



Privacy Policy — ExTempora Technologies

Effective date: September 19, 2025

This Privacy Policy explains how **ExTempora Technologies** (“we”, “us”, “our”) collects, uses, discloses and protects personal data when you use our websites, applications, and services including **ExamFlow** (collectively, the “Services”). By using the Services you agree to the collection and use of information described here. If you do not agree, please do not use the Services.

1. What we collect

We collect information you provide, and information collected automatically:

a. **Information you provide**

- Account details (name, organization, email, password, billing information).
- Content you upload or create via the Services (e.g., exam papers, answer images, student data) — “User Content”.
- Communications with support or sales (messages, attachments).

b. **Automatically collected information**

- Usage and device data (IP address, browser, OS, pages visited, timestamps, logs).
- Cookies and similar technologies (session identifiers, preferences, analytics).
- Metadata and machine-generated outputs (e.g., text extracted by OCR, confidence scores).

2. How we use your information

We use data to:

- Provide, operate, maintain and improve the Services (including generating papers, grading aids, OCR/text extraction).
- Process payments and manage subscriptions.
- Communicate about accounts, updates, billing and security.
- Detect, prevent and respond to fraud, abuse, security incidents and legal requests.
- Personalize and analyze usage and performance.





- Comply with legal obligations.

3. Legal bases for processing (where applicable)

Where required, we rely on one or more of: performance of a contract, legitimate interests (service operation, security, analytics), consent (cookies, marketing) and compliance with legal obligations.

4. Sharing & third-party processors

We do not sell personal data. We share data only as described below or with your consent:

- **Service providers:** payment processors, hosting and infrastructure providers (we use AWS), analytics, email, and OCR/vision services (we may use Google Cloud Vision or AWS Textract or OpenAI for text extraction). These processors act under contract and only as directed by us.
- **Legal & safety:** to comply with law, legal process, or to protect rights, safety or property.
- **Business transfers:** in connection with mergers, acquisitions or asset sales subject to confidentiality and buyer obligations.

5. International transfers

Data may be processed and stored in countries other than your own (e.g., AWS datacenters). Where transfers occur, we use appropriate safeguards (standard contractual clauses or other lawful mechanisms).

6. Data retention

We retain personal data only as long as necessary to provide the Services, fulfill contractual or legal obligations, resolve disputes, and enforce our agreements. Typical examples: account data while account is active; transactional and billing records retained for up to 7 years for tax/compliance purposes unless law requires otherwise.

7. Your rights and choices

Depending on your jurisdiction, you may have rights to: access, correct, port, restrict or delete your personal data; object to processing; and withdraw consent. To exercise rights, contact us (see Contact below). We will respond in accordance with applicable



law. You may also manage cookies and preferences via browser settings and our cookie controls.

8. Security

We implement reasonable technical, administrative and physical safeguards to protect personal data. No method of transmission or storage is 100% secure; we cannot guarantee absolute security. We will notify affected users and regulators as required by law in the event of a qualifying data breach.

9. Children

The Services are not directed at children. We do not knowingly collect personal data from children below the applicable minimum age (e.g., 13 in the U.S.) without parental consent. If we learn we collected such data unlawfully, we will delete it.

10. Cookies & tracking

We use cookies and similar technologies for essential functionality, analytics, performance and marketing. You can set cookie preferences through our cookie controls or through your browser settings; note that disabling cookies may affect functionality.

11. Links to third-party sites

Our Services may link to third-party sites. We are not responsible for their privacy practices. Please review the privacy policies of those sites before providing personal data.

12. Changes to this Policy

We may update this Policy periodically. Material changes will be posted with a new effective date and, where required, notified to users. Continued use after changes constitutes acceptance.

13. Contact

For questions, requests, or privacy concerns, contact:

ExTempora Technologies — Email: info@xtempora.org

