PRIVACY POLICY

Last Updated August 27, 2026

This Privacy Policy applies to all websites, mobile applications, and services provided by MentorPRO LLC ("we", "our", or "us"), a New Jersey limited liability company and its affiliates (collectively “MentorPRO”). By accessing or using our services, you agree to the terms outlined in this policy. This policy outlines how we collect, use, share, and protect your personal information. It also explains your rights and choices regarding your information.

References to "GDPR" in this Privacy Policy refer to the General Data Protection Regulation (EU 2016/679), which governs the processing of personal data for individuals located in the European Union.

This Privacy Policy is effective as of September 1, 2023, or the date you first access or use our services, whichever is later.

1. Information we collect

MentorPRO collects personal and technical information strictly necessary to provide, maintain, and improve our services. We are committed to transparency and data minimization, collecting only what is relevant and lawful.

We collect information through the following methods:

Information You Provide Directly: This includes data you submit when registering, completing forms, making purchases, or contacting us. Examples include your name, email address, phone number, company name, job title, and communication content. Payment-related data is collected when necessary to process transactions. This also includes educational records or student data provided by institutions or authorized users in compliance with the Family Educational Rights and Privacy Act (FERPA), which governs the privacy and protection of student education records.

Automatically Collected Information: We collect certain technical details automatically when you use our services. This may include your device type, browser, IP address, access times, and activity data such as pages visited and features used. We also use cookies and similar technologies to support functionality and analytics. Google Analytics is used to understand usage patterns and improve service quality.

Third-Party and Integration Data: We may receive information from integrated platforms such as CRM tools, email delivery services, and analytics providers. These integrations enhance our ability to support your experience and improve our service delivery.

MentorPRO does not intentionally collect sensitive personal information (e.g., health, racial or ethnic origin, political or religious beliefs) unless required by law or contractual obligation. All

data is collected in accordance with applicable privacy laws and aligned with business necessity and legal obligations.

2. How We Use the Information We Collect

MentorPRO processes personal information in accordance with applicable data protection laws and principles, including consent, contractual necessity, legal obligations, and legitimate interest. Our goal is to use personal data transparently, fairly, and only as necessary to deliver and improve our Services.

We use the information we collect for the following purposes:

To fulfill contractual obligations: We use your information to provide, operate, and maintain our Services; manage user accounts and subscriptions; offer customer support; send important service-related notifications such as billing updates, renewal alerts, and transaction confirmations; and deliver customer-specific consulting services or support.

To comply with legal requirements: We process collected data to uphold compliance with applicable laws and regulations, respond to lawful government or regulatory requests, and maintain records for auditing and legal defense.

For legitimate business interests: We rely on legitimate interests to improve functionality, personalize user experiences, monitor performance, detect abuse, and support internal research and development. This includes collecting information such as browser type, IP address, and usage activity to ensure the platform functions properly and securely across devices and sessions.

For marketing and communications: We may send newsletters, promotional materials, and service-related announcements based on your preferences. You can opt out of marketing communications at any time by clicking the "unsubscribe" or “opt-out” link included in our emails or by contacting us directly..

For profiling and automation: We may combine data collected from your use of our Services with third-party insights to tailor experiences, personalize content, and improve recommendations. We apply machine learning techniques to user interaction and usage data to generate statistical insights, improve the relevance of content and services, optimize our marketing efforts, and improve our fraud detection capabilities.

For security and fraud prevention: We use collected data, including log data and IP addresses, to monitor for suspicious activity, detect unauthorized access, and prevent service abuse. This includes the analysis of log data, detection of abuse patterns, and alerting mechanisms to support incident response and account protection.

Use of third-party services: We may use analytics and advertising partners who apply cookies, tags, and IP matching to measure marketing performance and improve service

engagement. These partners may use pseudonymized or aggregated data for better targeting across devices and browsers.

We limit data use to only what is necessary for the intended purposes and continually review how personal information is processed. If at any time you wish to exercise your rights under applicable privacy laws - including the right to access, correct, delete, or restrict your data - you may contact us at privacy@mentorpro.com.

MentorPRO may use customer-provided data, such as data from constituent management systems, to deliver requested consulting or support services. This may include names, addresses, emails, and transaction histories. Such data is retained only as needed and is never shared with third parties without consent. You may request deletion of this data at any time.

3. Information You Share

Many MentorPRO services allow you to share information with others. Please note that if you choose to share information publicly, it may become accessible to others and potentially indexed by search engines. While MentorPRO provides functionality to modify or delete your shared content, we cannot guarantee removal from external platforms or search engine caches.

