AI Data Usage Policy

How Promo CoWork's AI agents use data from Google Workspace, Microsoft 365, and connected business systems

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1. In short

Promo CoWork uses third-party AI models to process business email, attachments, and records from systems a Customer authorizes and connects for the agents and workflows the Customer enables. Depending on Customer-configured permissions, tolerances, exceptions, and approval rules, agents may classify and route messages, extract and compare business data, draft communications, update connected systems, or present proposed actions for review. When a user configures an enabled workflow to move messages, agents will move matching messages from the inbox to the designated folder within that same user's connected mailbox. Each AI request is scoped to a single Customer. Promo Consulting does not sell Customer Data, use it for advertising, or use it to train AI models; AI providers are contractually restricted from training or improving their models on Customer Data. Because AI output may be inaccurate, Customers remain responsible for required review and business decisions, and consequential actions require approval by Customer personnel.

2. What the agents read and do

This Policy applies to Promo CoWork's use of AI in the agents and workflows a Customer enables. An agent runs only after a Customer authorizes the agent and connects the systems and accounts needed for its assigned tasks. The categories below describe the data inputs, permitted actions, and human-oversight points for current workflows; available agents and features may change, and current descriptions are available at https://www.promocowork.com.

Kind of work	What the agents read	What they may do	Human oversight
Sort and route email	Subject, sender, recipients, message body, attachment names, and, when needed for an enabled workflow, attachment contents in connected business mailboxes	Classify a message, route it to the appropriate enabled agent, or leave it in the inbox when it is not handled. When configured in the user's settings, agents will move matching messages from the inbox to the designated folder within that same user's connected mailbox. Promo CoWork does not delete messages or offer a separate message-labeling action in this workflow.	Messages that do not meet the Customer's configured routing criteria or confidence thresholds are not moved. They are left in the inbox or presented to authorized Customer personnel for review.

Read, compare, and process business documents	Vendor bills, invoices, acknowledgements, freight bills, remittance advice, emails, and other business documents received through connected mailboxes, uploads, or supplier feeds, together with related purchase orders, sales orders, and accounting records. These materials may contain full bank-account or payment-card numbers.	Identify and classify documents, extract task-relevant fields, compare those fields with related purchase or sales orders and business records, and flag discrepancies, missing information, and other configured exceptions, subject to the Financial-document handling paragraph below	Items outside Customer-set tolerances, matching rules, or other approval criteria are presented to authorized Customer personnel for review, correction, approval, or rejection
Read and update business systems	Task-relevant records in the Customer's authorized order management, accounting, supplier, carrier, or payment systems	Create or update vendor-bill, shipping, remittance, and payment-status records as permitted by the Customer's connected-system permissions and enabled workflow	Automation is limited by Customer-configured permissions, tolerances, exception rules, and approval thresholds; an item outside those settings waits for authorized Customer review and approval
Send messages for the Customer	Sales orders, invoices, open balances, Customer-approved templates, recipient information, and the Customer's communication schedule and rules	Identify invoices, statements, and payment reminders that are due under the Customer's rules; prepare them from Customer Data; and, when authorized, transmit them through the Customer's connected business systems	Messages remain subject to the Customer's configured approval rules. A Customer may authorize routine messages within defined settings, but final collection notices require approval by authorized Customer management.
Draft and send email replies	The email thread and attachments being answered, relevant Customer-approved templates, and related orders and business records	Create a draft reply or message in a connected mailbox for Customer review and, after approval, send it from that mailbox	Authorized Customer personnel may review and edit each draft and must approve it before Promo CoWork sends it from a connected mailbox
Alerts and approvals	Agent results, identified exceptions, proposed actions, and available supporting records	Display alerts, approval requests, status information, and results to authorized users in the portal	Authorized Customer personnel review the available context and may approve, edit, reject, or return the item for further handling

Financial-document handling. To perform an enabled invoice, remittance, payment-posting, vendor-bill, or related document task, Promo CoWork may temporarily submit the full business document to an AI provider. The submitted document may include a full bank-account, payment-card, or other financial-account number, and Promo CoWork does not automatically redact those numbers before AI processing. Processing is limited to the Customer-authorized business task. The agent is designed not to intentionally extract a full account or card number for an unrelated purpose or include the full number in agent output, and Promo Consulting does not use the number to access a financial account. At the end of the task, a source document identified as containing a full bank-account or payment-card number is discarded from temporary task processing and is not retained in Promo CoWork's persistent application document storage or application backups. Separately retained prompts, responses, action history, and operational or security logs are governed by Section 10; they

are not a substitute for the source document and are designed not to include full account or card numbers except to the extent needed to investigate a processing or security issue.

