# Clockwork Privacy Policy

Version 2026-11-14

This Policy explains how Northbridge Lab Private Limited ("**we**", "**us**") collects, uses and discloses data through Clockwork, including personal data covered by the Personal Data Protection Act 2012 ("**PDPA**").

## 1. What this Policy covers

**1.1 Data we control.** This Policy covers data we collect for our own purposes, including information about you as a user and the records we keep about your Jobs.

**1.2 Personal data in your work.** What you provide to a tool and the result may contain personal data about your clients and others. Your firm remains responsible for that data under the PDPA. For tools that require an account, we process that data as your firm's data intermediary under Schedule 1 of our Terms of Service. For tools you can use without an account, inputs and results stay in your browser as described in our Terms of Use. This Policy does not cover that data.

Words defined in our Terms of Service, such as "Job", "Files" and "Output", have the same meaning here.

## 2. Data we collect

| Category | What it includes | Where it comes from |
|---|---|---|
| Account | Your work email address, and the dates you signed up and signed in | You |
| Acceptance | Which versions of the Terms of Service and this Policy you were shown and accepted, and when | You |
| Job records | The tool used, a Job's dates, status and outcome, and the names, sizes and fingerprints of its Files and Output | Your use of Clockwork |
| Invoice details | The firm name and case reference you add for an invoice | You |
| Payments | Amount, date, status and refunds. Our payment provider handles your card details; we never see them in full | You and our payment provider |
| Usage | Measures of each Job, such as pages processed, file sizes and processing time | Your use of Clockwork |
| Communications | What you send us, such as support requests and defect reports | You |
| Technical and analytics | Browser, device and request information, and how you find and use Clockwork. | You and your activity |

## 3. How we use data

We use this data for the following purposes:

(a) create and secure your account, and sign you in;

(b) run your Jobs, make Output available for download and, when you ask, email you a copy of our Terms of Service;

(c) take payments, issue invoices and refunds, and deal with payment disputes and defect reports;

(d) record which terms apply to each Job;

(e) prevent abuse, keep Clockwork secure and fix faults;

(f) understand usage so we can set prices and improve our tools;

(g) tell you about changes to the Terms of Service or this Policy; and

(h) comply with the law.

We do not use your data to train AI models and we do not sell your data.

## 4. Consent and withdrawal

We ask for only the personal data needed to provide Clockwork.

We will send you marketing emails only if you opt in, and every such email lets you unsubscribe. You may withdraw your consent to other uses by writing to us. If the data is needed to provide Clockwork, we will explain the effect of withdrawing, which may be that we can no longer provide it.

## 5. Who we share personal data with

We share personal data only with service providers that help us run Clockwork, under contracts requiring them to protect it, and only as they need for that purpose. They provide hosting, database and file storage, document and AI processing, email delivery, payments, analytics, and logging and monitoring.

We may also disclose personal data where the law requires it, or to a company that takes over Clockwork, which must then protect it as this Policy describes.

## 6. Transfers outside Singapore

Our service providers store and process personal data in Singapore and the United States. We ensure through contracts that personal data sent outside Singapore is protected to a standard comparable to the PDPA.

## 7. How long we keep data

| Data | Kept until |
|---|---|
| Files and Output | 7 days after the Job is completed, or when it closes unfinished (see clause 5 of the Terms of Service) |
| Job records | As long as needed to handle disputes about the Job |
| Payment records | As long as tax and accounting law requires |
| Account and acceptance records | While your account exists, and for six years after it closes, to show which terms applied |

We delete a Job's content when it closes, as set out in clause 5 of the Terms of Service. Data deleted from our database may remain in backups for up to 7 days. Uploaded documents and generated files are excluded from database backups.

When we no longer need personal data, we delete it or anonymise it.

## 8. How we protect personal data

We protect personal data with reasonable security arrangements, including encryption in transit and at rest and access limited to staff who need it. We hold Cyber Essentials certification from the Cyber

Security Agency of Singapore. If a data breach affects your personal data, we will notify you and the Personal Data Protection Commission where the PDPA requires it.

## 9. Your rights

You may ask us for access to your personal data, or ask us to correct it.

You may also ask us to close your account and delete your personal data. We then close any open Jobs and delete their Files, and delete your account, your Job records, your sign-up answers, your analytics data and your messages to us. We keep only:

- the record of which terms you accepted, for six years after your account closes, so that we can show which terms applied to your Jobs; and
- payment records, for as long as tax and accounting law requires.

We respond within 30 days, or tell you when we will. We may charge a reasonable fee for access, and will tell you the fee first.

## 10. Cookies and browser storage

Clockwork stores your sign-in session and your theme preference in your browser. These are needed for the site to work.

Analytics and session replay use first-party browser storage to recognise your browser across visits, including on public pages before you sign in. When you sign in, we may link this activity to your account using an internal identifier.

We do not use advertising cookies.

## 11. Changes to this Policy

We publish each version of this Policy with its date, and earlier versions are available on request. When it changes, we show you the updated Policy and ask you to acknowledge it before your next Job. We will not use personal data for a new purpose until we have told you about it.

## 12. Contact us

Contact our Data Protection Officer at founders@northbridgelab.com, or write to Northbridge Lab Private Limited, 68 Circular Road, #02-01, Singapore 049422.