

MENTIQ — PRIVACY POLICY

Last Updated: 2025-12-09

This Privacy Policy describes how **Mentiq Inc.** (“**Mentiq**,” “**we**,” “**us**,” or “**our**”) collects, uses, stores, discloses, and protects information in connection with the Mentiq platform, websites, dashboards, APIs, SDKs, analytics tools, and related services (collectively, the “**Service**”).

This Privacy Policy applies to:

- Customers who create accounts with Mentiq
- Authorized users of Customer accounts
- Website visitors
- Individuals whose information is processed indirectly through Customer use of the Service (“**End Users**”)

By accessing or using the Service, you acknowledge and agree to the practices described in this Privacy Policy.

IMPORTANT JURISDICTION NOTICE

Mentiq currently operates **outside the European Union** and does not intentionally target EU-based entities or process data subject to the EU General Data Protection Regulation (GDPR).

1. ROLES AND RESPONSIBILITIES

1.1 Customer as Controller

Customers are the **data controllers** with respect to Customer Data and End User Data. Customers determine what data is collected from End Users and are responsible for providing legally sufficient notices and obtaining any required consents.

1.2 Mentiq as Processor / Service Provider

Mentiq acts as a **data processor or service provider**, processing data solely on behalf of Customers and in accordance with the Terms of Service and Data Processing Addendum (DPA).

Mentiq does not have a direct relationship with Customer End Users.

2. INFORMATION WE COLLECT

2.1 Information Provided by Customers

When Customers create accounts or communicate with Mentiq, we may collect:

- Names
 - Company names
 - Email addresses
 - Login credentials
 - Billing and payment information
 - Support communications
 - Account configuration information
-

2.2 Customer Data

Customer Data includes data Customers submit or cause to be processed through the Service, such as:

- Analytics events
- Feature usage data
- Application interaction data

- Session information
 - Technical logs submitted by Customer
-

2.3 End User Data

End User Data includes information about individuals who interact with a Customer's product or service and whose data Customers submit to the Service.

This may include:

- Usage activity
 - Behavioral events
 - Feature interaction data
 - User identifiers
-

2.4 Email Addresses and User Identifiers

Customer Data and End User Data **may include email addresses or other identifiers**, including:

- Customer account emails
- Authorized user emails
- End User emails provided by Customers

Email addresses and identifiers are processed **solely** to:

- Authenticate users
- Associate analytics with users
- Manage accounts

- Provide customer support
- Secure the Service
- Deliver system, transactional, and administrative communications

Mentiq does **not require Customers to submit End User email addresses**, and Customers are solely responsible for obtaining all required notices and consents for such disclosure.

2.5 Automatically Collected Information

We may automatically collect:

- IP addresses
 - Log files
 - Browser type
 - Device information
 - Time zone data
 - Referring URLs
 - Performance diagnostics
-

2.6 Cookies and Similar Technologies

We use cookies and similar technologies for authentication, security, analytics, and functionality as described in our **Cookie Policy**.

3. HOW WE USE INFORMATION

We use information for the following purposes:

3.1 Service Operation

- Providing analytics and dashboards
- Processing events
- Managing accounts
- Authenticating users
- Providing support

3.2 Security and Integrity

- Detecting fraud or misuse
- Enforcing Terms of Service
- Preventing unauthorized access

3.3 Communications

- Transactional emails
- Security notifications
- Administrative notices
- Product announcements

Marketing communications are sent **only to Mentiq's direct users** and include opt-out mechanisms as required by law.

4. NO DIRECT MARKETING TO END USERS

Mentiq **does not** independently initiate marketing or promotional communications to Customer End Users.

End User email addresses and identifiers are **not used** by Mentiq for direct marketing purposes unless expressly authorized by the Customer and permitted by law.

5. DERIVED DATA (ANONYMIZED & AGGREGATED DATA)

5.1 Creation of Derived Data

Mentiq may create **Derived Data** by anonymizing, aggregating, or de-identifying Customer Data and End User Data using commercially reasonable techniques.

Derived Data cannot reasonably identify any individual or Customer.

5.2 Ownership of Derived Data

Mentiq owns all rights, title, and interest in Derived Data.

Derived Data:

- Is not Personal Data
 - Is not Customer Data
 - Is not End User Data
 - Is not subject to access, deletion, or portability requests
-

5.3 Use of Derived Data

Mentiq may use Derived Data for any lawful purpose, including:

- Marketing and advertising
- Case studies and testimonials
- Benchmarking and industry reports
- Website content and sales materials

- Product improvement
 - Research and development
 - Training machine-learning models
 - Training and improving large language models (LLMs)
 - Internal AI systems and automation
-

5.4 Sharing Derived Data

Mentiq may share Derived Data with:

- Strategic partners
- Marketing partners
- Analytics providers
- Machine-learning infrastructure providers

Partners may not re-identify, resell, or independently commercialize Derived Data.

6. HOW WE SHARE INFORMATION

6.1 Subprocessors

We may share information with vetted Subprocessors who assist with:

- Cloud hosting
- Infrastructure management
- Security monitoring
- Payment processing

- Email delivery
- Customer support

All Subprocessors are bound by contractual confidentiality and security obligations.

6.2 Legal and Government Requests

We may disclose information if required to comply with legal obligations, enforce our agreements, or protect rights and safety.

Where permitted, Customers will be notified.

6.3 Business Transfers

Information may be transferred in connection with a merger, acquisition, restructuring, or asset sale.

7. DATA RETENTION

7.1 Customer Data

Customer Data is retained while an account is active and deleted within a reasonable period after termination, unless legally required to retain it.

7.2 Derived Data

Derived Data is retained indefinitely.

8. DATA SECURITY

We implement commercially reasonable security measures, including:

- Encryption in transit

- Access controls
- Monitoring and logging
- Secure development practices

No method of transmission or storage is 100 percent secure.

9. DATA SUBJECT RIGHTS

9.1 Customer Rights

Customers may access, update, or delete account-level information via the Service.

9.2 End User Rights

End Users must contact the applicable Customer to exercise privacy rights.

Mentiq assists Customers as required by law but does not act directly on End User requests unless legally required.

Derived Data is not subject to data subject rights.

10. CHILDREN'S DATA

The Service is not directed at individuals under the age of 13.

Customers must not submit children's data without lawful consent.

11. INTERNATIONAL PROCESSING

Data may be processed in jurisdictions where Mentiq or its Subprocessors maintain operations.

Mentiq applies reasonable contractual and security safeguards consistent with applicable non-EU laws.

12. NO SALE OF PERSONAL DATA

Mentiq does not sell Personal Data as defined by applicable U.S. or Canadian privacy laws.

Derived Data is not Personal Data.

13. CHANGES TO THIS POLICY

We may update this Privacy Policy from time to time.

Material changes will be communicated through the Service or via email.