

LUCKY HORZE

GLOBAL PRIVACY & DATA PROTECTION POLICY

Document Control ID:	LH-PVP-2025-v2	Effective Date:	January 15, 2025
Governing Entity:	Lucky Horze (Sole Proprietorship)	Annual Review Date:	January 10, 2026
Principal Place of Business:	38B, Citi Mall, New Link Road, Andheri West, Mumbai, Maharashtra 400053, India	Digital Property:	www.luckyhorzeai.com
Central Privacy Contact:	business@luckyhorze.com		

1. Purpose, Legal Authority & Scope

This Privacy and Data Protection Policy sets forth the mandatory principles, legal mechanisms, and technical safeguards through which Lucky Horze, a sole proprietorship organized under the laws of the Republic of India ("Lucky Horze", "the Company", "we", "us", or "our"), processes, secures, and transfers personal data and specialized data assets.

Lucky Horze operates as an artificial intelligence data engineering, multimodal data collection, and digital annotation partner for international technology enterprises, research institutions, and foundational model developers. This Policy applies universally to all personal data collected directly from research participants, crowd workers, independent field contractors, website visitors across www.luckyhorzeai.com, and institutional partners.

Our data governance framework is structured to ensure rigorous compliance with applicable statutory data protection legislation, including the Digital Personal Data Protection Act, 2023 (India) and subsequent implementing rules, Regulation (EU) 2016/679 (GDPR), the UK General Data Protection Regulation and Data Protection Act 2018, and the California Consumer Privacy Act of 2018, as amended by the California Privacy Rights Act of 2020 (CCPA / CPRA).

2. Taxonomy & Scope of Data Collected

Lucky Horze captures, curates, and engineers specialized datasets across diverse sensory modalities for machine learning and artificial intelligence development. Data collection encompasses the following categories:

A. Direct Personal & Identification Data (Administrative Identity)

- Full legal name, address, telephone number, and email address.
- Government-issued identification credentials (PAN, Aadhaar, Passport, or Voter ID) collected strictly for identity verification, statutory tax compliance, and disbursement of participant honorariums.
- Banking details (bank account number, IFSC code, UPI virtual payment addresses) necessary for financial settlements.
- Executed written or electronic informed consent records, digital signatures, and collection audit trails.

B. Multimodal Research & AI Training Media

- **Acoustic & Speech Corpora:** Raw voice recordings, vocal utterances, conversational speech across multiple Indian and international languages/dialects, audio cadence, reading samples, and associated linguistic transcripts.
- **Computer Vision & Visual Media:** Egocentric video recordings captured via head-mounted or body-worn cameras, third-person high-definition video footage, industrial setting interactions, facial expressions, hand movement dynamics, and biometric spatial coordinates.

- **Physical Movement & Gesture Tracking:** Skeletal tracking, fine motor hand/palm movements, object manipulation trajectories, and robotic automation training inputs.
- **Textual & Natural Language Assets:** Handwriting samples, optical character recognition (OCR) scans, domain-specific text entries, and conversational prompts.
- **Technical Telemetry:** Device-level metadata, capture hardware configuration, sampling rates, timestamps, and sensor telemetry (inertial measurement unit data, accelerometer readings).

