

PRIVACY POLICY

Last updated: 28.04.2026

This Privacy Policy explains how HaldenCraft LLC ("Company", "we", "us", or "our") collects, uses, discloses, and protects personal data when you access or use the subscription-based digital platform, including services related to interactive tests, quizzes, brain games (the "Service"). This Privacy Policy forms part of, and should be read together with, our Terms & Conditions, Cookie Policy and Refund Policy. We encourage you to review this Privacy Policy periodically to stay informed about any updates or changes.

The Service is intended for users located in the United Kingdom, the United States of America, and Canada.

For personal data collected from residents in California, we are the business with respect to your personal data. This means we are responsible for the purposes and means of processing your personal data. "Personal data" as used in this notice shall have the meaning ascribed to it under data protection laws.

If you are a Nevada resident or California resident, please see additional disclosures below.

By using our Services, you acknowledge that you have read our Privacy Policy, Refund Policy, Cookie Policy and Terms & Conditions.

1. Scope and Purpose

This Privacy Policy applies to all users of the Service and covers personal data collected through our website, applications, customer support channels, and payment systems.

We process personal data using computers and/or IT enabled tools solely for lawful purposes related to providing and operating the Service, complying with legal obligations, and protecting our users and platform. In some cases your Personal Data may be accessed by certain Company's workers involved in providing and maintaining the Services.

Personal data is processed at the Company's operational offices and at other locations where service providers or partners involved in the processing are based. Depending on your location, this may involve transferring your personal data to countries outside your jurisdiction. Further information about where and how personal data is processed is provided in the relevant sections of this Privacy Policy.

2. Legal Bases for Processing

Notice for Nevada customers

Nevada law requires businesses to provide a designated method for Nevada residents to submit requests directing a business not to sell certain categories of personal information. For these purposes, a "sale" means the exchange of personal information for monetary consideration to a third party that intends to license or resell that information. If you are a Nevada resident and wish to submit a request related to our compliance with Nevada privacy law, please contact us using the details provided below.

California Privacy Notice

The following additional disclosures apply only to residents of California. California privacy law provides certain rights regarding personal information, including the right to access, delete, and opt out of certain processing activities, and requires businesses to provide notice and mechanisms for exercising these rights.

Notice of Collection

We collect the following categories of personal information:

- Identifiers, such as name, email address, online identifiers, and IP address. Postal address may be collected for invoicing purposes where payment is made by card.
- Customer records, including account-related information.
- Characteristics of protected classifications, such as gender, where voluntarily provided.
- Commercial and transaction information, including subscription details and purchase history.
- Application activity, including interactions with the App, browsing activity within the App, and engagement with emails or advertisements.
- Geolocation data, derived from IP address.
- Inferences, such as preferences or interests generated from the information described above.

We collect and use these categories of personal information for the business and operational purposes described in the “Personal Data We Collect” and “How We Use Your Personal Data” sections of this Privacy Policy, including to operate, maintain, and improve the Service.

We do not sell personal information in the traditional sense. However, to the extent that certain data-sharing activities may be considered a “sale” or “sharing” under California law, we comply with all applicable legal requirements. For commercial purposes, we may disclose the following categories of personal information: identifiers, characteristics, commercial or transaction information, App activity, geolocation data, and inferences. Additional details about data sharing are provided in the “Data Sharing and Disclosure” section of this Privacy Policy.

Your Rights to Know and Delete

Users have the right to request an information about our data practices over the preceding twelve (12) months, including:

- The categories of personal information we have collected about you.
- The sources from which personal information was collected.
- The categories of personal information disclosed or shared for business or commercial purposes.
- The categories of third parties with whom personal information was disclosed or shared.
- The business or commercial purposes for collecting, sharing, or selling personal information and
- The specific pieces of personal information we hold about you.

You also have the right to request deletion of personal information we have collected about you, subject to applicable legal exceptions.

Requests may be submitted using the contact details provided in this Privacy Policy. Please specify the nature of your request so we can process it appropriately. We may need to verify your identity before fulfilling your request and may be unable to complete requests that cannot be verified.

We will respond to verifiable consumer requests within 45 days of receipt. Where reasonably necessary, this period may be extended by an additional 45 days, in which case we will notify you of the extension within the first 45-day period.

Right to Opt Out of Sale or Sharing

Where applicable, California residents have the right to opt out of the sale or sharing of their personal information, as those terms are defined under California law. You may submit an opt-out request using the contact details provided below.

We also honor opt-out preference signals, including Global Privacy Control (GPC), as required by applicable law.

Authorized Agents

You may appoint an authorized agent to submit a request on your behalf. We may require proof of authorization and may also verify your identity directly before processing the request.

Right to Non-Discrimination

You will not be discriminated against for exercising any of your rights under California privacy law. This includes denial of services, different pricing, or reduced quality of service, except as permitted by law.

