

We at Mentle Inc., ("Mentle," "our," "we," or "us") value our users' privacy as we know that you care about how your personal information is collected, used, safeguarded, shared, and we take that seriously. Kindly read the following terms to learn more about your privacy as this Privacy Policy ("Policy") will help you understand how we collect and use personal information from those who use access and make use of our Site and the services that we offer.

This privacy policy also helps you understand the rights and choices that you have with respect to your personal information.

By accessing or using the Service in any manner, you acknowledge that you accept the practices and policies outlined in this Privacy Policy, and you hereby consent that we will collect, use, and share your information in the following ways.

1. Changes to this Privacy Policy

We reserve the right to make changes to this Policy at any given time. If you want to make sure that you are up to date with the latest changes, we advise you to frequently visit this page. If at any point in time Mentle decides to make use of any personally identifiable information on file, in a manner vastly different from that which was stated when this information was initially collected, the user or users shall be promptly notified by email. Users at that time shall have the option as to whether to permit the use of their information in this separate manner.

2. What does this privacy policy cover?

This Policy applies to Mentle, and it governs any and all data collection and usage by us in compliance with applicable regulations. Through the use of these Services, you are consenting to the data collection procedures expressed in this Policy.

We gather various types of information from our users, as explained in more detail below, and we use this information internally in connection with our Services, including to personalize, provide, and improve our Services, to allow you to make purchases, to communicate with you, and to analyze how you use the Services. In certain cases, we may also share some information with third parties, but only as described below.

Please note that this Policy does not govern the collection and use of information by companies that Mentle does not control, nor by individuals not employed or managed by us. If you visit a website that is made available via the service or link, be sure to review its privacy policy before providing the site with information. It is highly recommended and suggested that you review the privacy policies and statements of any website you choose to use or frequent to better understand how such websites garner, make use of and share the information collected.

3. Information we collect

When you make use of our Services, we may collect and process a variety of personal information about you and from various sources which may include but are not limited to the following as described below:

A. Information you provide:

"Personal Information" means any information which, either alone or in combination with other information we hold about you, identifies you as an individual, including, for example, your contact information such as your name, email address, telephone, location information, demographic information, mental health goals, as well as any other non-public information about you that is associated with or linked to any of the foregoing data which you may be required to provide when using the Service. We collect this information when you sign-up for the Service, engage our interactive services, make a purchase, feedback and survey responses, request customer support or otherwise communicate with us.

"Anonymous/Aggregated Data" means data that is not associated with or linked to your Personal Information; Anonymous Data does not, by itself, permit the identification of individual persons. We collect, use and share Anonymous Data such as statistical or demographic data for any purpose. Anonymous Data may be derived from your personal information but is not considered personal information in law as such data does not directly or indirectly reveal your identity. For instance, Mentle may aggregate or anonymize your usage data to calculate the percentage of users accessing a specific Service feature. However, if Mentle combines or connects Aggregated Data with your personal information so that it can directly or indirectly identify you, Mentle treats the combined data as personal information which will be used in accordance with this privacy notice.

Mentle does not collect any Special Category of information about you such as your race, ethnicity, philosophical or religious beliefs, sexual orientation, political opinions, trade union membership, information about your health and genetic and biometric data).

Please note that you can choose not to provide us with certain information, but this may limit the features of the Services you can use.

B. Information we collect automatically

We may collect certain information (which does not identify you as an individual) about your use of the Service through the use of tracking technologies or by other passive means and other relevant statistics, including the following:

- i. Usage Data: When you access and/or make use of our Services, we collect details of your visit such as traffic data, date and time of your visit to the Service, logs, location, error tracking information, and other usage data and resources that you access and use on or in the Services.
- ii. Device and location information: We also collect information about your mobile, computer device, and internet connection, such as your operating system, IP address, browser type, and App version information. For example, we make use of Google Analytics and Mixpanel to track and collect these kinds of information. We may also collect location through the use of geolocation technology.
- iii. Cookies: When you access and/or make use of our Services, we send one or more cookies (small text files containing a string of characters) to your device that uniquely identifies your browser. We use cookies to improve the quality of the software and service by storing user preferences and tracking user trends. You can refuse to accept browser cookies on your computer by activating the relevant browser setting, and you may have the same capabilities on your mobile device under the choices for your operating system or browser. If you choose

this option, you may be unable to access or utilize certain features of our Services. Unless you have configured your browser or operating system to reject cookies, our system will send cookies when you visit our website or use our App. Please see our Cookie Policy for more information on how we make use of cookies.

