
Planned Giving Interactive

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Max™ & Frank™ AI Agents — IT and Legal FAQ

For Institutional Review, Procurement, and Compliance Teams

Prepared by: Planned Giving Interactive, LLC

Products Covered: Max™ and Frank™ AI Research Agents

Overview:

Max™ and Frank™ are AI-powered educational research agents developed by Planned Giving Interactive, LLC (“PGI”) for use on planned giving and charity websites. Max™ is designed for donors and general audiences seeking plain-language educational reference related to estate and charitable gift planning. Frank™ is designed for professional advisors and gift planning professionals seeking technical charitable planning information.

The agents are intended as informational and educational tools only. They do not provide legal, tax, investment, or fiduciary advice.

Both agents operate using a contained Retrieval-Augmented Generation (“RAG”) architecture grounded in curated reference materials and controlled source documentation.

Product Functionality & Scope

Q: How do the agents generate responses?

A: The agents use a Retrieval-Augmented Generation (RAG) framework that retrieves information from a curated library of vetted planning and tax-reference materials before generating a response.

Responses are constrained to the contained knowledge environment and designed to:

- prioritize source-grounded responses,
- reduce hallucinations,
- avoid speculative outputs, and
- defer to human professionals when appropriate.

If a user inquiry falls outside the scope of available source material, the agent may indicate insufficient information, recommend contacting a qualified advisor, or refer the user to the organization directly.



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Q: What source materials are used?

A: The contained reference environment may include materials such as:

- Internal Revenue Code (IRC)
- Treasury Regulations
- IRS Revenue Rulings and guidance
- Gift Planner's Workstation™ research content
- Russell James III, Ph.D., J.D., CFP® materials
- Clontz & Raffin charitable planning references
- Journal of Gift Planning (NCGP) publications
- Other internally approved planned giving reference materials

Q: Are the agents intended to provide legal or tax advice?

A: No. The agents are informational educational tools only and are not intended to replace legal, tax, financial, or fiduciary professionals. Users are encouraged to consult qualified advisors regarding their individual circumstances.

Deployment & Technical Architecture

Q: How are the agents deployed?

A: The agents are deployed through a secure embedded web component added to a public-facing webpage. Deployment generally requires:

- whitelisting the client domain,
- insertion of PGI-provided embed code, and
- no direct integration into internal institutional systems.

Q: Do the agents require access to internal systems?

A: No. By default, the agents operate independently and do not require:

- CRM access, CMS access, or institutional databases,
- VPN access, remote desktop access, or firewall modifications,
- privileged credentials, or internal network connectivity.

Q: Do the agents require user authentication?

A: No. The standard deployment model does not require account creation, SSO, SAML, Shibboleth, MFA, passwords, or institutional identity integration. The agents are designed for anonymous public informational use.

Q: Will the agents impact website performance?

A: No significant impact is expected. The embedded components load asynchronously, operate in isolated browser contexts, do not modify institutional infrastructure, and do not require additional open inbound ports.



Max™ & Frank™ AI Agents — IT and Legal FAQ^{continued}

Data Collection, Privacy & Retention

Q: What user data is collected?

A: The agents process conversational text voluntarily submitted by users during a live session. Standard deployments are not intended to collect protected health information (PHI), payment card data, student education records, institutional credentials, or sensitive regulated personal information. Users are instructed not to submit confidential or highly sensitive information into the chat interface.

Q: Is conversation data stored?

A: Conversation data may be transiently processed and temporarily retained for operational continuity, abuse prevention, security monitoring, and troubleshooting purposes. Conversation/session data is automatically deleted within approximately 24 hours unless otherwise required for legal obligations, active security investigations, or abuse prevention activities. PGI does not use customer conversation data to train public AI models.

Q: Is user data shared or sold?

A: No. Conversation data is not sold to third parties and is not used for advertising purposes.

Q: Is customer data used to train AI models?

A: No. Customer conversation data is not used to train or fine-tune public or shared large language models.

Q: Where is data hosted?

A: Infrastructure and data processing are hosted within the United States using commercially managed cloud infrastructure providers and associated service providers. Additional infrastructure details may be provided under NDA or during formal procurement review.



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Security Controls

Q: How is data protected?

A: Security controls include:

- TLS 1.2+ encryption in transit,
- encryption at rest using industry-standard controls,
- role-based administrative access controls,
- environment isolation,
- monitoring and logging,
- least-privilege administrative practices
- vendor-managed infrastructure security controls.

Q: Does PGI maintain cybersecurity policies and procedures?

A: PGI maintains operational security and data handling procedures appropriate to the nature and scope of the platform. Security practices are periodically reviewed and updated.

Q: Does PGI follow recognized security standards?

A: The underlying AI infrastructure provider maintains SOC 2 Type II compliance. Additional documentation may be available upon request, subject to confidentiality restrictions.

Q: Are penetration tests or vulnerability scans performed?

A: Security monitoring, vulnerability management, and infrastructure-level testing are performed through platform providers and associated cloud infrastructure controls. Additional documentation may be available during formal vendor review processes.

