



# NITRO-AI

## PRIVACY POLICY

**Effective Date:** January 1, 2026 **Last Updated:** January 1, 2026

**At a Glance:** Nitro-AI provides AI-powered workflow automation for construction and commercial lending. We collect and process data necessary to deliver our services securely. Your data is encrypted, never sold, and handled in compliance with SOC 2 Type 2 standards. You control your data and can request access, correction, or deletion at any time.

### 1. Introduction

Nitro-AI, Inc. ("Nitro-AI," "we," "us," or "our") is committed to protecting the privacy and security of your personal information. This Privacy Policy describes how we collect, use, disclose, and safeguard information when you use our AI-powered workflow platform for construction and commercial lending (the "Service").

#### **This policy applies to information collected through:**

- Our website at nitro-ai.com
- Our software-as-a-service platform
- Email, text, and other electronic communications
- Mobile applications (if applicable)
- Third-party integrations and APIs

**SOC 2 Type 2 Compliance:** Nitro-AI maintains SOC 2 Type 2 certification, demonstrating our commitment to security, availability, processing integrity, confidentiality, and privacy of customer data. Our practices are audited annually by independent third-party assessors.

## 2. Information We Collect

### 2.1 Information You Provide Directly

Category	Examples	Purpose
Account Information	Name, email address, phone number, company name, job title, password	Account creation, authentication, service delivery
Business Information	Company details, business address, tax ID, billing information	Billing, compliance, service customization
Loan & Project Data	Loan applications, construction project details, financial documents, inspection reports, contractor information	Platform functionality, risk analysis, workflow automation
Communications	Support inquiries, feedback, correspondence	Customer support, service improvement
Payment Information	Credit card details, bank account information, billing address	Payment processing (processed by third-party PCI-DSS compliant providers)

### 2.2 Information Collected Automatically

- **Usage Data:** Pages viewed, features used, time spent, click patterns, workflow interactions
- **Device Information:** IP address, browser type, operating system, device identifiers
- **Log Data:** Access times, error logs, system events, API calls
- **Cookies & Similar Technologies:** Session cookies, authentication tokens, preference settings (see Section 9)

### 2.3 Information from Third Parties

- Data from integrated systems (CRM, loan origination systems, document management platforms)
- Public records and databases for construction cost benchmarking
- Identity verification services
- Business contact information from data providers

## 3. How We Use Your Information

We use collected information for the following purposes:

### 3.1 Service Delivery & Operations

- Provide, maintain, and improve the Nitro-AI platform
- Process loan applications and construction project data
- Perform AI-powered risk analysis and fraud detection
- Generate inspection reports, fund control documentation, and feasibility analyses

- Automate workflows and document processing
- Facilitate communication between lenders, contractors, and other stakeholders

### 3.2 Security & Compliance

- Authenticate users and prevent unauthorized access
- Detect, prevent, and respond to fraud, security incidents, and malicious activity
- Comply with legal obligations and regulatory requirements
- Conduct security audits and maintain SOC 2 compliance
- Monitor system integrity and availability

### 3.3 Communication & Support

- Respond to inquiries and provide customer support
- Send service updates, security alerts, and administrative messages
- Notify you about changes to our Service or policies
- Conduct training and onboarding

### 3.4 Business Operations

- Process payments and manage billing
- Analyze usage patterns to improve Service functionality
- Develop new features and services
- Conduct research and analytics (using aggregated, de-identified data)

### 3.5 Marketing (With Your Consent)

- Send newsletters and product updates (opt-out available)
- Provide information about new features and services
- Invite participation in surveys or feedback opportunities

## 4. Legal Basis for Processing (GDPR)

For users in the European Economic Area (EEA), United Kingdom, or Switzerland, we process personal data based on:

- **Contract Performance:** Processing necessary to provide services you've requested
- **Legal Obligation:** Compliance with applicable laws and regulations
- **Legitimate Interests:** Fraud prevention, security, service improvement (when not overridden by your rights)
- **Consent:** Marketing communications, optional features (withdrawable at any time)

## 5. How We Share Your Information

**We do not sell your personal information.** We share information only in the following circumstances:

### 5.1 Service Providers & Subprocessors

We engage trusted third-party vendors to perform functions on our behalf, including:

- Cloud hosting providers (AWS, Google Cloud, Microsoft Azure)
- Payment processors (PCI-DSS compliant)
- Email and communication services
- Analytics and monitoring tools
- Customer support platforms
- Security and fraud prevention services

All service providers are contractually bound to protect your information and use it only for specified purposes. A current list of subprocessors is available upon request.

