

Privacy Policy

Moderately AI Inc.

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PRIVACY POLICY

Last Updated: December 9, 2025

Introduction

Moderately AI Inc., operating the Catalyzed platform (“Moderately AI”, “we”, “us”, or “our”), is committed to protecting your privacy and handling your personal information with care. This Privacy Policy explains how we collect, use, disclose, store, and protect your personal information when you use the Catalyzed platform and our services.

This Privacy Policy applies to: - **Business Users:** Organizations and their authorized users who use the Catalyzed platform - **End Users:** Individuals whose data is processed through our Business Users’ use of Catalyzed - **Website Visitors:** Anyone who visits our websites (including moderately.ai, catalyzed.ai, and their subdomains) - **Partners:** Developers, resellers, and others who collaborate with us

Moderately AI Inc. is a federal corporation governed by the laws of Canada and operates out of Ontario. We comply with Canada’s *Personal Information Protection and Electronic Documents Act*

(PIPEDA) and other applicable privacy laws.

1. Our Privacy Principles

Our approach to privacy is guided by three core values:

Your Information Belongs to You

We only collect information necessary to provide our services. Where possible, we delete or anonymize information when no longer needed. Your data is yours—we use it solely for your benefit.

We Protect Your Information

We implement robust security measures to protect personal information from unauthorized access, use, or disclosure. We refuse third-party requests for your information unless legally required or you provide explicit permission.

We Help You Meet Your Privacy Obligations

For Business Users: We provide tools, documentation, and support to help you meet your privacy obligations to your end users. The Catalyzed platform is designed to enable privacy-friendly data practices.

2. What Personal Information We Collect

The information we collect depends on how you interact with the Catalyzed platform:

2.1 Information from Business Users

When you create an account or use our platform, we collect:

Account Information: - Name, email address, phone number - Company name, job title - Billing address and payment information - Login credentials (password is encrypted)

Usage Information: - Platform usage data (queries run, datasets accessed, features used) - API usage and integration activity - Session data, IP addresses, device information - Performance metrics and error logs

Content You Provide: - Data you upload to the platform (datasets, documents, configurations) - Feedback, ratings, and annotations you submit - Support requests and communications with our team

2.2 Information from End Users

When Business Users process their end users' data through Catalyzed, we act as a **data processor** on behalf of the Business User. The Business User (as data controller) determines what personal information is processed. This may include:

- Contact information (names, email addresses, phone numbers)

- Business information (company, role, department)
- Usage data (how end users interact with Business User applications)
- Any other information the Business User chooses to process through Catalyzed

2.3 Information from Website Visitors

When you visit our websites, we collect:

- Browser type, operating system, device information
- IP address and general location (city/region level)
- Pages visited, time spent, referral source
- Cookie data (see Section 8 below)

2.4 Information from Partners

- Contact information for authorized representatives
 - Company details and credentials
 - Integration and API usage data
 - Support and communication records
-

3. How We Use Personal Information

We use personal information for the following purposes:

3.1 To Provide and Improve Our Services

- Process queries and deliver platform functionality
- Manage your account and subscriptions
- Process payments and billing
- Provide customer support
- Monitor platform performance and reliability
- Develop new features and improve existing ones

3.2 To Ensure Security and Prevent Fraud

- Detect and prevent security threats
- Investigate suspicious activity
- Verify user identity
- Enforce our Terms of Service

3.3 To Communicate With You

- Send service-related notifications
- Respond to inquiries and support requests
- Provide platform updates and announcements
- Send marketing communications (with your consent, where required)

3.4 To Comply With Legal Obligations

- Respond to legal requests and court orders
- Comply with regulatory requirements
- Protect our legal rights
- Prevent illegal activity

3.5 For Analytics and Research

- Analyze platform usage patterns (in aggregate)
- Conduct research to improve our services
- Generate anonymized statistics and insights
- Performance benchmarking

Legal Basis for Processing (PIPEDA/GDPR): - **Contractual necessity:** To fulfill our service agreement with you - **Legitimate interests:** To improve our services, ensure security, and operate our business - **Consent:** Where required by law (e.g., marketing communications, certain cookies) - **Legal obligations:** To comply with applicable laws

4. How We Share Personal Information

We do not sell personal information. We share information only in the following circumstances:

4.1 Service Providers

We work with third-party service providers who assist in operating our platform. These providers are bound by confidentiality agreements and may only use your information to provide contracted services.