3. AI models and providers

Promo CoWork uses third-party AI model and classification providers to perform specified portions of enabled workflows, including classifying email, reading and comparing business documents, extracting task-relevant fields, drafting messages, and explaining results. The current providers, their functions, the Customer Data they process, and their processing locations are listed on the Service Providers page at https://promoconsulting.com/serviceproviders. Provider processing is temporary or retained according to the applicable provider configuration and the retention terms described below; publication of a provider on that page does not expand an agent's Customer-authorized permissions.

- AI providers are contractually restricted from using Customer Data to train or improve their models and may process it only to provide the contracted service to Promo CoWork.
- Where a provider offers an applicable zero-data-retention setting, Promo Consulting enables that setting so the provider does not retain task inputs and outputs beyond the period needed to return the response, subject to the provider's documented exceptions and applicable law. If that setting is not available for a particular service, the applicable provider terms and the Service Providers page govern.
- Promo CoWork records an audit reference for each AI request, including the model and instruction version used, so the related agent action can be investigated; request records and any retained prompts or responses are subject to Section 10.
- Promo Consulting evaluates a model for its intended workflow before enabling it in production. If a selected model is unavailable, the affected workflow may pause or use a substitute model that Promo Consulting has evaluated for that workflow; Promo CoWork does not automatically substitute a model that has not completed that evaluation. Model selection or substitution does not alter the Customer's permissions, tolerances, exception rules, or required approvals.

4. Prohibited uses and agent actions

- Sell Customer Data; disclose it to advertisers or data brokers; or use or transfer it for advertising, cross-context behavioral advertising, or marketing unrelated to providing Promo CoWork.
- Use Customer Data to create, train, or improve any AI or machine-learning model, whether operated by Promo Consulting or a provider. Customer-specific workflow settings and approved rules described in Section 5 are not model training.
- Combine data from different Customers in the same AI request, expose one Customer's Customer Data to another Customer, or permit one Customer's agent credentials or actions to access another Customer's systems.
- Treat instructions embedded in an email, attachment, or business document as authority to change an agent's task, permissions, destination, or approval requirements. Such content is processed as untrusted data for the authorized workflow.
- Delete mailbox content; move money out of a bank account; allow an agent to approve its own action; or allow an agent to change its own permissions, autonomy level, tolerances, exception rules, or approval requirements.
- Use Customer Data to determine a person's or business's creditworthiness, make a lending decision, or support another financial decision unrelated to the Customer-authorized operational task.

5. Customer-specific learning and shared process improvement

Within a Customer's environment, Promo CoWork may propose workflow rules based on that Customer's personnel decisions, including approvals, edits, rejections, and stated reasons. A proposed Customer-specific rule becomes active only after it is checked against Promo Consulting's best-practice rules and approved by a person the Customer authorizes. The Customer can review the rule, the decisions from which it was derived, and available rollback controls. Customer-specific learning configures workflow behavior for that Customer; it does not train an AI model, does not transfer the Customer's content or rules to another Customer, and cannot remove a required human approval.

Separately from Customer-specific learning, Promo Consulting may improve shared best-practice rules using deidentified process information about how tasks, workflows, and issues are handled across Customers. Shared process improvement excludes document and email content, Google user data, Microsoft 365 data, Customer and client identities, names, order details, and other confidential business content. The resulting process rules are not made available in a form that identifies a Customer or its clients, and one Customer's underlying information is not disclosed to another Customer.

6. Google user data and Limited Use

Promo CoWork's use and transfer to any other app of information received from Google APIs will adhere to the Google API Services User Data Policy (https://developers.google.com/terms/api-services-user-data-policy), including its Limited Use requirements. Google Workspace access is offered only for Customer-authorized business use and is limited to the permissions granted by the user or the Customer's Google Workspace administrator.