We advise users to exercise discretion when posting any information that they do not wish to make public. MentorPRO is not responsible for content that users voluntarily disclose in areas that may be visible to others.

If you use social media features integrated into our services, those platforms may collect information about your interactions and associate it with your social media profile. Your use of such features is subject to the privacy policies of the respective third-party platforms.

4. Information We Share

MentorPRO does not sell your personal information. We only share data when necessary to operate our services, comply with legal obligations, or enhance user experience in a secure and responsible manner. All data sharing is governed by strict contractual and confidentiality obligations.

We may share personal information under the following circumstances:

With service providers that help us with our business activities, including payment processors and email service providers. These parties are contractually required to protect your data and may use it solely for the services they provide to MentorPRO.

With legal and regulatory authorities when required to comply with applicable laws, enforce our terms, respond to valid legal processes, or protect the rights, safety, and property of MentorPRO, its users, or the public.

During business transitions such as mergers, acquisitions, financing, or asset sales. In such cases, your information may be transferred as part of the business assets, subject to appropriate safeguards and continued adherence to this Privacy Policy.

MentorPRO ensures that any third party receiving personal information does so under strict privacy and security obligations and only uses the data for the original purposes intended.

5. Use of AI (MentorAI)

MentorPRO uses artificial intelligence ("MentorAI") to help mentors synthesize program data and surface actionable mentee insights. MentorAI processes only the information necessary for this purpose and applies privacy safeguards including data minimization and pseudonymization (and, where feasible, anonymization). We do not sell personal data and we do not use identifiable user data to train general-purpose AI models. AI processing occurs under strict access controls and encryption, and outputs are intended to support—not replace—human judgment. MentorAI does not make automated decisions that produce legal or similarly significant effects on users. We maintain controls consistent with SOC 2 and GDPR requirements, use vetted sub-processors under data protection agreements, and retain data only as long as needed for the services or as required by law.

6. Cookies

MentorPRO uses cookies and similar tracking technologies to support, enhance, and personalize your experience with our services. Cookies are small text files stored on your device that help us recognize returning users, remember preferences, and analyze usage patterns.

We use cookies for the following key purposes:

Performance and Analytics: Understand user behavior, feature usage, and traffic trends to improve functionality and content relevance.

User Experience: Store login sessions, interface settings, and language preferences to streamline navigation.

Security: Support secure authentication, monitor session integrity, and identify suspicious behavior.

Personalization: Deliver content and interface adjustments based on user interests and activity.

Advertising: With user consent, personalize marketing communications and measure campaign effectiveness. Users may opt out via browser settings or by contacting us.

Google Analytics: MentorPRO uses Google Analytics, including remarketing and demographic features, to evaluate user engagement. Users can manage these settings through Google Ad Preferences or opt out via the Google Analytics Opt-out Browser Add-on.

Disabling cookies may limit the functionality of some services. Users can manage cookie preferences in their browser settings.

7. Third-Party Websites

MentorPRO's services may contain links to external websites, applications, or platforms operated by third parties. These sites are not controlled by MentorPRO, and we are not responsible for their privacy practices, content, or terms.

Third-party platforms may collect information independently and operate under their own privacy policies. While we aim to link to reputable resources, we do not endorse or make representations about third-party services. Users are encouraged to review the privacy policies of any third-party service before providing personal information or engaging with their content.

Your interactions with these services are solely governed by their terms and policies.

8. How We Keep Information Secure

MentorPRO is committed to protecting the confidentiality, integrity, and availability of the personal information entrusted to us. We implement a layered security approach that includes administrative, technical, and physical controls designed to safeguard data against unauthorized access, loss, misuse, alteration, or disclosure. These safeguards include, but are not limited to, encryption to protect data both in transit and at rest; enforcement of least privilege and role-based access principles to ensure that only authorized personnel can access protected data; detailed access logs and audit trails to monitor and track data interactions; regular security audits; endpoint protection through full-disk encryption; and security awareness training for employees.

We continuously evaluate and enhance our security practices in line with evolving threats and industry standards. While no system is entirely immune to risk, we proactively monitor for security incidents and have formal incident response procedures in place to detect, contain, and remediate potential threats.

Our security framework follows industry-leading standards and best practices, including alignment with the SOC 2 Trust Services Criteria and compliance with Massachusetts regulation 201 CMR 17.00. MentorPRO maintains comprehensive Information Security Policies that collectively constitute a formal Written Information Security Program (WISP), which is reviewed annually. These policies address access controls, encryption, employee training, and incident response requirements, in alignment with applicable regulatory standards.

