

**North America**

92 Caplan Avenue, Suite 508
Barrie, Ontario, L4N 9J2
Canada

Australasia

8/15 Bonner Drive
Malaga WA 6090
Australia

Plain-Language Privacy Summary

At GrackleDocs, we care about your privacy and want to keep your personal information safe. This summary explains, in simple terms, what we do with your data when you use our website or services. For full details, please read our complete Data Privacy Policy below.

- **What We Collect:** We only collect what we need, like your name, email, or payment details when you sign up or buy our services. We also gather non-personal data, like how you use our website, to make it better.
- **How We Use It:** We use your information to provide our document accessibility services, process payments, answer your questions, and improve our website. We may send you marketing emails, but only if you say it's okay.
- **Sharing Your Data:** We do not share your information unless it's needed to run our services (e.g., with secure payment processors) or required by law. We make sure anyone we share with follows strict privacy rules. We NEVER sell data.
- **Your Choices:** You can ask to see, fix, or delete your information. You can also stop marketing emails or control cookies through your browser. Just contact us, and we'll help within 30 days.
- **Keeping It Safe:** We use strong security, like encryption, to protect your data. If there's ever a data breach, we'll let you know and fix it fast.
- **Data Storage:** We retain your information only for as long as necessary to provide our services, meet legal obligations, or until you request its deletion.
- **GrackleDocs uses artificial intelligence (AI) and machine learning technologies** to provide automated accessibility features including Layout Detection, AutoTagging, and document structure analysis. These features can be opted out of use for services.
- **Contact Us:** If you have questions or concerns, email us at info@grackledocs.com or write to us at 92 Caplan Ave, Suite 508, Barrie, Ontario, L4N 9J2, Canada.

We may update this policy, but we'll let you know about big changes. Thank you for trusting GrackleDocs with your information!





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Data Privacy Policy

Last Updated: December 1, 2025

GrackleDocs Inc. ("GrackleDocs," "we," "us," or "our"), a Canadian company headquartered in Ontario, is unwavering in its commitment to safeguarding your privacy. This Data Privacy Policy outlines our rigorous practices for collecting, using, disclosing, and protecting your personal information in strict compliance with the *Personal Information Protection and Electronic Documents Act* (PIPEDA) and all applicable Canadian laws. By accessing or using our website or services, you explicitly consent to these practices. We take our obligations seriously and ensure your trust is well-placed.

1. Information We Collect

We collect only the personal information necessary to deliver and enhance our services. Personal information, as defined under PIPEDA, is any data about an identifiable individual. We are transparent about what we collect:

Personal Information

Contact Information: Name, email address, phone number, and mailing address, provided when you register, contact us, or purchase services.

Billing Information: Payment details (e.g., credit card numbers), securely processed through trusted third-party payment processors.

Account Information: Username, password, and related details when you establish an account.

Non-Personal Information

Usage Data: Information on how you engage with our website or services, including IP address, browser type, device details, pages visited, and session duration. Where possible, this data is anonymized and does not constitute personal information under PIPEDA.

Cookies and Tracking Technologies: We deploy cookies, web beacons, and similar technologies to optimize user experience, analyze trends, and manage our website. You have full control to manage cookie preferences via your browser settings.





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Information from Third Parties

We may obtain information from third parties, such as business partners or social media platforms, only with your consent or as permitted by law, ensuring alignment with PIPEDA's principles.

2. How We Use Your Information

We use your personal information solely for clearly defined purposes, disclosed at the time of collection or with your explicit consent. Our uses include:

- Delivering, maintaining, and continuously improving our document accessibility solutions.
- Efficiently processing transactions and issuing billing communications.
- Promptly addressing inquiries, providing exceptional customer support, and delivering service-related updates.
- Personalizing your experience and providing tailored content or advertisements.
- Analyzing usage patterns to enhance website performance and functionality.
- Fulfilling legal obligations under PIPEDA and other Canadian laws with unwavering compliance.
- Sending marketing communications, such as newsletters or promotions, only with your express or implied consent, which you may revoke at any time.

3. How We Share Your Information

We do not sell, rent, or trade your personal information. Disclosures occur only under strictly controlled circumstances:

- **Service Providers:** We engage trusted third-party vendors (e.g., for hosting, payment processing, or analytics) who are contractually bound to protect your information and fully comply with PIPEDA.
- **Business Transfers:** In the event of a merger, acquisition, or asset sale, your information may be transferred, but only with robust safeguards and prior notice as mandated by law.
- **Legal Requirements:** We will disclose information to comply with Canadian laws, regulations, or legal processes, or to respond to lawful government or court requests.
- **Protection of Rights:** We may share information to protect our rights, safety, or property, or those of our users or the public, including to prevent fraud.





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- **Data Breach Notification:** Should a data breach occur, we will promptly notify affected individuals and the Office of the Privacy Commissioner of Canada, as required by PIPEDA, and take decisive action to mitigate risks.

