

TIA Privacy Policy

1. Introduction and Commitment to Privacy

Welcome to TIA. This Privacy Policy outlines the practices of **SOFTIA Technologies Inc.** ("SOFTIA," "we," "us," or "our") regarding the collection, use, processing, and disclosure of your information when you use our artificial intelligence-powered document analysis application, TIA, and its associated services, websites, and software (collectively, the "Services").

SOFTIA is a company based in Longueuil, Quebec, Canada. Our privacy practices are designed to comply with applicable Canadian privacy laws, including the federal *Personal Information Protection and Electronic Documents Act* (PIPEDA) and Quebec's *Act respecting the protection of personal information in the private sector* (commonly known as "Law 25").

Our fundamental commitment is to your privacy and data security. We believe that you should own and control your data. This policy is designed to be transparent about how we handle your information, particularly the documents you entrust to our Services.

This Privacy Policy applies to our online activities and is valid for all users of our Services. By accessing or using our Services, you signify that you have read, understood, and agree to our collection, storage, use, and disclosure of your personal information as described in this Privacy Policy and our Terms and Conditions.

Definitions

For the purposes of this Privacy Policy, the following key terms shall have the meanings set forth below:

- **Personal Information:** Any information that can be used to identify an individual, including but not limited to names, email addresses, phone numbers, and any other data that relates to an identifiable person.
- **Contributions:** Any documents, data, and text that you upload or submit to our Services for analysis, which remain your property. This includes but is not limited to files in formats such as PDF, Word, or any other document type you choose to provide.
- **Services:** Refers to the artificial intelligence-powered document analysis application TIA and its associated services, websites, and software provided by SOFTIA Technologies Inc.

2. The Role of a Privacy Officer

In accordance with Quebec's Law 25, we have appointed a Privacy Officer who is responsible for overseeing our compliance with this Privacy Policy and applicable privacy legislation. Should you have any questions, concerns, or complaints regarding our privacy practices, you may contact our Privacy Officer using the details provided in the "Contact Us" section of this policy.

3. Consent

By using our website and Services, you hereby consent to our Privacy Policy and agree to its terms.

We collect, use, and disclose your Personal Information with your consent, except where otherwise permitted or required by law. Your consent can be express (e.g., by ticking a box) or implied (e.g., when you provide information to use a service).

You have the right to withdraw your consent at any time, subject to legal or contractual restrictions and reasonable notice. The withdrawal of consent may impact our ability to provide you with certain features of the Services. For instance, withdrawing consent to process your documents will prevent you from using the core functionality of TIA. You can withdraw consent by deleting your account and your data as described in Section 8.

4. Information We Collect

To provide and enhance our Services, we collect several types of information. We are committed to collecting only the information that is necessary for the purposes identified in this policy.

4.1. Information You Provide Directly to Us

- **Account Information:** When you register for a TIA account, we collect personal information such as your name, email address, and password. If you are using our Services on behalf of an organization, we may also collect the company name and your role. For paid subscriptions, we will work with a third-party payment processor and may collect billing information, such as your address and payment card details, which are securely handled by our payment partner.
- **User-Generated Contributions ("Contributions"):** The core of our Service involves you uploading documents (such as PDFs, Word files, etc.), data, and text for analysis. These Contributions are your property. We process them to provide the Service, but we do not claim any ownership over them.
- **Direct Communications:** If you contact us directly for customer support, feedback, or any other inquiry, we may receive and store additional information about you, such as your phone number, the content of your messages and/or attachments, and any other information you choose to provide.

4.2. Information We Collect Automatically

- **Technical Information:** When you access our Services, we automatically collect technical data to ensure compatibility and optimize performance. This includes your IP address, browser type and version, device type and capabilities, operating system, and Internet Service Provider (ISP).
- **Usage Information:** We collect data on how you interact with our Services. This may include the features you use, the web pages you visit on our site, the duration of your sessions, your navigation paths within the application, the types of queries you make (but not the specific content of sensitive queries), and your general engagement patterns. This information is typically aggregated and anonymized to help us understand user behavior and improve the Service.