- iv. Links: The Service or contents made available on the Service may include links in a format that enables us to keep track of whether these links have been followed by IP addresses. We use this information to improve the quality of our products and design.
- v. Beacons: Beacons (also known as “pixel tags” or “clear GIFs”) are 1×1 single-pixel graphics that allow us to count the number of users who have visited or accessed the Service and to recognize users by accessing our cookies. We may employ beacons to facilitate Service administration and navigation, track the actions of users of the Service, compile aggregated statistics about Service usage and response rates, and provide an enhanced online experience for visitors to the Services.
- vi. Analytics services: We may use third-party analytics services ("Analytics Services"), such as Google Analytics, to help monitor, visualize, report, integrate and analyze how users use our Services. Google Analytics also make use of cookies, which are text files placed on your computer, to help our Services analyze how users use the Services. You can find out more about how Google uses data when you visit our Services by visiting "How Google uses information from sites or apps that use our services" (located at <https://policies.google.com/technologies/partner-sites>). Furthermore, the information generated through cookies or other technologies about your use of the Mentle Service (the "Analytics Information") may be transmitted to the Analytics Services. The Analytics Services use Analytics Information to compile reports on user activity. The Analytics Services may also transfer the Analytics Information to third parties where required to do so by law, or where such third parties process Analytics Information on their behalf. Each Analytics Service's ability to use and share Analytics Information is restricted by such Analytics Service's terms of use and privacy policy.
- vii. Payment transaction information: Through the use of a third-party payment processor, certain financial information used by you for payment transactions on our Services may be collected. Payment amount, date and time of the transaction, payment instrument expiration date and billing postcode, user’s address and other details related to the transaction may be collected as well.

C. Information automatically collected by third parties about you

Some embedded content on the Service may be served by third-party service providers. Please note that these companies may also use cookies or other similar technologies to collect data about you, both on the Site and throughout the Internet. Data collection and use by those third parties is subject to the privacy policies of those third-parties

Please rest assured that this site will only collect personal information that you knowingly and willingly provide to us by way of surveys, completed forms, and emails. Mentle intends to use personal information only for the purpose for which it was requested, and for any additional uses specifically provided for on this Policy.

4. What we use your personal information for

Mentle uses the information collected from you to provide, improve, and develop the services we provide to you, communicate with you, offer you a better service, and protect us and our users. When you interact with or make use of the Mentle service, we use a variety of technologies to collect information about you for various reasons.

- i. To create and service your user account on the service and to enable certain functionalities for your use on our Services.
- ii. Identify you as a user of the Services and ensure the security of your account -e.g., by sending an email to confirm that you are the owner of the email address linked to your user account.
- iii. To personalize your experience when you make use of our Services, such as by providing personalized content and recommendations. For example, we use the email address we collect from you to help you create, log into, and manage your Mentle account on our Services. This lets us personalize your experience and give you relevant information. It also powers the features that help you better understand, engage with, and track your mental health goals and journey and present you with personalized, relevant and helpful information/features.
- iv. Conducting research and analysis to help build a profile about you when you make use of our Services and make automated decisions based on your interaction with our Services to generate better answers to your mental health questions and effectively communicate relevant information with you.
- v. **Purchase and delivery of services:** We use your personal information to process and maintain your subscription plan, process payments, deliver the service, and communicate with you about purchases and relevant services.
- vi. **Recommendations and Personalization:** Personalize your experience and inform you about the therapy/services in which you have indicated an interest.
- vii. We use information collected to facilitate the connection of Social Media Accounts to our Services to provide information from Social Media Accounts to your Profile. Depending on the Social Media Accounts you choose and subject to the privacy settings that you have set in such Social Media Accounts, we will access, make available and store (if applicable and as permitted by the social media service and authorized by you) the information in your Social Media Accounts so that it is available on and through your Profile on the Services.
- viii. **For communication purposes:** We may send emails, newsletters, product updates and related emails to the email address you provide to us and text messages to any cellphone number you provided to us, and for informational and operational purposes, such as account management, customer service, system maintenance, and other Service-related purposes. We use personal information that we gather from you to communicate with you in relation to your use of the Mentle Service via different channels (e.g., by email, chat, phone).
- ix. To administer a promotion, survey or other Service feature.

