

## **Privacy Policy<sup>1</sup>**

**This Privacy Policy is not a contract and does not create any legal rights or obligations.**

Effective as of 9/7/2026.

This Privacy Policy describes how Multiple Sensory Training LLC and our corporate subsidiaries and affiliates (collectively, “**MST**”, “**we**”, “**us**”, or “**our**”) collect, use, and share your personal information if you visit [msttrain.com](https://msttrain.com) or our other websites or services that link to this Privacy Policy (collectively, the “**Services**”), contact us, receive our communications or attend our events.

### **Exclusions**

This Privacy Policy does not address (1) de-identified or aggregated information that cannot reasonably be used to identify a specific individual, such as summary statistics from our pilot programs; (2) information collected by third-party services with their own privacy policies, including our payment processor and the social media platforms where we maintain a presence; or (3) student education records handled in connection with our school-partnership pilot programs, which are governed by the applicable school district's own policies under the Family Educational Rights and Privacy Act (FERPA) and our data agreements with those districts.

### **Links to third-party sites**

This notice does not apply to any third-party applications, integrations, or websites that may link to, or be accessible from, our sites and tools. We are not responsible for any of the content, features, functionality, or privacy practices of such linked third-party applications, integrations, or websites. The data collection and use practices of any linked third-party application, integration, or website will be governed by that third party's applicable privacy notice, statement, or policy, and its terms of use. We encourage you to read them. We link to and integrate with the following companies and their privacy policies apply to the services they provide, not ours: Stripe ([stripe.com](https://stripe.com); payment processor and age verification service)

### **Individuals in Europe.**

We provide important information for individuals in Europe.

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## How to Contact Us

# Personal Information We Collect

Information you provide to us. Personal information you provide to us through the Services may include:

- **Contact information**, such as your first and last name, email address, phone number, professional title and organization name.
- **Profile information**, such as your username and password and any account preferences for the Services.
- **Feedback or correspondence**, such as information you provide when you contact us with questions, feedback, or otherwise correspond with us.
- **Usage information**, such as information about how you use the Services and interact with us, including information you provide when you use any interactive features of the Services.
- **Marketing information**, such as your preferences for receiving communications about our products, activities, and publications, and details about how you engage with our communications.
- **Other information** that we may collect which is not specifically listed here, but which we will use in accordance with this Privacy Policy or as otherwise disclosed at the time of collection.

Information we obtain from social media platforms. We may maintain pages for Multiple Sensory Training on social media platforms, such as Medium, Facebook, Twitter, and LinkedIn. When you visit or interact with our pages on those platforms, the platform provider's privacy policy will apply to your interactions and their collection, use, and processing of your personal information. You or the platforms may provide us with information through the platform, and we will treat such information in accordance with this Privacy Policy.

If you choose to connect your account on a third-party platform or network to the Services, like using your Medium account to access our blog, we may collect information from that platform or network. For example, this information may include your Medium username, profile picture, and other profile information. You may also have the opportunity to provide us with additional information via the third-party platform or network, such as a list of your connections. You can read more about your privacy choices for social media networks and other third-party platforms [below](#).

**Information we obtain from other third parties.** We may receive personal information about you from third-party sources, such as marketing partners, publicly-available sources, and data providers.

**Cookies and Other Information Collected by Automated Means**

We, our service providers, and our business partners may automatically log information about you, your computer or mobile device, and activity occurring on or through the Services. The information that may be collected automatically includes your computer or mobile device operating system type and version number, manufacturer and model; device identifier; browser type; screen resolution; IP address; the website you visited before browsing to our website; general location information such as city, state or geographic area; and information about your use of and actions on the Services, such as pages or screens you viewed, how long you spent on a page or screen, navigation paths between pages or screens, information about your activity on a page or screen, access times, and length of access. Our service providers and business partners may collect this type of information over time and across third-party websites and mobile applications.