- **Cookies and Similar Technologies:** We use cookies, web beacons, and other tracking technologies to operate and personalize the Services.
 - **Cookies:** These are small data files stored on your device that help us maintain your session (keeping you logged in), remember your preferences (like your preferred language or AI model), and provide a customized experience.
 - **Beacons:** These are small pieces of code embedded in our web pages that help us track usage patterns and the effectiveness of our communications. You can manage or block cookies through your browser settings, but please note that doing so may impair the functionality of our Services.

4.3. Our Approach to Cookies and Tracking Technologies

At SOFTIA, we are committed to a "privacy-first" approach. This principle extends to our use of tracking technologies.

We do not use any third-party tracking or marketing cookies. We do not use web beacons, or any other technology designed to track your activity across different websites for advertising or profiling purposes.

The only "cookies" we use are **essential functional cookies**. These are small, temporary files necessary for the basic operation of the TIA application. Their sole purpose is to provide the service you have requested, specifically:

- **Session Management:** To keep you logged in to your account as you navigate the application. Without this essential cookie, you would be required to re-enter your password on every page.
- **Security:** To help secure your account and prevent fraudulent activities.

These functional cookies are temporary, are not shared with any third parties, and do not contain personal information that can identify you outside of your session with TIA. Because these cookies are strictly necessary for the service to function, they are active by default. By using our Services, you acknowledge the use of these essential cookies.

5. How We Improve Our Services: A Commitment to User Feedback

Instead of relying on invasive tracking analytics, we believe the best way to improve TIA is by listening directly to our users. We actively encourage you to share your feedback, suggestions, and critiques with us.

We may periodically invite you, via non-intrusive notifications within the application or by email, to participate in surveys, provide reviews, or contact our support team with your ideas. Your participation is entirely voluntary.

This direct feedback is invaluable to us and is used exclusively for the following purposes:

- Identifying and fixing bugs or performance issues.
- Understanding which features are most valuable to you.

- Prioritizing the development of new tools and functionalities.
- Improving the overall user experience of the TIA application.

6. Your Data, Third-Party AI Models, and Data Processing

This section details how your Contributions are handled when you use TIA's core functionality. Transparency is a core principle of our Service.

6.1. Your Ownership and Our Role You own your Contributions. We are a processor of your data, **not an owner**. All documents and data you upload are stored securely on our servers. We do not sell your Contributions or use them for any purpose other than providing and improving the Services as described herein.

6.2. The Interaction with AI Model Providers TIA integrates with several world-class third-party AI model providers to offer you a range of analytical capabilities. When you submit a query about your document:

- **We do not send the entire document to the AI provider.**
- Our system first processes your document on our own secure servers to create a searchable index (a process often called "embedding").
- When you ask a question, our system identifies the most relevant snippets of text from your document.
- Only your query and these relevant text snippets (the "input context") are sent to the AI model provider you have selected for processing.

Below is information regarding the data handling policies of our AI partners. We are committed to working with providers who meet high standards of privacy.

- **OpenAI (GPT Models):** According to OpenAI's Enterprise Privacy policy, data submitted via their API is **not** used to train or improve their models. OpenAI retains API data for a limited period (typically up to 30 days) for abuse and misuse monitoring, after which it is deleted.
- **Anthropic (Claude Models):** Anthropic's policy states that data sent for inference via their API is **not** used for training their general models. They employ strict data protection and access control measures to ensure your information remains secure.
- **Google (Gemini Models):** Google's AI developer terms specify that customer data submitted to the Gemini API is **not** used for training or improving their models without explicit consent.
- **Other Potential Providers:** Should we integrate other AI models, we will update this policy accordingly. We will prioritize partners who commit to not using customer API data for model training. We recommend you exercise your own judgment when selecting a model, especially if your documents contain highly sensitive information.