- x. **Fraud detection and prevention:** Increase and maintain the safety and security of our products and services and prevent misuse. We use personal information to detect and prevent fraud and abuse in order to protect the security and ensure the safety of our Customers, Mentle, and others.
We also use collected information to protect against, identify and prevent fraud and other criminal activity, claims and other liabilities
- xi. **Provide, troubleshoot, and improve Mentle Services:** We use your personal information to understand, diagnose, troubleshoot, and fix issues with the Mentle Services. We also use such information to operate, evaluate, develop, manage and improve our Services (including operating, administering, analyzing and improving our products and services; developing new features and services; managing and evaluating the effectiveness of our communications; performing accounting, auditing, billing reconciliation and collection activities and other internal functions;
- xii. To fulfill contractual obligations with third parties, for example, partnering with logistics partners in delivering your order.
- xiii. **Comply with and enforce applicable legal requirements:** in certain cases, we collect your personal information to stay in compliance with laws and relevant industry standards and policies, including this Privacy Notice and our Terms and Conditions of use.

5. Personal Information that we share

Except as described below, we do not sell, rent, trade, or otherwise share personal information collected through the Service because we are committed to maintaining your trust:

- i. Service providers: We work with third-party service providers such as OpenAI and related service providers in order to make available to you our products and services for use on or through Mentle or engage the services of other service providers to perform certain functions on our behalf. Such services may include email services, product development and enhancement, payment processing, customer service, and marketing. We may share personal information or any information collected through the Service with these third parties for the purpose of enabling them to provide these services and they may have controlled and limited access to the database of user information. Below includes some but are not limited to third party providers we will be sharing certain information about you with, if necessary:
 - a. Firebase, to send our newsletters. Through the service, we will also gather statistics around e-mail open and click-through rates to help us monitor and improve our newsletters. We will also use the Firebase service for authentication, hosting, test lab, notification, and real-time database.
 - b. Mixpanel, to track app download attribution by channel, track attributions metrics as well as set up attribution links.
 - c. Adapty, to track and manage our mobile app subscriptions and understand how our customers are spending.
 - d. Rasa X, we use this as a chatbot framework based on machine learning, mainly used to integrate these chatbots in our App.

- e. DigitalOcean, Kubernetes clusters and object storage that we use to store and deliver data to our end-users as well as the application itself.
 - f. OpenAI, we make use of GPT-3 (open-source artificial intelligence) as a third-party API to build realistic dialogues with our users.
 - g. Sentry, we make use of Sentry for data collection, analysis, monitoring, visualization, reporting and integration with other applications for our website.
 - h. Microsoft Azure, will be used for a range of cloud services and networking.
 - i. GoogleAnalytics, will be used for data collection, analysis, monitoring, visualization, reporting and integration with other applications for our website.
- ii. Subsidiaries, business partners and affiliates: We may share personal information or any information collected through your use of the Service with our subsidiaries and affiliates for the purposes for which you provided the information or as reasonably necessary for our internal administrative and business purposes. We may share your Personal Information with our business partners. Some of these business partners may use your personal information to facilitate the offering of services or products that may be of interest to you. We may also share your Personal Information as otherwise described to you at the time of collection.
- iii. Analytics Partners: When you provide your personal information to us, we may make certain personal information available to certain third parties for analytics purposes, including but not limited to leveraging third-party tools and services to host, track, integrate, manage user's interests, mood, emotional wellbeing, usage pattern, and/or functionality available through our Services. We will only share your personal information with analytics partners for the improvement of our own service and/or to deliver the Mentle services to you. We do not in any way sell your personal information to advertisers.
- iv. Merger and acquisition: We may disclose or transfer personal information or any information collected through your usage of our Service to third parties who acquire all or a portion of Mentle's business, whether such acquisition is by way of merger, consolidation, or purchase of all or a portion of our assets, or in connection with any bankruptcy or reorganization proceeding brought by or against us.
- v. Compliance with laws: We may disclose personal information or any information collected through your usage of the Mentle Service if we are required to do so by law or pursuant to legal process, in response to a request from government officials, law enforcement authorities or a valid subpoena, or as necessary or appropriate in connection with an investigation of illegal activity, including without limitation to prevent, investigate, detect or prosecute any criminal offense or attack.
- vi. Consent: We may share personal information in accordance with any consent you provide.
- vii. Aggregate Information: We share aggregate statistical data for the improvement of our Services. We may also share aggregated or de-identified information with third parties at our discretion.

6. Data retention and deletion

We keep your personal information only as long as necessary to provide you with the Mentle Service and for legitimate and essential business purposes, such as maintaining the performance of the Mentle Service, making data-driven business decisions about new features and offerings, complying with our legal

obligations, and resolving disputes. We keep some of your personal information for as long as you are a user of the Mentle Service.

