CMMCSync Privacy Policy

Effective Date: December 4, 2024

This Privacy Policy describes how HanumanLabs, LLC ("Company", "we", "us", or "our") collects, uses, shares, and protects information when you use CMMCSync (the "Service"). We are committed to protecting your privacy and being transparent about our data practices. By using the Service, you consent to the data practices described in this Privacy Policy.

1. Information We Collect

1.1 Information You Provide

We collect information that you voluntarily provide when using the Service, including:

- Account Information: Name, email address, phone number, company name, job title, and password
- Compliance Data: CMMC assessment responses, control implementation details, compliance status, and evidence descriptions
- Documents and Files: Policies, procedures, evidence files, and other documents you upload
- Communication Data: Messages, feedback, and support requests you send to us
- Payment Information: Billing details processed by our payment processors (we do not store complete credit card numbers)

1.2 Information We Collect Automatically

When you use the Service, we automatically collect certain information, including:

- Usage Data: Features accessed, actions taken, time spent, and interaction patterns
- Device Information: IP address, browser type, operating system, device identifiers
- Log Data: Access times, page views, errors, and system activity
- Cookies and Tracking Technologies: Session cookies, analytics cookies, and similar technologies (see Section 9)

2. How We Use Your Information

We use the information we collect for the following purposes:

- Providing and Maintaining the Service: To operate, maintain, and deliver the features and functionality of CMMCSync
- AI-Powered Features: To process your data through third-party AI services for policy generation, compliance recommendations, and intelligent analysis (see Section 3)
- Account Management: To create and manage your account, authenticate users, and provide customer support
- Communications: To send service-related emails, notifications, updates, and marketing communications (with your consent)
- Analytics and Improvement: To analyze usage patterns, improve the Service, and develop new features

- Security and Fraud Prevention: To detect, prevent, and respond to security incidents and fraudulent activity
- Legal Compliance: To comply with legal obligations and respond to lawful requests from authorities

2.4 Controlled Unclassified Information (CUI)

CMMCSync is not designed or intended to serve as a repository for Controlled Unclassified Information (CUI) as defined by NIST SP 800-171. If you upload data that may be classified as CUI, you are solely responsible for ensuring compliance with applicable NIST, DoD, and DFARS requirements. We do not provide CUI-compliant infrastructure unless explicitly stated in a separate agreement.

3. Third-Party AI Processing and Data Sharing

3.1 AI Service Providers and Federal Compliance

IMPORTANT: When you use AI-powered features in CMMCSync, your data is transmitted to and processed by third-party artificial intelligence service providers that operate in commercial cloud environments. These AI providers are NOT FedRAMP High, GCC High, or DoD Impact Level (IL4/IL5) compliant. By using AI-powered features, you acknowledge that your data will be processed outside of federal government cloud enclaves.

AI service providers include but are not limited to:

- Anthropic (Claude AI)
- OpenAI (ChatGPT)
- Google (Gemini)
- Other AI/LLM providers we may use to enhance the Service

3.2 What Data Goes to AI Providers

When you use AI-powered features, the following types of data may be sent to AI providers:

- Text content from policies, procedures, and documents you create or upload
- Compliance assessment responses and evidence descriptions
- Contextual information about your organization necessary for personalized recommendations
- Queries and prompts you submit to AI features

3.3 How AI Providers Use Your Data

Each AI provider has its own privacy policy and data handling practices. Generally, these providers use your data solely to generate responses to your queries. However, you should review each provider's privacy policy to understand their specific practices:

- Anthropic Privacy Policy: https://www.anthropic.com/privacy
- OpenAI Privacy Policy: https://openai.com/privacy
- Google Privacy Policy: https://policies.google.com/privacy

3.4 Data Security with AI Providers

We work with AI providers that implement enterprise-grade security measures and, where available, business tier services that offer enhanced data protection. However, by using AI-powered features, you acknowledge and accept that your data will be processed by these third-party services and agree to their respective terms and privacy policies.

3.5 Opting Out of AI Processing

If you do not wish to have your data processed by AI providers, you may choose not to use AI-powered features within the Service. Core compliance tracking functionality is available without AI processing, though certain advanced features may be limited.

4. How We Share Your Information

We may share your information in the following circumstances:

- With AI Providers: As described in Section 3, for AI-powered features
- With Service Providers: With trusted third parties who help us operate the Service (hosting, analytics, payment processing, customer support)
- For Legal Reasons: When required by law, to comply with legal processes, or to protect our rights and safety
- With Your Consent: When you authorize us to share information with specific third parties
- Business Transfers: In connection with a merger, acquisition, or sale of assets (we will notify you if this occurs)

We do not sell your personal information to third parties for their marketing purposes.

5. Data Security and Storage

5.1 Security Measures

We implement industry-standard security measures to protect your information, including encryption in transit (TLS/SSL), encryption at rest, access controls, regular security audits, and secure authentication mechanisms. However, no method of transmission or storage is 100% secure. While we strive to protect your information, we cannot guarantee absolute security. You are responsible for maintaining the security of your account credentials and should notify us immediately of any unauthorized access.

5.2 Data Storage Location

We store data in secure cloud infrastructure located in the United States. Our primary infrastructure providers operate data centers within the continental United States, ensuring that your data remains within U.S. jurisdictions.

