

# **PRIVACY POLICY**

**Last Updated: February 1, 2026**

## ***1. Introduction***

Mene Group Inc., (“Richie,” “we,” “our,” or “us”) provides a platform that enables microbusinesses and solo operators to create branded payment pages and manage subscription-based offerings.

This Privacy Policy describes how we collect, use, disclose, and retain personal information in connection with our Services in the United States, and explains your rights under applicable U.S. privacy laws.

By accessing or using our services, you agree to the collection, use, and sharing of your personal information as described in this Privacy Policy. If you do not agree, please do not use our services.

We may update this Privacy Policy periodically. When we make material changes, we will update the “Last Updated” and provide notice in accordance with applicable law.

## ***2. Scope of This Policy***

This Privacy Policy applies to personal information we collect when you:

- Visit or use our website or web application,
- Register for or use our Services, and
- Interact with us via email, support channels, or other communications.

This Policy does not apply to:

- Information processed by Stripe as an independent payment processor, and
- Information processed by third parties on their own behalf.

Business Users are responsible for providing privacy notices to their End Customers where required by law. When we process personal information on behalf of Business Users (including End Customer information), we do so solely to provide our Services and in accordance with our contractual obligations to those Business Users. Business Users are responsible for lawful collection of End Customer information and providing any required notices.

The Business User is responsible for providing any legally required privacy notices to End Customers and for ensuring lawful collection of that information.

## ***3. Categories of Personal Information We Collect***

We collect different types of personal information depending on how you interact with our services. The information we collect falls into several categories, explained below in plain language. This includes identifiers and service information — all collected with purpose, clarity, and your consent where required.

We limit our collection of personal information to what is reasonably necessary for the purposes described in this Policy.

California and other state privacy laws require a description of the categories of personal information collected.

### 3.1 Categories Collected

In the past 12 months, we have collected the following categories:

Category (Statutory)	Examples	Collected	Purpose	Sold	Shared for Targeted Advertising
Identifiers	Email address, IP address, login credentials	Yes	Account management, security	No	No
Commercial Information	Transaction metadata (date, amount, status)	Yes	Display payment history, subscription management	No	No
Internet/Electronic Activity	Device data, browser type, usage activity	Yes	Analytics, service improvement, security	No	No
Professional Information	Business name, business type	Yes	Account setup	No	No
Sensitive Personal Information	Account login credentials	Yes	Account authentication and security	No	No

### California Notice at Collection

For California residents, we collect the categories of personal information listed above for the business and commercial purposes described in this Privacy Policy. We do not sell personal information or share personal information for cross-context behavioral advertising.

We retain personal information only for as long as reasonably necessary to fulfill the purposes for which it was collected, including legal, accounting, security, and compliance obligations, as further described in the Data Retention section of this Policy.

### Aggregated and De-Identified Data

We may also generate **de-identified** or **aggregated** data for internal analytics and service improvement. This data cannot reasonably be used to identify you and is not subject to individual rights under data protection laws.

If we materially change how we collect information — or begin gathering new categories of personal data — we will update this Privacy Policy and notify you as required under applicable law.

## 4. Sources of Personal Information

We collect personal information in different ways depending on how you use our services. This includes information you provide directly, information collected automatically during use, and data we receive from third-party service providers. We also ensure that contractors and internal team members only access what they need — and nothing more.

We collect personal information from:

- You directly (account registration, communications) when you:

- Communicate via phone, text, email, or in-app messages
- Share service instructions, special requests, or feedback
- When you use our Mobile app (If you download or use a mobile application through a third-party platform (such as Apple or Google), your use of that platform is also subject to the platform provider's terms and privacy policies).
- Third Parties:
  - Stripe (transaction metadata)
  - Service providers (hosting, analytics, email services)
 These vendors are required by contract to:
  - Use personal data only as instructed by Richie
  - Apply strict confidentiality and security safeguards
  - Not use or retain data for any other purpose
- Automatically via cookies and similar technologies
  - When you visit our website or use our services, we may collect technical and usage data automatically from your device or browser. This includes:
    - IP address, browser version, device type, and operating system
    - Website interactions (pages viewed, clicks, session duration)
    - Temporary session data to support user login and navigation
  - We use **cookies and similar technologies** to:
    - Enable core website functions (e.g., form submission, login persistence)
    - Understand how users interact with our content
    - Improve website design, content, and performance

We do not use behavioral profiling or track your activity across third-party websites. We do not use social media pixels or share cookie data with ad networks. Certain state laws provide an opt-out right for targeted advertising and related activities. Because we do not engage in targeted advertising or cross-context behavioral advertising at this time, these opt-outs may not apply to our current practices; however, you may still submit a request under Section 11. If our cookie or tracking practices change in the future, we will update this Privacy Policy and provide options for you to manage preferences.

### ***5. How We Use Personal Information***

We use personal information for the following purposes:

- Providing and maintaining our Services
- Managing accounts and subscriptions
- Displaying transaction history
- Security and fraud prevention
- Customer support
- Improving functionality and user experience
- Sending transactional communications
- Sending marketing communications (where permitted by law)

We do not use personal information to make automated decisions that produce legal or similarly significant effects. Richie does not use automated decision-making systems, algorithmic scoring models, or behavior-based profiling. All operational and service-related decisions are made by human personnel. We do not sell personal information or share it with third parties for advertising purposes.

