### PRIVACY POLICY

## **SMARTBIDS (a PRODUCT OF RONAV-AI)**

Last Updated: November 27, 2024

#### 1. INTRODUCTION

SmartBids ("we," "us," or "our") is committed to protecting the privacy and security of your data. This Privacy Policy outlines how we collect, use, store, and disclose information when you use our Software-as-a-Service (SaaS) platform. By using SmartBid, you consent to the data practices described in this policy. We adhere to the principles of the Personal Data Protection Act (PDPA) of Malaysia, and where applicable, the GDPR (Europe) and DPDP Act (India).

### 2. INFORMATION WE COLLECT

We collect only the data necessary to provide our services:

## 2.1 Personal Information:

- Registration details: Name, Job Title (Designation), Company Name, Email Address, and Contact Number.
- Billing details: Processed securely by Stripe (we do not store full credit card numbers).

# 2.2 Business Data ("User Content"):

- Request for Quotation (RFQ) documents.
- Bid Proposals and Pricing documents.
- Generated reports and compliance scores.

# 2.3 Usage Data:

 Logs of system access, audit frequency, and feature usage (e.g., "God View" metrics).

#### 3. HOW WE USE YOUR INFORMATION

- 3.1 Service Provision: To authenticate your identity, process payments, and generate the AI-driven compliance analysis you request.
- 3.2 Service Improvement: To analyze usage trends and improve the accuracy of our algorithms (using anonymized metadata only).
- 3.3 Communication: To send transactional emails (password resets, payment receipts) and service updates.

### 4. AI PROCESSING AND DATA PRIVACY

- 4.1 AI Provider: We utilize Google's Gemini API to process the text within your uploaded documents.
- 4.2 No Training on Data: We have configured our API usage to ensure that your data is NOT used to train Google's public AI models. Your proprietary bid strategies remain private.
- 4.3 Ephemeral Processing: Uploaded documents are processed in memory for the duration of the analysis. We do not retain raw file copies longer than necessary to generate the report.

## 5. SHARING OF INFORMATION (SUBPROCESSORS)

We do not sell your data. We share data only with the following trusted infrastructure providers required to run the Service:

- Render: Cloud hosting and backend server infrastructure.
- Firebase (Google): Secure database storage for user profiles and audit history.
- Stripe: PCI-compliant payment processing.
- Google Cloud AI: Text processing and analysis.

# 6. DATA RETENTION AND DELETION ("RIGHT TO BE FORGOTTEN")

- 6.1 Retention: We retain your account information and audit history for as long as your account is active.
- 6.2 User Deletion: You have the right to delete individual audit reports or your entire account at any time via the application interface.
- 6.3 Permanent Erasure: When you delete a report or account, the data is permanently removed from our active database. Please note that residual copies may exist in secure backup archives for a limited period before being overwritten.

#### 7. SECURITY MEASURES

We implement industry-standard security measures to protect your data, including:

- Encryption in Transit: All data is transmitted via HTTPS/TLS encryption.
- Encryption at Rest: Data stored in Firebase is encrypted.
- Access Control: Strict role-based access control (User vs. Admin) ensures data isolation.

### 8. INTERNATIONAL DATA TRANSFERS

Your information, including Personal Data, may be transferred to — and maintained on — computers located outside of your state, province, country, or other governmental jurisdiction where the data protection laws may differ. By using the Service, you consent to this transfer to our cloud infrastructure providers (Google/Render/Firebase) which generally host data in secure global data centers (often US or Singapore-based).

#### 9. CHANGES TO THIS PRIVACY POLICY

We may update our Privacy Policy from time to time. We will notify you of any changes by posting the new Privacy Policy on this page and updating the "Last Updated" date.

### **10. CONTACT US**

If you have any questions about this Privacy Policy or wish to exercise your data rights, please contact our Data Protection Officer at:

SmartBid Support Team Email: support@smartbids-app.com