5.3 Data Breach Notification

In the event of a data breach affecting your personal information, we will notify affected users within 72 hours as required by applicable law, including GDPR and state breach notification statutes. Notifications will include the nature of the breach, types of data affected, steps we are taking to address the breach, and recommended actions for affected users.

6. Data Retention

We retain your information for as long as your account is active or as necessary to provide the Service. After account termination, we will retain certain information for legitimate business purposes (such as fraud prevention, legal compliance) and as required by law. You may request deletion of your data by contacting us at Hemant@ibLaunch.com, subject to legal retention requirements. Upon termination, you have thirty (30) days to request a data export before permanent deletion occurs.

7. Your Rights and Choices

Depending on your location, you may have certain rights regarding your personal information:

- Access: Request access to the personal information we hold about you
- Correction: Request correction of inaccurate or incomplete information
- Deletion: Request deletion of your personal information (subject to legal obligations)
- Data Portability: Request a copy of your data in a structured, machine-readable format
- Opt-Out: Unsubscribe from marketing communications by clicking the unsubscribe link in emails
- Restrict Processing: Request restriction of how we process your information in certain circumstances

To exercise these rights, please contact us at Hemant@ibLaunch.com. We will respond to your request within a reasonable timeframe as required by applicable law.

8. International Data Transfers

Your information may be transferred to and processed in countries other than your country of residence, including the United States. These countries may have data protection laws different from those in your country. By using the Service, you consent to the transfer of your information to these countries. We take appropriate measures to ensure that your information receives adequate protection, including the use of standard contractual clauses for transfers to countries outside the European Economic Area.

9. Cookies and Tracking Technologies

We use cookies and similar tracking technologies, which are categorized as follows:

9.1 Essential Cookies

These cookies are necessary for the Service to function and cannot be disabled. They include session cookies for authentication, security features, and core functionality.

9.2 Analytics Cookies

We use analytics cookies to understand usage patterns, measure performance, and improve the Service. These cookies help us identify which features are most valuable to users.

9.3 Functional Cookies

These cookies remember your preferences and settings to provide a personalized experience. They may include language preferences, display settings, and feature customizations.

You can control cookies through your browser settings, but disabling cookies may limit certain features of the Service.

10. Third-Party Services and Links

The Service may contain links to third-party websites or integrate with third-party services. We are not responsible for the privacy practices of these third parties. We encourage you to review their privacy policies before providing any information to them.

11. Children's Privacy

The Service is not intended for individuals under the age of 18. We do not knowingly collect personal information from children. If you believe we have inadvertently collected information from a child, please contact us immediately at Hemant@ibLaunch.com, and we will take steps to delete such information.

12. California Privacy Rights (CCPA)

If you are a California resident, you have additional rights under the California Consumer Privacy Act (CCPA):

- Right to Know: Request information about personal information we collect, use, disclose, and sell
- Right to Delete: Request deletion of personal information we have collected
- Right to Opt-Out: We do not sell personal information, but you may opt out of certain data sharing
- Right to Non-Discrimination: We will not discriminate against you for exercising your CCPA rights

To exercise these rights, contact us at Hemant@ibLaunch.com. We will verify your identity before processing your request.

13. GDPR Compliance (European Users)

If you are located in the European Economic Area (EEA), you have rights under the General Data Protection Regulation (GDPR):

- Legal Basis: We process your data based on consent, contract performance, legal obligations, or legitimate interests
- Data Protection Officer: Contact our DPO at Hemant@ibLaunch.com for privacy concerns
- Right to Lodge Complaint: You may file a complaint with your local data protection authority
- Data Transfers: We use standard contractual clauses for data transfers outside the EEA

14. Dispute Resolution

14.1 Governing Law

This Privacy Policy shall be governed by and construed in accordance with the laws of the Commonwealth of Virginia, United States, without regard to its conflict of law provisions.

14.2 Arbitration

Any dispute arising from or relating to this Privacy Policy shall be resolved through binding arbitration in accordance with the rules of the American Arbitration Association.

14.3 Class Action Waiver

You agree that any dispute resolution proceedings will be conducted only on an individual basis and not in a class, consolidated, or representative action. You expressly waive the right to participate in class actions.

15. Changes to This Privacy Policy

We may update this Privacy Policy from time to time to reflect changes in our practices, technology, legal requirements, or other factors. We will notify you of material changes by posting the updated Privacy Policy on our website with a new effective date and, where required, by sending you an email notification. Your continued use of the Service after the effective date constitutes acceptance of the updated Privacy Policy. We encourage you to review this Privacy Policy periodically.

16. Contact Us

If you have questions, concerns, or requests regarding this Privacy Policy or our data practices, please contact us at:

HanumanLabs, LLC

43756 Welty Ct, Ashburn, VA 20147

Email: Hemant@ibLaunch.com

Website: www.HanumanLabs.ai

Product Website: www.CMMCSync.ai

Data Protection Officer: Hemant@ibLaunch.com

BY USING CMMCSYNC, YOU ACKNOWLEDGE THAT YOU HAVE READ AND UNDERSTAND THIS PRIVACY POLICY AND AGREE TO ITS TERMS, INCLUDING THE PROCESSING OF YOUR DATA BY THIRD-PARTY AI PROVIDERS.