Avalon AI Privacy Policy

Last Updated: January 2026

1. Introduction and Purpose

1.1 Avalon AI Inc. ("Avalon AI," "we," "us," or "our") is committed to safeguarding the privacy and confidentiality of personal information entrusted to us by our customers, prospects, end users, and business partners. This Privacy Policy establishes the principles, practices, and procedures governing how Avalon AI collects, uses, discloses, stores, retains, and protects personal information in the course of providing AI-powered inbound and outbound call agents, conversational automation, and AI-driven social media management services (the "Services").

1.2 This Policy is designed to comply with applicable Canadian federal and provincial privacy laws, including but not limited to the Personal Information Protection and Electronic Documents Act (PIPEDA), the Newfoundland and Labrador Personal Health Information Act (PHIA, where applicable), and common law privacy obligations. Where applicable, this Policy also reflects generally accepted international privacy principles to ensure a high standard of data protection for all stakeholders.

2. Scope and Application

2.1 This Privacy Policy applies to all personal information processed by Avalon AI, whether collected directly from individuals, indirectly through our business customers, or automatically through the use of our Services.

2.2 This Policy applies to information processed in connection with:

- AI-powered inbound and outbound voice calls
- Call recordings, transcriptions, and summaries
- SMS, email, and chat communications
- AI-driven social media engagement and management
- Client portals, dashboards, and analytics tools
- Website visits and marketing interactions

2.3 This Policy does not replace or override contractual obligations between Avalon AI and its customers, including Data Processing Agreements (DPAs), but operates in

conjunction with them.

3. Definitions

3.1 "Personal Information" means information about an identifiable individual, as defined under PIPEDA, including but not limited to names, contact details, voice recordings, identifiers, and online activity data.

3.2 "Customer" means any business entity that subscribes to Avalon AI Services.

3.3 "End User" means an individual whose personal information is processed through the Services on behalf of a Customer.

4. Legal Authority and Compliance

4.1 Avalon AI is headquartered in St. John's, Newfoundland and Labrador, Canada, and operates in accordance with Canadian privacy legislation.

4.2 Our compliance framework includes:

- PIPEDA (federal private-sector privacy law)
- Applicable provincial privacy statutes in Newfoundland and Labrador
- Common law duties of confidentiality and privacy

4.3 Where Services are provided to Customers operating in other jurisdictions, Avalon AI implements commercially reasonable measures to support compliance with applicable foreign privacy requirements, subject to contractual terms.

5. Accountability and Governance

5.1 Avalon AI is responsible for personal information under its control and has designated a Privacy Officer responsible for compliance, training, and oversight.

5.2 Internal policies, employee training programs, and access controls are implemented to ensure ongoing compliance with this Privacy Policy.

6. Categories of Personal Information Collected

6.1 The categories of personal information we may collect include, without limitation:

- Identifying information (name, company, role)
- Contact information (phone number, email address)
- Voice recordings and call transcripts
- Appointment, scheduling, and lead qualification data
- Social media handles and public interaction data
- Technical data (IP addresses, device identifiers, logs)
- Usage analytics and performance metrics

6.2 Avalon AI does not intentionally collect sensitive personal information unless required to provide the Services and authorized by the Customer.

7. Methods of Collection

7.1 Personal information may be collected:

- Directly from Customers during onboarding and account setup
- Automatically through AI interactions with End Users
- Through integrations with third-party platforms authorized by Customers
- Through website forms, cookies, and tracking technologies

8. Purposes of Collection and Use

8.1 Personal information is collected and used strictly for legitimate business purposes, including:

- Operating and delivering the Services
- Routing, answering, and managing communications
- Lead qualification and customer support
- Service analytics, optimization, and AI model improvement
- Quality assurance and compliance monitoring
- Billing, account management, and reporting
- Meeting legal and regulatory obligations

9. Consent

9.1 Avalon AI relies on express or implied consent as permitted under PIPEDA and applicable laws.

9.2 Customers are responsible for obtaining all required consents from End Users for call recording, AI interaction, and data processing, including notification obligations under Canadian law.

10. Call Recording and AI Processing

10.1 Calls handled by Avalon AI systems may be recorded, transcribed, analyzed, and summarized using artificial intelligence.

10.2 Recordings and transcripts may be retained beyond 30 days for service improvement, quality control, dispute resolution, and legal compliance, subject to retention policies.

11. Retention of Personal Information

11.1 Personal information is retained only for as long as necessary to fulfill identified purposes or as required by law.

11.2 Secure deletion, anonymization, or aggregation is performed once information is no longer required.

12. Disclosure and Data Sharing

12.1 Avalon AI does not sell personal information.

12.2 Personal information may be disclosed to:

- Authorized service providers and subprocessors
- Cloud infrastructure and analytics partners
- Legal or regulatory authorities where required by law

13. Cross-Border Transfers

13.1 Personal information may be processed or stored outside Canada, subject to contractual safeguards and risk assessments.

14. Security Safeguards

14.1 Avalon AI employs administrative, technical, and physical safeguards, including:

- Encryption in transit and at rest
- Access controls and authentication mechanisms
- Monitoring, logging, and incident detection

15. Breach Notification

15.1 Avalon AI maintains breach response procedures consistent with PIPEDA breach notification requirements.

16. Individual Rights

16.1 Individuals have the right to request access, correction, or deletion of their personal information, subject to legal limitations.

17. Cookies and Tracking Technologies

17.1 Avalon AI websites may use cookies and similar technologies for functionality, analytics, and performance optimization.

18. Third-Party Links and Integrations

18.1 Avalon AI is not responsible for the privacy practices of third-party platforms integrated at the Customer's request.

19. Children's Privacy

19.1 Avalon AI Services are not intended for use by minors under the age of majority.

20. Changes to this Privacy Policy

20.1 Avalon AI may update this Privacy Policy periodically. Material changes will be communicated through appropriate channels.

21. Contact Information

21.1 Privacy inquiries, access requests, or complaints may be directed to: Avalon AI – Privacy Office

Email: info@avalonai.ca

St. John's, Newfoundland and Labrador, Canada

22. Acceptance

22.1 By using Avalon AI Services, Customers acknowledge and accept this Privacy Policy.