, irrevocable, royalty-free license to use and incorporate such feedback into the services without obligation to you.

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14. Contact us

For privacy inquiries, contact: **support@hazelai.com**.