Precognition Labs, Inc - Privacy Policy

Effective Date: November 23, 2025

This Privacy Policy ("Policy") describes the manner in which Precognition Labs ("Precognition Labs," "we," "us," or "our") collects, uses, stores, processes, transfers, discloses, and protects Personal Information in connection with our enterprise SaaS products and services ("Services"). Precognition Labs is committed to maintaining the highest standards of privacy, security, and regulatory compliance, including obligations under the General Data Protection Regulation ("GDPR"), the California Privacy Rights Act ("CPRA"), and SOC 2 Trust Services Criteria, where applicable.

By accessing or using our Services, you acknowledge that you have read and understood this Policy.

1. Categories of Information We Collect

Precognition Labs adheres to strict data minimization and purpose limitation principles. We collect only the Personal Information necessary to operate, secure, and improve our Services.

1.1 Personal Information Provided by Users

We may collect Personal Information voluntarily provided to us, including:

- Full name
- Email address
- Account credentials or identifiers
- Organizational affiliation or role
- Communications, support requests, and related correspondence

1.2 Automatically Collected Information

We may automatically collect information related to the access and use of our Services, including:

- Device and browser type, operating system, IP address
- Usage activity, interaction logs, and feature utilization
- Performance metrics, reliability data, error reports, and diagnostic artifacts
- Timestamped activity logs

Such information is used solely to ensure system functionality, improve performance, and maintain operational integrity.

1.3 Customer Data Submitted Through the Services

We may process Customer Data uploaded or transmitted by enterprise customers. With respect to such Customer Data:

- Customers retain full ownership and control;
- Precognition Labs acts only as a **data processor**, processing Customer Data strictly in accordance with customer instructions and contractual obligations;
- We do not access Customer Data except as necessary to provide the Services, investigate issues, fulfill support requests, or meet legal requirements.

1.4 Cookies and Essential Tracking Technologies

Our Services utilize **strictly necessary first-party cookies** required for:

- Authentication and session management
- Security, fraud prevention, and integrity protection
- Maintaining continuous access to the Services

These may include session cookies, refresh tokens, and security tokens. We do not use third-party cookies, tracking beacons, cross-site identifiers, or advertising technologies. Disabling these essential cookies may impair or prevent functionality of the Services.

1.5 Telemetry and Analytics

We use cloud-native telemetry services exclusively for the purpose of assessing system performance, reliability, and operational efficiency. Telemetry may include aggregated usage metrics, load characteristics, and error diagnostics.

We do **not** sell, share, or transfer telemetry data for advertising or marketing purposes.

2. Purposes of Processing

We process Personal Information only for legitimate and specified business purposes, including:

- Providing and maintaining the Services
- Authenticating users and securing accounts
- Monitoring system health, performance, and reliability
- Detecting, investigating, and preventing security incidents
- Responding to support inquiries and customer requests
- Meeting legal, regulatory, and contractual obligations

● Conducting internal testing, quality assurance, and improvements

We do **not** use Personal Information for automated decision-making or profiling that produces legal or significant effects on individuals.

3. Legal Bases for Processing (Where Applicable)

Where the GDPR applies, Precognition Labs processes Personal Information under the following lawful bases:

● **Contractual Necessity:** Delivering and supporting the Services.
● **Legitimate Interests:** Ensuring security, preventing misuse, improving functionality, and operating the business.
● **Consent:** When expressly required for certain optional interactions.
● **Legal Obligations:** Compliance with regulatory, audit, and security requirements.

Precognition Labs does **not** sell Personal Information or share it for cross-context behavioral advertising.

4. Roles of the Parties

4.1 Precognition Labs as Data Controller

We act as a data controller with respect to:

● User account information (name, email, credentials)
● Authentication metadata
● Usage telemetry and performance analytics
● Support communications and operational data

4.2 Precognition Labs as Data Processor

We act as a data processor with respect to Customer Data that customers submit or process through the Services. We process such data solely on behalf of and in accordance with the documented instructions of the customer.

5. Sensitive Personal Information

Precognition Labs does **not** collect, process, use, or disclose Sensitive Personal Information as defined under CPRA, GDPR, or other applicable privacy laws. Our Services are not

designed to receive or process such information, and customers are instructed not to submit sensitive data.