Current Sub-Processors:

Provider	Purpose
Amazon Web Services (AWS)	Cloud infrastructure, data processing, LLM services, and S3 storage
Google Cloud Platform (GCP)	Google Workspace integration (Gmail, Calendar) and Vertex AI for ML inference and training
Neon	Managed PostgreSQL database hosting
OVH Cloud	Bare metal servers for application hosting, cache, and database infrastructure
Modal Labs	GPU-based ML inference
Axiom	Log management and monitoring
PostHog	Product analytics
Stripe	Payment processing

4.2 Business Transfers

If Moderately AI is involved in a merger, acquisition, or sale of assets, your information may be transferred. We will notify you before your information is transferred and becomes subject to a

different privacy policy.

4.3 Legal Requirements

We may disclose personal information if required by law, court order, or government request, or to:

- Enforce our Terms of Service
- Protect our rights, property, or safety
- Prevent fraud or illegal activity
- Protect the rights and safety of others

4.4 With Your Consent

We may share information with third parties when you explicitly consent.

4.5 Aggregated or Anonymous Data

We may share aggregated, anonymized data that cannot identify individuals for research, marketing, or analytics purposes.

For Business Users: Your end user data belongs to you. We process it only according to your instructions and do not use it for our own purposes or share it with other customers.

5. Data Storage and International Transfers

5.1 Where We Store Data

Moderately AI Inc. is based in Canada. By default, data is stored across US and Canadian regions for performance and redundancy. Enterprise customers can request specific data residency requirements.

When we transfer personal information outside Canada, we ensure appropriate safeguards are in place.

5.2 Transfers from the European Economic Area (EEA) or UK

If you are located in the EEA or UK, we transfer your personal information in accordance with applicable law:

- **Standard Contractual Clauses** approved by the European Commission
- **Adequacy decisions** (Canada has been found to provide adequate protection under GDPR)
- **Your explicit consent**

5.3 Transfers from Canada

Canada's PIPEDA allows transfers outside Canada provided appropriate safeguards are in place. We use contractual protections with our service providers to ensure your information remains protected.

6. How Long We Retain Personal Information

We retain personal information only as long as necessary for the purposes described in this policy:

Business User Account Data: - Active accounts: For the duration of your subscription plus 90 days

- Closed accounts: Up to 7 years for legal and accounting purposes

Platform Usage Data: - Raw logs: 90 days

- Aggregated analytics: Indefinitely (anonymized)

End User Data (processed on behalf of Business Users): - As directed by the Business User
- Deleted within 30 days of account termination or upon request

Website Visitor Data: - Analytics: 24 months - Cookies: As per cookie settings

Legal Compliance: - We may retain information longer if required by law, to resolve disputes, or enforce agreements

When data is no longer needed, we securely delete or anonymize it.

7. Your Privacy Rights

Depending on your location and applicable law, you may have the following rights:

7.1 Rights for Business Users (Canadian/EEA/UK Residents)

Access: Request a copy of your personal information we hold

Correction: Request correction of inaccurate or incomplete information

Deletion: Request deletion of your personal information (subject to legal obligations)

Portability: Receive your data in a structured, machine-readable format

Restriction: Request we limit how we use your information

Objection: Object to certain processing activities (e.g., marketing)

Withdraw Consent: Withdraw consent for processing based on consent (doesn't affect prior processing)

7.2 How to Exercise Your Rights

To exercise these rights, contact us at privacy@moderately.ai

We will respond within 30 days (or as required by applicable law). We may need to verify your identity before processing requests.

7.3 Rights for End Users

If you are an end user whose data is processed by a Catalyzed Business User, please contact that Business User directly. They control your data. We will assist Business Users in responding to your requests where appropriate.