# How We Use Your Personal Information

We use your personal information for the following purposes and as otherwise described in this Privacy Policy or at the time of collection:

To operate the Services. We use your personal information to:

- provide, operate, and improve the Services;
- establish and maintain your user profile on the Services;
- facilitate social features of the Services, such as our blog;
- communicate with you about the Services, including by sending you announcements, updates, security alerts, and support and administrative messages;
- understand your interests and personalize your experience with the Services;
- provide support and maintenance for the Services; and
- respond to your requests, questions, and feedback.

**Categories of Information We Collect and How We Use Them**

*Checkmarks indicate that a category of information is used for that purpose.*

| Purpose of Use \ Category of Information            | Name | Age | Gender | Email | Phone Number | City / Location | Testing Date | Device & Input Info | Parent/Guardian Name & Email (14–17 only) |
|-----------------------------------------------------|------|-----|--------|-------|--------------|-----------------|--------------|---------------------|-------------------------------------------|
| Personalizing report language (e.g., pronoun usage) |      |     | ✓      |       |              |                 |              |                     |                                           |

|                                                                                         |   |   |  |   |   |   |   |   |   |
|-----------------------------------------------------------------------------------------|---|---|--|---|---|---|---|---|---|
| Providing and delivering the assessment and report                                      | ✓ | ✓ |  | ✓ | ✓ | ✓ | ✓ | ✓ |   |
| Verifying age-based eligibility to use the Services                                     |   | ✓ |  |   |   |   |   |   | ✓ |
| Communicating with you (confirmations, access delivery, report delivery)                |   |   |  | ✓ | ✓ |   |   |   | ✓ |
| Accurately interpreting test results (e.g., device-specific timing context)             |   |   |  |   |   |   |   | ✓ |   |
| Obtaining and documenting parental consent for clients age 14–17                        | ✓ | ✓ |  | ✓ | ✓ |   |   |   | ✓ |
| Internal business analysis (e.g., understanding the geographic distribution of clients) |   |   |  |   |   | ✓ |   |   |   |

We use Anthropic's Claude API. Under Claude API's current terms, API usage is not used to train Anthropic's models.

For research and development. We analyze use of the Services to improve the Services and to develop new products and services.

To send you marketing and promotional communications. We may send you marketing communications as permitted by law. You can opt out of our marketing and promotional communications as described [below](#).

To comply with law. We use your personal information as we believe necessary or appropriate to comply with applicable laws, lawful requests, and legal process, such as to respond to subpoenas or requests from government authorities.

For compliance, fraud prevention, and safety. We may use your personal information and disclose it to law enforcement, government authorities, and private parties as we believe necessary or appropriate to: (a) protect our, your, or others' rights, privacy, safety, or property (including by making and defending legal claims); (b) enforce the terms and conditions that govern the Services; and (c) protect, investigate, and deter against fraudulent, harmful, unauthorized, unethical, or illegal activity.

With your consent. In some cases we may specifically ask for your consent to collect, use, or share your personal information, such as when required by law.

To create anonymous data. We may create aggregated and other anonymous data from your personal information and other individuals whose personal information we collect. We make personal information into anonymous data by removing information that makes the data personally identifiable to you. We may use this anonymous data and share it with third parties for our lawful business purposes, including to analyze and improve the Services and promote our business.

## How We Share Your Personal Information

We do not share your personal information with third parties without your consent, except in the following circumstances or as otherwise described in this Privacy Policy:

**Affiliates.** We may share your personal information with our corporate subsidiaries and affiliates for purposes consistent with this Privacy Policy.

**Service providers.** We may share your personal information with third-party companies and individuals that provide services on our behalf or help us operate the Services. As of the date of this privacy policy, that includes Twilio, Render, Anthropic, Tailor Brands, Google, and Blotato. These third parties may use your personal information only as authorized by their contracts with us.

**Large-Language Model Providers and other AI Companies.** We use LLM providers to provide the services. These providers may retain certain rights to use personal information they receive in providing us services to improve their products and services.

