GroundWorx Privacy Policy

Draft for attorney review — not yet effective
Prepared November 1, 2026

This proposed notice describes how GroundWorx, Inc. d/b/a GroundWorx, a Delaware corporation, handles personal information in connection with its websites, products and services. It is a review draft: product-specific data flows, provider contracts and applicable legal obligations must be confirmed before adoption.

1. Scope and responsibility

This policy covers GroundWorx websites, inquiries, purchases, support, connected hardware and sensors, communications equipment, the GAIN platform, mobile applications, alerts, integrations, and artificial intelligence (AI), machine learning and deep learning features made available by GroundWorx. It also covers demonstrations, online assistants and related services to the extent GroundWorx processes personal information through them. Mentioning a technology or planned product does not mean it is released or enabled.

Personal information is information that identifies, relates to, or can reasonably be linked to an individual or household. Environmental readings may not identify a person by themselves, but can become personal information when associated with an account, identifiable property or location. Employment and applicant records may be covered by a separate notice.

Where GroundWorx processes information on behalf of an organization under a customer agreement, the organization may control the purposes of that processing. This notice does not replace that agreement, a data-processing agreement or a more specific notice. Contact the organization that manages your account for requests concerning its records; GroundWorx will assist as required by its agreement and applicable law.

2. Information we collect

Contact and inquiry information: name, email address, telephone number, organization, role, property details, correspondence and other information you provide when requesting a demonstration, pilot, consultation, documentation, support or a purchase.

Account and transaction information: account identifiers, login and access records, permissions, subscription or service details, order and shipping information, billing records and payment status. Payment handling depends on the checkout service used; do not send payment-card numbers through chat or inquiry forms.

Hardware and operational information: device identifiers, configuration, installation or mapped locations, timestamps, connectivity and diagnostic information, and environmental measurements supported by the applicable device. These can include soil moisture, temperature, dielectric

measurements and weather or other environmental readings. Not every product collects every category.

Software and AI interactions: prompts, questions, chat history, messages, selected inputs, recommendations, generated outputs, feedback and information supplied to integrations. Inputs may include property characteristics and operational context. Do not submit passwords, access tokens, medical information or other sensitive information that is unnecessary for the service.

Technical information: browser and device information, request and security logs, network information such as IP addresses, and cookie or local-storage identifiers where used. A location you select for weather, mapping or a property inquiry is different from permission-based access to your device's precise location. Product-specific permission notices should explain any such access before it occurs.

3. Sources of information

Information comes from you; your authorized organization and its users; installed devices; use of our websites and software; and authorized service providers or integrations. We also use public environmental, weather, fire and research sources for public information tools. Public or modeled environmental data is not represented as a customer's private sensor readings.

Only connect an account, upload records or provide another person's information when you are authorized to do so. An integration should be limited to the information and permissions needed for its agreed purpose.

4. Why we use information

We use information to respond to requests; fulfill orders; activate, operate and support products and subscriptions; maintain accounts and authorized integrations; display readings and trends; deliver requested alerts and recommendations; and communicate about service, billing and security.

Other purposes include diagnosing problems, protecting accounts and services, detecting abuse, enforcing agreements, keeping required business records, meeting legal obligations and improving product quality and model performance. Promotional communications should be distinguished from necessary service messages and provide applicable opt-out choices.

Where a law requires a lawful basis, the basis depends on the purpose and relationship: fulfilling a contract or taking requested pre-contract steps, complying with legal obligations, pursuing legitimate interests where legally permitted and appropriately balanced, or obtaining consent where required. This is not a claim that every law applies to every customer or that using a website supplies consent for all processing.

5. AI, machine learning and deep learning

GAIN and related tools may process environmental observations, historical patterns, property context and user inputs to produce analyses, forecasts, recommendations or conversational responses. Machine learning and deep learning are methods used within AI; the privacy implications depend on the information processed, not the name of the method. Available functionality varies by product and release status.

Website chat and the Solution Advisor send relevant inputs to an external AI processing service to generate answers. Chat exchanges are retained to support follow-up conversations and authorized administrative review. Requests also use security and usage-limit information to prevent abuse. Do not treat a conversation as confidential advice or submit information unnecessary to your request.

GroundWorx may use aggregated or de-identified environmental measurements to evaluate and improve models, as described in customer data terms. This permission must not be read as unlimited permission to use identifiable conversations, personal information or customer records to train unrelated general-purpose models. De-identified data used for training is prepared under the AAEI standard described in the retention section. Provider retention and training terms, and any use of identifiable information for additional training, require confirmation and any notice, agreement or consent required by law.

