

# GLOBAL DATA HANDLING POLICY STATEMENT

At CXEX, we are committed to upholding the highest standards of data security, privacy, and regulatory compliance across all regions where we operate our SaaS Speech Analytics Platform, AutoInsights. This policy outlines how we handle, protect, and process data to ensure transparency, trust, and adherence to local and international standards.

## 1. Regional Data Residency and Processing

- AutoInsights is hosted in regional AWS data centers in the USA, UK, Australia, and South Africa, ensuring compliance with local data residency and privacy regulations. All data is processed and stored within the client's geographic region to meet specific regulatory requirements, such as GDPR.
- Any data shared with language models can undergo pre-processing redaction to remove Personally Identifiable Information (PII). This anonymization step ensures an additional layer of privacy.

## 2. Certifications and Compliance

- ISO 27001 Certification: We maintain ISO 27001 certification, reflecting our commitment to internationally recognized standards for data security, confidentiality, and integrity.
- SOC 2 Compliance: We are on track to finalize SOC 2 certification in 2025, further strengthening our operational security measures and adherence to rigorous compliance standards.
- AWS Foundational Technical Review (FTR): AutoInsights has passed AWS's FTR, confirming its compliance with AWS's stringent security and operational benchmarks.

## 3. Automated Compliance Monitoring

- We utilize Vanta software to manage and monitor compliance with ISO 27001 and SOC 2 standards. Vanta automates security monitoring, ensuring continuous adherence to compliance benchmarks and enabling proactive risk management.

## 4. Human Oversight and Testing

- We employ a Human-in-the-Loop (HITL) process to ensure the accuracy, fairness, and reliability of AI outputs. This process involves rigorous testing and validation of AI models, referred to as "Listeners," before deployment and during ongoing operations.
- On a quarterly basis, we conduct a statistical review of client AI models to assess their performance, ensuring the AI continues to perform accurately and consistently. These reviews help us identify any necessary adjustments to maintain optimal model accuracy and alignment with client requirements.

## 5. Incident Management and Risk Mitigation

- Our incident response protocols, aligned with ISO 27001, ensure rapid detection, containment, and resolution of potential security incidents.
- Regular risk assessments and audits are conducted to identify and mitigate vulnerabilities, supported by continuous monitoring through Vanta and our broader compliance framework.

## 6. Transparency and Client Control

- Clients retain full ownership of their data, and any use of client data is limited to agreed-upon purposes. Additional data processing requires explicit client consent.
- We provide transparent reporting on the effectiveness and security of our AI solutions, ensuring that clients have full visibility into how their data is managed.

## 7. Commitment to Continuous Improvement

- Our data handling practices are reviewed regularly to ensure alignment with evolving regulations, technological advancements, and industry standards. Through ISO 27001 certification, SOC 2 compliance efforts, and the use of advanced compliance tools like Vanta, we are dedicated to continuous improvement.

