



SHADOW AI DISCOVERY · KANGO LABS LLC

# AI Governance Statement

Umbravi · Kango Labs LLC · umbravi.io

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## THE PURPOSE OF THIS DOCUMENT

This document sets out how Umbravi governs its use of AI, how we handle the information you share with us, and the commitments you can hold us to.

## OUR MISSION

*Umbravi exists to help organizations practically roll out and govern an as-yet-untested technology innovation — AI — without putting their data, their intellectual property, or their reputation at undue risk.*

# 1. What Umbravi is — and isn't

Umbravi is a Shadow AI Discovery service. We analyze the software (i.e., SaaS) spend data your organization already has, identify AI tools in use across your team, and map those tools against applicable regulatory frameworks. We then deliver a branded Shadow AI Risk Report within 1–2 business days.

## **We are a discovery service, not a certification service.**

This distinction matters. We do not issue certifications, compliance determinations, or legal opinions. We do not substitute for a qualified auditor, counsel, or compliance officer.

What we give you is a risk observation — a structured, evidence-based starting point for the decisions those professionals will help you make. Our work helps you see the AI tools actually running across your organization and frames the regulatory conversation. Formal compliance determinations are the work of your auditor, your counsel, and your compliance function.

### **IN PLAIN ENGLISH**

*Umbravi is the service you use when you need to know what AI your team is using and how regulators are likely to view it. It is a starting point for governance — not a substitute for the professionals who help you complete it.*

# 2. How we use AI in our service

Umbravi uses artificial intelligence to produce your Shadow AI Risk Report.

## **What the AI does**

- Reviews your uploaded software (i.e., SaaS) spend data for known AI tool vendors.
- Cross-references those vendors against our internal AI Tool Risk Database.
- Applies the regulatory framework — the Colorado AI Act (SB26-189), California's CPPA Automated Decision-Making Technology (ADMT) regulations, the EU AI Act, and the Massachusetts Data Security Regulation (201 CMR 17.00) — to the tools identified.
- Drafts the structured content of your report — inventory, risk scoring, and recommended actions.

## **What the AI does not do**

- Make final compliance determinations — your report is guidance, not a ruling.
- Access your internal systems, credentials, APIs, or any data beyond the file you upload.
- Act autonomously without human review.
- Learn from your data — our AI provider operates under zero-retention terms, meaning your data is never used to train or improve any AI model.

- Make decisions about you — we use AI to find risks in your data, not to make decisions about you.

### **Human review before delivery**

Every Shadow AI Risk Report is reviewed by a human at Umbravi before it is delivered to you.

## **3. How we protect your exposure**

Our commitment is to protect three things: your data, your intellectual property, and your reputation.

### **Your data**

- Your software (i.e., SaaS) spend file is encrypted in transit (TLS 1.2+) and at rest (AES-256) throughout the engagement.
- We collect only what you explicitly provide in the intake form — nothing more.
- Raw files and identifying records are permanently purged from our systems 14 days after your report is delivered.
- Delivery happens via your Microsoft OneDrive or Google Drive, where your report remains under your organization's existing security controls.

### **Your intellectual property**

- Your data is never used to train, fine-tune, or improve any AI model — ours or anyone else's.
- Our AI provider operates under contractual zero-retention terms: your submission is processed and discarded.
- We never request write access, admin access, or credentials to any of your systems.
- Your report is yours. We do not retain copies of your report or your raw data for commercial use, case studies, or marketing without your explicit written permission. Aggregate, de-identified insights contributed to the Shadow AI Index are governed by the section below.

### **Your reputation**

- We do not sell, rent, license, or share your information with third parties for commercial purposes.
- We do not publicly disclose the names of our customers without your explicit written permission.
- We do not share findings, risk scores, or tool inventories with regulators, insurers, or any external party on your behalf — that decision is yours alone.
- Our reports are framed as risk observations, not legal opinions, precisely so that a misinterpretation of our findings does not create downstream reputational exposure for you.