**Third-party platforms and social media networks.** If you have enabled features or functionality that connect the Services to a third-party platform or social media network (such as by connecting your

account with a third party to the Services or sharing content via a third-party platform), we may disclose the personal information that you authorized us to share. We do not control the third party's use of your personal information.

**Professional advisors.** We may disclose your personal information to professional advisors, such as lawyers, bankers, auditors, and insurers, where necessary in the course of the professional services that they render to us.

**For compliance, fraud prevention and safety.** We may share your personal information for the compliance, fraud prevention and safety purposes described [above](#).

**Government Requests.** Notwithstanding anything to the contrary in this policy, we may preserve or disclose your information if we believe that it is reasonably necessary to comply with a law, regulation, or legal request or to protect the safety, property, or rights of MST or others. However, nothing in this policy is intended to limit any legal defenses or objections that you may have to a third party or government request to disclose your information.

**Business transfers.** We may sell, transfer, or otherwise share some or all of our business or assets, including your personal information, in connection with a (potential) business transaction such as a corporate divestiture, merger, consolidation, acquisition, reorganization or sale of assets, or in the event of bankruptcy or dissolution.

## Your Choices

In this section, we describe the rights and choices available to all users.

Access or update your information. If you have registered for an account with us, you may review and update certain personal information in your account profile by logging into your account.

Opt out of marketing communications. You may opt out of marketing emails by following the unsubscribe instructions at the bottom of the email. You may continue to receive service-related and other non-marketing emails.

Choosing not to share your personal information. Where we are required by law to collect your personal information, or where we need your personal information to provide the Services to you, if you do not provide this information when requested (or you later ask to delete it), we may not be able to provide you with the Services. We will tell you what information you must provide to receive the Services by designating it as required at the time of collection or through other appropriate means.

Third-party platforms or social media networks. If you choose to connect to the Services via a third-party platform or social media network, you may have the ability to limit the information that we may obtain from the third party at the time you connect your third-party account to the Services. Subsequently, you may be able to control your settings through the third-party platform. If you withdraw our ability to access certain information from a third-party platform or social media network, that choice will not apply to information that we have already received from that third party.

## Other Sites, Mobile Applications, and Services

The Services may contain links to, or content or features from, other websites and online services operated by third parties. These links are not an endorsement of, or representation that we are affiliated with, any third party. In addition, our content may be included on web pages or in mobile applications or online services that are not associated with us. We do not control third-party websites, mobile applications, or online services, and we are not responsible for their actions. Other websites and services follow different rules regarding the collection, use, and sharing of your personal information. We encourage you to read the privacy policies of the other websites and mobile applications and online services you use.

## Security Practices

The security of your personal information is important to us. We employ a number of organizational, technical and physical safeguards designed to protect the personal information we collect. However, security risk is inherent in all internet and information technologies and we cannot guarantee the security of your personal information. As of the date of this policy, it is our policy to use the following security practices:

- Single-use access: assessments are accessed through a unique link paired with a separate access PIN, rather than a reusable password.
- Access logging: attempts to access an assessment is logged (timestamp, IP address, device information) to support security monitoring.

- Server-side processing: scoring and interpretation logic runs on our servers and is not exposed in the client-facing application.
- Payment security: payment card information is collected and processed directly by Stripe, a PCI-DSS compliant payment processor.
- Restricted source code access: our application source code is stored in a private repository with controls to limit access to authorized personnel.
- Data minimization: for example, we collect age rather than date of birth.

