

# RedBrick AI Privacy Policy

## 1. Introduction

Zantula, Inc. and its corporate affiliates RedBrick AI, and Venturebay AI (“Company”, “we”, “us”, “RedBrick AI”) is a software platform for creating and managing computer vision training data. Our clients use the RedBrick AI platform to automate, structure, and qualify their labeling efforts.

This Privacy Policy (“Policy”) describes how the Company collects, uses, and discloses information associated with an identified or identifiable individual (“Personal Data”), your rights and choices, as well as how you can contact us with privacy-related inquiries.

Data privacy is at the core of everything RedBrick AI builds and maintains, and RedBrick AI has implemented comprehensive measures to ensure that all Personal Data is managed in a safe and secure manner.

This Policy applies to all activities conducted on RedBrick AI’s platform (the “Service”), [app.redbrickai.com](http://app.redbrickai.com) (the “Web Application”), and other RedBrick AI websites (collectively, the “Websites”) and other interactions (e.g., customer service inquiries, error reports, etc.) you may have with RedBrick AI.

This Policy does not apply to any third-party applications or software that integrate with the Service (“Third-Party Services”), or any other third-party products, services or businesses who will provide their services under their own terms of service and privacy policy. In addition, a separate agreement governs delivery, access and use of the Service (the “Terms of Service”), including the processing of data such as messages, files or other content submitted through Service accounts (collectively, “Customer Data”).

The organization (i.e., your employer or another entity or person) that entered into the Terms of Service (“Customer”) controls its instance of the Service (its “Workspace”) and any associated Customer Data and/or Personal Data (collectively, “Data”).

If you do not agree with this Policy, then do not access or use the Service, Websites or any other aspect of RedBrick AI's business.

For the avoidance of doubt, this is the only privacy policy that applies to RedBrick AI.

## 1.1 Relevant Terms

For the purposes of this Policy:

- "Authorized User" - an individual that has registered an account on RedBrick AI.
- "Company" (also "we", "us") - refers to the corporate entity RedBrick AI.
- "Customer" - an individual or organization that has entered into a contractual agreement with the Company.
- "Customer Data" - all information provided by Customers or collected by the Company, including Personal Data (e.g. email addresses, IP addresses) and other information (e.g. anonymized error logs, the name of a Business, a dummy image used for resolving a support query).
- "Customer Label Data" - annotations and associated information, such as which individual labeled the data.
- "Customer MetaData" - data that is generated as a result of using our Service, which includes information on the usage of our Service.
- "Customer Visual Assets" - raw image/video data owned and/or managed by RedBrick AI Customers.
- "Data" - Personal Data and Customer Data
- "External Storage Methods" - any Customer data storage method or third-party storage method outside of RedBrick AI's infrastructure.
- "Legitimate Interests" - business interests that serve as a justification for data processing activities.
- "Hybrid Cloud Storage" - a storage configuration in which the Customer has granted RedBrick AI explicit permission to store and/or route Customer Visual Assets and Customer Label Data on Company servers.
- "Personal Data" - any information that relates to an identified or identifiable individual.
- "Policy" - the RedBrick AI Privacy Policy.
- "Service" - the RedBrick AI Web Application and related tools.

- “Subprocessor” - a third-party data processor that also has access to certain types of Personal and Customer Data.
- “Web Application” - the Company software hosted at <https://app.redbrickai.com>.
- “Websites” - all web properties owned and maintained by RedBrick AI and/or its Affiliates.
- “Workspace” - the instance of the Service on the Web Application that is managed by the Customer.

## 2. Collection of Personal Information

We collect a limited amount of Personal Data, receive information directly from the Customer, and receive information related to a Customer's usage of our services through Third-Party Services.

You have choices about whether you visit and/or utilize our Sites and Service. However, some parts of the Service may become inaccessible if you do not provide certain Personal Data. For example, you must provide a valid email address in order to create an account on RedBrick AI.

You provide us with Personal Data about yourself or others when you:

- Register or log in to your account
- Edit your user profile
- Contact customer support (or CC colleagues in your query)
- Comment on our blog
- Participate in surveys
- Opt in to receiving product updates
- Extend user invitations to an existing RedBrick Organization

The different kinds of information we collect are enumerated below.

