

PRIVACY POLICY

Last Updated: January 17th, 2026

Effective Date: January 17th, 2026

“M² Prime,” “M2Prime,” “MiiPrime.com,” and “M2Prime.com” are trade names of M Squared Prime, LLC, a [State] limited-liability company (“M² Prime,” “we,” “us,” “our”). This Policy explains how we collect, use, disclose, and protect information about visitors, purchasers, subscribers, trial users, and any other individual who interacts with our websites, mobile or desktop applications, APIs, e-mail, SMS, or offline events (collectively, the “Services”). Capitalized terms not defined here have the meaning given in our Terms of Service. By accessing or using any part of the Services you acknowledge that you have read and understood this Policy.

1. SCOPE

1.1 This Policy applies to all personal data (GDPR) / personal information (CCPA) / personally identifiable information (U.S. state laws) that we Process (defined below) regardless of the medium in which you provide it.

1.2 It does not apply to third-party sites that may be linked or embedded; please review their policies separately.

2. DEFINITIONS

“Process” or “Processing” means any operation performed on data, whether automated or not, such as collection, recording, organization, structuring, storage, adaptation, retrieval, consultation, use, disclosure, dissemination, restriction, erasure, or destruction.

“Sell” or “Selling” has the meaning given in Cal. Civ. Code § 1798.140(t)(1) and includes sharing for cross-context behavioral advertising.

“Service Provider,” “Contractor,” “Third Party,” and “Consumer” have the meanings given in the CCPA/CPRA and applicable state statutes.

3. INFORMATION WE COLLECT

We may collect the following categories of information, some of which may be considered sensitive under certain laws (e.g., precise geolocation, biometric data, Social Security numbers, consumer account log-in / password):

A. Identifiers – real name, alias, postal address, unique personal identifier, online identifier, IP address, e-mail address, account name, Social Security number, driver’s license or

passport number, or other similar identifiers.

B. Customer Records – paper or electronic records containing personal information such as name, signature, address, telephone number, education, employment, employment history, credit-card numbers, debit-card numbers, or any other financial information.

C. Protected Classification Characteristics – age, race, color, ancestry, national origin, citizenship, religion or creed, marital status, medical condition, physical or mental disability, sex (including gender, gender identity, gender expression, pregnancy or childbirth and related medical conditions), sexual orientation, veteran or military status, genetic information.

D. Commercial Information – products or services purchased, obtained, or considered, or other purchasing or consuming histories or tendencies.

E. Biometric Information – physiological, biological, or behavioral characteristics used to identify a specific person, including DNA, imagery of the iris, retina, fingerprint, face, hand, or palm veins, voiceprints, keystroke patterns or rhythms, gait patterns or rhythms, and sleep, health, or exercise data that contain identifying information.

F. Internet or Network Activity – browsing history, search history, information regarding a consumer’s interaction with an Internet website, application, or advertisement.

G. Geolocation Data – precise (within 1,850 feet) or imprecise location information.

H. Sensory Data – audio, electronic, visual, thermal, olfactory, or similar information.

I. Employment / Education Information – professional or employment-related information or non-public education information (as defined in the Family Educational Rights and Privacy Act).

J. Inferences – profiles reflecting a person’s preferences, characteristics, psychological trends, predispositions, behavior, attitudes, intelligence, abilities, or aptitudes.

We collect this information directly from you, automatically through cookies and similar technologies, from third-party sources (e.g., data brokers, social-media plug-ins, advertising networks, analytics partners), and by combining data across devices and browsers.

4. HOW WE USE INFORMATION

We Process personal information for one or more of the following business purposes (“Purposes”):

- a. Provide, operate, maintain, improve, and debug the Services.
- b. Process or fulfill orders, returns, exchanges, and warranty claims.

- c. Manage accounts, authentication, and security (including fraud detection).
- d. Offer customer support and respond to inquiries.
- e. Personalize content, recommendations, and advertising.
- f. Conduct research, analytics, data-science, and machine-learning to develop new products and features.
- g. Communicate marketing, promotional, or transactional messages via e-mail, SMS, push, or phone in accordance with your preferences and applicable law (CAN-SPAM, TCPA, GDPR, ePrivacy).
- h. Administer sweepstakes, contests, surveys, or loyalty programs.
- i. Audit interactions and transactions to prevent fraud, abuse, and illegal activity.
- j. Comply with legal, regulatory, tax, and law-enforcement requests.
- k. Evaluate or conduct a merger, divestiture, restructuring, reorganization, dissolution, or other sale or transfer of some or all of our assets, whether as a going concern or as part of bankruptcy, liquidation, or similar proceeding.

5. LEGAL BASES FOR PROCESSING (GDPR)

If you are located in the European Economic Area (EEA), United Kingdom, or Switzerland, we rely on the following legal bases under Art. 6 GDPR:

- i. Consent – you have given clear consent for Processing for a specific purpose (e.g., optional cookies, marketing e-mail).
- ii. Contract – Processing is necessary for a contract you have with us or to take steps at your request before entering into a contract.
- iii. Legal Obligation – Processing is necessary for compliance with a legal obligation.
- iv. Legitimate Interests – Processing is necessary for our legitimate interests (or those of a third party) and your interests and fundamental rights do not override those interests.

We will not use sensitive personal data (Art. 9 GDPR) without obtaining explicit consent or otherwise meeting a specific condition under Art. 9.

6. COOKIES & SIMILAR TECHNOLOGIES

6.1 Types of Cookies

Strictly Necessary – required for core functionality (e.g., load balancers, authentication).

Performance/Analytics – collect anonymous statistics (e.g., Google Analytics).

Functional – remember preferences (e.g., language, region).

