

# Privacy Policy

**Last Updated:** October 21, 2025

## 1. Introduction

Theodora ("we," "us," or "our") provides real-time operational risk intelligence and automated compliance assurance to financial institutions. This Privacy Policy explains how we collect, use, disclose, and protect information when you use our platform at theodora.live (the "Service").

## 2. Information We Collect

### 2.1 Information You Provide

- **Account Information:** Name, email address, job title, company name, phone number
- **Business Information:** Financial institution details, compliance requirements, organizational data
- **Communications:** Support requests, feedback, and correspondence with us

### 2.2 Information Collected Automatically

- **Usage Data:** Log data, IP addresses, browser type, device information, pages viewed
- **Cookies and Tracking:** Session identifiers, analytics cookies, functional cookies
- **Platform Activity:** Risk assessments, compliance workflows, system interactions

### 2.3 Information from Third Parties

- Data from integrated systems and compliance databases as configured by your organization
- Information from publicly available sources for risk intelligence purposes

## 3. How We Use Your Information

We process your information for the following purposes:

- **Service Delivery:** Providing risk intelligence, compliance monitoring, and platform functionality
- **Security and Fraud Prevention:** Detecting and preventing unauthorized access and security threats
- **Platform Improvement:** Analyzing usage patterns to enhance features and performance
- **Legal Compliance:** Meeting regulatory obligations and responding to lawful requests
- **Communications:** Sending service updates, security alerts, and support responses
- **Business Operations:** Billing, account management, and customer support

## Legal Bases (GDPR/UK GDPR)

- **Contract Performance:** Processing necessary to provide our services
- **Legitimate Interests:** Platform security, fraud prevention, and business operations
- **Legal Obligation:** Compliance with applicable laws and regulations
- **Consent:** Where specifically obtained for certain processing activities

## 4. Data Sharing and Disclosure

We do not sell your personal information. We may share data with:

- **Service Providers:** Cloud infrastructure, analytics, and security vendors under strict data processing agreements
- **Business Partners:** Only with your consent and as necessary for integrated services
- **Legal Requirements:** When required by law, court order, or governmental authority
- **Business Transfers:** In connection with mergers, acquisitions, or asset sales (with notice to you)

## 5. Data Retention

We retain personal information for as long as necessary to:

- Provide our services and maintain your account
- Comply with legal, regulatory, and contractual obligations
- Resolve disputes and enforce our agreements

Typical retention periods:

- **Active Account Data:** Duration of subscription plus 90 days
- **Compliance Records:** 7 years or as required by financial regulations
- **Marketing Data:** Until consent is withdrawn

## 6. Your Rights and Choices

### 6.1 GDPR/UK GDPR Rights (EU/UK Individuals)

- **Access:** Request copies of your personal data
- **Rectification:** Correct inaccurate or incomplete information
- **Erasure:** Request deletion (subject to legal obligations)

- **Restriction:** Limit processing in certain circumstances
- **Portability:** Receive your data in a structured, machine-readable format
- **Objection:** Object to processing based on legitimate interests
- **Withdraw Consent:** Revoke consent where processing is based on consent
- **Lodge Complaints:** Contact supervisory authorities

## 6.2 US Privacy Rights

**California (CCPA/CPRA), Virginia (VCDPA), Colorado (CPA), Connecticut (CTDPA):**

- Right to know what personal information is collected
- Right to delete personal information
- Right to correct inaccurate information
- Right to opt-out of sale/sharing (we do not sell data)
- Right to limit use of sensitive personal information
- Right to non-discrimination

## 6.3 Exercising Your Rights

Contact us at [privacy@theodora.live](mailto:privacy@theodora.live) or use our Data Subject Request portal at [theodora.live/privacy-requests](https://theodora.live/privacy-requests)

## 7. International Data Transfers

For EU/UK users, we transfer data internationally using:

- **Standard Contractual Clauses (SCCs)** approved by the EU Commission and UK ICO
- **Adequacy Decisions** where applicable
- **Appropriate Safeguards** including encryption and access controls

## 8. Security Measures

We implement industry-standard security measures including:

- End-to-end encryption for data in transit and at rest
- Multi-factor authentication and access controls
- Regular security audits and penetration testing
- SOC 2 Type II compliance

- Employee security training and background checks

## 9. Cookies and Tracking Technologies

We use:

- **Essential Cookies:** Required for platform functionality
- **Analytics Cookies:** To understand usage patterns (with consent where required)
- **Functional Cookies:** To remember your preferences

Manage cookie preferences at [theodora.live/cookie-settings](https://theodora.live/cookie-settings)

## 10. Children's Privacy

Our Service is not intended for individuals under 18. We do not knowingly collect information from children. If we become aware of such collection, we will promptly delete it.

## 11. Changes to This Policy

We may update this Privacy Policy periodically. We will notify you of material changes via email or prominent notice on our platform at least 30 days before changes take effect.

## 12. Contact Information

**Data Controller:** Theodora Inc.

**Privacy Inquiries:** [privacy@theodora.live](mailto:privacy@theodora.live)

**Data Protection Officer:** [dpo@theodora.live](mailto:dpo@theodora.live)

**EU Representative:** [If applicable, provide EU representative details]

**UK Representative:** [If applicable, provide UK representative details]

**Mailing Address:**

Theodora Inc.

[Complete address]

## 13. Jurisdiction-Specific Information

### 13.1 California Residents

Under CCPA/CPRA, California residents have specific rights regarding their personal information. We do not sell personal information or share it for cross-context behavioral advertising.

**Categories of Information Collected:** Identifiers, professional information, internet activity, commercial information

**Contact for California Rights:** [privacy@theodora.live](mailto:privacy@theodora.live) or 1-XXX-XXX-XXXX

### **13.2 Nevada Residents**

Nevada residents may opt-out of the sale of covered information. We do not sell personal information as defined under Nevada law.

### **13.3 EU/EEA Residents**

**Supervisory Authority:** You have the right to lodge a complaint with your local data protection authority.

**Data Protection Officer:** [dpo@theodora.live](mailto:dpo@theodora.live)

### **13.4 UK Residents**

**ICO Registration:** [Registration number if applicable]

**UK Representative:** [Provide if required]

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*This Privacy Policy is designed to comply with GDPR, UK GDPR, CCPA/CPRA, VCDPA, CPA, CTDPA, and other applicable privacy laws. For specific legal advice regarding your rights, please consult an attorney.*