



LEGAL DOCUMENT

# PRIVACY AND DATA PROTECTION NOTICE

Effective date

**1 April 2026**

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**Production candidate**

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This Privacy and Data Protection Notice explains how CWIN TECH SOLUTIONS, the parent company and provider of emp.ai ( emp.ai , we , us , or our ), collects, uses, shares, stores, and protects personal data when people use emp.ai websites, apps, school workspaces, assignments, AI-assisted education features, subscriptions, payments, and support services.

This Notice is written for students, parents and guardians, teachers, school administrators, direct users, website visitors, and paying customers. It should be reviewed by counsel before publication.

## 1. WHO WE ARE

Provider: CWIN TECH SOLUTIONS

Registered address: Bakatue Street, Accra, Ghana

Business name registration: Republic of Ghana, Registration of Business Names Act, 1962 (No. 151)

Product website: <https://empai.space>

Parent company website: <https://www.cwinsolutions.tech>

Privacy contact: [info@empai.space](mailto:info@empai.space)

Support contact: [support@empai.space](mailto:support@empai.space)

Phone: +233 25 611 1992

Data protection registration: Ghana Data Protection Commission application in progress

Registration number: BNG42080723

TIN: PO063099314

Depending on the situation, emp.ai may act as:

- a controller for direct account, billing, support, platform security, legal compliance, and product administration data; and
- a processor or service provider for student, classroom, assignment, and school-managed data where a school or organization decides why and how the data is used.

## 2. PEOPLE COVERED BY THIS NOTICE

This Notice covers:

- learners and students;
- parents and guardians;
- teachers and school staff;
- school owners, organization administrators, and authorized representatives;
- direct users and account holders;
- payment customers;
- website visitors; and
- people who contact support or are invited to a school workspace, class, group, or assignment.

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### 3. PERSONAL DATA WE COLLECT

We collect only the information reasonably needed to provide, secure, support, and improve emp.ai.

#### **Account and Identity Data**

This may include name, email address, login credentials, verification status, role, account status, profile details, authentication settings, and security preferences.

#### **School and Organization Data**

This may include organization name, school contact details, workspace settings, classes or groups, invitations, membership records, role assignments, and authorized user activity.

#### **Learning and Assessment Data**

This may include assignments, questions, answers, attempts, uploaded response files, marks, feedback, grading status, learning progress, timestamps, notifications, and assessment analytics.

#### **AI-Assisted Education Data**

When AI-assisted features are used, we may process prompts, question text, answer text, marking rubrics, uploaded documents, generated educational content, feedback, summaries, and usage records needed to operate and monitor the feature.

We do not describe internal model choices, model routing, or vendor implementation details in this public Notice. Where required, schools may request an appropriate vendor or subprocessor summary under the applicable agreement.

#### **Payment and Subscription Data**

This may include plan selections, subscription status, billing scope, payment references, transaction status, receipts, top-ups, token balances, ledger entries, and reconciliation records. Payments may be made using supported card, mobile money, bank, or other payment options through payment providers. We do not intentionally store full payment card numbers.

#### **Device, Cookie, and Security Data**

This may include IP address, device/browser information, app logs, authentication events, failed login events, security events, cookies, local storage, session storage, and similar technologies.

#### **Files and Media**

This may include profile images, organization images, generated educational images, student answer attachments, PDFs, Word documents, images, and other files uploaded for assessment or learning workflows.

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### 4. HOW WE COLLECT DATA

We collect data:

- directly from users during sign-up, login, profile setup, payments, assignments, and support requests;
- from schools, teachers, or organization administrators who create workspaces, invite users, or manage classes;
- when users create, submit, grade, review, or discuss assignments;
- when AI-assisted features process prompts, answers, files, or educational content;
- from payment, authentication, hosting, communication, security, and support providers; and
- automatically through cookies, local storage, logs, and security tools.

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## 5. WHY WE USE PERSONAL DATA

We use personal data to:

- create and manage accounts;
- authenticate users and protect accounts;
- provide school workspaces, classes, assignments, grading, feedback, and analytics;
- operate AI-assisted education features;
- process payments, subscriptions, top-ups, receipts, and billing records;
- send service, security, support, and assignment notifications;
- provide customer support;
- detect fraud, abuse, cheating, unauthorized access, and security incidents;
- maintain, troubleshoot, and improve the service;
- comply with legal, tax, accounting, payment, regulatory, and contractual obligations; and
- enforce our Terms and school agreements.