- **Workspace and Account Information:** to register an account on the RedBrick AI platform, the Customer must provide their full name, email address, and a password, as well as join an existing Organization.
- **Usage Information:**

- o *Services metadata*: when a registered user (“Authorized User”) interacts with the Services, metadata is generated that provides additional context about the way that an Authorized User utilizes the Service. For example, RedBrick AI uses a Third-Party Service to log whether or not a customer has opened a response to a support email.
- o *Log data*: like the vast majority of websites and technology services delivered over the Internet, we automatically collect information when you access or use our Websites or Service and record it in log files. This log data may include your Internet Protocol (IP) address, your browser type and settings, the date and time the Service was used, information about browser configuration and plugins, and your language preferences.
- o *Device information*: RedBrick AI collects information about devices accessing the Service, including type of device, what operating system is used, and browser settings.
- o *Location information*: we receive information from you, our Customers and other third parties that helps us approximate your location. We may, for example, use a business address submitted by your employer (who listed your registered place of business when establishing a contract with RedBrick AI) or an IP address received from your browser or device to determine approximate location to assist with localization, troubleshooting, or for security purposes.
- **Third-Party Service Information**: we collect information on our Customers from certain Third-Party Services for a variety of purposes. For a full list of the services RedBrick AI collaborates and exchanges data with, please see [Section 4.1](#), below.
- **Cookie Information**: RedBrick AI uses essential cookies, non-essential cookies and similar technologies to collect information from our Customers and website visitors. For a detailed overview of how we use these cookies, as well as how to opt out of them, please see our Cookie Policy.
- **Additional Information provided to RedBrick AI**: We also receive Customer Data when submitted to our Websites or in other ways, such as responses or opinions you provide during surveys, feedback you provide about our products or services, information you provide if you apply for a

job with RedBrick AI, request support, interact with our social media accounts or otherwise communicate with RedBrick AI.

### **3. Use of Personal Data**

In general, and subject to applicable law, including consent (as required), we may use your Personal Data to provide, fix, and improve our Service, develop new Services, and market our companies and their products and Service. Examples of how we use the Personal Data we process include, but are not limited to, the following:

- Create your account and manage your relationship with us (e.g., communicating with you, providing you with requested information).
- Create and review data about our users and how they use our Service.
- Test changes in our Service and develop new features and products.
- Fix problems you may have with our Service, including answering support questions, customer education and training, and resolving disputes.
- Manage the Service platform, including support systems and security.
- Prevent, investigate and respond to fraud, unauthorized access to or use of our Service, breaches of terms and policies, or other wrongful behavior.
- Comply with legal obligations.
- Meet legal retention periods.
- Establish, exercise, or defend our rights in legal claims.
- Send you records of our relationship, including for purchases or other events.
- Collect payment for the Service you request.

#### **3.1 Lawful Basis for Processing Your Personal Information**

We collect or process Personal Data only where we have your consent to do so, in instances where the Personal Data is required to execute our contractual obligations with you, or where the processing is in our legitimate interests and not overridden by your data protection interests or fundamental rights and freedoms.

#### **Contractual Obligations**

In certain circumstances, we may be required to access or process your Personal Data in order to comply with the obligations defined in our Terms of Service.

These activities are primarily associated with the provision of technical support services to the Customer and the maintenance of Customer accounts.

We use Workspace and Account Information, Usage information, Cookie Information, Third-Party Service Information, and Additional Information provided to RedBrick AI when fulfilling our contractual obligations.

### **Compliance With A Legal Obligation**

RedBrick AI processes Data when we comply with a legal obligation including, for example, to access, preserve or disclose certain information if there is a valid legal request from a regulator, law enforcement or others. For example, a production order from law enforcement to provide information in relation to an investigation, such as your IP address.

We use Workspace and Account Information, Usage information, Cookie Information, Third-Party Service Information, and Additional Information provided to RedBrick AI for compliance with a legal obligation.

### **Legitimate Interests**

We rely on our legitimate interests or the legitimate interests of a third party where they are not outweighed by your interests or fundamental rights and freedoms ("legitimate interests").