Right to Correct

You have the right to request that we correct inaccurate personal information we hold about you. Requests may be submitted using the contact details provided in this Privacy Policy.

California “Shine the Light” Disclosure

California residents may request information about the categories of personal information disclosed to third parties for their own direct marketing purposes during the preceding calendar year, as well as the categories of those third parties. Requests may be submitted using the contact details provided in this Privacy Policy and should include the statement “California Shine the Light Request.” We are only required to respond to such requests once per calendar year.

Legal Bases for Processing (UK GDPR Article 13 Disclosure)

Where the UK GDPR applies, the Company acts as the "data controller" for personal data processed through the Service.

We process personal data based on the following legal bases:

- Performance of a contract: to provide the Service, manage accounts, and administer subscriptions.
- Consent: where you have provided consent, including for optional features or communications.

- Legitimate interests: to secure the Service, prevent fraud, improve functionality, and ensure service integrity, provided such interests are not overridden by your rights. A full Legitimate Interests Assessment is available on request.
- Legal obligation: to comply with applicable laws, regulations, and lawful requests from authorities.

You are not required to provide personal data by law; however, failure to provide certain information may prevent access to some or all features of the Service.

3. Personal Data We Collect

We may collect the following categories of personal data:

Account Information:

- Name
- Email address
- Phone number
- Account credentials
- Country or region of residence

Service-Related Data:

- User-provided information required for calculations (only where required for Service functionality or calculations)
- Preferences and settings
- Interaction data with the Service (such as feature usage, clicks, and session duration)

Technical and Usage Data:

- IP address
- Device and browser information
- Log files
- Usage analytics (which may be aggregated or anonymized where possible)

Billing and Transaction Data:

- Subscription status
- Payment history
- Transaction identifiers

Personal data is collected directly from you, automatically through your use of the Service, or, where applicable, from third-party service providers. We do not intentionally collect special-category personal data unless you voluntarily provide such information. If you do not provide a data we are asking for, we may not be able to provide you with the Services and fulfill our obligations to you

under the contract between you and the Company. If you have any questions regarding providing your personal data, please contact us using the details below.

You have the right to withdraw your consent at any time, where we rely on consent to process your personal data. If you withdraw consent, certain features of the Service may no longer be available.

You may delete your profile at any time through the deletion option available in your account settings. Alternatively, you may request a profile deletion link by contacting us at the email address specified in this Privacy Policy. Profile deletion requests will be processed subject to applicable legal and contractual obligations.

4. How We Use Personal Data

We use personal data to:

- Provide, operate, and maintain the Service.
- Generate insights and reports.
- Manage subscriptions, billing, and payments.
- Communicate with you about your account or the Service.
- Provide customer support and contact you personally.
- Improve and secure the Service.
- Comply with legal and regulatory requirements.
- Send marketing and promotional emails.

Personal data is not used for automated decision-making that produces legal or similarly significant effects. No profiling producing legal or similarly significant effects under Article 22 UK GDPR. Any automated processing is used solely to generate informational or entertainment content and does not affect your legal rights or obligations.

We will use your personal data only for the purposes described in this Privacy Policy, or for additional purposes that are compatible with those original purposes. If we update the purpose for which we process your personal data, we will revise this Privacy Policy accordingly. You may contact us if you would like further information about how a new purpose is compatible with the original one.

If we intend to use your personal data for a purpose that is not compatible with the original purposes, we will inform you in advance and explain the new purpose and the legal basis that allows such processing.

Use of Artificial Intelligence Service Providers

To provide the Service and generate requested content, we may process certain user-provided information using third-party artificial intelligence service providers. Such providers act as data processors and process personal data solely on our instructions and in accordance with applicable data protection laws. We do not permit these providers to use personal data for their own purposes.

5. Payment Processing

Payments are processed by third-party payment providers. We do not store full payment card details. Payment providers process data in accordance with their own privacy policies and applicable law. By using our Service, you agree to their terms and policies.

6. Cookies and Tracking Technologies

We use cookies and similar technologies to:

- Enable core functionality
- Maintain sessions
- Analyze usage and improve performance

You may control cookie preferences through your browser settings or applicable consent tools. More info about cookies you can find in our Cookie Policy.

7. Data Sharing and Disclosure

We may share personal data with:

- Service providers (hosting, analytics, payment processing, customer support).
- Business partners that provide co-branded services, distribute or sell our products, or participate with us in joint marketing activities.
- Advertising. We use Meta Pixel (Meta Platforms, Inc., USA) for targeted advertising and campaign measurement. Meta acts as an independent data controller; see [facebook.com/privacy/policy/](https://www.facebook.com/privacy/policy/). Activated on consent only. You may opt out as described in this Privacy Policy.
- Prospective purchasers, investors, or other parties involved in a potential sale, merger, reorganization, or investment in our business.
- Our group companies where the access to your personal data is required to maintain and provide you the Services.
- Professional advisors (legal, accounting, compliance).
- Authorities or regulators where required by law as well as to defend or assert legal claims, or to protect the rights, property, health, safety, security, or wellbeing of the Company, its workers and users, or others.