### **Aggregate research and the Shadow AI Index**

Umbravi maintains an internal Shadow AI Index — an aggregated, de-identified dataset of trends drawn from the Shadow AI Risk Reports we produce. The Index is how we track which AI tools are entering the mid-market,

how regulatory exposure patterns shift over time, and what sector-level risks look like.

### What contributes to the Index

- AI tool categories identified across all reports (for example, meeting transcription, AI coding assistants).
- Risk classifications and regulatory framework applicability (for example, HIPAA-triggering, Colorado AI Act high-risk).
- Aggregate statistical patterns (for example, percentage of organizations in a given sector using at least one high-risk tool).

### What does not contribute to the Index

- Your company name, your employees, or any identifier that could trace the data back to you.
- Your specific vendor contracts, dollar amounts, or spend-level data.
- Your raw software (i.e., SaaS) spend file, which is permanently purged within 14 days of report delivery.

When Umbravi publishes Index-derived research — including our State of Shadow AI reports, regulatory analyses, and public benchmarks — no individual customer is identifiable from the published output. The Index is a sector-level view, not a customer directory.

## 4. When we get something wrong

AI systems — including ours — make mistakes. A vendor might be misclassified. A regulation might be misapplied. A nuance of your specific situation might be missed because we are working only with the data you upload. We do not pretend otherwise. What we do commit to is a process for making it right.

### Our accountability process

- You have 14 days from report delivery to flag any concern, factual error, or regulatory misapplication.
- We will investigate within 2 business days, reply with a correction or an explanation, and — where warranted — reissue your report at no additional cost.
- If our report missed a material at-risk AI tool that was reasonably identifiable from the data you provided, we will reissue the corrected report at no additional cost.
- If Umbravi does not identify at least one at-risk AI tool in your software (i.e., SaaS) spend data, your report is provided free of charge and a full refund is issued within 5 business days.

#### IN PLAIN ENGLISH

*If we are wrong, tell us. We will fix it or refund you.*

## 5. How we govern ourselves

The regulatory landscape for AI is moving quickly. A statement we make today may be out of date by next quarter. We accept that as a condition of operating in this space, and we have structured our internal processes accordingly.

### Quarterly regulatory updates

Our internal AI Regulatory Reference is reviewed and updated every quarter to reflect new guidance, enforcement actions, case law, and legislative changes. Every report generated reflects the version of the reference that was current on the date of generation.

### AI Tool Risk Database maintenance

Our proprietary AI Tool Risk Database is updated quarterly to incorporate new AI vendors entering the market, new privacy policy and terms of service changes from existing vendors, and new enforcement precedent that affects how a tool should be risk-classified.

### Public disclosure of method

We publish the AI Regulatory Reference as a companion document to every Shadow AI Risk Report. You can read how we categorize risk, which statutes we apply, and how we score exposure. We do not hide the method — a risk observation you cannot audit is not a risk observation you can trust.

### Independence

Our risk classifications are independent. Umbravi's revenue comes exclusively from the organizations that hire us to produce their reports. We do not accept commissions, referral fees, sponsorships, or any form of compensation from the AI tools we classify. A vendor's rating in our analysis reflects our evidence-based assessment — nothing more.

## 6. Transparency and contact

If any of the commitments in this document are unclear, or if you believe we have failed to honor them, we want to hear from you directly.

### Founder-accessible

Umbravi is a product of Kango Labs LLC, a small US company.

### How to reach us

- **Email:** [hello@umbravi.io](mailto:hello@umbravi.io) — we reply personally, usually within one business day.
- **Data requests, corrections, or deletion requests:** same address.
- **Media or regulatory inquiries:** same address; please indicate the nature of the inquiry in the subject line.

## Document lifecycle

This AI Governance Statement is versioned. Material changes will be versioned. We will not substantively change this document without publishing the change.

### OUR PROMISE, RESTATED

Umbravi exists to help you practically roll out and govern AI without putting your data, your intellectual property, or your reputation at undue risk. Every commitment in this document is in service of that promise. If you ever feel we have not met your needs, let us know and we will make it right.

*This AI Governance Statement is a living document. It will be updated as Umbravi's practices evolve and as the regulatory landscape changes. Previous versions are retained and available upon request.*