We use Workspace and Account Information, Usage information, Cookie Information, Third-Party Service Information, and Additional Information provided to RedBrick AI for the following legitimate interests:

- *To provide, update, maintain and protect our Service, Websites and business.*  
This includes the use of Data to support delivery of the Service under Terms of Service, prevent or address service errors, security or technical issues, analyze and monitor usage, trends and other activities, or at an Authorized User's request.
  - It is in our and your interests to provide, update, maintain and protect our Service, Websites, and business.

- To develop and provide additional features.

RedBrick AI endeavors to make the Service as useful as possible for Authorized Users. For example, we may:

- make Services or third-party service suggestions based on historical use and predictive models;
  - identify organizational trends and insights;
  - customize a Service experience; or
  - create new productivity features and products.
- It is in our interest and in the interest of Customers and Authorized Users to continuously improve and develop the Service and customer support we provide.

- To investigate and help prevent security issues and abuse.

We may use a variety of tools such as device fingerprinting to prevent issues and abuse. We may process, including in an automated fashion, Data to better understand how RedBrick AI is used or to prevent spam or abuse.

- It is in our interest to keep the Service secure and to detect, prevent, and address abuse, as well as investigate and take action in respect of suspicious activity on the Service.

- To aggregate or de-identify information.

In some cases, we aggregate or de-identify information we have associated with you and use the resulting information, for example, to improve the Service.

- It is in our interest to research and improve the Service;
- It is in the interests of Customers and Authorized Users to practice data minimization and privacy by design in respect of their information.

- Share information with others including law enforcement and to respond to legal requests.

- It is in our interest and the interest of the general public to prevent and address fraud, unauthorized use of RedBrick AI, violations of our terms or other harmful or illegal activity; to protect ourselves, our users or others, including as part of investigations or regulatory

enquiries; or to prevent death or imminent bodily harm.

- *Transfer, store or process your information outside the European Economic Area.*

As the Websites and Service operate globally, with Customers around the world, we need to share information we collect globally. We carry out necessary transfers outside the European Economic Area, including to India and the United States, to provide, update, maintain and protect our Services, Websites and business.

For more information, review [Section 8.3](#) below.

- It is in our and your interests to provide, update, maintain and protect our Service, Websites and business.

We use Workspace and Account Information, Usage information, Cookie Information, Third-Party Service Information, and Additional Information provided to RedBrick AI for the following legitimate interests:

- *To communicate with you by responding to your requests, comments and questions.*

If you contact us, we may use your Data to respond.

- It is in our, our Customers' and Authorized Users' interests to facilitate communication (for example, to answer questions from Customers).

- *To send service emails and other communications.*

For example, we may:

- send you service, technical and other administrative emails, messages, and other types of communications; or
- contact you to inform you about changes in our Service, our Services offerings, and important Service-related notices, such as security and fraud notices. These communications are considered part of the Service and you may not opt out of them. It is in our Customers and Authorized Users' interests to address service-related issues.

We use Workspace, Account Information and Usage Information for the following legitimate interests:



- For billing, account management and other administrative matters.  
RedBrick AI may need to contact you for invoicing, account management, and similar reasons and we use account data to administer accounts and keep track of billing and payments.
  - It is in our interest to facilitate the effective provision and administration of the Websites and Service.

We use Workspace and account information, Usage Information, Cookie information, Third-Party Services Information, Third-Party data, and Additional information provided to Slack for the following legitimate interests:

- To send marketing emails and other communications.  
We sometimes send emails about new product features, promotional communications or other news about RedBrick AI. Inasmuch as these are marketing messages, you can control whether you receive them. If you have additional questions about a message you have received from RedBrick AI, please get in touch through the contact mechanisms described below.
  - It is in our interest to promote the Websites and Service and send our direct marketing.

## 4. Sharing and Disclosure of Personal Information

We limit access to your Personal Data to our employees and consultants who have both a legitimate legal basis to process it and a clear, relevant need to do so.

If we share your Data with other parties (such as developers, service providers, domain registrars, and reselling partners), we will ensure that they have implemented appropriate security measures and have a valid reason for processing your Data.

Subject to applicable law, including consent (as required), we may share Personal Data as follows:

- **Service Providers.** We share your Personal Data with service providers we use to support our Service. These companies provide services like

intelligent analytics, advertising, authentication systems, bill collection, fraud detection, and customer support. We have contracts with our service providers that address the safeguarding and proper use of your Personal Data. For a full list of our Third-Party Services, please see [Section 4.1](#) below.