9. Data Retention

MentorPRO retains personal information only for as long as necessary to fulfill the purposes for which it was collected, including providing our services, complying with legal obligations, resolving disputes, enforcing agreements, and supporting our legitimate business operations.

The duration of retention depends on the nature of the information and the context in which it was collected. For example:

- Personal data is retained while your account remains active or as long as required to provide you with access to our services. Where retention is based on contractual or legal requirements (e.g., tax, accounting, or regulatory compliance), we will retain the data in accordance with applicable laws.
- Non-personal data, including anonymized or aggregated usage metrics, may be retained for analytics or operational purposes, typically not exceeding eighteen (18) months unless a longer period is required for legitimate business interests.

Once the data is no longer needed, it is securely deleted, anonymized, or otherwise rendered inaccessible. Users may also request deletion of their personal information at any time by contacting us at privacy@mentorpro.com. We will evaluate such requests in accordance with applicable laws and contractual commitments.

10. Legal Basis for Processing (EU and Switzerland Visitors)

If you are located in the European Union or Switzerland, our collection and processing of your personal data is governed by the General Data Protection Regulation (GDPR) and relevant Swiss data protection laws. The legal basis on which we process your data will depend on the nature of the personal information and the context in which it is collected.

MentorPRO relies on the following lawful bases for processing:

Your consent (Article 6(1)(a) GDPR): Where you have freely given, specific, informed, and unambiguous consent, for example, when you opt in to receive marketing communications or agree to the use of non-essential cookies.

Contractual necessity (Article 6(1)(b) GDPR): Where the processing of your information is necessary to perform our contractual obligations to you.

Legal obligations (Article 6(1)(c) GDPR): Where we are required to retain or disclose information to comply with applicable laws and regulations.

Legitimate interests (Article 6(1)(f) GDPR): Where processing supports purposes such as fraud prevention, service improvement, or security, and where those interests are not overridden by your data protection rights.

If you would like more information about the specific legal basis on which we rely for a given data processing activity, including how we assess legitimate interests, please contact us at privacy@mentorpro.com. We are committed to maintaining full transparency regarding our data handling practices.

11. International Data Transfers

MentorPRO is headquartered in the United States, and all data collected through our Services is primarily processed and stored on servers located within the United States. If you are accessing our Services from outside the U.S., please be aware that your information will be transferred to, stored, and processed in a jurisdiction that may not provide the same level of data protection as your home country.

Where personal data is transferred across borders, including to third parties or affiliates in jurisdictions that may lack equivalent privacy safeguards, MentorPRO takes appropriate steps to ensure your information remains protected. These safeguards may include:

- Contractual commitments based on Standard Contractual Clauses (SCCs) approved by the European Commission or other recognized mechanisms for lawful data transfer;
- Binding corporate rules, where applicable;
- Due diligence on vendors and partners to ensure their privacy practices align with applicable data protection laws.

Regardless of where your data is processed, MentorPRO maintains rigorous privacy and security controls as described in this Privacy Policy. We are committed to ensuring a consistent level of protection for your personal information, regardless of geographic location.

12. Children's Privacy

MentorPRO is committed to protecting the privacy of children and does not knowingly collect personal data from individuals under the age of 13 in accordance with the U.S. Children's Online Privacy Protection Act (COPPA).

For users located in the European Union, United Kingdom, or Switzerland, MentorPRO does not process personal data of children under the age of 16 without verifiable parental or guardian consent, as required by applicable data protection laws. When processing is necessary, we make reasonable efforts to confirm that consent is authorized by a person holding parental responsibility.

MentorPRO's services are intended for users aged 18 and above or those legally capable of entering into binding contracts. If you are a parent or legal guardian and believe that your child has provided us with personal information, please contact us at privacy@mentorpro.com. We will act promptly to delete the child's information in accordance with our obligations.

13. Sensitive Personal Data

MentorPRO does not knowingly collect or process any "Sensitive Personal Data" as defined under the General Data Protection Regulation (GDPR). This includes information revealing racial or ethnic origin, political opinions, religious or philosophical beliefs, trade union membership, genetic or biometric data, data concerning health, or data regarding an individual's sex life or sexual orientation.

We also do not request or encourage users to submit such data through our Services. In the event that you believe sensitive data may have been provided inadvertently, we encourage you to contact us at privacy@mentorpro.com so that we may assess and delete such data in accordance with applicable data protection laws.

MentorPRO remains committed to collecting only the minimum information necessary to deliver and support our services effectively and lawfully.

