

# SEEDLESS PRIVACY POLICY

Effective Date: September 17, 2025

## 1. INTRODUCTION

Welcome to Seedless, Inc. ("Seedless," "we," "us," or "our"). At Seedless, we generate high-quality fictional business data to enable enterprises and law firms to safely test, train, and evaluate AI tools without compromising privacy or security.

This Privacy Policy explains how we collect, use, share, and safeguard information when you:

- Visit our website ([www.seedlessdata.com](http://www.seedlessdata.com))
- Use our services
- Communicate with us

**Our Commitment to Privacy:** Privacy is fundamental to our business. Our entire value proposition centers on helping organizations adopt AI capabilities without exposing sensitive data. We extend that same commitment to protecting information we collect in the course of doing business with you.

## 2. FICTIONAL DATA

**The datasets we generate contain entirely fictional information.**

Our service creates synthetic business data through AI agent simulations. This means:

- No real personal data is embedded in our fictional datasets
- No seed data from actual individuals or organizations is required
- All names, companies, communications, and scenarios in our datasets are intended to be completely fabricated
- Our fictional data is designed specifically to avoid privacy concerns

When you receive a fictional dataset from Seedless, you are receiving artificial content created from scratch, not processed or derived from any real person's information.

## 3. INFORMATION WE COLLECT

### 3.1 Information You Provide to Us

**Customer Business Contact Information:**

- Name, email address, phone number
- Company name, job title, department
- Billing and payment information
- Communication preferences

**Communications:**

- Information in emails, calls, or messages you send us
- Feedback, questions, or support requests
- Demo requests and evaluation inquiries
- Requests to create datasets

**Service-Related Information:**

- Details about your use-case requirements
- Specifications for data generation
- Custom scenario descriptions
- Proof-of-concept specifications

### 3.2 Information We Collect Automatically

Website Usage Data:

- IP address and device information
- Browser type and version
- Pages visited and time spent
- Referring URLs
- Operating system

**Cookies and Similar Technologies:** We do not use cookies, nor similar tracking technologies.

### 3.3 Information from Third Parties

We may receive information from:

- Business partners and resellers
- Payment processors
- Analytics providers
- Marketing platforms

## 4. HOW WE USE YOUR INFORMATION

We use collected information for the following purposes:

### 4.1 Service Delivery

- Provide our fictional data generation services
- Process transactions and deliver datasets
- Fulfill contracts and service agreements
- Customize data generation to your specifications

### 4.2 Business Operations

- Communicate with you about our services
- Respond to inquiries and requests
- Process billing and payments
- Maintain accounts and records

### 4.3 Legal and Security

- Comply with legal obligations
- Protect against fraud and security threats
- Resolve disputes

### 4.4 Lawful Basis for Processing Your Information

Under UK GDPR and GDPR, we must have a lawful basis for processing your personal information. Below is the lawful basis for each of our processing activities:

**Creating and managing your account** – Contract performance

**Delivering fictional datasets to you** – Contract performance

**Processing payments and billing** – Contract performance

**Responding to your inquiries** – Contract performance / Legitimate interests

**Customizing data generation to your specifications** – Contract performance

**Sending service updates and notifications** – Contract performance / Legal compliance

**Website analytics and improvement** – Legitimate interests

**Security and fraud prevention** – Legitimate interests / Legal compliance

**Sending marketing communications** – Consent (you may opt out at any time)

**Complying with legal obligations** – Legal compliance

**Resolving disputes** – Legitimate interests / Legal compliance

**Business transfers (merger/acquisition)** – Legitimate interests

### **Legitimate Interests Explanation**

Where we rely on legitimate interests, this means we have a business or commercial reason to process your information that is necessary for our business operations, provided this does not override your fundamental rights and freedoms. Examples include:

- Improving our services and website functionality
- Protecting against fraud and security threats
- Efficient business operations and customer service

### **Consent**

Where we rely on consent, you have the right to withdraw your consent at any time by contacting us at [info@seedlessdata.com](mailto:info@seedlessdata.com). Withdrawing consent does not affect the lawfulness of processing based on consent before withdrawal.

## **5. HOW WE SHARE YOUR INFORMATION**

We do not sell your personal information. We may share information in the following limited circumstances:

### **5.1 Business Transfers/Change of Control**

If Seedless is involved in a merger, acquisition, financing, or sale of all of its assets, your information may be transferred to the acquirer as part of that transaction.