- **Affiliates.** We may share your Personal Data with other companies under common ownership or control with RedBrick AI. These companies use your Personal Data as described in this Policy.
- **Public or Government Authorities.** We may share your Personal Data to comply with our legal obligations, regulations, or contracts, or to respond to a court order, administrative, or judicial process, such as a subpoena, government audit, or search warrant where we are legally compelled to do so. We also may share your information when there are threats to the physical safety of any person, violations of RedBrick AI policies or other agreements, or to protect the legal rights of third parties, including our employees, users, or the public.
- **Corporate Transactions.** Your Personal Data may be disclosed or transferred to relevant third parties in the event of, or as part of the due diligence for, any proposed or actual reorganization, sale, merger, consolidation, joint venture, assignment, transfer, or other disposition of all or part of our business, assets, or stock (including in connection with any bankruptcy or similar proceeding). If a corporate transaction occurs, we will provide notification of any changes to the control of your information, as well as choices you may have.
- **Consent.** We may share your Personal Data in other ways if you have asked us to do so or have given consent. For example, with your consent, we could post a user testimonial that would identify you.

Your Personal Data may also be shared as described below:

- **Other RedBrick AI Authorized Users.** When you allow others to access, use, or edit content in your Workspace, we share that content with them. For example, if you add an Authorized User to an annotation project, we make the contents of that project available to them.
- **Third Parties.** When you create an account on RedBrick AI using an email address that you own, the authentication information associated with your account is stored in a database.

- **Public Information.**
  - **User-Generated Content.** When you comment on our blogs or within a Workspace, this information may also be read, collected, and used by others.
- **Your Employer or Organization.** When you create an account or user role with an email address assigned to you as an employee, contractor or member of an organization (e.g., yourname@youremployer.com), that organization (if it is a RedBrick AI Customer) can find your account and take certain actions that may affect your account.

#### 4.1 Third-Party Services

We share certain Data with a select number of data processors (each, a “Subprocessor”) for the specific purposes outlined below.

Each Subprocessor that we share Data with is responsible for maintaining its privacy notice and practices related to the use and protection of Personal Data.

RedBrick AI requires Subprocessors acting on our behalf or with whom we share Personal Data to also ensure appropriate security measures under relevant industry standards.

RedBrick AI will always ensure that any Subprocessors with whom we share Data are subject to privacy and security obligations consistent with this Policy and applicable laws.

<b>Service Provider</b>	<b>Processing Operation</b>
Amazon Web Services	Identity Management, IaaS
Checkr	Employee Background Checks
Deel	Workforce Management
DocuSign	Electronic Signature and Contract Solution
GitHub	Code Version Control and Collaboration
Google	Web Analytics, Email Communication

Hubspot	Marketing, Sales, and Customer Outreach
LaunchNotes	Business Communication
Linear	Project Management and Ticket Tracking
PostHog	Product Analytics
Sentry	Error Monitoring and Logging
Slack	Team Communication and Collaboration, Direct Support for Customers using Enterprise-level service
Stripe	Payment Processing
Vanta	Security and Compliance
Zendesk	Customer Support

## 5. Your Choices and Rights

In accordance with global and local data protection and privacy laws, you have certain rights related to the collection and processing of your personal information.

To exercise any of the following rights, please contact us directly at [contact@redbrickai.com](mailto:contact@redbrickai.com).

- You can **access** and **review** Personal Data associated with your account.
- You also can **request** the following information: how we collect and use your Personal Data and why; the categories of Personal Data involved; the categories of recipients of your Personal Data; how we received your Personal Data and its source; our business purpose for using your Personal Data; and how long we use or store your Personal Data or the manner in which we determine relevant retention periods.
  - EU Citizens and other persons residing in the EU and/or EEA may also contact our EU Representative (see [Section 8.5.](#)) directly to submit a **Subject Access Request**.

- You can **correct** information about you that you feel is inaccurate or incomplete.
- In certain circumstances, you have the right to request to have your Personal Data **erased** without undue delay, **object** to or **restrict** the processing of your Personal Data, or **export** your Personal Data to another controller.
- Where we rely on your consent to process your personal information, you have the right to **decline consent** and/or, if provided, to **withdraw consent** at any time. This will not affect the lawfulness of processing prior to the withdrawal of your consent.
- You can **request** that your Personal Data no longer be used for direct marketing purposes.

