

Privacy Policy

How Exigyn collects, uses, and protects information.

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Provided by [Exigyn, Inc.] · exigyn.com

DRAFT — FOR LEGAL REVIEW

This document is a working template prepared for Exigyn and is provided for general informational purposes only. It is not legal advice and does not create an attorney–client relationship. Items in [brackets] require confirmation, and the document should be reviewed and adapted by qualified legal counsel licensed in the relevant jurisdiction(s) before publication. Remove this notice before going live.

This Privacy Policy explains how [Exigyn, Inc.] (“Exigyn,” “we,” “us”) collects, uses, discloses, and protects information in connection with the Exigyn biotech-native financial planning & analysis (FP&A) platform, our website at exigyn.com, and the application at start.exigyn.com (together, the “Service”). We built Exigyn to handle sensitive financial information for life-sciences companies, and we treat the protection of that information as a core part of the product.

1. Scope and Our Role

This policy applies to personal data we process as a **controller** — for example, account registration details, billing contacts, website-visitor data, and support communications. When you load financial and operational data into your workspace (your “Customer Content”), we act as a **processor** on behalf of your organization, which remains the controller of that content. Our processing of Customer Content is governed by your Terms of Service and any applicable Data Processing Addendum (DPA), and this policy yields to those terms where they differ.

2. Information We Collect

2.1 Information you provide

- **Account and identity data:** name, work email, organization, role, and a hashed password (we never store passwords in plain text).
- **Billing data:** subscriptions are processed by our payment provider, Stripe. Stripe handles your card details directly; we receive limited billing metadata (such as plan, status, and the last four digits of a card), not full card numbers.
- **Customer Content:** the financial models, scenarios, assumptions, headcount and clinical-trial data, and files (e.g., CSV, XLSX, PDF) you upload or create in the Service.
- **Communications:** messages you send to privacy@, security@, or support@exigyn.com, and related correspondence.

2.2 Information collected automatically

- **Usage and log data:** features used, actions taken, pages viewed, timestamps, and diagnostic information.
- **Device and connection data:** IP address, browser type, operating system, and similar technical identifiers.

- **Cookies and analytics:** strictly necessary cookies to operate the Service, plus product-analytics (currently via PostHog) to understand and improve usage. See Section 11.

3. How We Use Information

- Provide, operate, provision, and maintain the Service, including automatically seeding new workspaces.
- Authenticate users, process subscriptions and billing, and deliver customer support.
- Secure the Service, detect and prevent fraud, abuse, and security incidents.
- Analyze and improve features, reliability, and performance.
- Communicate with you about service, security, billing, and (where permitted) product updates.
- Comply with legal obligations and enforce our agreements.

4. AI Features and Automated Processing

The Service includes AI-assisted analysis and forecasting and offers connectors to third-party tools (including Microsoft Excel, Microsoft PowerPoint, and the Claude / Model Context Protocol (MCP) connector). To generate outputs you request, relevant Customer Content may be processed by these features and transmitted to an AI sub-processor under contract. **We do not use Customer Content to train third-party foundation models**, and we engage AI sub-processors on terms that prohibit such training and require confidentiality. AI-generated outputs may be inaccurate or incomplete and are intended as decision support, not as a substitute for professional review (see your Terms of Service).

5. Legal Bases for Processing (EEA/UK)

Where the EU or UK GDPR applies, we rely on the following legal bases: **performance of a contract** (to provide the Service you request); **legitimate interests** (to secure, support, and improve the Service, balanced against your rights); **consent** (for example, certain analytics cookies or optional marketing, which you may withdraw at any time); and **compliance with legal obligations**.

6. How We Share Information

We do **not** sell personal data. We share information only as described here:

- **Sub-processors and service providers:** cloud hosting and infrastructure, our payment processor (Stripe), an AI/LLM provider for AI features, email and communication providers, and product analytics. A current list of sub-processors is available on request and, where required, under a DPA.
- **Legal and safety:** where required by law, regulation, legal process, or to protect the rights, property, or safety of Exigyn, our customers, or others.
- **Business transfers:** in connection with a merger, acquisition, financing, or sale of assets, subject to this policy.
- **With your direction:** when you connect a third-party tool or instruct us to share data.

7. International Data Transfers

We may process and store information in the United States and other countries. Where we transfer personal data from the EEA, UK, or Switzerland to a country without an adequacy decision, we use appropriate safeguards

such as the European Commission's Standard Contractual Clauses (and the UK Addendum), together with supplementary measures as appropriate.

8. Data Retention

We retain account and controller data for as long as your account is active and as needed to provide the Service, then for a limited period to meet legal, tax, accounting, and security obligations. Customer Content is retained for the life of your subscription; following termination, it is made available for export for a limited window and then deleted or returned in accordance with your Terms of Service. Residual copies may persist in encrypted backups for a limited, scheduled period before being overwritten.

9. Security

We use administrative, technical, and organizational safeguards designed to protect information, including encryption in transit and at rest, access controls, and logical tenant isolation. No method of transmission or storage is perfectly secure. For details, see our Security page, and report concerns to security@exigyn.com.

10. Your Rights and Choices

Depending on your location, you may have rights to access, correct, delete, port, restrict, or object to the processing of your personal data, and to withdraw consent where processing is based on consent. Residents of California and certain other U.S. states may have rights to know, access, correct, and delete personal information and to opt out of “sale” or “sharing” — note that Exigyn does not sell personal information. We will not discriminate against you for exercising these rights.

To exercise any right, contact privacy@exigyn.com. We will verify your request as required by law. Where a request concerns Customer Content for which your organization is the controller, we will refer the request to that organization or act on its documented instructions.

11. Cookies and Tracking

We use strictly necessary cookies to operate the Service and analytics cookies to understand usage. You can control cookies through your browser settings; disabling some cookies may affect functionality. Where required, we request consent for non-essential cookies.

12. Children's Privacy

The Service is a business tool intended for organizations and is not directed to children. We do not knowingly collect personal data from children under the age of 16. If you believe a child has provided us personal data, contact privacy@exigyn.com and we will take appropriate steps to delete it.

13. Changes to This Policy

We may update this policy from time to time. We will revise the “Effective date” above and, for material changes, provide additional notice (such as by email or in-product notice). Your continued use of the Service after an update constitutes acceptance of the revised policy.

14. Contact Us

PRIVACY AND DATA PROTECTION CONTACTS

Privacy & data requests — **privacy@exigyn.com**

Security disclosures — **security@exigyn.com**

General support — **support@exigyn.com**

Mailing address — [Company mailing address]

EU/UK representative — [Name and contact, if applicable]