### **5.2 Legal Requirements**

We may disclose information when required by law, legal process, or government request.

### **5.3 With Your Consent**

We may share information for any other purpose with your explicit consent.

## **6. DATA SECURITY**

We implement robust security measures to protect your information:

### **6.1 Technical Safeguards**

- Encryption in transit and at rest
- Secure cloud infrastructure
- Regular security audits and assessments
- Appropriate access controls and authentication
- Network security and monitoring

### **6.2 Organizational Safeguards**

- Employee training on data protection
- Employee confidentiality obligations
- Limited access on a need-to-know basis

## **7. DATA RETENTION**

We retain your information for as long as necessary to:

- Provide our services to you
- Fulfill the purposes outlined in this policy
- Comply with legal obligations
- Resolve disputes and enforce agreements

When information is no longer needed, we securely delete it.

#### **Typical Retention Periods:**

- Customer business contact information: Duration of relationship plus 7 years
- Transaction records: 7 years for accounting/tax purposes
- Website analytics: 26 months

## **8. YOUR PRIVACY RIGHTS**

Depending on your location, you may have the following rights:

### **8.1 General Rights**

- **Access:** Request copies of your personal information
- **Correction:** Request correction of inaccurate information
- **Deletion:** Request deletion of your information (subject to legal requirements)
- **Restriction:** Request limitations on processing
- **Portability:** Request transfer of information in a structured format
- **Objection:** Object to certain processing activities
- **Opt-Out:** Unsubscribe from marketing communications

### **8.2 How to Exercise Your Rights**

Contact us at: [info@seedlessdata.com](mailto:info@seedlessdata.com)

We will respond to valid and verified requests within the timeframes required by applicable law (typically 30 days).

### **8.3 California Privacy Rights (CCPA/CPRA)**

California residents have additional rights under the California Consumer Privacy Act:

- Right to know what personal information we collect, use, and disclose
- Right to delete personal information
- Right to opt-out of the sale of personal information (note: we do not sell personal information)
- Right to non-discrimination for exercising privacy rights

**California "Shine the Light" Law:** California residents may request information about disclosures of personal information to third parties for direct marketing purposes.

### **8.4 UK Privacy Rights (UK GDPR)**

If you are in the United Kingdom, you have specific rights under the UK General Data Protection Regulation (UK GDPR):

#### **Data Subject Rights**

You have all the rights listed in Section 8.1 above, including:

- Right of access to your personal information
- Right to rectification of inaccurate information
- Right to erasure ("right to be forgotten")
- Right to restriction of processing
- Right to data portability
- Right to object to processing
- Rights related to automated decision-making (see Section 15 below)

#### **Legal Basis for Processing**

We process your personal information based on one or more of the following lawful bases under UK GDPR:

- **Contract performance:** To provide our services and fulfill our contractual obligations

- **Legitimate interests:** For business operations, fraud prevention, and security (where balanced against your rights)
- **Legal compliance:** To comply with legal and regulatory obligations
- **Consent:** Where you have given explicit consent (you may withdraw consent at any time)

### **Supervisory Authority**

You have the right to lodge a complaint with the UK Information Commissioner's Office (ICO):

- **Website:** [www.ico.org.uk](http://www.ico.org.uk)
- **Telephone:** 0303 123 1113
- **Address:** Information Commissioner's Office, Wycliffe House, Water Lane, Wilmslow, Cheshire SK9 5AF

### **International Data Transfers**

As Seedless is based in the United States and you are in the UK, your personal information will be transferred outside the UK. We ensure appropriate safeguards are in place for these transfers through:

- UK-approved Standard Contractual Clauses (SCCs)
- Additional technical and organizational security measures
- Regular assessments of data protection standards

## **8.5 European Privacy Rights (GDPR)**

If you are in the European Economic Area (EEA) or Switzerland:

You have the rights listed in Section 8.1 above.

### **Legal Basis for Processing**

Our legal basis for processing includes contract performance, legitimate interests, legal compliance, and consent (as detailed for UK residents above).

### **Supervisory Authority**

You may lodge a complaint with your local data protection authority in your country of residence.

### **International Data Transfers**

For transfers from the EEA to the United States, we use:

- EU Standard Contractual Clauses
- Appropriate safeguards and security measures

## **9. INTERNATIONAL DATA TRANSFERS**

### **9.1 Cross-Border Transfers of Personal Information**

Seedless, Inc. is based in the United States. When you use our services or communicate with us from outside the United States, your personal information will be transferred to, stored, and processed in the United States.