For all other inquiries regarding the collection, use, storage, or processing of your Personal Data, please reach out to us at [contact@redbrickai.com](mailto:contact@redbrickai.com).

## 6. Data Privacy Strategy

As stated above, best practices for data collection, maintenance, and security are at the core of RedBrick AI's vision and mission. The subsections below provide a comprehensive overview of how various data are moved, stored, and processed by RedBrick AI's systems.

### 6.1. How We Handle Customer Data

Our preferred strategy to ensure the privacy of raw image/volume data ("Customer Visual Assets") and segmentation data ("Customer Label Data") is to completely decouple customer data storage from the RedBrick AI platform.

RedBrick AI can be integrated with a variety of storage methods that exist outside of our infrastructure ("External Storage Methods"), which allows Customers to have complete control over the level of privacy and security protocols that are appropriate for their application, as well as leverage commonly utilized third-party solutions.

RedBrick AI does not store or route data through Company servers unless we receive explicit consent from a Customer to do so or a Customer utilizes our

Direct Upload feature. In these cases, all data will be stored in a U.S.-based AWS S3 bucket (“Hybrid Cloud Storage”). For more information, please see Section 3.3 of our Terms of Service.

If you or your organization has specific privacy and security needs, the RedBrick AI team is always happy to cooperate with Customers to ensure the proper implementation of custom requirements.

## **Technical Overview**

To make the Customer Visual Assets accessible on RedBrick AI, Customers are required to upload a list of file paths or URLs to the Web Application. These paths or URLs act as a reference to the individual data points in the storage method, allowing the Customer’s browser to request the Customer Visual Assets and/or Customer Label Data as needed.

Whether Customer Visual Assets and/or Customer Label Data are stored in part or fully on the cloud, the data transfer only occurs between a Customer’s browser and the data storage method.

To accommodate a variety of Customer requirements, Customer Visual Assets and Customer Label Data can be stored using any of the following storage methods:

- Third-party cloud storage (Amazon S3, Azure, Google Cloud Storage)
- Hybrid cloud storage (Amazon S3)
- On-premises storage

The specifics of the data flows for each of the three data storage methods is covered in the sections below.

### **6.2. Third-Party Cloud Storage and Flow**

RedBrick AI currently supports data storage on Amazon S3, Azure Blob and Google Cloud Storage.

In order to integrate an external cloud storage solution to the RedBrick AI platform, certain information and permissions associated with the storage method will have to be provided. Our [documentation](#) provides a comprehensive overview of how to configure the integration for each of the above three cloud service providers.

When an Authorized User logs into the RedBrick AI platform and visits a page where the Customer Visual Assets and/or Customer Label Data needs to be displayed, the Customer's browser retrieves a pre-signed URL from the RedBrick AI backend. This pre-signed URL, which is only valid for several minutes, allows the Authorized User's browser to request the data directly from the Customer's storage method.

This flow ensures data never gets routed via RedBrick AI servers (with the exception of Hybrid Cloud Storage implementations), and authentication is properly handled using pre-signed URLs.

### **6.3. Hybrid Cloud Storage and Flow**

When a Customer has requested to use Hybrid Cloud Storage or utilized the Direct Upload feature to transfer data from their local machine to Company servers, all data will be stored in a U.S.-based AWS S3 Bucket managed by RedBrick AI.

The procedure for requesting and displaying Customer Visual Assets and Customer Label Data in the browser is identical to the process outlined in [Section 6.2.](#) above.

### **6.4. On-premises Storage and Flow**

RedBrick AI can be used with Customer Visual Assets and/or Customer Label Data stored on-premises and accessible only over a private network. On-premises storage gives a Customer complete control over their data privacy flows, including who can access the data and how it can be accessed.

Once an Authorized User visits a page where data needs to be displayed, the browser requests the data directly from the on-premises servers (using the URLs/\_le paths uploaded during data import). This flow ensures that data is only moving from the on-premises storage to the browser.

On-premises storage methods can be configured to be as private as a Customer desires. Requests to the on-premises server can be restricted to specific IP addresses or specific file paths on the server.

