

Fox ML Infrastructure — Privacy Policy

Last Updated: January 2026

This Privacy Policy describes how Fox ML Infrastructure LLC (“we,” “our,” or “us”) handles information when you visit our website, use our software, or interact with our services.

1. Executive Summary

Fox ML Infrastructure does not collect, store, or process personal data from users of our software.

Our software is **client-hosted**, meaning it runs entirely on your infrastructure. We have no access to your data, no ability to collect your data, and no infrastructure that could store your data.

This Privacy Policy covers: - **Website usage** (if applicable) - **Software licensing** (no data collection) - **Consulting engagements** (limited data access, NDA-protected) - **Support communications** (email only)

2. Information We Do NOT Collect

2.1 Software Usage

When you use Fox ML Infrastructure software:

- [NO] **No personal information** — We do not collect names, email addresses, or contact information
- [NO] **No usage data** — We do not collect usage statistics, analytics, or telemetry
- [NO] **No location data** — We do not collect IP addresses, geolocation, or device information
- [NO] **No trading data** — We do not collect trading signals, positions, or financial data
- [NO] **No model data** — We do not collect model outputs, predictions, or results
- [NO] **No configuration data** — We do not collect configuration files or settings

The software runs entirely on your infrastructure. We have no access to your systems or data.

2.2 No Cookies or Tracking

Our software does not use:

- [NO] **Cookies** — No cookies, tracking pixels, or web beacons
 - [NO] **Analytics** — No Google Analytics, Mixpanel, or similar services
 - [NO] **Telemetry** — No usage telemetry or performance monitoring
 - [NO] **Third-party trackers** — No embedded tracking scripts or services
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3. Information We May Collect (Limited)

3.1 Website Usage (If Applicable)

If you visit our website, we may collect:

- **Basic server logs** — IP address, browser type, access times (standard web server logs)
- **Contact form submissions** — Information you voluntarily provide via contact forms
- **Email communications** — Emails you send to us (stored in our email system)

Purpose: Website operation, responding to inquiries, providing support

Retention: Server logs retained for up to 90 days; emails retained per business needs

3.2 Licensing Inquiries

When you request commercial licensing, we collect:

- **Contact information** — Name, email, organization name (provided voluntarily)
- **Organization details** — Company size, use case (provided voluntarily)
- **Email communications** — Licensing-related email correspondence

Purpose: Processing licensing requests, providing quotes, managing commercial relationships

Retention: Retained for the duration of the commercial relationship and as required by law

3.3 Support Communications

When you contact support, we collect:

- **Email communications** — Support emails and responses
- **Issue descriptions** — Problem descriptions, logs, configuration details (provided by you)
- **Contact information** — Email address, name (provided by you)

Purpose: Providing technical support, resolving issues

Retention: Retained for support history and as required by law

4. Consulting Engagements

4.1 Limited Data Access

For consulting engagements only (separate from software licensing):

- **NDA required** — All consulting engagements require a Non-Disclosure Agreement
- **Limited scope** — Data access is limited to the minimum required for the engagement
- **Client-controlled** — All data access uses client-approved secure methods
- **No retention** — Client data is deleted upon project completion unless written authorization is provided

See `legal/internal/SECURITY_AND_ACCESS_POLICY.md` for detailed consulting data handling practices.

4.2 Consulting Data Handling

When consulting engagements require data access:

- **Purpose-limited** — Data is accessed only for the duration and scope of the project
 - **Client-approved storage** — Data is stored only in client-approved environments
 - **No external transfer** — Data is never transferred to personal cloud storage or external services
 - **Deletion upon completion** — All datasets, credentials, and artifacts are deleted upon delivery
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5. How We Use Information

5.1 Limited Use Cases

We use collected information only for:

- **Licensing management** — Processing licensing requests and managing commercial relationships
- **Support services** — Providing technical support and resolving issues
- **Communication** — Responding to inquiries and providing information
- **Legal compliance** — Complying with legal obligations and responding to legal requests

5.2 No Sharing or Selling

We do NOT:

- [NO] **Sell data** — We do not sell, rent, or trade any information
 - [NO] **Share with third parties** — We do not share information with third parties (except as required by law)
 - [NO] **Use for marketing** — We do not use information for marketing purposes without consent
 - [NO] **Create profiles** — We do not create user profiles or behavioral tracking
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6. Data Storage and Security