AI outputs can be incomplete or inaccurate. Environmental forecasts and recommendations are decision-support tools, not guarantees, emergency services, medical advice or autonomous authority to control irrigation or equipment. Users should assess outputs against conditions and professional judgment. Any future processing subject to special automated-decision rules needs a specific assessment and required notices and rights before deployment.

6. Sensors, property locations and connected hardware

Customers own the measurements taken on their property as provided in the applicable agreement, to the very end: a customer who stops paying for the service remains entitled to own the data that was taken on their behalf while they were a paying customer. Ownership and privacy obligations are separate: GroundWorx processes measurements and associated information to deliver the service and may use properly aggregated or de-identified measurements for improvement under those terms. The retention section of this draft states GroundWorx's own rights to the same data; how customer ownership and GroundWorx's retained rights coexist must be reconciled by the attorney before adoption.

Property coordinates, device mappings and operational patterns can be commercially sensitive and may also identify individuals. Access should be restricted to authorized users and providers supporting the service. Customer names, exact installation coordinates and identifiable records are not authorized for public demonstrations merely because they are available to GroundWorx.

Wireless technologies such as cellular connectivity, satellite connectivity, RFID or Bluetooth may support device operation or identification where a product includes them. This does not mean every device uses all technologies or collects continuous personal movement information. Device-specific documentation and permissions govern the actual capabilities.

7. When information is disclosed

Information may be disclosed to providers supporting hosting, data processing, AI responses, connectivity, communications, order fulfillment, payment processing and support, as needed for their assigned functions. Actual provider contracts and permitted uses must be reviewed before this draft is adopted; this notice does not guarantee that every provider has identical retention or training terms.

Information may also be shared with your authorized organization and users, integrations you authorize, advisers assisting with legal or business obligations, and authorities where legally required. Necessary disclosures may occur to protect rights, safety and security, or in connection with a merger, financing or transfer of the business subject to applicable safeguards and notice requirements.

A supplier listing, technology reference or partner logo does not itself authorize sharing your personal information with that organization. Additional sharing outside these purposes requires an appropriate legal basis and any required notice or choice.

8. Cookies, browser storage and external services

Website functions use browser storage and identifiers for purposes such as sign-in, conversation continuity, preferences, local demonstrations and abuse prevention. Blocking or clearing storage can affect those functions. Some information is stored in your browser, while information submitted to a service can also be stored by that service.

Maps, checkout, embedded content and third-party services may receive technical request information when loaded or used. Their own privacy notices apply to their independent processing. Links to outside websites do not make those websites GroundWorx services.

Any nonessential analytics or advertising technologies must be assessed separately, with the notices and consent or opt-out controls required by applicable law. This draft does not assert that an advertising cookie, universal cookie-consent system or Global Privacy Control implementation exists. Browser settings are not a substitute for a legally required service-side opt-out.

9. Sale, targeted advertising and sensitive information

GroundWorx does not sell personal information for money. Some privacy laws define sale or sharing more broadly, including certain advertising-related disclosures. Before this draft is adopted, GroundWorx must verify its provider and advertising practices, determine whether those definitions apply, and provide any required opt-out link and recognized preference-signal handling. This draft does not certify a historical twelve-month sale or sharing assessment.

Information such as account-access credentials and precise geolocation may receive special protection under applicable law. Use and disclosure should be limited to necessary, authorized purposes and subject to any applicable consent or limitation rights. Do not provide sensitive information through general-purpose inquiry forms or AI conversations.

10. Retention and de-identification

GroundWorx retains all rights to the environmental data its sensors and services produce, for as long as GroundWorx keeps it: the measurements, the associated records, and the association between them. GroundWorx knows which data belongs to which property and account, and retains that association while a service relationship continues and afterwards, subject to the rest of this section. Customers own the measurements taken on their property as provided in the applicable agreement, to the very end; how that ownership coexists with GroundWorx's retained rights must be reconciled by the attorney before adoption.

Through its AAEI standard (anonymous autonomous environmental intelligence), GroundWorx converts environmental data into anonymous form so it can be shared, used to train and improve models, and learned from over the long term. Anonymization means more than removing a name: where locations, property details or other details could still identify a source, reasonable measures against re-identification are required. De-identification is applied through this standard; it is not a promise that every contact, order, account, log or chat record is automatically anonymized. Implementation and the precise scope of the 90-day rule in the existing customer data terms must be verified before adoption.

Properly anonymized or aggregated information may be retained indefinitely for environmental analysis, benchmarking and model improvement. De-identification should include reasonable measures against re-identification; removing a name alone may not be enough where locations or other details remain identifying. Legal holds, disputes, fraud prevention and required accounting records can limit deletion or anonymization.

11. Security

GroundWorx uses technical and organizational measures intended to protect information, including access restrictions and safeguards against unauthorized use. Website conversations are restricted to their owning visitor and authorized administrative access; public AI tools have usage limits. Security controls differ across services and must be assessed for the applicable product.

