

# Data Governance & Input Data Policy

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SolaraCloud AI LLC — SolaraIMPACT Platform | EU AI Act & GDPR Compliance  
*SolaraCloud AI LLC — SolaraIMPACT Platform | EU AI Act & GDPR Compliance*

Version 1.0 | March 2026

## SECTION 1: PURPOSE AND SCOPE

This policy establishes SolaraCloud AI LLC's approach to data governance as it relates to AI processing in the SolaraIMPACT platform. It covers the governance of data used as inputs to AI processing, the handling of AI-generated outputs, and the responsibilities of SolaraCloud AI LLC and its customers with respect to data quality, appropriateness, and compliance. This policy establishes SolaraCloud AI LLC's approach to data governance as it relates to AI processing in the SolaraIMPACT platform. It covers the governance of data used as inputs to AI processing, the handling of AI-generated outputs, and the responsibilities of SolaraCloud AI LLC and its customers with respect to data quality, appropriateness, and compliance.

## SECTION 2: DATA GOVERNANCE PRINCIPLES

### 2.1 Data Minimization

SolaraIMPACT is designed to process the minimum data necessary for each AI task. Module prompts are structured to request only the context required for the specific marketing or analytical task. Users are encouraged to provide business-domain data (briefs, objectives, market context) rather than personal data about individuals. SolaraIMPACT is designed to process the minimum data necessary for each AI task. Module prompts are structured to request only the context required for the specific marketing or analytical task. Users are encouraged to provide business-domain data (briefs, objectives, market context) rather than personal data about individuals.

### 2.2 Purpose Limitation

All data processed through SolaraIMPACT is used solely for: delivering the requested AI module output to the user; maintaining the user's project and job history within their account; providing customer support where required. All data processed through SolaraIMPACT is used solely for: delivering the requested AI module output to the user; maintaining the user's project and job history within their account; providing customer support where required.

Data is never used for: AI model training; cross-customer analysis; advertising; sale to third parties. Data is never used for: AI model training; cross-customer analysis; advertising; sale to third parties.

### 2.3 Data Quality **2.3 Data Quality**

SolarCloud AI LLC acknowledges that AI output quality is directly dependent on input data quality. Users are responsible for the accuracy and completeness of the data they provide as inputs. SolarCloud AI LLC is not responsible for AI outputs based on inaccurate or incomplete inputs. SolarCloud AI LLC acknowledges that AI output quality is directly dependent on input data quality. Users are responsible for the accuracy and completeness of the data they provide as inputs. SolarCloud AI LLC is not responsible for AI outputs based on inaccurate or incomplete inputs.

### 2.4 Accountability **2.4 Accountability**

SolarCloud AI LLC is accountable for its data governance practices through: SOC 2 Type II certification; GDPR Data Processing Agreement; this policy; and the annual EU AI Act compliance review. SolarCloud AI LLC is accountable for its data governance practices through: SOC 2 Type II certification; GDPR Data Processing Agreement; this policy; and the annual EU AI Act compliance review.

## SECTION 3: PERMITTED INPUT DATA **SECTION 3: PERMITTED INPUT DATA**

### 3.1 Encouraged Input Data Categories **3.1 Encouraged Input Data Categories**

The following types of data are appropriate for use as SolarAI IMPACT inputs: The following types of data are appropriate for use as SolarAI IMPACT inputs:

Business context: Company names, industry verticals, geographic markets, business objectives  
Business context: Company names, industry verticals, geographic markets, business objectives

Marketing briefs: Campaign goals, target market descriptions, brand guidelines, messaging frameworks  
Marketing briefs: Campaign goals, target market descriptions, brand guidelines, messaging frameworks

Competitive information: Publicly available competitor data, market positioning, industry benchmarks  
Competitive information: Publicly available competitor data, market positioning, industry benchmarks

Client profiles: Agency client names and industry verticals (business-level, not individual consumer data)  
Client profiles: Agency client names and industry verticals (business-level, not individual consumer data)

Published content: URLs, published articles, public reports for research and analysis tasks  
Published content: URLs, published articles, public reports for research and analysis tasks

Internal documents: Strategy documents, briefs, presentations uploaded by users for contextual analysis  
Internal documents: Strategy documents, briefs, presentations uploaded by users for contextual analysis

**3.2 Data Requiring Caution**

The following data types may be processed in SolaraIMPACT but require care to ensure compliance:  
The following data types may be processed in SolaraIMPACT but require care to ensure compliance:

Contact information: Professional contact details (name, business email, job title) used in outreach context — users must ensure compliance with applicable marketing and data protection laws  
Contact information: Professional contact details (name, business email, job title) used in outreach context — users must ensure compliance with applicable marketing and data protection laws

Employee information: Aggregate workforce information for HR/talent modules — individual employee data should be anonymized where possible  
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Client data: Data about the user's own clients — users are responsible for having appropriate legal basis to process and share client data  
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**SECTION 4: PROHIBITED INPUT DATA**

The following data must NOT be submitted as inputs to SolaraIMPACT:  
**The following data must NOT be submitted as inputs to SolaraIMPACT:**

Data Category	Description / Examples
4.1 Special Category Personal Data (GDPR Article 9) <b>Special Category Personal Data (GDPR Article 9)</b>	Health/medical data; biometric data; genetic data; racial/ethnic origin; political opinions; religious beliefs; sexual orientation Health/medical data; biometric data; genetic data; racial/ethnic origin; political opinions; religious beliefs; sexual orientation