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## 6. AI-ASSISTED FEATURES

emp.ai may use AI-assisted features to help with educational tasks such as question generation, document reading, feedback, explanations, assessment review, and marking support.

AI outputs are assistive and may be inaccurate, incomplete, or inappropriate. Teachers and schools should review AI-generated questions, feedback, and marks before relying on them for important academic decisions.

Students and parents should be told by the school when AI-assisted marking or feedback is used where required by law, school policy, or the applicable agreement.

Users should not submit unnecessary sensitive personal data to AI-assisted features.

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## 7. STUDENTS AND CHILDREN

emp.ai is designed for education. When a student uses emp.ai through a school, the school is usually responsible for confirming the authority, notice, and consent needed for student use.

We do not sell student personal data. We do not use school-managed student data for behavioral advertising.

Student data should be used for educational, safety, support, security, compliance, and service-operation purposes. Parents or guardians who have questions about school-managed student records should usually contact the school first.

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## 8. COOKIES, LOCAL STORAGE, AND SIMILAR TECHNOLOGIES

We may use cookies, local storage, session storage, and similar technologies to:

- keep users signed in;
- secure sessions;
- remember preferences;
- support payment redirects and checkout flows;
- protect against fraud and unauthorized access;
- measure reliability and performance; and
- debug errors and improve the service.

Some technologies are strictly necessary for the service to work. Optional analytics or marketing technologies should be used only where legally permitted and with appropriate controls. Marketing technologies should not be enabled for school-managed

student users without counsel-approved consent and product controls.

Users can manage cookies through browser settings. Blocking necessary cookies may prevent login, assignments, payments, or other features from working.

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## 9. WHEN WE SHARE DATA

We may share personal data with:

- schools, teachers, and authorized organization administrators;
- users who are authorized to see relevant assignment, class, or account information;
- service providers who help us host, store, secure, process payments, send communications, support users, or operate AI-assisted features;
- professional advisers, auditors, insurers, and legal representatives;
- regulators, courts, law enforcement, or other parties where required by law;
- parties involved in a merger, acquisition, financing, reorganization, or sale of business assets; and
- other parties with consent or as instructed by the relevant school/customer.

Service providers must process data for appropriate business, operational, contractual, or legal purposes.

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## 10. INTERNATIONAL PROCESSING

emp.ai and its providers may process data in countries other than where a user, school, or organization is located. Where required, we will use appropriate contractual, technical, and organizational safeguards for cross-border processing.

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## 11. DATA RETENTION

We keep personal data only as long as reasonably needed for the purposes described in this Notice, including service delivery, school records, account administration, payment records, tax/accounting obligations, support, disputes, legal compliance, audit logs, security, and backups.

Typical retention depends on the data type:

- account data: for the life of the account plus a reasonable closure period;
- school-managed education records: according to school instructions, contract terms, or legal requirements;
- payment, billing, and tax records: for the legally required accounting period;
- security and audit logs: for a period needed to investigate abuse, protect the service, and meet legal obligations;
- backups: until they expire through normal backup cycles.

We may retain limited records where needed for fraud prevention, legal holds, disputes, payment records, tax compliance, security investigations, or regulatory obligations.

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## 12. DATA RIGHTS AND CHOICES

Depending on applicable law and the context of processing, users may have rights to:

- access personal data;
- correct inaccurate data;
- request deletion;
- object to or restrict certain processing;
- request export or portability;
- withdraw consent where processing is based on consent; and

- complain to a data protection authority.

For school-managed records, students and parents should usually contact the school first because the school controls the educational record. emp.ai may refer school-managed requests to the relevant school unless law requires otherwise.

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### **13. SECURITY**

We use reasonable technical and organizational measures designed to protect personal data. No online service can guarantee absolute security. Users should keep passwords, MFA codes, private links, and account credentials confidential.

If you believe your account or data has been compromised, contact [support@empai.space](mailto:support@empai.space) promptly.

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### **14. CHANGES TO THIS NOTICE**

We may update this Notice as our service, legal obligations, or providers change. Material changes will be communicated as required by law or contract.

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### **15. CONTACT**

Privacy questions: [info@empai.space](mailto:info@empai.space)

Support questions: [support@empai.space](mailto:support@empai.space)

Legal notices: [info@empai.space](mailto:info@empai.space)

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