

CUSTOMER DATA PROTECTION & PRIVACY POLICY

Effective Date: 1 April, 2025

Last Updated: 1 December 2025

1. PURPOSE

The purpose of this Customer Data Protection & Privacy Policy is to articulate INIA AI's commitment to safeguarding the privacy and security of customer data. This Policy outlines the principles and procedures that INIA AI follows to protect the personal and confidential information of its customers and clients. The Customer Privacy clauses explain how we collect, use, disclose, and safeguard your personal information when you visit our website, or interact with our services

INIA AI fully complies with the General Data Protection Regulation (GDPR), the UK Data Protection Act 2018, and all applicable privacy and data protection laws.

2. SCOPE

This Policy applies to all employees, contractors, vendors, and authorized users who have access to customer data or are involved in any aspect of customer data processing within INIA AI. It encompasses all forms of customer data, including personal information, financial data, and any other data provided by customers.

3. CUSTOMER DATA

Customer data will only be collected when necessary for legitimate business purposes, and consent will be obtained when required by law. Customers will be informed about the purpose of data collection and their rights regarding their data.

Information We Collect

- **Business Contact Information**

We collect professional contact information, including names, titles, business email addresses, phone numbers, and company affiliation, primarily through direct business interactions and personal professional contacts, not through cold calls. This information is maintained in our Customer Relationship Management (CRM) system.

- **Private Data**

INIA AI acts strictly as a Data Processor under the GDPR when processing customer credit analysis data. Our technology runs entirely within the infrastructure that is owned or controlled by the customer. All analyst credentials, usage logs, and related personal data are stored in the customer's systems; we do not copy, store, or otherwise access this information. Customers therefore maintain full control and ownership of this data at all times, and INIA AI processes this data solely within customer-controlled environments.

- **Public Data**

In the course of developing, evaluating, and testing our technology modules, INIA AI may utilize data that is publicly available and lawfully accessible. This includes data that has been made available without restriction by individuals, organizations, or governmental bodies, and which does not require a login, subscription, or contractual agreement to access.

How We Use Your Information

We use the collected information exclusively to:

- Facilitate effective communication with our business clients
- Maintain business relationships and conduct standard administrative practices
- Ensure secure access to our company services and news updates
- Comply with applicable laws and regulations

Legal Basis for Data Processing

Our processing of your business contact information is primarily based on legitimate business interests (GDPR Article 6(1)(f)), specifically to maintain effective communication, administer contractual obligations, and manage ongoing business relationships. Where applicable by law, processing will also be conducted based on your explicit consent.

Data Sharing and Disclosure

We do not utilize personal data for marketing purposes beyond direct business communications. We may share information with:

- Authorized third-party service providers essential for CRM management and technical infrastructure
- Regulatory or legal entities if required by law or regulation
- Affiliates or partners if any who are necessary to deliver contracted services

Customer Rights

- INIA AI will respect and uphold customer rights regarding their data, including the right to access, rectify, delete, or restrict the processing of their data:
 - Access the personal data we hold about you
 - Request corrections or deletion
 - Withdraw consent at any time
 - Object to or restrict processing
 - Receive your data in a portable format
 - Lodge a complaint with the Information Commissioner's Office (ICO) or another relevant supervisory authority if you believe your data rights under GDPR have been infringed.
- To exercise any of these rights, see contact details below.

International Data Transfers

- Currently, INIA AI does not transfer any personal data outside of the United Kingdom. If international transfers of personal data become necessary in the future, we will inform customers clearly through updates to this policy and implement appropriate safeguards (such as Standard Contractual Clauses approved under GDPR) to ensure ongoing compliance.

Third-Party Contracts

- When INIA AI engages third-party data processors, contracts will be established to ensure they comply with data-protection regulations and safeguard any data in their custody.

Cookies and Tracking Technologies

- We use cookies and similar tracking technologies strictly necessary for our website functionality and security. With your explicit consent, we may also use analytical cookies (e.g., Google Analytics) to evaluate usage patterns and enhance our website performance. You can manage cookie preferences through our cookie consent management tool, which will be presented clearly upon your first visit to our website and is accessible at all times.

Data Security

- We employ robust security measures including encryption, access controls, and regular security audits.
- These measures include AES-256 encryption for data at rest and in transit, strict access control policies, multi-factor authentication, regular vulnerability assessments, and adherence to recognized security frameworks.

Data Retention

- We retain business contact information in our CRM system for the duration of our active business relationship plus a maximum of 24 months after the relationship ends, unless longer retention is required by applicable legal or regulatory requirements. After this period, data is securely deleted or anonymized.

Data Breach Response

- In the event of a data breach, INIA AI will follow a predefined incident response plan to promptly detect, respond to, and mitigate the impact of the breach. Affected individuals and authorities will be notified as required by law.

Children's Privacy

- INIA AI does not knowingly collect or process personal data relating to individuals under the age of 18. If we become aware that we have inadvertently collected such data, we will immediately delete it.

4. COMPLIANCE AND CONSEQUENCES

At INIA AI, we are committed to protecting your personal information. Our employees receive regular training in data protection, and we enforce strict internal controls to ensure the integrity and confidentiality of your data.

5. POLICY REVIEW

This policy may occasionally be updated to reflect operational, legal, or regulatory changes.

Material changes will be clearly communicated to customers via email or prominently displayed on our website prior to taking effect.

6. CONTACT INFORMATION

For any questions or concerns about our privacy practices, or to exercise your data protection rights, please contact our Privacy Officer:

INIA AI Ltd.

Registered in England and Wales

Company No.: 15588106

Registered office: Britannia Court, 5 Moor Street, Worcester, WR1 3DB

Email: privacy@inia.ai

Should your concerns remain unresolved, you have the right to lodge a complaint with the Information Commissioner's Office (ICO), the UK's data protection supervisory authority.