

Privacy *Policy*.

THE MINDSET OPERATING SYSTEM LTD • EFFECTIVE DATE: JUNE 2026

1. Who we are

The Mindset Operating System Ltd ("MindsetOS", "we", "our", or "us") provides digital and AI tools that help individuals and teams build psychological awareness, develop healthier performance habits, and strengthen their mindset at work and in life.

Company details:

- The Mindset Operating System Ltd
- Britannia Court, 5 Moor Street, Worcester, Worcestershire, England, WR1 3DB
- Email: admin@themindsetos.com

We are the **Data Controller** for the personal data of individual users, whether they access MindsetOS directly or through their employer. Where access is provided through an organisation, that organisation is a separate, independent **controller** only for the limited data it determines, such as the employee list it provides and the aggregated, de-identified insights it receives.

2. What data we collect

We collect only the data necessary to provide, personalise, and improve the MindsetOS experience.

- **Account and contact data:** name, email address, password, and company (if applicable).
- **Assessment and coaching data:** responses to mindset mapping exercises, self-assessments, AI coaching conversations, reflections, and goals that you choose to share for personal development purposes. Over time, the platform builds a personalised coaching profile based on your interactions, including recurring themes, growth areas, strengths, and preferred coaching styles. This profile is used solely to improve the relevance of your coaching experience.
- **Personalisation data:** preferences, coaching history, and interaction patterns used to tailor the coaching experience to each user.
- **Usage and technical data:** device type, operating system, IP address, and in-app activity (such as completed modules or feature interactions).
- **AI interaction data:** text inputs shared through AI-assisted coaching features. To improve coaching relevance, conversation content may be indexed for contextual recall within your account. This data is processed securely and is not used to train external AI models.

MindsetOS does **not** collect or process health records, medical information, or any data intended for clinical or diagnostic use. All data shared within the app relates to mindset, habits, and personal growth, **not to** medical or therapeutic evaluation.

3. Legal basis for processing

Under the UK General Data Protection Regulation (UK GDPR), we rely on the following lawful bases to process personal data:

Purpose	Type of data	Lawful basis	GDPR article
Account creation and delivery of services	Account and contact data	Necessary for performance of a contract (to deliver app functionality).	Art. 6(1) (b)
User reflections, assessments, and AI coaching interactions	Self-reported mindset and behavioural information (non-clinical)	Consent: users choose to share this data to receive personalised insights.	Art. 6(1) (a)
Platform improvement and analytics	Technical and aggregated usage data	Legitimate interests in maintaining and improving the service (balanced against user rights).	Art. 6(1) (f)
Marketing communications (optional)	Contact data (email)	Consent (users can withdraw at any time).	Art. 6(1) (a)

Important: MindsetOS does not collect or process medical, clinical, or therapeutic information. The data you provide through assessments or reflections relates to personal development and mindset awareness, not to health status or diagnosis. Our tools are designed for self-awareness and behavioural insight, not for medical or psychological evaluation.

4. How we use data

We use data to:

- Provide and personalise the MindsetOS coaching experience
- Generate insights and recommendations tailored to each user
- Improve content and functionality (using anonymised data)
- Communicate updates and ensure security

We do **not** sell or rent your personal data.

5. B2B clients and employee data

When MindsetOS provides services through an employer or organisation:

- Individual user data remains private and anonymous.
- Employers only receive aggregated, de-identified insights.
- MindsetOS acts as a **Data Controller** for individual user data; the employer is a separate, independent controller only for the limited data it determines. Data protection terms are set out in our separate Data Protection Agreement (DPA).

6. Data storage and security

Data is securely hosted and processed using GDPR-compliant partners, including:

- **Vercel (US/Global)**: app hosting and content delivery (Standard Contractual Clauses applied).
- **Convex Labs, Inc. (US)**: backend data storage, access management, and app performance monitoring (Standard Contractual Clauses applied).
- **AI service providers**: MindsetOS currently uses OpenAI, L.L.C. and Anthropic PBC for AI language processing, including coaching features and insight generation (Standard Contractual Clauses applied). MindsetOS may engage alternative or additional AI service providers from time to time, subject to equivalent data protection safeguards.
- **Kit (formerly ConvertKit) (US)**: transactional email delivery (Standard Contractual Clauses applied).
- **PostHog, Inc. (US/EU)**: product analytics, used to understand general usage patterns and improve the platform. Analytics are disabled by default and only activated with user consent. Data is not used for advertising or cross-app tracking (Standard Contractual Clauses applied).
- **Mux, Inc. (US)**: video content delivery for coaching and course materials (Standard Contractual Clauses applied).
- **BetterAuth**: user authentication and session management (self-hosted, data remains within MindsetOS infrastructure).

All personal data is encrypted in transit (TLS 1.2+) and at rest (AES-256). Access is limited to authorised personnel and protected by authentication controls. MindsetOS is Cyber Essentials certified, meeting UK government-backed standards for cyber security. MindsetOS remains responsible for ensuring lawful and secure processing by all partners.

7. Data retention

- **Account data**: retained for the duration of your active account. If you request account deletion, your data will be removed within 30 days of the request.
- **Coaching and assessment data**: upon account deletion, coaching conversations, assessment responses, and personalised coaching profiles are permanently deleted within 30 days. Anonymised, aggregated data that cannot be linked to an individual may be retained for product improvement.

- **Backups:** securely retained for up to 30 days, after which deleted data is fully purged. To request account deletion, contact admin@themindsetos.com.

8. International data transfers

Where third parties (such as Convex, OpenAI, or Kit) process data outside the UK/EU, Standard Contractual Clauses (SCCs) and the UK International Data Transfer Agreement (IDTA) ensure equivalent safeguards and compliance with UK GDPR.

9. Your rights

Under UK GDPR, you have the right to access, correct, delete, restrict, or object to processing; withdraw consent; and request data portability.

To exercise your rights, contact admin@themindsetos.com.

If you are unsatisfied with our response, you can lodge a complaint with the Information Commissioner's Office (ICO) at ico.org.uk.

10. App analytics and local data storage

MindsetOS uses local storage and session tokens to maintain secure sessions, save progress, and enable offline functionality.

Product analytics (provided by PostHog) are used to understand general usage patterns and improve the platform. Analytics are disabled by default and only activated with user consent. Analytics data is anonymised or aggregated and is never used for advertising or cross-app tracking.

You can delete local data at any time by logging out or deleting your account within the app.

11. Updates

We may update this policy periodically. The latest version will always be available within the app and on our website.

For organisations using MindsetOS under a business agreement, data protection terms are set out in our standard Data Protection Agreement (available on request).