



# Privacy Policy

**Last updated:** 08/01/2026

This Privacy Policy explains how **Pitflow Tecnologia LTDA**, a company registered in Brazil under CNPJ **56.348.559/0001-61**, with registered address at **Rua Alvorada 1289, Vila Olimpia, São Paulo SP, 04550-004** (“Company”, “we”, “our”), collects, uses, stores, and protects personal data when you use **pitflow.ai** and its cloud-based processing services (the “Service”).

This policy complies with the **Brazilian General Data Protection Law (LGPD — Law No. 13,709/2018)** and applicable consumer and civil legislation.

## 1. Scope

This Policy applies to:

- Individual users (B2C)
- Business customers and their authorized users (B2B)
- Students, researchers, and academic institutions using subsidized plans

It applies to all data processed through the Service, including user-uploaded files.

## 2. Roles Under Data Protection Law (LGPD)

For personal data contained in uploaded files:

- **User / Client = Data Controller**
- **Pitflow = Data Processor (Operador)**

We process data only according to user instructions and for the purpose of providing the Service.

For account and billing data, **[Company Name]** acts as **Data Controller**.

## 3. Data We Collect

### 3.1 Account and Identification Data

- Name
- Email address
- Organization or institution (if applicable)
- Login credentials (stored in encrypted or hashed form)

## 3.2 Billing and Subscription Data

- Plan type
- Billing address
- Tax identification data (for business customers)

Payment card data is processed by certified third-party payment providers. We do **not** store full credit card information on our systems.

## 3.3 User-Provided Files and Processing Data

- Files uploaded by users
- Processing parameters and configuration settings
- Metadata related to processing jobs

These files may contain personal data depending on what the user uploads.

**Users are solely responsible for the legality and content of uploaded data.**

## 3.4 Technical and Usage Data

- IP address
- Device and browser information
- Access logs
- Error and performance logs

# 4. Purpose of Processing

We process data for the following purposes:

- Providing and operating the Service
- Executing user-requested cloud processing
- Managing subscriptions and billing
- User authentication and account management
- Security monitoring and fraud prevention
- System performance and reliability improvements
- Legal and regulatory compliance

We do **not** sell personal data and do not use it for advertising.

# 5. Use of Machine Learning and AI

The Service may use machine learning techniques to:

- Optimize system performance
- Improve automation and processing workflows

**Important:**

- User files and customer data are **not used** to train, improve, or validate machine learning or AI models
- User data is not incorporated into training datasets
- Models are trained only on synthetic data, public datasets, or internal anonymized operational data

User data is used **exclusively to perform the processing requested by the user**.

## 6. Legal Basis for Processing (LGPD)

We process personal data based on:

- **Performance of contract** (Art. 7, V — providing the Service)
- **Legal obligations** (Art. 7, II — tax and regulatory compliance)
- **Legitimate interest** (Art. 7, IX — security and system stability)
- **Consent**, where required

## 7. Cloud Infrastructure and International Transfers

Data is stored and processed on **Microsoft Azure** cloud infrastructure.

This may involve processing in data centers located:

- In Brazil
- In other countries, when necessary for service operation

International transfers are protected by:

- Contractual safeguards
- Data protection agreements with subprocessors

Microsoft acts as a **subprocessor** under contractual obligations consistent with LGPD.

## 8. Data Retention

- Uploaded files are retained only as long as necessary to provide the Service
- Users may delete their data at any time through the platform or by request
- Backup systems may retain data for limited periods for disaster recovery only

After account termination, data is deleted according to technical and legal retention requirements.

## 9. Data Sharing

We may share data only with:

- Cloud infrastructure providers (e.g., Microsoft Azure)
- Payment processors
- Authentication and monitoring service providers
- Government authorities when legally required

All third parties are contractually bound to protect personal data.

We do **not** share data for marketing purposes.

## 10. Security Measures

We implement appropriate technical and organizational measures, including:

- Encrypted communications (TLS/HTTPS)
- Access control and authentication mechanisms
- Segregated processing environments
- Monitoring and logging systems

Despite these measures, no system is completely immune to security risks.

## 11. Security Incidents

In case of a personal data security incident that may pose risk to users, we will:

- Take immediate containment measures
- Notify affected users and authorities when required by LGPD
- Provide reasonable assistance to mitigate impacts

## 12. Academic and Subsidized Plans

Educational plans are intended solely for:

- Teaching activities
- Academic research
- Non-commercial projects

We may request verification of academic status, such as:

- Institutional email
- Proof of enrollment or affiliation

Commercial use under academic plans is prohibited.

## 13. Government and Public Institutions

For public sector customers, contracts may include:

- Audit rights
- Transparency obligations
- Compliance with Brazilian public procurement laws (including Law No. 14,133/2021)
- Specific data protection clauses

These contracts may supplement this Privacy Policy.

## 14. Data Subject Rights (LGPD)

Users may request:

- Confirmation of processing
- Access to personal data
- Correction of inaccurate data
- Anonymization or deletion, when applicable
- Data portability
- Information about data sharing
- Revocation of consent

Requests can be made via: [privacy@pitflow.ai](mailto:privacy@pitflow.ai)

## 15. Data Protection Officer (DPO)

Email: [dpo@pitflow.ai](mailto:dpo@pitflow.ai)

## 16. User Responsibilities

Users declare that they:

- Have legal authority to upload and process the data
- Comply with applicable data protection laws
- Will not upload illegal or unauthorized data

The Company is not responsible for unlawful user content.

## 17. Changes to This Policy

We may update this Privacy Policy periodically.

Updates will be published on this page with a new revision date.

Continued use of the Service constitutes acceptance of the updated policy.

## 18. Contact Information

**Pitflow Tecnologia LTDA**

CNPJ: **56.348.559/0001-61**

Address: **Rua Alvorada 1289, Vila Olimpia, São Paulo SP, 04550-004**

Email: [privacy@pitflow.ai](mailto:privacy@pitflow.ai)