

Privacy Policy

Effective date: November 11, 2025

This Privacy Policy explains how **Opiniated** ("**Opiniated**," "**we**," "**us**") collects, uses, shares, and protects information about you when you use our website, products, and services (collectively, the "**Service**"). Your use of the Service is also governed by our Terms of Use.

Plain-English summary (not a substitute for the Policy): We collect your email to log you in via magic link and basic analytics about how you use the site. We don't take payments. We don't use your content or personal information to train AI models. You can ask us to access or delete your data. We use cookies/analytics, and we may process your data outside your country with safeguards.

1) Who we are & scope

- **Controller.** For purposes of privacy laws where applicable, **Opiniated** acts as the **data controller** of your personal information when you use the Service.
- **Geographic scope.** We operate from Canada and may serve users globally. This Policy is drafted to align with **Canadian privacy law (including PIPEDA)** and, where applicable to you, the **EU/EEA/UK GDPR** and the **California Consumer Privacy Act (CCPA/CPRA)**.

2) Information we collect

We collect the categories of information below:

A. Information you provide to us

- **Account & login.** Email address for **magic-link authentication**.
- **Prompts & interactions.** Text you enter to use the tool and related settings or feature selections. We do **not** intentionally host your file uploads; the Service is designed primarily for in-product tool use.
- **Communications.** Messages you send to us (e.g., via the site contact form).

B. Information collected automatically

- **Usage & log data.** IP address, device/browser type, pages viewed, requests/time stamps, referrer/UTM, and diagnostic events for reliability and security.
- **Cookies & similar tech.** Cookies/local storage may be used for session management, security, and **analytics** (see Section 6 below).

C. Information we do not collect

- **Payments.** We do **not** process payments or collect payment card details.

- **Sensitive categories.** We do not seek to collect sensitive personal information (e.g., government IDs, health data). Please do not submit such data through the Service.

3) How we use information (purposes)

We use your information to: 1. **Provide and operate** the Service (authentication via magic link, session management); 2. **Maintain safety/security**, prevent abuse, and troubleshoot; 3. **Improve** the Service, including analytics, de-identified telemetry, and product research; 4. **Communicate** with you about the Service (transactional notices, policy updates); 5. **Comply** with legal obligations and enforce our Terms.

No AI training on your content. We **do not** use your personal information, prompts, or outputs to train third-party or our own foundation AI models. We may use **aggregated and de-identified** telemetry to maintain and improve reliability and performance.

4) Legal bases for processing (GDPR/UK GDPR)

Where the GDPR/UK GDPR applies, our processing relies on: - **Contract** (Art. 6(1)(b)): to provide the Service you request; - **Legitimate interests** (Art. 6(1)(f)): to secure, maintain, and improve the Service and prevent abuse (balanced against your rights); - **Consent** (Art. 6(1)(a)): where required for cookies/analytics or optional features; - **Legal obligation** (Art. 6(1)(c)): to comply with applicable laws.

5) How we share information

We do **not** sell your personal information. We may share information as follows: - **Service providers (processors).** Vendors that host, operate, analyze, support, and secure the Service (e.g., hosting, email delivery, analytics). They process data **on our behalf** under contracts and may be located outside your country. - **Legal and safety.** To comply with law, enforce our Terms, or protect rights, safety, and security. - **Business transfers.** In connection with a merger, acquisition, or asset sale, subject to this Policy's protections.

Where required, we will maintain a **sub-processor list** on our site and update it as vendors change.

6) Cookies & analytics

- We use **necessary** cookies for security and login, and **analytics** to understand usage and improve the Service.
- Where required by law, we will obtain **consent** or provide controls for non-essential cookies.
- You may adjust browser settings to block/clear cookies; some features may not work without them.

7) Data retention

We retain personal information **only as long as necessary** to provide the Service and for legitimate business needs (e.g., security, debugging), or as required by law. The Service does **not** currently support **self-service export** in the UI; we plan to offer export in the future.

8) Your rights & choices

Your rights depend on your location. Subject to exceptions, you may have the following rights:

Under Canadian law (PIPEDA)

- **Access and correction** of personal information we hold about you;
- **Withdrawal of consent** for optional processing (e.g., analytics cookies) where applicable.

Under GDPR/UK GDPR (if applicable to you)

- **Access, rectification, erasure, and restriction;**
- **Portability** (where technically feasible);
- **Object** to processing based on **legitimate interests**;
- **Withdraw consent** at any time where processing relies on consent.

Under California law (CCPA/CPRA) (if applicable to you)

- **Know/access, delete, and correct** personal information;
- **Opt-out of “sale” or “sharing.”** We **do not** sell or share personal information for cross-context behavioral advertising;
- **Limit use/disclosure of sensitive information** (not sought by us);
- **Non-discrimination** for exercising your rights.

How to exercise your rights. Submit requests through the **contact method provided on the Site**. We may take reasonable steps to verify your identity. If we decline a request, we will explain why, subject to legal limits.

9) International transfers

We may transfer personal information to countries other than your own (e.g., the **United States**). Where required, we use safeguards such as the **EU Standard Contractual Clauses (SCCs)** and implement technical/organizational measures to protect your data.

10) Security

We implement reasonable **technical and organizational measures** designed to protect personal information against loss, misuse, and unauthorized access. However, no method of transmission or storage is **100% secure**.

11) Children’s privacy

The Service is intended for **adults 18+**. We do not knowingly collect personal information from anyone under 18. If you believe a minor has provided personal information, contact us so we can delete it.

12) Do Not Track & signals

Your browser may send **Do Not Track (DNT)** or Global Privacy Control signals. We will apply legally required responses where applicable and otherwise continue to evaluate industry standards.

13) Changes to this Policy

We may update this Policy from time to time. If we make **material changes**, we will provide notice (e.g., by posting in the Service or emailing you) and indicate the effective date at the top. Your continued use after the effective date means you agree to the updated Policy.

14) Contact us

For privacy questions or requests, please use the **contact method provided on the Site** (Attn: Privacy). If local law grants you the right to escalate a concern to a supervisory authority, you may also contact your **local data protection authority**.

Appendix (CCPA categories disclosure)

Category (CPRA)	Examples we collect	Business purposes	Disclosed for business purpose
Identifiers	Email address; IP address; device identifiers	Login via magic link; security; analytics	Yes, to service providers
Internet or other electronic network activity	Usage logs, pages viewed, interactions, timestamps	Operate, secure, and improve the Service	Yes, to service providers
Geolocation (coarse)	Approximate location from IP	Abuse prevention; analytics	Yes, to service providers
Sensitive personal information	Not sought	—	No

We **do not** "sell" or "share" personal information as those terms are defined by the CCPA/CPRA.

By using the Service, you acknowledge this Privacy Policy.