

US — PRIVACY POLICY

Effective Date: February 13, 2026

Last Updated: February 13, 2026

This Privacy Policy describes how Palindrom – Institution of Innovation LLC (“Palindrom,” “we,” “us,” “our”) collects, uses, and discloses personal information when you visit our website(s), create an account, purchase or use AILA, or interact with our related services (collectively, the “Services”).

1) Core Principle: AILA Is Local-First

AILA is designed as local-first software. In the ordinary course of using the Software, we do not receive or store your prompts, chats, files, or AI-generated outputs as AI content.

Processing occurs on your device.

We do process limited operational data necessary to run and protect the Services, such as account administration, checkout/billing, license/key registry and verification, update distribution (including security updates), security/integrity and fraud prevention, and customer support.

If you choose to connect AILA to third-party services or models (for example, external APIs or online model providers), those third parties may process data under their own terms and privacy policies. You are responsible for reviewing and accepting third-party terms where applicable.

2) Who We Are & How to Contact Us

Business: Palindrom – Institution of Innovation LLC

Business Address (USA):

1007 N Orange St, 4th Floor Suite #5410

Wilmington, DE 19801

United States

Additional Service Address (Germany) — for EU/DE correspondence:

M. Heigl

Anna-Ebermann-Straße 26

13053 Berlin

Germany

General / Legal Contact: info@palindrom-ioi.com

Support: support@palindrom-ioi.com

Privacy Contact (Requests): info@palindrom-ioi.com

Payment Processing (Checkout & Billing):

Payments are processed using **Stripe**. For payment processing, a Stripe account may be used that is registered to:

Marco Heigl (sole proprietor / “Einzelunternehmen”), Anna-Ebermann-Straße 26, 13053 Berlin, Germany.

Important clarification: This payment-processing arrangement is provided for transparency regarding checkout and payment flows. Unless explicitly stated otherwise during checkout, the seller / service provider and contracting party for AILA remains **Palindrom – Institution of Innovation LLC**.

3) Personal Information We Collect

A) Information You Provide

- **Account data:** name (if provided), email, username, password (stored in hashed form), account settings
- **Billing/purchase data:** billing address, order IDs, subscription status, receipts/invoices (Payment details are handled by payment processors; we typically do not store full card numbers.)
- **Support communications:** messages you send and information/attachments you voluntarily provide

B) Information Collected Automatically (Website/Service)

- **Device/usage data:** IP address, browser/device type, language, pages viewed, referring URL, timestamps
- **Security/integrity logs:** signals used to detect fraud, abuse, circumvention, or security issues (e.g., suspicious login activity or abnormal license/registry behavior)
- **Cookies and similar technologies:** see Section 8

C) License / Update Metadata (Operational, Limited)

- **License registry:** license ID/status, activation timestamps, basic entitlement information
- **Update delivery:** version checks, update availability checks, update success/failure signals, and integrity/security check results necessary to protect the update/registry systems

No optional telemetry/analytics beyond what is necessary:

Currently, we do not enable optional telemetry beyond the operational data described above. If we enable additional analytics in the future, we will update this Policy and (where required) provide cookie controls/consent.

4) How We Use Personal Information

We use personal information to:

- operate accounts, checkout, billing, and subscriptions;
- deliver, verify, and administer license entitlements and subscriptions;
- distribute updates and provide security protections (including critical security fixes);
- provide customer support and troubleshoot issues;
- prevent fraud, detect abuse/circumvention, and enforce our agreements;
- comply with legal obligations and respond to lawful requests; and
- send transactional communications (receipts, service notices, policy updates, security notices).

We do not use your prompts/chats/files/outputs to train our AI models because we do not receive them as AI content in ordinary local-first operation.

5) How We Disclose Personal Information

We may disclose personal information to:

- **Payment processors (e.g., Stripe)** for payments, subscriptions, invoicing, and fraud prevention;
- **Hosting/infrastructure providers (e.g., IONOS)** to operate our website(s) and infrastructure;
- **Database/account infrastructure (e.g., Supabase)** to operate accounts, authentication, and related systems;
- **Shipping carriers (e.g., DHL)** to deliver physical license keys if applicable;
- **Support tools** (email providers and internal tooling) to respond to support requests;
- **Professional advisors** (legal/accounting) for compliance and business operations; and
- **Authorities and others** when required by law or to protect rights, safety, and security (for example, to investigate fraud or abuse).

No sale/sharing of personal information for advertising: We do not sell personal information as “sale” is defined by applicable U.S. state privacy laws, and we do not share personal information for cross-context behavioral advertising.

6) Data Retention

We retain personal information only as long as reasonably necessary for the purposes described in this Policy, including legal, accounting, dispute resolution, security, fraud prevention, and enforcement needs.

Retention periods vary by data type and legal requirements. You may request deletion where applicable (see Section 9), subject to lawful exceptions (e.g., records required for tax, billing, fraud prevention, or legal compliance).

7) Security

We use reasonable administrative, technical, and physical safeguards designed to protect personal information. However, no system is 100% secure; absolute security cannot be guaranteed.

8) Cookies & Similar Technologies

We use cookies and similar technologies primarily for essential functionality, security, and preferences (for example, login/session management and fraud/security protections). We do not currently use analytics/marketing cookies or cross-site tracking technologies. If we later enable non-essential cookies (e.g., analytics), we will update this Policy and, where required by law, provide cookie controls/consent mechanisms.

9) U.S. State Privacy Rights (Summary)

Depending on your U.S. state (including California, Colorado, Virginia, Connecticut, Utah, and others), you may have rights to:

- access/confirm personal information we collected about you;
- correct inaccurate information;
- delete personal information (with exceptions);
- obtain a copy/portability of certain information;
- opt out of certain processing (e.g., targeted advertising, sale, or sharing if applicable); and
- not be discriminated against for exercising rights.

How to Exercise Your Rights

Email: info@palindrom-ioi.com
Subject: “Privacy Rights Request”

Please include:

- your name (if applicable),
- the email associated with your account/purchase,
- your state of residence, and
- the right you want to exercise.

We may verify your identity and your request before responding.

Authorized Agents (Where Allowed)

If your state allows you to use an authorized agent, the agent may submit a request on your behalf by emailing the address above and providing proof of authorization. We may require you to verify your identity directly with us and/or confirm that you authorized the agent.

Appeals (Certain States)

Where required by applicable law, if we deny your request, you may appeal by replying to our response email with the subject “Privacy Appeal” and explaining your concern. We will respond within the timeframe required by applicable law (for example, some state laws require an appeal response within a defined period).

Sale/Share & Targeted Advertising

Currently:

- We do not sell personal information as “sale” is defined by applicable state privacy laws.
- We do not share personal information for cross-context behavioral advertising as defined by applicable state privacy laws.
- We do not use targeted advertising based on cross-site tracking.

If this changes, we will update this Policy and provide required opt-out mechanisms (e.g., “Do Not Sell or Share” where applicable).

10) Children’s Privacy

Our Services are not directed to children under 13, and we do not knowingly collect personal information from children under 13. If you believe a child has provided personal information, contact us at info@palindrom-ioi.com.

11) International Users

We are a U.S. company. Personal information may be processed in the United States and other jurisdictions where we or our service providers operate. Those jurisdictions may have different data protection laws than your jurisdiction.

12) Changes

We may update this Policy from time to time. Material changes will be posted with a new “Last Updated” date and, where appropriate, we may provide additional notice.

13) Contact

Privacy Requests: info@palindrom-ioi.com

Support: support@palindrom-ioi.com

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