Furthermore, the RedBrick AI team is happy to work with our Customers to comply with specific security concerns and make modifications (e.g. configurations to use pre-signed URLs) to abide by company-specific protocols.

## **6.5. How We Handle Label Data and Metadata**

Customer Label Data and Customer Metadata generated during the use of our services is securely transmitted over SSL, stored by RedBrick AI on Amazon DynamoDB, and encrypted with industry-standard AES-256 encryption.

## **7. Internal Data and Network Security Department**

RedBrick AI strives to develop, implement, and maintain the highest level of data security and protection practices. Pursuant to this, our Company has a dedicated internal department dedicated to data and network security. Some of the functions of this department are highlighted below:

- To ensure that RedBrick AI complies with this Policy.
- To conduct a quarterly review of the Company's data security posture and protocols.
- To review and update Company's data security and protection practices, as applicable on at least a quarterly basis, with the goal of remaining up-to-date with various technological developments in regards to data security and privacy.
- To ensure compliance with relevant data protection laws and regulations
- To ensure the highest possible standard of data safety.



## **7.1. Standard Operating Procedures**

The RedBrick AI may formulate separate Standard Operating Procedures (SOP's) for the Internal Data and Network Security Department. These procedures will not be covered under this Policy. However, these SOPs would follow the global industry standards and practices with regards to data protection.

## **7.2. Data Retention**

We retain all Data for as long as is required for the purposes stated in [Section 3.1.](#) of this Policy.

When we no longer have a need to process your information based on the legal bases outlined above, we will delete, anonymize, or isolate your information as appropriate.

## **8. RedBrick AI and GDPR**

RedBrick AI is committed to maintaining continued compliance with the practices and standards outlined in the General Data Protection Regulation, as well as helping its Customer understand and, where applicable, comply with this law.

### **8.1. Identifying the Controller and Processor**

If European data protection law applies and where RedBrick AI acts as a data controller, our lawful basis for collecting and using the Personal Data described in this Policy will depend on the type of Personal Data concerned, as well as the context in which we collect or use it.

Note that in situations where RedBrick AI acts as a processor, it is our Customer who determines the appropriate legal basis associated with processing activities, and queries about the applicable lawful basis should be directed to them.

## 8.2. GDPR Compliance

RedBrick AI has implemented a wide range of policies, practices, and procedures in order to be fully compliant with GDPR. Some examples include:

- a dedicated GDPR Compliance Policy, which outlines internal procedures for improved data protection practices, an incident response plan, procedures for Data Subject Access Requests, among other things.
- the designation of a Data Protection Officer (see [Section 8.4.](#)).
- the designation of a Local EU Representative (see [Section 8.5.](#)).
- the designation of a Lead Supervisory Authority (see [Section 8.6.](#)).
- the establishment of GDPR-specific employee training, to be completed annually.
- investments into our security infrastructure
- a completed Data Protection Impact Assessment.
- Support for international data transfers by executing Standard Contractual Clauses through our updated Data Processing Addendum, which is available to all Customers.

We also monitor the guidance around GDPR compliance from privacy-related regulatory bodies, and update our product features and contractual commitments accordingly.

## 8.3. International Data Transfers

We may transfer your Personal Data to countries other than the one in which you live, including transfers to the United States. To the extent that Personal Data is transferred abroad, RedBrick AI will ensure compliance with the requirements of the applicable laws in the respective jurisdiction in line with our obligations.

In particular, we offer the following safeguards if RedBrick AI transfers Personal Data from jurisdictions with differing data protection laws:

- **European Commission's Standard Contractual Clauses.** RedBrick AI uses Standard Contractual Clauses approved by the European

Commission for transfers to, among others, India and the United States. RedBrick AI will transfer your Personal Data to facilitate the provision of the Services. A copy of our standard data processing addendum, incorporating the Standard Contractual Clauses, is available on our Website, and a copy of the executed version of the Standard Contractual Clauses may be obtained by contacting us as described in [Section 8.4.](#) below.

#### **8.4. Data Protection Officer**

For data or compliance-related inquiries, you can contact RedBrick AI's Data Protection Officer at [contact@redbrickai.com](mailto:contact@redbrickai.com).