### **9.2 Transfers from the UK**

For personal information transferred from the United Kingdom to the United States:

#### **Safeguards in Place**

- We use UK-approved Standard Contractual Clauses (UK SCCs) as required by UK GDPR
- We implement additional technical and organizational security measures
- We conduct regular assessments to ensure adequate protection

## **Your Rights**

You may request a copy of the safeguards we have in place by contacting [info@seedlessdata.com](mailto:info@seedlessdata.com).

### **9.3 Transfers from the EEA**

For personal information transferred from the European Economic Area to the United States:

#### **Safeguards in Place**

- We use EU Standard Contractual Clauses
- We implement appropriate technical and organizational measures
- We ensure compliance with GDPR requirements

### **9.4 Transfers of Fictional Datasets**

#### **Important Distinction**

The fictional datasets we generate and deliver to customers do NOT contain actual personal information. These datasets may be transferred internationally without the restrictions that apply to real personal data, as they contain only synthetic, fabricated information created through AI simulations.

Our international transfer safeguards apply only to:

- Your customer business contact information
- Communications with us
- Information collected through our website
- Other actual personal information collected in the course of our business relationship

## **10. CHILDREN'S PRIVACY**

Our services are not directed to individuals under 18 years of age. We do not knowingly collect personal information from children. If we learn we have collected information from a child without parental consent, we will delete it promptly.

## **11. CHANGES TO THIS PRIVACY POLICY**

We may update this Privacy Policy periodically to reflect:

- Changes in our practices
- Legal or regulatory requirements
- New features or services

We will notify you of material changes by:

- Posting the updated policy on our website
- Updating the "Last Updated" date
- Sending email notification (for significant changes)

Your continued use of our services after changes constitutes acceptance of the updated policy.

## **12. CONTACT US**

If you have questions, concerns, or requests regarding this Privacy Policy or our privacy practices:

#### **Seedless, Inc.**

Email for privacy or general inquiries: [info@seedlessdata.com](mailto:info@seedlessdata.com)

#### **Mailing Address:**

744 South Street, Suite #136 Philadelphia, PA 19147

## 13. INDUSTRY-SPECIFIC COMPLIANCE

Given our focus on highly regulated industries, we maintain compliance with applicable regulations:

### 13.1 Healthcare (HIPAA)

Our fictional data generation does NOT involve Protected Health Information (PHI). The datasets we create are entirely fictional and do not contain any actual patient data. However, we understand HIPAA requirements and ensure our fictional healthcare datasets are suitable for evaluating HIPAA-compliant tools.

### 13.2 Financial Services

We comply with relevant financial data protection requirements in our business operations. Our fictional financial datasets are designed to help institutions evaluate tools while maintaining regulatory compliance.

### 13.3 Legal Services

We understand attorney-client privilege and legal data sensitivities. Our fictional legal datasets contain no actual privileged communications and are designed specifically for safe evaluation of legal technology tools.

## 14. DEFINITIONS

**Personal Information:** Information that identifies, relates to, or could reasonably be linked to you or your household.

**Customer Business Contact Information:** Professional contact details provided by customers for business purposes, including name, business email, business phone number, company name, and job title.

**Fictional Data:** Entirely synthetic data generated through AI simulations, containing no real personal information or data derived from actual individuals or organizations.

**Processing:** Any operation performed on personal information, including collection, storage, use, disclosure, or deletion.

## 15. AUTOMATED DECISION-MAKING AND PROFILING

Seedless does not use automated decision-making or profiling that produces legal effects or similarly significantly affects you.

### What This Means

- We do not make automated decisions about you using algorithms or AI
- We do not create profiles about you for marketing or other purposes
- Any significant decisions about our services to you involve human review

### Our Fictional Data Generation

While we use AI to generate our fictional datasets, this process:

- Does NOT involve your personal information
- Does NOT make decisions about you as an individual
- Creates entirely fabricated data for our customers' use

If our practices change in the future, we will update this Privacy Policy and notify you accordingly.

## ACKNOWLEDGMENT

By using Seedless services, you acknowledge that you have read and understood this Privacy Policy and agree to its terms.

© 2025 Seedless, Inc. All rights reserved.