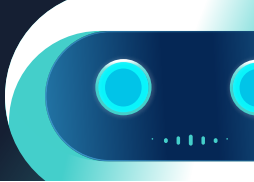


# LuLu FAQs



## QUESTION

## ANSWER

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### 1. What is LuLu and what does it do?

LuLu is your lending intelligence layer. It empowers lenders with GenAI-powered intelligence to identify growth opportunities, mitigate risk, and increase operational efficiency by connecting your data and delivering answers in plain language.

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### 2. Does LuLu have access to PII?

No. LuLu has no access to personally identifiable information. Any data that reaches LuLu has been anonymized through a Key Matching Service before it enters the LuLu application layer. Customers are contractually prohibited from inputting PII into LuLu.

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### 3. What AI models and providers power LuLu?

LuLu leverages foundational models from Google, Anthropic, and OpenAI. It is an Agentic AI solution — when a user submits a query, LuLu dynamically constructs prompts using relevant context and sends them to the underlying foundational models in one or more requests. LuLu also includes a Query Generation Engine for structured data queries.

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### 4. Is LuLu used in credit decisioning?

No. Zest AI maintains a strict policy boundary: large language models are prohibited from use in any Decisioning Models, which includes all credit underwriting and fraud detection models. All credit decisioning uses supervised machine learning models (such as XGBoost and gradient boosting) that are locked after training and do not continue to learn during production use. LuLu is exclusively a research, reports and analysis tool.

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### 5. How is data protected in LuLu (encryption in transit and at rest)?

All data in transit to and from LuLu is encrypted using HTTPS with TLS v1.2 or higher. Data at rest is encrypted using AES-256 encryption. LuLu's data is stored in Snowflake and S3, both of which use AES-256 encryption at rest with AWS-managed or customer-managed keys.

**6. Is LuLu included in your SOC 2 audit?**

Yes. LuLu is included in the scope of our SOC 2 Type II audit beginning with the 2025 audit period. Our most recent SOC 2 Type II audit was completed on May 16, 2025, covering April 1, 2024 through March 31, 2025. The current audit period (2025/2026) is in progress.

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**7. How does LuLu handle data hallucination and maintain accuracy?**

LuLu is purpose-built for lending analytics and does not have access to the open internet. All analytical outputs are drawn from verified, curated data sources — client data, Zest proprietary data, and public datasets — rather than unconstrained web content. This closed-data approach significantly reduces hallucination risk. LuLu's outputs include source citations, and the interface surfaces supporting documents, decision logic, and underlying code so users can verify responses.

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**8. Is customer data used to train LuLu or any LLMs?**

No. Customer data is not used to train any LLMs, including LuLu. LuLu models are not retrained on customer data.

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**9. How is client data segregated in LuLu?**

Each client's data within LuLu is logically separated with strict access controls ensuring data is never commingled or accessible across client boundaries. Client data is never shared with or visible to other clients.

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**10. What are LuLu's authentication and access controls?**

LuLu supports use of either SSO or username/password authentication. Access is managed per client with logical data separation. We support Entra ID and Active Director. MFA is required for all internal Zest AI system access. LuLu includes safeguards designed to decline prompts that attempt to circumvent policies. Audit logging covers user provisioning, user actions, and errors/adverse events.

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**11. Are any third-party sub-processors involved in LuLu?**

Yes. LuLu leverages foundational models from Google, Anthropic, and OpenAI, with AWS for hosting and Snowflake for data storage. These are all covered under Zest AI's vendor management program and are subject to our security and compliance review processes.

**12. What data sources does LuLu use?**

Approved data sources include customer-provided data, derivative credit bureau data (approved case-by-case with Legal review), Zest AI proprietary information, and publicly available industry data. Prohibited data sources include raw credit bureau data, copyrighted material, and PII.

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**13. How does LuLu's data flow work?**

LuLu operates on a data flow that is completely separate from the scoring API. The flow is: MeridianLink Data Processing Service → SPDE (temporary PII for bureau pulls only) → LuLu Accessible Data System (Snowflake/S3, anonymized only) → LuLu application layer. A Key Matching Service handles the anonymization bridge. LuLu draws on the client's knowledge base and internal reports to provide analytical insights without accessing the scoring pipeline or PII.

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**14. Has LuLu been penetration tested?**

Yes. Zest AI conducts annual penetration testing through an independent external firm. LuLu is one of four products tested in the most recent assessment. Any high or critical findings are reviewed by the CISO and remediated per severity-based timelines.

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**15. Does Zest AI have a formal Generative AI policy?**

Yes. Zest AI maintains a Generative AI/LLM Development Policy. The policy establishes clear boundaries between generative AI tools (like LuLu) and credit decisioning models, governs approved data sources, and sets controls around employee AI use. The policy is available as part of our Due Diligence material.

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**16. How does LuLu handle user consent for data usage?**

Customers are contractually prohibited from inputting PII into LuLu. Data usage within LuLu is governed by the terms of use. LuLu operates only on anonymized data and verified data sources.

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**17. How is LuLu priced?**

LuLu pricing details should be confirmed with the sales team.

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**18. Can LuLu explain its responses?**

Yes. LuLu is designed to provide transparency into how responses are produced. It surfaces source citations, supporting documents, and decision logic in the interface. This allows users to verify and understand the basis for any analytical output.