Advertising/Targeting – deliver ads relevant to you and measure ad campaigns.

6.2 How We Use Them

We use first-party and third-party cookies, pixels, SDKs, local storage, device fingerprinting, and other tracking technologies to:

- Authenticate users, prevent fraud, and protect data.
- Remember your settings and preferences.
- Analyze traffic and performance.
- Deliver personalized advertising and content.
- Attribute commissions to affiliates.

6.3 Control Options

You can refuse or delete cookies through your browser settings. Additional opt-outs:

Network Advertising Initiative (NAI) – <https://optout.networkadvertising.org/>

Digital Advertising Alliance (DAA) – <https://optout.aboutads.info/>

Google Analytics – <https://tools.google.com/dlpage/gaoptout>

Industry opt-outs do not block all vendors; you may still receive some cookies. Where required by law (e.g., EEA/UK/California), we will obtain opt-in consent for non-essential cookies.

7. DISCLOSURE OF INFORMATION

We do not Sell personal information except as disclosed here and only where permitted by applicable law. We may share each category of information listed in Section 3 with the following categories of recipients for the business purposes described in Section 4:

- Service Providers / Processors – cloud hosting (AWS, GCP), payment processors (Stripe, PayPal), customer-support platforms, e-mail delivery (SendGrid), analytics (Google, Mixpanel), advertising networks (Meta, Google Ads), fraud-prevention vendors, fulfillment centers.
- Affiliates – other entities under common ownership that adhere to this Policy.
- Business Partners – joint-marketing partners or co-sponsors of promotions with separate privacy policies.
- Advertising Partners – third parties that use cookies and similar technologies to deliver ads on our behalf.
- Government / Law Enforcement – when required by subpoena, court order, or similar legal process, or to protect our rights, users, or the public.
- Successors – in connection with a corporate transaction as described in Section 4(k).

We enter into Data Processing Addenda (DPAs) or California “contractor” agreements with each Service Provider that restrict their use of personal information to the services they perform for us and prohibit Selling or retaining it for their own purposes.

8. USER CONTROLS & OPT-OUTS

8.1 Marketing Communications

You may opt out of promotional e-mails by clicking “unsubscribe” at the bottom of any message or by contacting us at info@miiprime.com. You may opt out of SMS by replying STOP. Opt-outs do not apply to transactional messages (e.g., order confirmations).

8.2 Targeted Advertising & Selling (CCPA/CPRA)

California residents may opt out of Selling or Sharing for cross-context behavioral advertising by clicking “Do Not Sell or Share My Personal Information” on our homepage or by sending a request to info@miiprime.com. We do not knowingly Sell data of consumers under 16 without affirmative authorization.

8.3 Cookies & Tracking

See Section 6.3. EEA/UK users can withdraw consent at any time via the cookie banner or browser settings.

8.4 Rights Under GDPR, UK GDPR, and Swiss DPA

You have the right to access, rectify, erase, restrict Processing, data portability, object to Processing, and withdraw consent. Exercise these rights by e-mailing info@miiprime.com or through our privacy portal. You also have the right to lodge a complaint with your local supervisory authority.

8.5 Rights Under U.S. State Laws

Virginia (VCDPA), Colorado (CPA), Connecticut (CTDPA), Utah (UCPA), and other state residents may have rights to: confirm Processing, access, correct inaccuracies, delete, obtain a portable copy, opt out of Selling, targeted advertising, or certain profiling. Submit requests via info@miiprime.com or our webform. We will not discriminate for exercising these rights.

8.6 Nevada Residents

Nevada law allows you to direct us not to Sell covered information. Contact info@miiprime.com with “Nevada Opt-Out” in the subject line.

9. DATA RETENTION

We retain each category of personal information only as long as necessary to fulfill

the Purposes outlined in Section 4, including to comply with legal, accounting, or reporting obligations, or to resolve disputes and enforce our agreements. When no longer needed, we securely delete or anonymize it. Specific retention schedules are available upon request.

10. SECURITY

We implement technical, administrative, and physical safeguards designed to protect data consistent with NIST SP 800-53 and ISO 27001 controls, including TLS 1.3 encryption in transit, AES-256 encryption at rest, least-privilege access, multi-factor authentication, segmented networks, annual penetration testing, and incident-response plans. Nevertheless, no Internet transmission is 100 % secure; you transmit data at your own risk.

11. INTERNATIONAL TRANSFERS

If you access the Services from outside the United States, your data may be transferred to, stored, and processed in the United States or other jurisdictions whose privacy laws may differ from those of your home country. We rely on appropriate safeguards such as Standard Contractual Clauses (SCCs), UK IDTA, or your explicit consent for cross-border transfers. A copy of our SCCs is available upon request.

12. CHILDREN'S PRIVACY

The Services are not directed to children under 13 (or 16 in the EEA). We do not knowingly collect personal information from children. If you believe we have inadvertently collected such data, contact us immediately at info@miiprime.com; we will promptly delete it.

13. CHANGES TO THIS POLICY

We may update this Policy from time to time. Material changes will be posted on this page with a new "Last Updated" date and, where required by law, we will obtain your consent or provide prominent notice. Check this page periodically to stay informed.

14. CONTACT US

If you have questions, comments, or complaints about this Policy or our privacy practices, or to exercise any privacy rights, please contact:

M Squared Prime, LLC

Attn: Data Protection Officer / Legal Department

E-mail: info@miiprime.com

Postal Address: [INSERT PHYSICAL ADDRESS]

If you are an EEA/UK data subject and feel we have not resolved your concern, you have the right to lodge a complaint with the supervisory authority in your country of residence.

Contact details are available at https://edpb.europa.eu/about-edpb/board/members_en.