No internet transmission, storage system or AI service is completely secure. Protect account credentials, limit user permissions, secure devices and report suspected unauthorized access promptly. Where notification is required by law following a security incident, GroundWorx will follow the applicable requirements. This notice makes no unsupported certification or absolute security guarantee.

12. Privacy requests and communication choices

Contact info@getgroundworx.com with the subject Privacy Request to ask about access, correction, deletion, a copy of information, or communications preferences. Describe your request and the service involved, but do not send passwords or unnecessary sensitive documents. We may need proportionate verification to protect against unauthorized disclosure. If your organization manages the information, we may refer the request to its authorized administrator.

Depending on applicable law, you may have rights to know or access personal information, correct it, delete it, receive a portable copy, withdraw consent, object to or restrict certain processing, opt

out of sale or targeted advertising, limit certain sensitive-information uses, or appeal a denied request. Rights have exceptions and do not apply identically in every jurisdiction. We will respond within the period required by the law that applies to your request.

Where permitted by law, an authorized agent may submit a request with appropriate evidence of authority and verification. GroundWorx will not unlawfully discriminate against you for exercising privacy rights. To seek review of a response, contact the same address with the subject Privacy Appeal; where applicable, you may also contact your data-protection regulator.

Use an unsubscribe mechanism provided in promotional messages or contact us to stop promotional email. Necessary order, security and service communications may continue. Product notification preferences and device permissions may offer separate choices; disabling an operational alert can affect the information you receive.

13. California and other regional disclosures

If the California Consumer Privacy Act, as amended, applies to GroundWorx and your information, its rights and disclosure requirements supplement this notice. Relevant categories may include identifiers, customer-record information, commercial information, internet or network activity, geolocation, professional information, inferences, and sensitive personal information such as account credentials or precise geolocation where collected. Sources, purposes and recipient categories are described above; collection varies by the service used.

A final California notice must be checked against actual collection and disclosure practices, including required notices at collection, preceding twelve-month disclosures, sale or sharing status, retention disclosures and any required opt-out or sensitive-information controls. This review draft is not a substitute for those checks or an assertion that GroundWorx meets statutory applicability thresholds.

Other US state laws and international laws may provide additional rights or require different disclosures. Where such laws apply, GroundWorx should provide the applicable notices and honor legally required rights. Contact us about your location and request rather than assuming that one jurisdiction's rules govern every user.

14. International processing

GroundWorx is based in the United States. Services and their providers may process information in the United States or other countries, depending on their infrastructure. Laws and protections can differ between countries.

When applicable law requires safeguards for an international transfer, the relevant transfer mechanism and provider arrangements must be established and documented. This draft does not claim certification under a transfer framework, an existing standard-contractual-clause arrangement or a representative appointment that has not been verified. Using a service alone is not blanket consent to all international transfers.

15. Children and school-related use

GroundWorx products and services are intended for business, property-management and professional users, not for children under 13 to create accounts or submit personal information. An installation at a school or university does not itself make the service a student-record service.

Do not submit student records or children's identifiable information through general forms, demonstrations or AI tools. If you believe a child has provided personal information, contact us so we can investigate and take appropriate action. Any service specifically processing children's or education records needs a separate legal and privacy assessment before that use.

16. Demonstrations, uploaded files and property briefs

Public demonstration datasets are limited to approved, anonymized records. The website's sandbox CSV previews run locally in the browser tab rather than submitting those files as production integration data. A browser-local preview does not establish a live API connection or authorize equipment control.

Property-brief PDFs are generated in the browser from the Solution Advisor result, and a personal property name used for the PDF remains local in that flow. Inputs submitted to obtain the Advisor recommendation are processed separately by the AI service. Information included in a PDF or exported file can be exposed if you share the file or use a shared device; you control that distribution.

17. Changes to this policy

An adopted policy will display its effective or revision date. Material changes should be communicated as required by applicable law, and any new processing requiring consent must obtain that consent before it begins. Continued use does not waive statutory privacy rights or substitute for consent where the law requires it.

This November 1, 2026 version is a proposed expansion for review, not a representation that an attorney has approved the new privacy language or that every practice described has been validated. The prior website privacy notice is retained separately for reference until a final version is adopted.

18. Contact GroundWorx

For privacy questions or requests, email info@getgroundworx.com, subject Privacy Request. Mail: GroundWorx, Inc., Attn: Privacy, 10530 Sea Pearl Cove, Suite 17, San Diego, CA 92130, USA.

For contractual ownership, licensing and service terms, consult the separate Terms & Conditions and Intellectual Property Rights and Data Protection documents. Those agreements and this privacy notice serve different purposes; no contract overrides rights that applicable privacy law makes nonwaivable.