AI PRIVACY POLICY

WORKING DRAFT — NOT READY TO PUBLISH. Verify actual data practices, applicable requirements and working rights mechanisms. This draft does not establish consent, regulatory compliance or publication.

Effective date: [DATE]

Organization: [ORGANIZATION LEGAL NAME]

Address: [ORGANIZATION ADDRESS]

Privacy contact: [WORKING PRIVACY CONTACT EMAIL]

1. Scope and contacts

This notice describes personal-data practices for the following products, services, people and processing roles:

[PRODUCTS WEBSITES APPS INDIVIDUALS AND PROCESSING]

Controller and other applicable privacy contacts: [CONTROLLER REPRESENTATIVE AND DATA PROTECTION OFFICER]

Geographic scope: [APPLICABLE LOCATIONS AND JURISDICTIONS INCLUDING STATE]

Personal data includes information about an identified or identifiable individual, with the scope given by applicable law. This notice does not itself obtain consent, waive a privacy right or authorize a prohibited practice. Using a service, reading a notice or remaining silent does not supply any separately required affirmative consent. Mandatory rights apply regardless of a person's agreement with this notice.

2. Information, sources and purposes

Categories, sources and purpose of each use:

[ACTUAL DATA CATEGORIES SOURCES INFERRED DATA]

AI systems, vendors, inputs, outputs and activities:

[AI SYSTEMS VENDORS INPUTS OUTPUTS AND]

Sensitive information and children/teen data:

[SENSITIVE DATA AND CHILDREN TEEN DATA]

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Cookies, SDKs, tracking and device controls:

[ACTUAL COOKIES SDKS TRACKING DEVICE PERMISSIONS]

A system's name does not describe every use of its data. The purposes and recipients disclosed here apply to the actual activities described. Separate notices or consent are provided where required; a general reference to AI does not replace them.

3. Recipients, sale and advertising

Recipients, information, purposes, roles and locations:

[RECIPIENT CATEGORIES NAMES DATA CATEGORIES PURPOSES]

Vendor use and contractual safeguards:

[ACTUAL VENDOR USE RESTRICTIONS INDEPENDENT TRAINING]

Sale practice unresolved — verify before publication.

Advertising/sharing practice unresolved — verify before publication.

Required historical disclosures, including the preceding twelve months where applicable:

[RELEVANT DISCLOSURE SALE SHARING PRACTICES IN]

“Sale,” “sharing,” “targeted advertising” and ordinary disclosure have distinct legal meanings. A no-sale statement does not mean that no service provider or other recipient receives data. Applicable restrictions and individual choices govern every disclosed activity.

4. Training and other model uses

Model-use practice unresolved — verify first-party and vendor uses before publication.

Existing commitments and changes of purpose:

[EXISTING PRIVACY COMMITMENTS AND LAWFUL PROCESS]

A revised notice does not silently release an existing privacy commitment or retroactively authorize a new use of previously collected information. Any changed use must respect prior commitments, applicable purpose limits, notices and required consent. Technical difficulty deleting data from a model does not itself create a lawful retention exception. We do not treat a disclosure of a technical limit as a waiver of an applicable deletion or withdrawal right.

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5. Profiling and decisions

Profiling practice unresolved — verify before publication.

Significant-decision review unresolved — verify before publication.

6. Biometrics and AI transparency

Biometric practice unresolved — classify the actual data and uses before publication.

AI transparency activities unresolved — verify before publication.

7. Legal basis and international processing

Applicable requirements and coverage: [ACTUAL COVERAGE THRESHOLDS EXCLUSIONS OTHER APPLICABLE]

Purpose-specific legal bases, sensitive-data conditions, consent and required information:

[ACTUAL LEGAL BASIS FOR EACH PURPOSE]

International transfers, safeguards and details:

[INTERNATIONAL TRANSFERS ACTUAL LOCATIONS MECHANISM APPLICABLE]

Where consent is the applicable basis, it can be withdrawn through the stated method without affecting the lawfulness of processing before withdrawal. Selecting a legal basis in a form does not create it. A disclosure of overseas processing does not by itself supply a transfer mechanism. Mandatory local, state, national and international rights remain effective; no choice-of-law term in this notice displaces them.

8. Your rights and how to use them

Working request methods and authorized agents: [WORKING REQUEST METHODS AUTHORIZED AGENT PROCESS]

Rights and choices applicable to the described processing:

[APPLICABLE ACCESS CORRECTION DELETION PORTABILITY RESTRICTION]

Response timing, extensions and notices:

[ACTUAL RESPONSE DEADLINES AND DISTINCT EXPEDITED]

Signal handling and scope: [SIGNAL HANDLING ACTUAL RECOGNIZED SIGNALS SALE]

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Verification and any lawful fees/exceptions: [PROPORTIONATE IDENTITY VERIFICATION LIMITS ON INFORMATION]

Appeals, reasons and complaint contacts: [APPEALS REFUSAL REASONS AND REGULATOR COMPLAINT]

Non-retaliation and any lawful differences or incentives: [ACTUAL NON RETALIATION SERVICE PRICE DIFFERENCES]

9. Retention and protection

Category/purpose schedules, exceptions, backups and disposal:

[ACTUAL CATEGORY PURPOSE RETENTION PERIODS OR]

Implemented safeguards:

[ACCURATE HIGH LEVEL SECURITY MEASURES CURRENTLY]

No transmission or storage system is perfectly secure. This statement does not reduce an applicable security obligation. Retention must remain consistent with the disclosed purposes, applicable law and valid individual choices; a dispute or technical limitation does not automatically justify keeping all data indefinitely.

10. Changes and contact

Change notification and required consent process:

[ACTUAL MATERIAL CHANGE NOTIFICATION METHODS TIMING]

Questions, requests and complaints may be sent to **[WORKING PRIVACY CONTACT EMAIL]** or the applicable contacts identified above. Publication of this notice is not a consumer signature, an opt-in, or an agreement to waive rights.

Internal completion record — remove only after actual review

Review status: Pending

Evidence and unresolved issues: [INTERNAL REVIEW EVIDENCE REVIEWER DATE AND]

This working draft requires factual and jurisdiction-specific review before publication. It does not certify that all required disclosures or operational safeguards are complete. No customer consent or operator-signature fields are generated.

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