#### **8.5. Local EU Representative**

Adam Brogden  
EU - Ireland Representative  
INSTANT EU GDPR REPRESENTATIVE LIMITED  
[contact@gdprlocal.com](mailto:contact@gdprlocal.com)  
+ 353 15 549 700  
Office 2 12A Lower Main Street, Lucan Co.  
Dublin K78 X5P8  
Ireland

Subject Access Requests can be submitted directly to the EU Representative [here](#).

#### **8.6. Lead Supervisory Authority**

RedBrick AI's Lead Supervisory Authority is:

[Data Protection Commission](#)

21 Fitzwilliam Square South  
Dublin 2

D02 RD28

Ireland

The Data Protection Commission recommends the use of its [online contact form](#) when submitting an inquiry.

## 8.7. F.A.S.T.

The [Fast Automated Segmentation Tool \(F.A.S.T.\)](#) is an interactive segmentation tool that is specifically designed for radiology images and can be enabled for RedBrick AI Organizations both globally (i.e. Organization-wide) or at the Project level.

F.A.S.T. is powered by the [Segment Anything Model \(SAM\)](#), which is developed by Meta AI.

We firmly believe that it is imperative to have a clear understanding of the SAM's encoder-decoder architecture to explicate the privacy and security features of RedBrick AI's F.A.S.T.

RedBrick AI's F.A.S.T. **performs image encoding (i.e. the process of converting pixel/voxel data into a vector format suitable for machine learning) on the RedBrick AI servers**, which are located in the United States.

In plain terms, when using F.A.S.T., your image pixel/voxel data is transferred as a PNG image of a single slice, as captured with default Windowing settings. The derived PNG image is only used for computing embeddings and does not get stored after computation is complete.

Please note that no spatial information, UIDs, or other DICOM headers are stored or transmitted as part of this process.

Once the embeddings are calculated on the server side, F.A.S.T. is run in the browser through user prompts and the mask is decoded in the browser. This provides you with the ability to create segmentation masks interactively in real time.

By requesting access to and utilizing F.A.S.T., you agree to the following:

- to permit the transfer of your image data to RedBrick AI's U.S.-based servers for embedding computation;
- to not use the F.A.S.T. feature on any data that has PHI burned into the image (such as ultrasounds), as our organizations do not have a HIPAA BAA in place;

## 9. Children's Privacy

RedBrick AI does not permit individuals under the age of 16 to use our Service or Websites, to the extent prohibited by applicable law.

If you suspect that we have unlawfully received or collected Personal Data regarding any individuals under the age of 16, please reach out to [contact@redbrickai.com](mailto:contact@redbrickai.com) and we will take steps to delete the information.

## 10. Clauses Specific to California Residents

To the extent, you are a consumer as defined under the California Consumer Privacy Act of 2018 ("CCPA") and RedBrick AI is a business as defined under CCPA, the following applies to you:

Subject to the provisions of the CCPA, you have the right to request in the manner provided herein, for the following:

1. Right to request for information about the:
  - Categories of Personal Information
  - Specific pieces of Personal Information.
  - Categories of sources from which the Personal Information is collected.
  - Business or commercial purpose for collecting Personal Information.
  - Categories of third parties with whom the business shares Personal Information.
2. Right to request for deletion of any Personal Information

If you seek to exercise the foregoing rights to access or delete Personal Information which constitutes 'personal information' as defined in CCPA, please contact us at [contact@redbrickai.com](mailto:contact@redbrickai.com).

By writing to us, you agree to receive communication from us seeking information from you in order to verify you to be the consumer from whom we have collected the Personal Information from and such other information as reasonably required to enable us to honor your request.

## **11. Changes To Privacy Policy**

We may update this Policy at any time to reflect evolving standards of data protection and security protocols. Any and all such changes will be considered to be in effect immediately after being posted on RedBrick AI's web site. We reserve the right to update or change our Privacy Policy at any time and you should check this Privacy Policy periodically.

Your continued use of the Service and Websites after we post any modifications to the Privacy Policy on this page will constitute your acknowledgment of the modifications and your consent to abide and be bound by the modified Privacy Policy.

If we make any material changes to this Privacy Policy, we will notify you either through the email address you have provided us, or by placing a prominent notice on our website.

## **12. Contact Us**

If you have any questions or complaints regarding this Policy, please reach out to us at [contact@redbrickai.com](mailto:contact@redbrickai.com).