Promo CoWork uses Google user data only to provide the Customer-administrator-authorized business features identified in Section 2. It may also improve those user-facing features with the data as permitted by the Google API Services User Data Policy. The Customer administrator determines which business mailbox is connected and which authorized users may use the enabled features. Google user data is not sold, used or transferred for advertising, used to determine creditworthiness or for lending, or used, directly or in derived form, to create, train, or improve an AI or machine-learning model. It is excluded from the shared process improvement described in Section 5. Transfers are limited to service providers needed to provide the authorized features, security purposes, legal compliance, or a business transfer with any consent required by the Google policy. Promo Consulting personnel access Google user data only with the Customer's affirmative request or agreement for support, setup, testing, or review; as necessary for security; as required by law; or in aggregated and anonymized form for permitted internal operations. When filing is turned on, agents will move matching Gmail messages from the inbox to the designated folder within that same user's connected mailbox. In Gmail, that folder is a label Promo CoWork creates for this purpose. Moving messages requires Google's gmail.modify permission, which Promo CoWork requests only when filing is turned on and only after Google has verified Promo CoWork for that permission. Without it, Promo CoWork cannot move Gmail messages. Promo CoWork does not delete Gmail messages, move them to another mailbox, or otherwise label them in this workflow.

7. Microsoft 365 data

Promo CoWork accesses Microsoft 365 business mail through Microsoft Graph API in one of two ways. For a user's own mailbox, access uses delegated permissions authorized by the signed-in user or the Customer's Microsoft 365 administrator, limited to that user's mailbox. For shared or company inboxes, Promo CoWork does not use delegated access; instead, the Customer's Microsoft 365 administrator grants Promo CoWork access to specific inboxes only, and that access is read-only unless the administrator grants read-write access for filing. In either case, access is limited to the Customer-administrator-authorized business features described in Section 2. Promo CoWork uses that access to sign in the user, maintain the authorized connection, read messages and attachments needed for enabled workflows, create drafts for Customer review, and send a message only after Customer approval. When filing is turned on and the connection has

write access (Mail.ReadWrite for a user's own mailbox, or read-write access granted by the administrator for a shared inbox), agents will move matching Microsoft 365 messages from the inbox to a user designated folder within the same connected mailbox. Messages are never moved to another mailbox. Microsoft 365 data is subject to the same no-sale, no-advertising, no-credit-decision, no-model-training, restricted-transfer, and limited-personnel-access commitments stated above for Google user data, and it is excluded from shared process improvement under Section 5. Promo CoWork does not delete messages in Microsoft 365.

8. Human oversight and autonomy

Customer administrators configure each agent's permissions and autonomy for an enabled workflow. Depending on those settings, an agent may plan and log without changing a connected system, prepare a proposed action for Customer review, or perform specified routine actions within Customer-defined permissions, tolerances, and approval rules. These settings do not authorize an agent to exceed connected-system permissions or bypass a required approval. A user's folder preference does not grant mailbox permissions. An agent will not move a message unless the mailbox connection has the permissions needed for that move. For Gmail, that means Google's gmail.modify permission; for a shared Microsoft 365 inbox, it means read-write access granted by the Customer's administrator. Regardless of autonomy level:

- identified exceptions and items outside the Customer's configured tolerances or approval thresholds are presented to authorized Customer personnel rather than completed automatically;
- a required approval is not inferred from silence, delay, or expiration of an approval request; and
- a Customer administrator may pause an agent through available Customer controls, and Promo Consulting may pause an agent to protect the service, connected systems, or affected Customers. The time needed for a pause or other control to take effect may depend on the workflow and connected system.