We do not sell personal data. We share personal data for targeted advertising purposes only as explicitly disclosed above.

8. International Data Transfers

Personal data may be transferred to and processed in Netherlands (EU). Where required by law, we use appropriate safeguards to protect such transfers, including standard contractual clauses or equivalent mechanisms.

Data is also transferred to the USA via our advertising and payment service providers. Transfers are safeguarded by the UK IDTA or UK Addendum to EU SCCs. Copies available on request.

9. Data Retention

We retain personal data described in this Privacy Policy while account is active + 3 month to:

- Provide the Service.
- Comply with legal and regulatory obligations.
- Resolve disputes.
- Enforce our agreements.

Retention periods are determined based on the type of data, the purpose of processing, and applicable legal requirements.

10. Your Rights

Depending on your location, you may have the following rights with respect to your personal data:

UK and EEA-style Rights (UK GDPR):

- The right to access your personal data.
- The right to rectification of inaccurate or incomplete data.
- The right to erasure ("right to be forgotten").
- The right to restrict processing.
- The right to data portability.
- The right to object to processing based on legitimate interests.
- The right to lodge a complaint with the UK Information Commissioner's Office (ICO).
- The right to unsubscribe from marketing emails at any time.

Where we process your personal data based on legitimate interests and/or direct marketing purposes, you have the **right to object to such processing** at any time under Article 21 UK GDPR.

You have an absolute right to object at any time to the processing of your personal data for direct marketing purposes under Article 21 (2) UK GDPR.

You may object to direct marketing at any time, free of charge and without providing reasons.

United States State Privacy Rights:

- The right to know what categories of personal data are collected and how they are used.
- The right to access personal data held about you.
- The right to request deletion of personal data, subject to legal exceptions.

- The right to correct inaccurate personal data.
- The right to opt out of certain processing activities where applicable.
- The right not to be discriminated against for exercising privacy rights.
- The right to unsubscribe from marketing emails at any time.
- The right to data portability, where applicable under applicable state law.
- The right to appeal our decision if we decline to act on your privacy rights request, where required by applicable state law. To submit an appeal, please contact us using the details provided in this Privacy Policy.
- The right to request a list of the specific third parties to whom we have disclosed your personal data, where required by applicable state law.
- The right to use opt-out preference signals, including Global Privacy Control (GPC), where required by applicable state law.

Canadian Privacy Rights (PIPEDA-style):

- The right to access personal data held about you.
- The right to request correction of inaccurate or incomplete personal data.
- The right to withdraw consent, subject to legal or contractual restrictions.
- The right to unsubscribe from marketing emails at any time.

Requests may be submitted using the contact details below. We may require verification of your identity before fulfilling a request.

The right to lodge a complaint with the Office of the Privacy Commissioner of Canada (www.priv.gc.ca).

11. Security Measures

We implement reasonable technical and organizational measures to protect personal data against unauthorized access, loss, misuse, or alteration. However, no system can be guaranteed to be completely secure.

In the event of a breach of security safeguards that creates a real risk of significant harm, we will notify affected individuals and, where required, the relevant supervisory authorities, in accordance with applicable law.

12. Children’s Privacy

The Service is not intended for individuals under the age of 18. We do not knowingly collect personal data from minors.

13. Third-Party Links

The Service may contain links to third-party websites or services. We are not responsible for the privacy practices of such third parties. When you follow a link to an external website, you leave our Service and enter a site that is outside our control. We do not oversee how those websites collect, use, or protect personal information, and their practices are governed by their own privacy policies. We encourage you to review the privacy notice of any third-party website before providing personal information.

14. Changes to This Privacy Policy

We may update this Privacy Policy from time to time. The latest version will be available on our website. Material changes will be communicated where required by law.

15. Contact Information

For questions or requests regarding this Privacy Policy or your personal data, please contact:

Responsible person: Director

Email: support@marble-iq.com

Company: HaldenCraft LLC.

Registered Address: 524 Adrian Street, Waterloo, IA, 50703, United States of America.

UK-representative for data protection matters (Article 27 UK GDPR):

Email: MELSGROUPLTD@outlook.com.

Company: MELS GROUP LTD.

Registered Address: 85 Great Portland Street, First Floor, London, England, W1W 7LT.

Postal Address: Piccadilly Business Centre, Unit C, Aldow Enterprise Park, Manchester, M12 6AE.

We answer during 48 business hours (except weekends and holidays).

Canadian Access Request Procedure: If you are located in Canada and wish to access or correct your personal data, you may submit a written request (or email request) using the contact details above. Requests should include sufficient information to allow us to identify your records.

We will respond within a reasonable time and no later than the timeframes required under applicable Canadian privacy law. If access is refused, we will provide written reasons and information about available complaint mechanisms.