<p>4.2 Sensitive Financial Data <b>4.2 Sensitive Financial Data</b></p>	<p>Bank account numbers; credit card numbers; financial account credentials; API keys Bank account numbers; credit card numbers; financial account credentials; API keys</p>
<p>4.3 Government-Issued Identifiers <b>4.3 Government-Issued Identifiers</b></p>	<p>SSN; national insurance numbers; passport/national ID numbers; tax ID numbers SSN; national insurance numbers; passport/national ID numbers; tax ID numbers</p>
<p>4.4 Authentication Credentials <b>4.4 Authentication Credentials</b></p>	<p>Passwords; API keys; access tokens; private keys Passwords; API keys; access tokens; private keys</p>
<p>4.5 Children's Data <b>4.5 Children's Data</b></p>	<p>Any personal data of individuals under 13 years of age; any data that could identify or target minors Any personal data of individuals under 13 years of age; any data that could identify or target minors</p>

SolaraCloud AI LLC reserves the right to suspend accounts found to be submitting prohibited data categories.**SolaraCloud AI LLC reserves the right to suspend accounts found to be submitting prohibited data categories.**

**SECTION 5: AI INPUT DATA AND LLM PROCESSING**

**5.1 How Input Data Reaches LLM Providers**

When a user submits a job, SolaraIMPACT constructs a prompt incorporating the user's inputs and module-specific context. This prompt is transmitted to the selected LLM provider (Anthropic, OpenAI, Google, or xAI) via API for processing. The prompt may include: user-provided text inputs; contents of uploaded files (extracted text); project context from the user's SolaraIMPACT account.

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**5.2 Data Minimization in Prompts**

SolaraIMPACT's prompt engineering is designed to include only the context necessary for the specific task. SolaraCloud AI LLC does not transmit user account data, platform metadata, or other users' data to LLM providers.

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only the context necessary for the specific task. SolaraCloud AI LLC does not transmit user account data, platform metadata, or other users' data to LLM providers.

### 5.3 LLM Provider Data Handling **5.3 LLM Provider Data Handling**

All LLM providers are engaged via zero-data-retention or minimal-retention API configurations: All LLM providers are engaged via zero-data-retention or minimal-retention API configurations:

Anthropic: Zero retention — no storage of prompts or responses after processing  
Anthropic: Zero retention — no storage of prompts or responses after processing

OpenAI: Zero Data Retention (ZDR) configuration — no storage of prompts or responses  
OpenAI: Zero Data Retention (ZDR) configuration — no storage of prompts or responses

Google (Gemini): 55-day retention for policy enforcement only; not used for training  
Google (Gemini): 55-day retention for policy enforcement only; not used for training

xAI (Grok): 30-day retention; Zero Data Retention available  
xAI (Grok): 30-day retention; Zero Data Retention available

### 5.4 File Upload Processing **5.4 File Upload Processing**

Files uploaded by users (PDFs, Word documents, spreadsheets, etc.) are: Files uploaded by users (PDFs, Word documents, spreadsheets, etc.) are:

Stored in user-isolated Azure storage within the user's Azure region  
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Text extracted for AI processing via Azure Document Intelligence or local parsers  
Text extracted for AI processing via Azure Document Intelligence or local parsers

Retained for the duration of the subscription  
Retained for the duration of the subscription

Deleted within 30 days of subscription termination  
Deleted within 30 days of subscription termination

Never shared with other users or used for purposes beyond the user's own AI tasks  
Never shared with other users or used for purposes beyond the user's own AI tasks

## **SECTION 6: AI OUTPUT DATA GOVERNANCE**

### **6.1 Output Ownership**

Customers retain full ownership of all AI-generated outputs. SolaraCloud AI LLC claims no ownership interest in customer outputs.  
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## 6.2 Output Storage **6.2 Output Storage**

AI-generated outputs are stored as immutable JSON records in the user's account in Azure Cosmos DB. Original outputs are preserved even when users request refinements or generate new versions. AI-generated outputs are stored as immutable JSON records in the user's account in Azure Cosmos DB. Original outputs are preserved even when users request refinements or generate new versions.

## 6.3 Output Retention **6.3 Output Retention**

Outputs are retained for the duration of the active subscription to support access to historical work. Upon termination, outputs are deleted within 30 days. Outputs are retained for the duration of the active subscription to support access to historical work. Upon termination, outputs are deleted within 30 days.

## 6.4 Output Use Restrictions **6.4 Output Use Restrictions**

SolaraCloud AI LLC does not use customer outputs for: AI model training; developing competing products; analysis of customer business practices; any purpose other than delivering and improving the SolaraIMPACT service to that customer. SolaraCloud AI LLC does not use customer outputs for: AI model training; developing competing products; analysis of customer business practices; any purpose other than delivering and improving the SolaraIMPACT service to that customer.

## SECTION 7: DATA SUBJECT RIGHTS **SECTION 7: DATA SUBJECT RIGHTS**

SolaraCloud AI LLC supports data subject rights as required by GDPR and as detailed in the Data Processing Agreement. For requests related to personal data processed through SolaraIMPACT, contact [privacy@solarcloud.ai](mailto:privacy@solarcloud.ai). SolaraCloud AI LLC supports data subject rights as required by GDPR and as detailed in the Data Processing Agreement. For requests related to personal data processed through SolaraIMPACT, contact [privacy@solarcloud.ai](mailto:privacy@solarcloud.ai).

## SECTION 8: DOCUMENT CONTROL **SECTION 8: DOCUMENT CONTROL**

Document Owner: Mykhaylo Antonovych, CEO Document Owner: Mykhaylo Antonovych, CEO

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