7. Data Storage, Security, and Retention

7.1. Security Measures We take the security of your information very seriously and implement industry-leading technical and organizational measures to protect it. Our commitment to security includes:

- **Encryption:** All data, including your Contributions and Personal Information, is encrypted both **at rest** (when stored on our servers) and **in transit** (when transmitted between you and us, or between us and our service providers).
- **Access Controls:** We enforce strict access controls within our organization to ensure that only authorized personnel with a legitimate business need can access user data.
- **Secure Infrastructure:** Our servers are located in secure, top-tier data centers (e.g., Microsoft Azure, AWS, Google Cloud) that are compliant with rigorous security standards.
- **Vulnerability Management:** We regularly monitor our systems for potential vulnerabilities and strive to provide the highest level of security. However, no system is completely infallible. We encourage you to report any suspected security issues to us.

7.2. Data Storage Location As a Canadian company, we prioritize storing user data within Canada where possible. However, to provide our Services, we utilize a global infrastructure. This means your data may be stored and processed on servers located outside of your province or country, including in the United States and Europe, where data protection laws may differ.

When we transfer your Personal Information outside of Quebec or Canada, we conduct a Privacy Impact Assessment (PIA) and take steps to ensure that your information is protected by contractual clauses or other mechanisms that provide a comparable level of protection to that offered under Canadian law. By using our Services, you consent to this transfer, storage, and processing.

You have the right to request details about these transfers, including the countries where your data may be stored and the safeguards in place to protect your information. Please contact our Privacy Officer if you would like more information regarding the transfer of your data.

7.3. Data Retention and Deletion We retain your Personal Information and Contributions only for as long as necessary to fulfill the purposes for which they were collected, including to provide the Services, comply with our legal obligations, resolve disputes, and enforce our agreements.

You are in control of your data. We provide you with an easy and immediate mechanism to delete your Contributions and your entire account from our servers.

- **Document Deletion:** You can delete any document you have uploaded at any time through the Service interface.
- **Account Deletion:** You can delete your entire account, which will permanently remove your Personal Information and all associated Contributions.

This deletion process is irreversible. Once deleted, your data cannot be recovered.

8. Your Privacy Rights under Canadian Law

As a user of our Services, particularly if you are a resident of Canada, you have specific rights concerning your Personal Information. We are committed to upholding these rights.

- **Right of Access:** You have the right to request access to the Personal Information we hold about you and to receive an account of how it has been used and disclosed.
- **Right to Rectification:** You have the right to request the correction of any inaccurate or incomplete Personal Information we hold about you.
- **Right to Withdraw Consent (Erasure):** You have the right to withdraw your consent to our collection, use, and disclosure of your information at any time. This can be accomplished by deleting your account, which will result in the deletion of your Personal Information from our active systems.
- **Right to Data Portability (Quebec Law 25):** You have the right to request that we provide you with the Personal Information you have provided to us in a structured, commonly used, and machine-readable format.
- **Right to be Informed about Automated Decision-Making:** If we use your Personal Information to render a decision based exclusively on an automated process, you have the right to be informed of this.

To exercise any of these rights, please submit a written request to our Privacy Officer at the email address provided below. We will respond to your request within 30 days, as required by law.

9. Children's Privacy

Our Services are not intended for or directed at individuals under the age of 16. We do not knowingly collect Personal Information from children under 16. If we become aware that we have inadvertently collected such information, we will take steps to delete it as soon as possible.

10. Changes to This Privacy Policy

We reserve the right to modify this Privacy Policy at any time. If we make material changes, we will notify you either by prominently posting a notice of such changes on our website or by sending you a direct communication (e.g., via email). We will also update the "Effective Date" at the top of this policy. Your continued use of the Services after any modification to this Privacy Policy will constitute your acceptance of such modification.

11. Contact Us

In order to resolve a complaint, exercise your rights, or receive further information regarding our privacy practices, please contact our Privacy Officer:

Privacy Officer SOFTIA Technologies Inc. Email: @softia.com Mailing Address: **[Your Company's Street Address] Longueuil, Quebec, [Your Postal Code] Canada**