## 5.2 Business Partners

When you use our Service in connection with CFSI Loan Management or other partner services, we may share relevant data to facilitate integrated workflows. Partners are contractually obligated to maintain confidentiality.

## 5.3 Legal Requirements & Protection

We may disclose information when required by law or when necessary to:

- Comply with legal processes (subpoenas, court orders, regulatory requests)
- Enforce our Terms of Service or other agreements
- Protect the rights, property, or safety of Nitro-AI, our users, or the public
- Detect, prevent, or address fraud, security, or technical issues

## 6. Data Security

We implement comprehensive security measures aligned with SOC 2 Type 2 requirements and industry best practices:

### 6.1 Technical Safeguards

- **Encryption:** Data encrypted in transit (TLS 1.2+) and at rest (AES-256)
- **Access Controls:** Role-based access controls (RBAC), multi-factor authentication (MFA), least-privilege principles
- **Network Security:** Firewalls, intrusion detection/prevention systems, network segmentation
- **Secure Development:** Code reviews, vulnerability scanning, penetration testing
- **Monitoring:** 24/7 security monitoring, automated threat detection, incident response procedures

## 7. Data Retention

We retain personal information only as long as necessary to fulfill the purposes outlined in this Privacy Policy, unless a longer retention period is required or permitted by law.

### Retention Periods:

- **Active Account Data:** Retained while your account is active and for the period necessary to provide services
- **Transactional Records:** 7 years from transaction date (for financial and regulatory compliance)
- **Support Communications:** 3 years from last contact

- **Usage & Log Data:** 13 months (unless required for security investigations)
- **Marketing Data:** Until you opt out, plus 30 days
- **Backup Data:** Up to 90 days in encrypted backups, then permanently deleted

## 8. Your Privacy Rights

You have the following rights regarding your personal information:

### 8.1 All Users

- **Access:** Request a copy of the personal information we hold about you
- **Correction:** Request correction of inaccurate or incomplete information
- **Deletion:** Request deletion of your personal information (subject to legal retention requirements)
- **Opt-Out:** Unsubscribe from marketing communications at any time
- **Account Control:** Update account information and preferences through your account settings

### 8.2 Exercising Your Rights

To exercise any of these rights, please contact us at:

- **Email:** [privacy@nitro-ai.com](mailto:privacy@nitro-ai.com)
- **Mail:** Nitro-AI, Inc., Attn: Privacy Officer, [Your Business Address]

We will respond to verified requests within 30 days (45 days for complex requests). We may require additional information to verify your identity before processing your request.

## 9. Cookies & Tracking Technologies

We use cookies and similar technologies to enhance your experience and collect usage information. Most browsers allow you to control cookies through settings. Note that disabling essential cookies may impact Service functionality.

## 10. International Data Transfers

Nitro-AI is based in the United States. If you access our Service from outside the U.S., your information may be transferred to, stored, and processed in the United States or other countries where we or our service providers operate. For transfers from the EEA, UK, or Switzerland, we rely on Standard Contractual Clauses (SCCs) approved by the European Commission and Data Processing Agreements with appropriate safeguards.

## 11. Children's Privacy

Our Service is not intended for individuals under 18 years of age. We do not knowingly collect personal information from children. If we discover that we have collected information from a child under 18, we will promptly delete it. If you believe we have collected information from a child, please contact us at [privacy@nitro-ai.com](mailto:privacy@nitro-ai.com).

## 12. Changes to This Privacy Policy

We may update this Privacy Policy periodically to reflect changes in our practices, technology, legal requirements, or other factors. We will notify you of material changes by posting the updated policy on our website with a new "Last Updated" date, sending an email notification to your registered email address, and displaying a prominent notice within the Service.

Your continued use of the Service after the effective date of changes constitutes acceptance of the updated Privacy Policy. We encourage you to review this policy periodically.

## 13. Contact Information

If you have questions, concerns, or requests regarding this Privacy Policy or our data practices, please contact us:

**Nitro-AI, Inc. General Inquiries:** [info@nitro-ai.com](mailto:info@nitro-ai.com) **Privacy Matters:** [privacy@nitro-ai.com](mailto:privacy@nitro-ai.com) **Security Concerns:** [security@nitro-ai.com](mailto:security@nitro-ai.com) **Data Protection Officer:** [dpo@nitro-ai.com](mailto:dpo@nitro-ai.com) **Website:** <https://www.nitro-ai.com> **Mailing Address:** [Your Complete Business Address]

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**SOC 2 Type 2 Certification:** Nitro-AI maintains SOC 2 Type 2 compliance. For information about our security practices or to request our SOC 2 report, please contact [compliance@nitro-ai.com](mailto:compliance@nitro-ai.com).

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