4. Your Choices and Rights

Under PIPEDA, you have robust rights over your personal information, and we are committed to upholding them:

- **Access:** You may request access to all personal information we hold about you, subject to limited exceptions under PIPEDA.
- **Correction:** You may demand corrections to inaccurate or incomplete personal information, and we will act swiftly to ensure accuracy.
- **Consent Withdrawal:** You may withdraw consent for the collection, use, or disclosure of your information at any time, subject to legal or contractual obligations, and we will honor your request promptly.
- **Marketing Communications:** You can opt out of marketing communications by clicking the "unsubscribe" link in emails or contacting us directly, with immediate effect.
- **Cookies:** You may control cookie preferences through your browser settings, though disabling cookies may impact website functionality.

To exercise these rights, contact our Privacy Officer using the details below. We will verify your identity and respond within 30 days, as mandated by PIPEDA, ensuring a seamless process.

5. Data Security

We deploy industry-leading technical, organizational, and physical safeguards to protect your personal information from unauthorized access, use, or disclosure. Our security measures are regularly audited and updated to maintain compliance with PIPEDA's accountability requirements. While no system is infallible, we are resolute in minimizing risks and protecting your data.

6. Data Retention

We retain personal information only as long as necessary to fulfill the purposes outlined in this Privacy Policy, meet legal obligations, resolve disputes, or enforce agreements. When





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requested, we can securely delete or anonymize your data in strict accordance with PIPEDA's guidelines.

7. International Data Transfers

GrackleDocs may transfer, store, and process your information in jurisdictions outside of the one in which you live and/or work. These jurisdictions may have different privacy laws than those in your home jurisdiction. By using GrackleDocs services, you consent to such transfer, storage, and processing of your information.

8. Children's and Student Privacy

GrackleDocs Inc. is steadfast in safeguarding the privacy of all users, including children and students. Our services are designed for individuals of all ages, and we rigorously comply with the *Personal Information Protection and Electronic Documents Act* (PIPEDA) when collecting, using, or disclosing personal information.

When serving U.S. educational institutions, GrackleDocs strictly adheres to the *Family Educational Rights and Privacy Act* (FERPA), which governs the privacy of student education records and personally identifiable information (PII). In these cases, we:

- Collect and process education records solely as directed by the institution, with appropriate consent from parents or eligible students.
- Deploy state-of-the-art security measures to prevent unauthorized access or disclosure, aligning with both FERPA and PIPEDA standards.
- Disclose education records or PII only as permitted by FERPA, such as with consent or in response to lawful requests (e.g., subpoenas), while upholding Canadian legal obligations.
- Support parental or eligible student access to and correction of education records via the institution, as mandated by FERPA.

Should we inadvertently collect personal information from children without proper consent or unauthorized education records, we will promptly delete such data. Contact our Privacy Officer immediately if you suspect such collection. GrackleDocs is resolute in upholding PIPEDA and FERPA, ensuring uncompromising protection of children's and students' privacy.



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9. Third-Party Links

Our website or services may include links to third-party websites. We are not responsible for their privacy practices and strongly recommend reviewing their policies before sharing personal information.

10. Complaints

We take your concerns seriously. If you have issues with our privacy practices, contact our Privacy Officer first to resolve them efficiently. If unsatisfied, you may escalate your complaint to:

Office of the Privacy Commissioner of Canada

30 Victoria Street, Gatineau, Quebec K1A 1H3

Toll-free: 1-800-282-1376

Website: www.priv.gc.ca

We are fully cooperative with the Commissioner's investigations and committed to addressing any concerns.

11. Changes to This Privacy Policy

We may update this Privacy Policy to reflect changes in our practices or legal requirements. Material changes will be communicated prominently via our website or email, as required by PIPEDA. The "Last Updated" date reflects the latest revision. Your continued use of our services after changes signifies acceptance of the updated policy.

12. AI Data Processing

When you use AI-powered features, we process your document content, structure, formatting, and metadata solely to provide the requested services. AI processing occurs on secure servers within our infrastructure or with approved third-party providers bound by data processing agreements. Documents are processed only when you explicitly use AI features, and temporary processing files are automatically deleted after completion. We do not use your actual document content to train publicly available AI models or share it with third parties for training purposes without your consent.



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We may use aggregated, anonymized usage data (such as success rates, performance metrics, and error patterns) to improve our AI models. This improvement data does not include your document content, personally identifiable information, or proprietary information.

Data Security and Your Rights

All AI processing adheres to our standard security protocols including encryption in transit and at rest, access controls, and SOC 2 Type II compliance.

Prohibited Uses

You may not reverse engineer AI models, use AI features to process illegal or harmful content, exceed usage limits through unauthorized bulk processing, resell AI capabilities to third parties, or use AI features to train competing services.

13. Contact Us

For questions, concerns, or to exercise your PIPEDA rights, reach our Security Team at:

GrackleDocs Inc.

Email: info@grackledocs.com

Address: 92 Caplan Ave, Suite 508, Barrie, Ontario, L4N 9J2, Canada