6. Access to Data

Access to Personal Information and Customer Data is restricted to authorized engineering and support personnel who require such access to perform legitimate operational functions, including resolving service issues, investigating incidents, and maintaining platform reliability.

All access is controlled, logged, and subject to principle-of-least-privilege requirements.

7. International Access and Transfers

All data is stored and processed within data centers located in the United States. Precognition Labs does not transfer Personal Information to jurisdictions outside the United States except where explicitly instructed by an enterprise customer.

However, authorized employees or contractors located outside the United States (including in India) may remotely access systems hosted in the United States for operational purposes such as engineering, support, and maintenance. Such access is governed by strict security controls, confidentiality agreements, authentication policies, and audit logging. Such cross-border access is secured and legitimized by legal transfer mechanisms, such as Standard Contractual Clauses (SCCs), as necessary. This does not constitute a cross-border data transfer of stored data.

8. Third-Party Providers

We may engage third-party service providers to support essential operational functions, including but not limited to:

- Cloud infrastructure hosting
- Authentication services
- Machine learning model processing
- Security monitoring and logging
- System performance analytics

Precognition Labs discloses information to such providers only to the extent necessary for operational functionality. Providers are bound by confidentiality obligations, contractual restrictions, and security requirements consistent with SOC 2 standards. We do not disclose information to advertisers, data brokers, or non-essential third parties. A list of our current sub-processors is maintained and is available to customers upon request or via our Trust Center portal.

9. Security Measures

Precognition Labs implements comprehensive technical and organizational measures to safeguard Personal Information, including:

- Encryption of data in transit and at rest
- Role-based access controls and authentication safeguards
- Continuous monitoring, alerting, and audit logging
- Vulnerability management, penetration testing, and security reviews
- Incident response procedures and documentation
- Compliance with SOC 2 security, availability, and confidentiality principles

10. Incident Response and Breach Notification

In the event of unauthorized access, security breach, or compromise of Personal Information, Precognition Labs will promptly:

- Investigate the incident
- Assess the scope and impact
- Contain and remediate the issue
- Provide legally required notifications to affected individuals and regulators
- Implement corrective actions to prevent recurrence

11. User Rights

Where applicable under GDPR, CPRA, or other privacy laws, individuals may exercise the following rights:

GDPR Rights

- **Right of Access**
- **Right to Rectification**
- **Right to Erasure ("Right to Be Forgotten")**
- **Right to Restrict Processing**
- **Right to Object**
- **Right to Data Portability**
- **Right not to be subject to automated decision-making**

CPRA Rights

- **Right to Know**

- **Right to Delete**
- **Right to Correct**
- **Right to Opt Out of Sale/Sharing** (we do not sell or share)
- **Right to Limit the Use of Sensitive Personal Information** (not applicable, as none is collected)
- **Right to Non-Discrimination**

Requests may be submitted to **privacy@precognitionlabs.ai**. We will review, verify and respond to privacy requests within timeframes required by applicable law. To help protect user information, we may take reasonable steps to verify the identity of the requestor using information already in our possession before fulfilling a request. If we are unable to verify identity to the degree of certainty required by applicable law, we may be unable to comply with the request and will notify the requestor of this outcome."

12. Data Retention

Precognition Labs retains Personal Information only for as long as necessary to fulfill the purposes for which it was collected, comply with legal and regulatory obligations, maintain security and audit requirements, and support the operational needs of the Services. Data is securely deleted or anonymized when no longer required.

13. Changes to This Policy

We may update this Policy from time to time to reflect changes in our practices, legal requirements, or operational needs. The updated version will be posted with a revised effective date, and we will notify customers of all material changes to the Policy (e.g., changes affecting user rights or data processing) via email or a prominent notice within the Services.Continued use of the Services constitutes acknowledgment of the updated Policy.

14. Contact Information

For questions regarding this Policy, privacy rights, or data practices, please contact:

Precognition Labs

Email: **privacy@precognitionlabs.ai**

Website: **www.precognitionlabs.ai**