If you request, we will delete or anonymize your personal information so that it no longer identifies you, unless we are legally allowed or required to maintain certain personal information, including situations such as the following:

- i. If there is an unresolved issue relating to your use of the service, such as an outstanding subscription fee or an unresolved claim or dispute we will retain the necessary personal information until the issue is resolved;
- ii. Where we need to retain the personal information for our legal, tax, audit, and accounting obligations, we will retain the necessary personal information for the period required by applicable law; and/or,
- iii. Where necessary for our legitimate business interests such as fraud prevention or to maintain the security of our users.

7. Your rights

General Data Protection Regulations grant you certain rights ('information rights') which provide you with:

- i. **Right of rectification or erasure** - if you feel that any data that we hold about you is inaccurate you have the right to ask us to correct or rectify it. You also have a right to ask us to erase information about you where you can demonstrate that the data we hold is no longer needed by us if you withdraw the consent upon which our processing is based, or if you feel that we are unlawfully processing your data. Your right of rectification and erasure extends to anyone we have disclosed your personal information to and we will/shall take all reasonable steps to inform those with whom we have shared your data about your request for erasure. Note that we may have a legal obligation to retain some or even all personal information about you under relevant laws. We may also have the legal right to retain the information you have requested to be erased.
- ii. **Right to restriction of processing** - you have a right to request that we refrain from processing your data where you contest its accuracy, or the processing is unlawful and you have opposed its erasure, or where we don't need to hold your data anymore but you need us to in order to establish, exercise or defend any legal claims, or we are in dispute about the legality of our processing your personal information.
- iii. **Right to data portability**: In certain circumstances, you may have the right to request that data which you have provided to us be made available to you so that you can transfer this to another data controller.
- iv. **Right to object** - you have a right to object to our processing of your personal information where the basis of the processing is our legitimate interests including but not limited to direct marketing and profiling.

- v. **Right to withdraw consent** - you have the right to withdraw your consent for the processing of your personal information where the processing is based on consent. To withdraw consent, please specify what you wish to withdraw consent for, by emailing us at feedback@mentle.app.
- vi. **Right of complaint** - if you are unhappy with the way we have used or are handling your personal information you have the right to lodge a complaint with the supervisory authority for data protection issues. We would, however, appreciate the chance to deal with your concerns before you approach the Supervisory Authority. So, please contact us in the first instance by emailing us at feedback@mentle.app.

8. Keeping your data safe

As a matter of policy, we are committed to protecting your data and as such, Mentle takes precautions to protect your information. We adopt commercially reasonable measures to secure Personal Information by using physical and electronic measures designed to ensure the integrity and security of the Personal Information we hold. When you submit sensitive information via the Service, your information is protected.

However, please note that no method of transmission over the Internet, or method of electronic storage, is 100% secure. Although we will do our best to protect the personal information that we gather about you, the transmission of information via the internet is not completely secure and as such, we cannot guarantee the absolute security of your data transmitted to the Service; any transmission is at your own risk. We have implemented various policies including encryption, access, and retention policies to guard against unauthorized access and unnecessary retention of personal information in our systems.

9. Your California privacy rights

If you are a resident of California, this section provides additional information about specific rights regarding your personal information.

Personal Information we collect

The following is a list of personal information that we collect or have collected from California residents over the past twelve months. We will update this disclosure from time to time as appropriate.

- Unique identifiers such as your first name, last name, age, gender, or similar identifier, address, or IP address;
- Internet or other electronic network activity information, including content interaction information, such as content downloads, search history, transaction and interaction data on your use of our Service and from links in our emails sent to you;
- geolocation data, such as the location of your device or computer;
- inference data, such as information about your purchase preferences, feedback, and survey responses;

- Other information that identifies or can be reasonably associated with you (e.g., the information you voluntarily provide as you use the Mentle services, such as additional profile information or user-generated content).

How we collect personal information

We obtain the categories of personal information listed above from the following sources:

- Directly from our Services users when they provide the information to us.
- Indirectly from you as you navigate through the Services. Information collected automatically may include usage details, IP addresses, and information collected through cookies, web beacons, and other tracking technologies.
- From third-party service providers.