## Data Retention

We retain your information for as long as necessary to provide you MST's assessment and training services (the "Services"). This means we keep your client profile information for as long as you maintain an active client relationship with us. We retain payment and transaction records, processed by our payment processor Stripe, for at least seven years to fulfill legitimate business functions such as accounting and tax obligations. We also retain your information as necessary to comply with our legal obligations, resolve disputes, and enforce our terms and policies. The table below sets out our and our vendors' current retention approach by category of information.

| Category of Information                                                          | Proposed Retention Period                                                                | Reason                                                                                    |
|----------------------------------------------------------------------------------|------------------------------------------------------------------------------------------|-------------------------------------------------------------------------------------------|
| <b>Client profile &amp; contact info (name, age, gender, email, phone, city)</b> | Duration of the client relationship, plus 24 months after the last assessment or service | To support ongoing services, monthly retesting comparisons, and reasonable follow-up.     |
| <b>Assessment results and generated reports</b>                                  | Duration of the client relationship, plus 24 months after the last assessment            | Supports retesting comparisons and historical reporting for the client.                   |
| <b>Payment and transaction records (processed by Stripe)</b>                     | At least 7 years                                                                         | Required for accounting, tax, and financial recordkeeping obligations.                    |
| <b>Parent/guardian consent records (clients age 14–17)</b>                       | Duration of the client relationship, plus 3 years                                        | Demonstrates that required consent was obtained, in case of a future compliance question. |
| <b>Session/access logs (login timestamps, IP address, device info)</b>           | 12 months                                                                                | Supports security monitoring without retaining logs indefinitely.                         |
| <b>Marketing inquiries / contact form submissions (non-clients)</b>              | 24 months, or until the inquiry is resolved and not converted to a client                | Limits retention of contact information for people who never became clients.              |

|                                                                     |                                                                                    |                                                                                            |
|---------------------------------------------------------------------|------------------------------------------------------------------------------------|--------------------------------------------------------------------------------------------|
| <b>School pilot program data<br/>(Forensic Science, Math Pilot)</b> | Governed by the applicable school district data agreement, not this general policy | This data is collected under a separate school-partnership arrangement with its own terms. |
|---------------------------------------------------------------------|------------------------------------------------------------------------------------|--------------------------------------------------------------------------------------------|

## Your California Privacy Rights

This section covers California rights other than the Consumer Privacy Rights Act (CCPA).

**Shine Your Light Law.** Under California law, California residents are entitled, once per calendar year, to ask us for a notice identifying the categories of personal customer information that we share with certain third parties for the third parties' direct marketing purposes, and providing contact information (i.e., names and addresses) for these third parties. We don't do this, so we do not respond to Shine Your Light requests.

**Do Not Track.** Some Internet browsers may be configured to send "Do Not Track" signals to the online services that you visit. We currently do not respond to "Do Not Track" or similar signals. To find out more about "Do Not Track," please visit [www.allaboutdnt.com](http://www.allaboutdnt.com). This is distinct from our response to opt-out signals such as Global Privacy Control (aka GPC).

## International Data Transfers

We are headquartered in the United States and have service providers in other countries, and your personal information may be transferred outside of your state, province, or country to the United States or other locations where privacy laws may not be as protective as those in your state, province, or country.

## Children

The Services are not directed to, and we do not knowingly collect personal information from, anyone under the age of 18. If we learn that we have collected personal information of a child without the consent of the child's parent or guardian, we will delete it. We encourage parents with concerns to [contact us](#). When we are aware that a student under 18 contacts us, we require the parent to consent to the student's engagement with us by going through a parental consent process via Stripe. We have an additional check on the assessment itself.

## Changes to this Privacy Policy

We may amend this Privacy Policy by posting the amended version on the Services and indicating the effective date of the amended version. We may announce any material changes to this Privacy Policy through the Service and/or via email if we have your email address. In all cases, your continued use of the Services after the posting of any modified Privacy Policy indicates your assent to the amended Privacy Policy.

## How to Contact Us

If you have any questions or comments about this Policy or Multiple Sensory Training's privacy practices, email us at [assessments@msttrain.com](mailto:assessments@msttrain.com). You may also write to us via postal mail at:

Multiple Sensory Training LLC

Attn: Legal – Privacy

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