14. Your Rights

As a data subject, you are entitled to exercise a range of rights regarding your personal information under applicable data protection laws, including the General Data Protection Regulation (GDPR) where applicable.

You may have the right to:

- Access the personal information MentorPRO holds about you and request a copy of it.
- Request correction or update of your information if it is inaccurate or incomplete.
- Request the deletion or anonymization of your personal data where legally permitted.
- Object to or restrict the processing of your personal data under certain circumstances.
- Request the portability of your data, allowing you to obtain and reuse your personal data across different services.
- Withdraw your consent at any time when processing is based on your consent. This will not affect the lawfulness of processing carried out prior to the withdrawal.

Access, correct, or request deletion of your education records, consistent with FERPA's requirements for eligible individuals, ensuring transparency and control over educational data throughout its lifecycle.

You may also opt out of receiving marketing communications from us at any time by clicking the "unsubscribe" or "opt-out" link included in our emails or by contacting us directly. To opt out of other forms of marketing such as phone calls or postal mail, please refer to the contact details in the Contact Us section.

If you have concerns about how we handle your personal data, you have the right to lodge a complaint with your local data protection authority.

To exercise any of your data protection rights, please contact us at: privacy@mentorpro.com. We respond to all requests in accordance with applicable legal timelines.

15. Changes in Corporate Structure

If MentorPRO undergoes a business transition such as a merger, acquisition, reorganization, bankruptcy, or sale of all or a portion of its assets, your personal information may be transferred or disclosed as part of that transaction. In such cases, we will ensure that any successor entity

honors the commitments outlined in this Privacy Policy or provides notice of material changes in data handling practices.

We will notify you of any such change where required by law and provide options regarding your personal information in accordance with applicable data protection laws.

16. Rights of Users in Certain U.S. States/Compliance with U.S. State and Local Privacy Laws

MentorPRO complies with all applicable federal, state, and local data privacy and security laws across the United States. This includes, but is not limited to, comprehensive consumer privacy laws such as the California Consumer Privacy Act (CCPA/CPRA), Virginia Consumer Data Protection Act (VCDPA), Colorado Privacy Act (CPA), Connecticut Data Privacy Act (CTDPA), and Utah Consumer Privacy Act (UCPA), as well as specialized regulations like Massachusetts 201 CMR 17.00 and New York's SHIELD Act.

We also monitor and adapt to emerging legislation in states such as New Jersey, Texas, and Oregon to ensure continued compliance. Depending on your state of residence, you may have rights including access, correction, deletion of your personal information, and the ability to opt out of certain data processing activities. MentorPRO regularly updates its practices and this Privacy Policy to reflect changes in U.S. privacy laws and your rights under them.

Categories of Personal Information We Collect

We have collected the following categories of personal information in the last twelve (12) months:

Category	Examples	Collected
A. Identifiers	Contact details, such as real name, alias, postal address, telephone or mobile contact number, unique personal identifier, online identifier, Internet Protocol address, email address, and account name	YES
B. Personal information	Name, contact information, education, employment, employment history, and financial information	YES
C. Protected classification characteristics	Gender, age, date of birth, race and ethnicity, national origin, marital status, and other demographic data	NO

D. Commercial information	Transaction information, purchase history, financial details, and payment information	NO
E. Biometric information	Fingerprints and voiceprints	NO
F. Internet or other network activity	Browsing history, search history, online behavior , interest data, and interactions with our and other websites, applications, systems, and advertisements	NO
G. Geolocation data	Device location	NO
H. Audio, electronic, visual information	Images and audio, video or call recordings created in connection with our business activities	NO
I. Professional/employment information	Business contact details in order to provide you our Services at a business level or job title, work history, and professional qualifications if you apply for a job with us	YES
J. Education information	Student records and directory information	NO
K. Inferences	Inferences drawn from any of the collected personal information listed above to create a profile or summary about, for example, an individual's preferences and characteristics	NO

We may also collect other personal data when you interact with us directly, via customer support, surveys, or service delivery.

Sources of Personal Information:

We obtain personal information from the following categories of sources:

- Information you provide directly to us through methods such as registration forms, account setup, customer support communications, or service interactions.
- Information we collect automatically based on your use of our services, including usage data, system logs, and data from cookies or tracking technologies that help enhance performance, security, and user experience.

Sharing Personal Information:

We disclose personal information to third parties for a business purpose only under contractual obligations that restrict how data is used. In the last twelve (12) months, we have disclosed:

- Category A: Identifiers
- Category B: Personal Information
- Category D: Commercial Information
- Category F: Internet or other similar network activity.