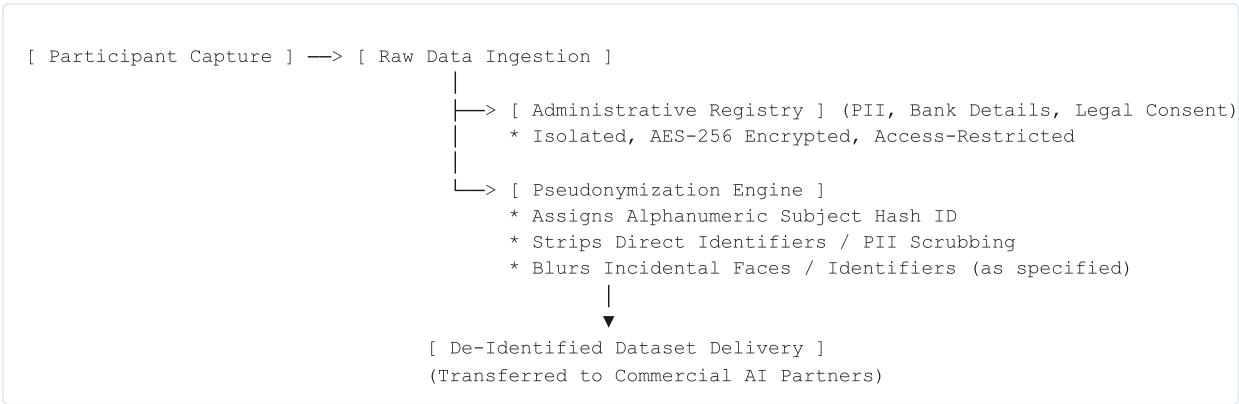
3. Lawful Bases and Purposes of Processing

Lucky Horze collects and processes data strictly under legitimate, documented legal grounds:

- **Explicit Informed Consent:** Every individual human contributor participates under an affirmative, unambiguous, and freely given written or digital consent agreement prior to any recording or capture.
- **Contractual Necessity:** Administrative data is processed to execute contractual commitments, including disbursing compensation and confirming participant eligibility.
- **Legal Compliance:** Identification records are maintained to comply with Indian corporate, financial, and tax reporting requirements.
- **Legitimate AI Engineering Purpose:** Data collected is utilized to train, validate, benchmark, optimize, and fine-tune machine learning architectures, including large language models (LLMs), automatic speech recognition (ASR) engines, computer vision detectors, synthetic data pipelines, and robotic automation platforms.

4. End-to-End De-Identification & Data Minimization Architecture

To protect human privacy while delivering high-value datasets for technological advancement, Lucky Horze enforces a structural separation between direct personal identity and commercial AI media:



1. **Pseudonymization at Ingestion:** Immediately upon receipt from field collection devices, media files are decoupled from participant legal identities and tagged exclusively with an alphanumeric Subject Hash ID.
2. **Registry Isolation:** Direct identifying details and consent documentation are encrypted and housed in a standalone administrative enclave accessible solely to authorized compliance personnel.
3. **Data Scrubbing:** Pre-processing pipelines systematically inspect transcripts and footage to detect, redact, or blur accidental captures of personally identifiable information (such as license plates, residential addresses, and incidental non-participant bystanders).
4. **Zero Resale of Direct PII:** Lucky Horze never sells, licenses, leases, or trades direct personal identification records (names, phone numbers, or national identification proofs) to any third party. Only de-identified, purpose-engineered multimodal datasets are licensed to technology partners.

5. Standard Data Retention & Disposal Schedules

Lucky Horze enforces systematic retention schedules balancing project delivery, audit integrity, and data minimization:

Data Category	Retention Schedule	Operational Purpose
Direct PII & Payment Records	7 Years from execution	Required for corporate, financial audit, and statutory Indian income tax record-keeping.
Executed Consent Records	Duration of Dataset Lifecycle + 5 Years	Necessary to prove chain of title, lawful collection, and licensing authority to downstream partners and regulators.
Raw Processing Caches (Endpoints)	30 to 60 Days post client acceptance	Cryptographically purged from local technician workstations via multi-pass deletion once cloud ingest and QA verification are complete.
Pseudonymized AI Training Datasets	Duration of Commercial Sublicense / Indefinite	Preserved in secure cold storage to fulfill contractual licensing terms, benchmarking requirements, and model development iterations.

Upon expiry of designated retention windows, media files undergo cryptographic erasure and physical drive sanitization in alignment with NIST SP 800-88 Rev. 1 media sanitization standards.

