

Data-handling note

Version 1.0 · 18 October 2026 · applies to every engagement unless a signed SOW says otherwise · emmanuel@agamanexus.com

1 · No production data, by default

Every engagement runs without your production data. The corpus is built from documents you choose to provide, or from public documentation of the same shape. No access to your systems, repositories, databases or cloud accounts is requested. Evaluation runs against a fixed corpus — never against real users, never in front of your customers. Any document containing personal data is redacted before transfer or excluded.

2 · What is held, where, and for how long

DATA	WHERE IT LIVES	WHO CAN SEE IT	RETENTION
Documents you provide	Encrypted disk, one workstation; private access-controlled folder for transfer	The consultant only	Deleted 90 days after delivery
Questions, answers, scores	Same; the delivered pack carries them redacted	Consultant; you on delivery	Deleted 90 days after delivery
Model inputs	Your approved LLM provider's API — no training opt-in granted	Per that provider's terms	Per their published policy
Your staff contacts	Email and a working folder	The consultant only	On request, or 12 months

3 · Security measures

In transit — TLS everywhere; documents are never sent as unencrypted email attachments, only as a link to an access-controlled folder. **At rest** — full-disk encryption, passphrase plus second factor on the account holding the folder. **Access log** — every access is logged by the storage provider and available to you on request. **Copies** — one working copy, no client documents in any other backup. **Devices** — workstation not shared, patched, folder removed at the end of retention.

Invoices are held in local encrypted storage and by the bank and tax authority, for six years as tax records require.

What is not claimed. No ISO 27001 certificate, no SOC 2 report, no accreditation. This is a one-person practice with documented practice, not a certified management system. Anyone who tells you otherwise at this size is telling you something untrue.

4 · Subprocessors

No subprocessor receives client documents without your written consent, and you may veto any of these. **LLM API provider** (answer generation) sees retrieved passages only, and only if you approve the provider — a local model can be used instead. **Cloud storage** (transfer) sees the corpus, encrypted at rest and access-logged. **Email and calendar** and **banking** see no client documents; documents are never attached to email.

5 · Deletion

All client documents, derived data and working files are deleted **90 days after delivery**, unless a signed SOW sets a different period, and confirmed to you in writing on request. Earlier deletion on written request, within five business days. The delivered pack is yours from handover; no copy is kept.

6 · Breach notification

If unauthorised access, loss or disclosure occurs: you are notified in writing **within 24 hours** of the consultant becoming aware; a written account follows **within 72 hours** covering what happened, what data was involved, what has been done and what is recommended; and the consultant cooperates with your own notification obligations. Notification is not delayed to complete an investigation, and it implies no admission of liability.

7 · Your rights, and the boundary of this note

You own your data and the deliverables you paid for; the consultant keeps only generic methods and tooling, and no client data. Publishing any result requires the case-study clause in the signed SOW — without it, nothing about the engagement is published in any form. You may ask what is held about your organisation at any time and be answered within five business days. Personal data is processed under the Nigeria Data Protection Act 2023, and under a signed DPA where you require one (AGX-DPA-2026-01).

This note does not cover an engagement requiring production access, live personal data or system integration — each is a separate written scope. It is not a compliance certification, an audit opinion, or legal advice.