We disclose information to:

- Our affiliates
- Service providers and business partners
- Third parties as authorized by you or your agent

We do not sell personal information.

Your Rights and Choices:

Depending on your residency, you may have one or more of the following rights under applicable U.S. state privacy laws:

Right to Know: You have the right to request confirmation of whether we are processing your personal data.

Right to Access: You may request access to and a copy of the personal information we have collected about you in the past 12 months.

Right to Correct: You have the right to request correction of any inaccurate or incomplete personal data we maintain.

Right to Delete: Subject to certain exceptions, you may request that we delete your personal information.

Right to Opt-Out: You have the right to opt out of the sale, sharing, or use of your data for profiling in furtherance of decisions with legal or similar effects.

Right to Limit Use of Sensitive Information: Where applicable, you may request that we limit our use and disclosure of sensitive personal information.

Right to Non-Discrimination: We will not discriminate against you for exercising any of your data privacy rights.

How to Exercise Your Rights: You can submit a verifiable consumer request via Email: privacy@mentorpro.com Only you or someone you authorize may make a request. Parents may also act on behalf of minors.

Verification Process: You must provide your name, address, email, and phone number so we can verify your identity. We use this to locate your information and fulfill your request. If we cannot verify you, we may limit the response.

Residents of Virginia, Colorado, and Connecticut may appeal a denied request within 14 days by emailing privacy@mentorpro.com and including the subject “Appeal Request.” If unresolved, you may contact your state Attorney General:

- Virginia: 202 North Ninth Street, Richmond, VA 23219
- Colorado: 1300 Broadway, 10th Floor, Denver, CO 80203
- Connecticut: https://www.dir.ct.gov/ag/complaint/

Response Time and Format: We will respond within 45 days of receiving a request. If we need more time (up to 90 days), we will notify you with the reason for delay. Responses will only include data from the prior 12 months unless the law requires a longer period.

Fees: We generally do not charge fees unless a request is excessive, repetitive, or unfounded. In such cases, you will receive a cost estimate.

17. Rights of Users in the United Kingdom, Switzerland, and the European Union

If you are located in the European Economic Area (EEA), the United Kingdom (UK), or Switzerland, you have specific rights under the General Data Protection Regulation (GDPR) and equivalent national legislation. These rights include:

- Accessing your personal data in a structured, commonly used, and machine-readable format (data portability)
- Requesting correction or deletion of your personal data
- Restricting or objecting to the processing of your personal data
- Filing a complaint with your local data protection authority

MentorPRO may process personal data outside of the EEA, UK, or Switzerland in connection with product delivery, payment processing, customer support, or analytics. MentorPRO uses Standard Contractual Clauses approved by the European Commission and enters into Data Processing Agreements (DPAs) to ensure that all third-party service providers adhere to data protection obligations.

By using our services, including applications, instructional tools, and educational programs, you acknowledge and consent to the transfer and processing of your personal information in the United States and other jurisdictions where we or our partners operate.

Other Users Outside the United States

If you reside outside the U.S. and access MentorPRO's services, your information may be transferred to our servers in the United States for processing. By continuing to use our services, you consent to this transfer in accordance with applicable privacy laws.

18. Impact of EU-US-UK Data Privacy Framework

This Privacy Policy is intended to comply with the EU-US-UK framework of privacy principles agreed on July 10, 2023, or any other framework for transferring personal data from the EEA, the United Kingdom or Switzerland to the United States (the "Data Privacy Framework"), and MentorPRO has committed to complying with the Data Privacy Framework Principles set forth at https://www.dataprivacyframework.gov/s/. In the event of any amendment to the Data Privacy Framework, this Privacy Policy shall be deemed to be amended to the extent necessary to ensure compliance with such amendment.

19. Changes to the Privacy Policy

MentorPRO may revise this Privacy Policy at any time. Any changes or updates will be posted directly on this page with an updated effective date. Where required by applicable law, we will notify you of material changes to this Privacy Policy via email or through our services. We encourage users to periodically review this Privacy Policy to stay informed about how we are protecting the personal information we collect.

20. Contacting Us

If you have questions or concerns about this Privacy Policy or our data practices, you may contact us at:

MentorPRO LLC
297 Route 72 West, Suite 35
PMB 176
Manahawkin, New Jersey 08050
United States
Email: privacy@mentorpro.com

MentorPRO is committed to addressing your inquiries or complaints. For privacy-related matters, you may also reach out to our designated Data Protection Officer at the same contact email provided above.