7.4 Right to Complain

If you believe we have not handled your personal information properly, you have the right to file a complaint with:

Canada: Office of the Privacy Commissioner of Canada Website: www.priv.gc.ca Phone: 1-800-282-1376

EEA/UK: Your local data protection authority

8. Cookies and Tracking Technologies

8.1 What Are Cookies?

Cookies are small text files stored on your device when you visit our website. We use cookies and similar technologies (web beacons, pixels) to:

- Remember your preferences and settings
- Analyze website traffic and usage
- Improve website performance
- Understand how visitors use our site

8.2 Types of Cookies We Use

Essential Cookies (always active) - Required for website functionality - Session management and security

Analytics Cookies (with your consent) - Understand how visitors use our site - Measure website performance - Improve user experience - Provider: PostHog

8.3 Managing Cookies

You can control cookies through:

- **Your browser settings** to block or delete cookies
- **Contacting us** at privacy@moderately.ai to opt-out of analytics

Note: Disabling essential cookies may affect website functionality.

9. Security Measures

We implement industry-standard security measures to protect personal information:

Technical Safeguards: - Encryption in transit (TLS 1.3) and at rest (AES-256) - Multi-factor authentication (MFA) for account access - Regular security audits and penetration testing - Intrusion detection and prevention systems

Organizational Safeguards: - Access controls (least privilege principle) - Employee training on privacy and security - Background checks for employees with data access - Incident response plan

SOC 2 Alignment: We maintain controls aligned with SOC 2 Type II requirements (audit in progress).

No system is 100% secure. While we take reasonable precautions, we cannot guarantee absolute security. Please use strong passwords and protect your login credentials.

10. Children's Privacy

The Catalyzed platform is 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 collected information from a child, please contact us at privacy@moderately.ai, and we will promptly delete it.

11. Third-Party Links

Our website may contain links to third-party websites and services. We are not responsible for their privacy practices. Please review their privacy policies before providing personal information.

12. Changes to This Privacy Policy

We may update this Privacy Policy from time to time. Changes will be posted on this page with a new "Last Updated" date.

Material Changes: If we make significant changes, we will notify you via: - Email to your registered address - Prominent notice on our website or platform

Your continued use of the Catalyzed platform after changes take effect constitutes acceptance of the updated policy.

13. Contact Us

If you have questions, concerns, or requests regarding this Privacy Policy or our privacy practices:

Moderately AI Inc. Email: privacy@moderately.ai Mailing Address: 2495 Dundas Street West Unit 210 Toronto, Ontario M6P 1X4 Canada

We will respond to inquiries within 30 days.

14. Jurisdiction-Specific Provisions

14.1 Canadian Residents (PIPEDA)

We comply with Canada's PIPEDA. You have the right to: - Know what personal information we hold about you - Challenge the accuracy and completeness of your information - Withdraw consent for certain processing - File a complaint with the Office of the Privacy Commissioner of Canada

14.2 European Economic Area and UK Residents (GDPR/UK GDPR)

Data Controller: Moderately AI Inc.

Legal Bases for Processing: - Contractual necessity - Legitimate interests - Legal obligations - Consent (where applicable)

14.3 California Residents (CCPA/CPRA)

While the Catalyzed platform is a B2B service, California residents have additional rights under the CCPA: - **Right to Know:** What personal information we collect, use, and share - **Right to Delete:** Request deletion of your information - **Right to Opt-Out:** We do not sell personal information - **Non-Discrimination:** We will not discriminate based on privacy rights exercise

To exercise these rights, contact privacy@moderately.ai.

Appendix: Definitions

Personal Information: Information about an identifiable individual (name, email, IP address, etc.)

Business User: An organization that subscribes to the Catalyzed platform

End User: An individual whose data is processed by a Business User through Catalyzed

Data Controller: Entity that determines the purposes and means of processing personal information

Data Processor: Entity that processes personal information on behalf of a data controller

PIPEDA: Canada's *Personal Information Protection and Electronic Documents Act*

GDPR: European Union's *General Data Protection Regulation*

End of Privacy Policy