9. When an agent gets something wrong

AI output and agent actions may be inaccurate or incomplete. For example, an agent may misread a document, mismatch records, draft an incorrect message, or enter an incorrect value. Customers remain responsible for review required by their settings and for business decisions based on agent output. If a suspected mistake is identified:

- **Report it.** An authorized user may flag the result in the portal or email engage@promoconsulting.com. The report should identify the affected record, action, or message; describe the suspected error; and note any known business impact or time sensitivity. Reports should not include credentials or unnecessary sensitive information.
- **Contain and correct.** Agent action history may help the Customer and Promo Consulting identify the affected workflow and records. Because the Customer's connected systems are its systems of record, the Customer controls correction or reversal of entries in those systems; Promo Consulting will provide reasonable assistance and may pause the affected workflow when appropriate.
- **Investigate and mitigate.** Promo Consulting will review available action history and relevant system information to assess the likely cause and scope. Depending on the circumstances, mitigation may include correcting a workflow rule, adding a validation check, reducing the affected agent's autonomy, or pausing the workflow while a change is evaluated.
- **Communicate material findings.** If the review indicates that the same issue may have affected additional records or messages, Promo Consulting will notify the Customer administrator and provide reasonably available information about the scope, mitigation, and corrective steps, subject to security, confidentiality, and legal constraints.

Review ownership and targets. Appropriate Promo Consulting operations and technical personnel review reported mistakes based on severity and available information. The periods below are good-faith targets for

initial response and mitigation, not guaranteed resolution times, warranties, or service levels unless a written Customer agreement expressly states otherwise. A target begins when Promo Consulting receives enough information to investigate during business hours; a report received outside business hours is treated as received on the next business day. Customer or third-party-system dependencies may extend the time needed to correct or reverse an issue.

Type of mistake	Examples	Target initial response	Target mitigation
Urgent	A wrong email or invoice sent to the Customer's customer, a wrong payment posted, or the same error across many records	Same business day after receipt of sufficient information	Promptly assess scope and consider pausing the affected workflow; aim to coordinate correction or reversal within 1 business day when within Promo Consulting's control
Standard	A single misread bill or wrong order match	Within 1 business day after receipt of sufficient information	Aim to coordinate correction or reversal within 3 business days when within Promo Consulting's control

10. Storage and retention of AI data

Promo CoWork applies the retention categories in the Privacy Policy: source email and attachment contents and uploaded or generated documents are retained only as long as needed to complete the agent's task, up to 30 days; AI prompts and responses are retained for 90 days; agent execution traces and error logs, with personal information redacted, are retained for 90 days; file metadata, file fingerprints, and access history, without file contents, are retained for two years; agent action history and security and access audit logs are retained for seven years because they record agent actions involving invoices and payments; and approved knowledge, search indexes, caches, and other content derived from Customer content are deleted with the source content or when the Customer leaves. Application backups operate on a rolling 35-day schedule. After access is revoked, deletion follows the timing and audit-record exceptions in the Privacy Policy, and residual backup copies expire through the applicable backup cycle. A source document identified as containing a full bank-account or payment-card number is handled differently: it may be submitted temporarily to an AI provider for the authorized task, but it is discarded at task end and is not placed in persistent application document storage or application backups. AI prompts, responses, action history, and operational or security logs remain subject to their respective retention periods; Promo CoWork is designed not to intentionally include full account or card numbers in those records, but it does not automatically redact source documents before AI processing. Full details are in the Privacy Policy at https://promoconsulting.com/privacy.

11. Access by people

Customer users' access is governed by their assigned roles and permissions. Promo Consulting personnel may access a Customer account or Customer Data only as needed to provide support; perform setup or testing with the Customer's approval; operate, maintain, or secure Promo CoWork; investigate suspected abuse, errors, or security events; or comply with law. Personnel access is limited to the information and duration reasonably needed for the applicable purpose and is logged. These access conditions do not authorize personnel to use Customer Data for personal purposes, advertising, model training, or unrelated product development.

12. Review of this Policy

Promo Consulting reviews this Policy at least annually and when a material change affects agent workflows, data inputs, permitted actions, connected-system permissions, AI providers, storage, retention, or human-oversight controls. The current Policy and its effective and last-updated dates are published at https://promoconsulting.com/aidata. Material changes are posted and communicated to Customer administrators in accordance with the Terms of Service and Privacy Policy before they take effect. The current provider list, provider functions, Customer Data processed, and processing locations are maintained separately at https://promoconsulting.com/serviceproviders; a provider-list update does not by itself expand a Customer's authorized features or permissions.

13. Contact

Questions about this Policy or Promo CoWork's AI data handling may be sent to engage@promoconsulting.com. Privacy requests should use the subject line “Privacy request.” Mail may be sent to Promo Consulting, LLC, PO Box 8262, Breckenridge, Colorado, United States.