6. Information Security & Technical Safeguards

Lucky Horze implements defense-in-depth security measures to protect data assets against unauthorized access, destruction, loss, or alteration:

- **Encryption Architecture:** Datasets at rest are encrypted using enterprise AES-256 protocols. Datasets in transit across public networks or during delivery to clients are protected via TLS 1.3 cryptographic protocols, secure pre-signed cloud endpoints, or encrypted SFTP channels.
- **Access Management:** Internal systems enforce the Principle of Least Privilege (PoLP) and Role-Based Access Control (RBAC). Personnel can access only the dataset segments required for their direct technical responsibilities. Multi-Factor Authentication (MFA) is strictly enforced across all operational accounts.
- **Storage Infrastructure:** Datasets reside on enterprise hyperscale cloud environments (AWS / Google Cloud Platform) maintaining ISO/IEC 27001, SOC 2 Type II, and PCI-DSS verified data centers. Public bucket ingress is permanently blocked at the tenant level.
- **Workstation Protection:** Technical workstations are equipped with centralized endpoint detection and response (EDR) agents, full-disk hardware encryption (BitLocker 256-bit), and automated vulnerability patching.

7. International Cross-Border Data Transfers

Due to the global nature of artificial intelligence engineering, data collected by Lucky Horze in India is transferred to technology buyers, cloud instances, and research partners across foreign jurisdictions (including the European Economic Area, the United Kingdom, and the United States).

To ensure adequate protection during cross-border transfers:

- All transfers are executed in conformity with cross-border data guidelines issued under the Indian Digital Personal Data Protection Act, 2023.
- Transfers involving personal data of European Economic Area or UK residents incorporate European Commission Standard Contractual Clauses (SCCs) alongside comprehensive Data Processing Addenda

(DPAs).

- Datasets are systematically pseudonymized and encrypted prior to cross-border transfer, ensuring that unauthorized intermediaries or transit networks cannot decrypt or associate data assets with individual real-world identities.

8. Data Subject Rights & Grievance Redressal

In accordance with applicable statutory frameworks, data subjects whose personal data is processed by Lucky Horze maintain enforceable legal rights, including the Right to Access & Confirmation, Right to Correction & Rectification, Right to Erasure, and Right to Withdraw Consent.

A. Protocol for Consent Withdrawal in AI Training Datasets

When a participant requests consent withdrawal:

1. Lucky Horze immediately verifies the participant against their Subject Hash ID.
2. The participant's raw files and pseudonymized assets are tagged and permanently purged from active internal storage, ensuring exclusion from all future dataset packages, releases, or sublicensing batches.
3. If the asset has been delivered to downstream commercial licensors, Lucky Horze issues an electronic deletion notice to the licensor referencing the Subject Hash ID to remove the asset from future training cycles.
4. **Technical Machine Learning Limitation:** In alignment with current computational technology, algorithmic models or deep neural network weights that were trained, compiled, or deployed prior to the withdrawal request cannot mathematically be decomposed or reverse-engineered to excise specific historical training vectors. Participants are informed of this reality at the point of initial informed consent.

B. Ingress & Exercise of Rights

Data subjects may submit formal inquiries, rights requests, or grievances to:

- **Attn:** Data Protection & Compliance Custodian
- **Legal Entity:** Lucky Horze
- **Central Grievance Email:** business@luckyhorze.com
- **Physical Office:** 38B, Citi Mall, New Link Road, Andheri West, Mumbai, Maharashtra 400053, India

All incoming requests are logged, acknowledged within 48 hours, and resolved within 30 business days following identity verification.

9. Third-Party Sub-Processors & Vendor Due Diligence

Lucky Horze engages specialized third-party service providers (including cloud hosting platforms, banking networks, and localized recruitment coordinators) to support technical and administrative operations. Prior to engagement, every sub-processor undergoes formal vendor due diligence to verify technical capability, financial integrity, and compliance with anti-bribery, modern slavery, and privacy requirements. All sub-processors execute binding Data Processing Agreements containing confidentiality mandates and audit rights.

10. Policy Amendments & Continuous Review

This Policy is formally reviewed on an annual basis by the management of Lucky Horze to maintain full alignment with evolving international data protection standards, artificial intelligence regulatory developments, and Indian administrative guidelines. Any operational revisions are published on our digital property at www.luckyhorzeai.com with an updated version and revision date.