



External AI Transparency Notice

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Introduction

You are seeing this Cloud Software Group (“Company,” “us”, or “we”) External AI Transparency (“Notice”) because you may be interacting with an artificial intelligence (AI) that the Company has deployed. The Company is committed to responsibly governing the AI systems it deploys. This Notice describes the Company’s use and deployment of AI systems to its customers, prospective customers, and partners in the contexts of sales, marketing, and customer support.

As used in this Notice and as defined under applicable laws, an AI system means a machine-based system that is designed to operate with varying levels of autonomy and that may exhibit adaptiveness after deployment, and that, for explicit or implicit objectives, infers, from the input it receives, how to generate



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outputs such as predictions, content, recommendations, or decisions that can influence physical or virtual environments.¹

Purpose

This Notice's purpose is to cover the Company's AI governance transparency obligations under applicable AI governance laws, as a deployer of AI systems.

Scope

This Notice covers AI systems that the Company deploys to its customers, prospective customers, partners, and website or app visitors ("you") in connection with the Company's sales, marketing, customer service, and support activities.

This Notice does not cover AI systems that the Company may provide through its products, which are covered under the respective product data sheets.

Potentially High-Risk AI We've Deployed

After conducting privacy, security, and AI governance reviews, the Company has deployed the following categories of AI systems that were potentially high-risk were it not for the resulting privacy, security, and AI governance controls that were put in place prior to deployment:

AI Systems Involving Emotion Recognition / Sentiment Analysis

The Company has deployed AI systems that are able to recognize emotion or analyze sentiment in customer-interfacing emails and call transcripts for the purposes of improving efficiency of business operations and enhancing customer support service delivery. However, none of these AI systems are processing biometric or other sensitive personal data. Moreover, these AI systems are deployed with human oversight.

No AI Systems Involving Deep Fakes or Misinformation

The Company has not deployed any AI systems that generate or manipulate image, audio, or video content to constitute a deep fake, nor any AI systems that generate or manipulate text published with the purpose of informing the public on matters of public interest to constitute misinformation or disinformation.

How We Manage Algorithmic Discrimination Risks

The Company has adopted a strict policy against algorithmic discrimination. Prior to deployment, any new AI system goes through cross-functional privacy, security, and AI governance reviews, which cover potential algorithmic discrimination issues. Any high-risk AI deployment requires human oversight to guard against algorithmic discrimination. Any suspected algorithmic discrimination triggers the Company's Incident Response Plan (IRP). The Company is also implementing ISO 42001, an international standard for establishing, implementing, maintaining, and continually improving Artificial Intelligence Management Systems (AIMS) within organizations.

Data Collected and Used

Depending on the applicable use case, AI systems deployed by the Company can have read access and can

¹ EU AI Act, Article 3(1).

process data. For example, AI systems may read correspondences (including name, email IDs and content of emails) between customer support team members and customers to improve customer service and experience, enhance customer retention, and business growth. AI systems may also read and process personal data disclosed by customers as part of their support service requests for efficient turn-around by our customer support team.

Your Rights

Explainability Right

You have a right to an explanation of the role of a high-risk AI system in our decision-making processes; we have explained this above under the section, “Potentially High-Risk AI We’ve Deployed.” You also have a right to have the main elements of any decision explained. You can exercise this right using the contact information below.

Privacy Rights

Your privacy rights are outlined in the separate [Cloud Software Group Privacy Statement](#).

Questions?

If you have any questions about this External AI Transparency Notice, please write to our AI Governance Team at:

Cloud Software Group

Attn: Chief Privacy Officer (CPO)

851 West Cypress Creek Road

Fort Lauderdale, Florida 33309

United States

Email: AIgovernance@cloud.com