6.1 Storage Location

Information we collect is stored:

- **Email systems** — Support and licensing emails stored in our email system
- **Client-controlled** — For consulting engagements, data is stored in client-approved environments
- **No cloud storage** — We do not use cloud storage services for client data

6.2 Security Measures

We implement reasonable security measures:

- **Email security** — Standard email security practices

- **Access controls** — Limited access to information on a need-to-know basis
- **No data processing** — Since we do not process client data, there are no data processing security risks

Note: Since our software is client-hosted, clients are responsible for securing their own infrastructure and data.

7. Data Retention

7.1 Retention Periods

We retain information for:

- **Licensing records** — Duration of commercial relationship and as required by law
- **Support communications** — Support history and as required by law
- **Website logs** — Up to 90 days (standard server log retention)
- **Consulting data** — Deleted upon project completion unless written authorization is provided

7.2 Deletion

You may request deletion of your information:

- **Email request** — Send deletion request to jenn.lewis5789@gmail.com
 - **Response time** — We will respond within 30 days
 - **Exceptions** — We may retain information as required by law or for legitimate business purposes
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8. Your Rights

8.1 Data Subject Rights

You have the right to:

- **Access** — Request access to information we hold about you
- **Correction** — Request correction of inaccurate information
- **Deletion** — Request deletion of your information (subject to legal requirements)
- **Portability** — Request a copy of your information in a portable format
- **Objection** — Object to processing of your information (if applicable)

8.2 Exercising Your Rights

To exercise your rights:

- **Email** — jenn.lewis5789@gmail.com
 - **Subject** — Privacy Request — [Your Request Type]
 - **Response time** — We will respond within 30 days
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9. Third-Party Services

9.1 No Third-Party Data Processors

We do not use third-party data processors for:

- **[NO] Data storage** — No third-party cloud storage
- **[NO] Analytics** — No third-party analytics services
- **[NO] Tracking** — No third-party tracking services
- **[NO] Data processing** — No third-party data processors

9.2 Email Services

We use email services for:

- **Email delivery** — Standard email service providers (Gmail, etc.)
 - **No data sharing** — Email services are used only for email delivery, not data processing
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10. International Data Transfers

10.1 No International Data Transfers

Since we do not process client data:

- **No transfers** — No data is transferred internationally
- **No storage** — No data is stored in international locations
- **Client-controlled** — All data remains in client-controlled infrastructure

For consulting engagements, data location is determined by the client.

11. Children's Privacy

11.1 No Children's Data

Our software and services are not intended for children under 13:

- **No collection** — We do not knowingly collect information from children
 - **No targeting** — Our services are not targeted at children
 - **Parental consent** — If we become aware of collection from children, we will delete such information
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12. Changes to This Policy

12.1 Policy Updates

We may update this Privacy Policy:

- **Notification** — Commercial licensees will be notified of material changes
- **Effective date** — Updates become effective on the date specified
- **Continued use** — Continued use of our services implies acceptance of updated policy

12.2 Version History

Current version: 1.0 (January 2026)

13. Contact

For privacy-related questions or requests:

Jennifer Lewis

Fox ML Infrastructure LLC

Email: jenn.lewis5789@gmail.com

Subject: *Privacy Inquiry — Fox ML Infrastructure*

14. Related Documents

- `legal/DATA_PROCESSING_ADDENDUM.md` — Data Processing Addendum (DPA) for commercial licensees
 - `legal/SECURITY.md` — Security statement and data handling practices
 - `legal/internal/SECURITY_AND_ACCESS_POLICY.md` — Security and access policy for consulting engagements
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15. Summary

Key Privacy Principles:

1. **No data collection** — We do not collect personal data from software usage
2. **Client-hosted** — Software runs on client infrastructure; we have no access
3. **Limited collection** — We collect only information necessary for licensing and support
4. **No sharing** — We do not sell, rent, or share information with third parties
5. **Your rights** — You have rights to access, correct, and delete your information
6. **Transparency** — This policy clearly explains our data handling practices

This Privacy Policy ensures transparency and compliance with privacy regulations.