Categories of personal information disclosed for our business purpose

The personal information that we disclosed about consumers for a business purpose over the past (12) twelve months falls into the following categories as established by the California Consumer Privacy Act:

- Identifiers such as your name, email address, billing address, or IP address;
- Personal information, such as a credit card number, for example, if we use a third-party payment processor;
- Your age, age range, gender, or other protected classifications, for example, if you choose to participate in a survey distributed by us or fill the User Content form;
- Geolocation data from your IP address

Access request rights

You have the right to request that we disclose certain information to you about our collection and use of your personal information over the past twelve (12) months. But only you, or someone legally authorized to act on your behalf, may make a verifiable consumer request related to your personal information. Agents must submit proof that the consumer has authorized them to act on their behalf. Making a verifiable consumer request does not require you to create an account with us. We will only use personal information provided in a verifiable consumer request to verify the requestor's identity or authority to make the request. If you wish to do any of these things, please contact us. Once we receive and verify your request, we will disclose it to you. You may make up to two (2) requests, no more than twice in a twelve-month period for information as to:

- The categories of personal information we collected about you or shared with our service providers for business purposes.
- The categories of sources for the personal information we collected about you.
- Our business or commercial purpose for collecting that personal information.

- The specific pieces of personal information we collected about you.

Right to deletion of personal information

You have the right under the California Consumer Privacy Act to request the deletion of your personal information. If you wish to do this, please contact us. Depending on your data choices and subject to applicable regulations, certain services may be limited or unavailable.

We may, however, deny your deletion request if retaining the information is necessary for us or our service providers(s) to:

- Complete the purpose for which we collected the personal information, provide a service that you requested, take actions reasonably anticipated within the context of our ongoing business relationship with you, or otherwise perform our contract with you.
- Detect security incidents, protect against malicious, deceptive, fraudulent, or illegal activity, or prosecute those responsible for such activities.
- Exercise free speech; ensure another consumer's right to exercise their free speech rights or exercise another right provided for by law.
- Comply with the California Electronic Communications Privacy Act (Cal. Penal Code § 1546 et. seq. or other legal obligation.
- Make other internal and lawful uses of that information that are compatible with the context in which you provided it.

No discrimination

You have the right not to receive discriminatory treatment for the exercise of your rights under the CCPA, and we will not discriminate against any consumer for exercising their rights under the California Consumer Privacy Act.

10. Children under the age of 13/Age restriction

Mentle's Services are not directed to and do not knowingly collect personally identifiable information from, children under the age of thirteen (13). If it is determined that such information has been inadvertently collected on anyone under the age of thirteen (13), we shall immediately take the necessary steps to ensure that such information is deleted from our system's database. Also, for users between the age of thirteen (13) and eighteen (18), you must have your parent's or legal guardian's permission in order to be able to make use of our website and the services that we offer.

11. Your choices; unsubscribe or opt-out

Account information: You may update certain information you provide to us (such as your password, name and email address) by logging into your Mentle account or contacting us through our support channel atfeedback@mentle.app. Also, if you decide to delete your Mentle account, please contact us at feedback@mentle.app, but note that we may retain certain information where required or permitted by

law. We may also retain cached or archived copies of certain information about you and your usage of the Services for a certain period of time.

Marketing emails: If you have subscribed to our e-mail and electronic newsletter communications, you will always have the opportunity to unsubscribe from future communications. You will also have the opportunity to "opt-out" of commercial e-mail from the applicable Mentle Service by following the unsubscribe instructions provided in the e-mail you receive or by contacting us directly. Mentle will continue to adhere to this Policy with respect to any personal information previously collected.

Interest-based advertising: We may also make use of the information we gather about you to provide you with advertisements and offers that are more relevant to your interest. These advertisements may be based on the information we collect through cookies and other tracking technologies that we make use of on our Services, emails and through other third-party websites that you visit.

Do not track: Some browsers have "Do Not Track" features that let you send a request to sites to not track your online activities. We, like many other sites, do not honor those requests.

Mobile push alerts/notifications: With your consent, we may send important and other push alerts to your mobile device. However, you have the option to deactivate such notifications at any time by updating your notification setting on your device.

12. Links to other sites

Mentle does not claim nor accept responsibility for any privacy policies, practices and/or procedures of other third-party sites or resources. Therefore, we encourage all users and visitors to be aware when they leave our Site and to read the privacy statements of every website that collects personally identifiable information. This Privacy Policy Agreement applies only and solely to the information collected by our Site.

13. Acceptance of Terms

By using this Service, you are hereby accepting the terms and conditions stipulated within the Privacy Policy Agreement. If you are not in agreement with our terms and conditions, then you should refrain from further use of our Services. In addition, your continued use of our Service following the posting of any updates or changes to our Terms shall mean that you agree and acceptance of such changes.

14. How to contact us

Feedback, comments, requests for technical support, and other communications relating to the Site and the services should be directed to us at feedback@mentle.app.