Q: Are backups maintained?

A: Infrastructure providers maintain operational redundancy and backup capabilities consistent with commercially reasonable cloud-service practices.

Incident Response & Business Continuity

Q: Does PGI maintain an incident response process?

A: Yes. PGI maintains procedures for identifying, assessing, containing, and responding to security incidents affecting platform operations. Clients will be notified of confirmed incidents impacting their environment or data in accordance with applicable contractual obligations and legal requirements.

Q: Has PGI experienced a known material security breach?

A: No known material security breach affecting customer environments has been identified within the past three years.

Q: What happens if service is discontinued?

A: If service is terminated, the client domain will be removed from the deployment whitelist, the embedded agent will cease operating, transient conversation data will expire according to retention policies, and no institutional system dependencies remain active.



Max™ & Frank™ AI Agents — IT and Legal FAQ *continued*

Third-Party Services & Subprocessors

Q: Are third-party providers used?

A: Yes. PGI may utilize commercially managed cloud, infrastructure, AI-processing, monitoring, logging, and hosting providers necessary for operation of the platform. Subprocessors may change over time as operational needs evolve. Additional details may be provided upon request during procurement review.

Accessibility & Institutional Compatability

Q: Are the agents designed for public-facing institutional websites?

A: Yes. The agents are designed to operate on public-facing institutional webpages, including nonprofit, healthcare, educational, and advancement environments.

Q: Do the agents require installation on institutional devices?

A: No. The standard deployment is browser-based and does not require local software installation.

Accessibility & ADA Compliance

Q: Are Max™ and Frank™ designed with accessibility considerations?

A: Yes. PGI recognizes the importance of digital accessibility and the obligations many educational, healthcare, nonprofit, and public-sector organizations have under the Americans with Disabilities Act (ADA), Section 508, and WCAG accessibility standards.

The Max™ and Frank™ agents are designed for deployment on public-facing institutional websites and are intended to support accessible user interaction to the extent reasonably achievable within the current platform architecture.

Q: Does PGI provide a VPAT® or Accessibility Conformance Report (ACR)?

A: PGI can provide accessibility-related documentation and supporting materials upon request. The underlying third-party AI/chat interface infrastructure provider currently maintains:

- an Accessibility Statement,
- ongoing WCAG 2.1 remediation efforts, and
- internal accessibility review processes.

At this time, the third-party provider has not yet published a finalized VPAT® Accessibility Conformance Report (ACR) certifying full WCAG 2.1 AA conformance across all chatbot interface functionality. PGI does not represent the platform as fully WCAG 2.1 AA conformant at this time.



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Accessibility & ADA Compliance

Q: What accessibility standards are being pursued?

A: The underlying chatbot infrastructure provider is actively working toward improved alignment with WCAG 2.1 Level AA, ADA accessibility expectations, and related accessibility best practices for embedded web applications.

The provider's published accessibility program includes ongoing remediation efforts related to:

- keyboard navigation,
- screen-reader compatibility,
- semantic labeling,
- ARIA implementation,
- zoom/reflow support,
- contrast improvements, and
- dynamic content announcements.

Q: Does accessibility depend on the client institution's website?

A: Yes. Accessibility outcomes are partially dependent on the host institution's website implementation, surrounding page structure, color and branding choices, browser behavior, embedded page restrictions, and other third-party site elements.

Because the agents are embedded web components, overall accessibility compliance may be influenced by the environment in which they are deployed.

Q: Can the agents be disabled or supplemented with alternative contact methods?

A: Yes. Organizations may choose to provide alternative contact channels, include accessibility support messaging, supplement the tool with human assistance workflows, or disable/remove the embedded agents at any time.

Q: Are accessibility improvements ongoing?

A: Yes. Accessibility remediation and interface improvements are ongoing through the underlying third-party platform provider and related infrastructure vendors. PGI continues to monitor accessibility-related developments and work with platform providers regarding accessibility enhancements and institutional requirements.

Legal & Contractual

Q: Are organizations indemnified?

A: Indemnification terms, limitation-of-liability provisions, and related contractual obligations are governed by the applicable license or service agreement between PGI and the client organization.



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Max™ & Frank™ AI Agents — IT and Legal FAQ *continued*

Legal & Contractual *continued*

Q: Are Data Processing Agreements (DPAs) supported?

A: Yes. PGI can review reasonable institutional data protection and security addenda during contracting processes.

Q: Does PGI support institutional security reviews?

A: Yes. PGI regularly participates in institutional procurement, IT security, legal, and vendor review processes.

Support & Maintenance

Q: Who provides support?

A: PGI provides operational and customer support for the platform. Support requests are generally addressed during normal business hours.

Q: How are updates managed?

A: Platform, content, and operational updates are managed centrally and deployed through the hosted environment. Clients are not required to manually install updates.

Contact Information

Planned Giving Interactive, LLC
14260 W. Newberry Rd. #215
Newberry, Florida 32669 USA
Email: info@estategiftplanning.com

Website: ESTATEGIFTPLANNING.COM