We retain communications only as necessary for service coordination, customer support, compliance, and legitimate business recordkeeping.

If we intend to use personal information in a materially different manner than described in this Privacy Policy, we will provide appropriate notice and update this Policy in accordance with applicable privacy laws.

## ***6. How We Disclose Personal Information***

We may disclose personal information to:

### **6.1 Service Providers**

We share personal information with vendors that perform services on our behalf, including:

- Stripe (payment processing)
- Bubble.io (hosting infrastructure)
- Email service providers (Sendgrid)

We contractually require service providers to:

- Process personal information only for specified business purposes
- Not retain, use, or disclose it outside the scope of services
- Provide appropriate security protections

Certain members of our internal team — such as schedulers, support agents, or quality control staff — may access customer or contractor information when necessary to perform their roles.

Access is:

- Role-based and limited to those with a business need
- Governed by login and authentication controls
- Monitored and subject to our internal data access policies

Service providers process personal information solely on our behalf for specified business purposes. They are contractually prohibited from selling, sharing, or using personal information for their own independent purposes.

### **6.2 Business Transfers**

We may disclose or transfer personal information in connection with a merger, acquisition, financing, due diligence review, reorganization, bankruptcy, receivership, sale of company assets, or transition of service to another provider. In such circumstances, personal information may be transferred as part of the transaction, subject to appropriate confidentiality and security safeguards. If the transaction results in personal information becoming subject to a materially different privacy policy, we will provide notice as required by applicable law.

### **6.3 Legal Requirements**

We may disclose personal information when required to do so by law, subpoena, legal process, or government request. This may include responding to regulatory inquiries, court orders, or other legal obligations.

If legally permitted, we will notify you when such a disclosure has occurred.

#### **6.4 Emergency or Safety Disclosures**

We may share personal information when necessary to protect the rights, safety, or well-being of individuals — including you, our service providers, or members of the public. For example, we may cooperate with law enforcement in situations involving risk of harm or suspected illegal activity.

#### **International Transfers**

All personal information we collect is stored and processed in the United States. We do not intentionally transfer personal information outside of the U.S. We do not target individuals outside the United States. If you access our services from another country, your information will be processed in accordance with this Privacy Policy and U.S. data protection standards.

#### ***7. Sale and Sharing of Personal Information***

We do not sell personal information as defined under applicable state privacy laws.

As previously stated, we do not knowingly share personal information for cross-context behavioral advertising.

If we engage in targeted advertising in the future, we will:

- Update this Privacy Policy
- Provide a “Do Not Sell or Share My Personal Information” or “Your Privacy Choices” link

We recognize and honor legally required universal opt-out preference signals, such as Global Privacy Control (GPC), where applicable under state privacy laws. If we were to engage in activities that trigger opt-out rights under applicable law, such signals would be processed in accordance with those requirements.

#### ***8. Targeted Advertising and Cookies***

We use cookies and similar technologies for:

- **Essential cookies** – Required for core functionality such as submitting forms, staying logged in during a session, or navigating between pages
- **Preference cookies** – Help retain your user settings (like language or time zone preferences)
- **Analytics cookies** – Allow us to understand how visitors use our site and app, such as which pages are viewed most often or where users may experience issues

Certain state laws provide an opt-out right for targeted advertising and related activities. Because we do not engage in targeted advertising or cross-context behavioral advertising at this time, these opt-outs may not apply to our current practices; however, you may still submit a request under Section 11.

You may:

- Adjust browser settings

- Use opt-out tools provided on our website (if available)
- Submit a request under Section 10

### **Your Choices**

You can control cookie usage through your browser settings. Most web browsers allow you to:

- Block cookies entirely
- Delete cookies after each session
- Set alerts when a website attempts to place cookies

Please note that disabling essential cookies may affect your ability to use certain features of our website or application.

We do not use cookies or tracking technologies for behavioral advertising, user profiling, or third-party marketing purposes.

### **No Cross-Context Behavioral Tracking**

We do not allow third-party ad networks, tracking pixels, or social media plugins to collect data across platforms. Your activity on our site is not linked to tracking systems outside of Richie's control.

Analytics tools (such as Google Analytics) are used solely to generate aggregated reports about website usage and performance. We configure these tools to limit the collection of identifiable information and do not enable advertising features, cross-site tracking, or data sharing for targeted advertising purposes.

## **9. How We Protect Personal Information**

We take the protection of your personal information seriously. Richie implements a combination of administrative, technical, physical, and organizational safeguards that are appropriate to the nature of the data we handle and the needs of our business.

We evaluate these safeguards on an ongoing basis and update them as needed to address emerging threats, technology changes, or legal requirements.

### **Administrative Safeguards**

- Access controls that limit information access to team members and service providers with a legitimate business need
- Vendor risk assessments and confidentiality agreements to ensure third parties meet our privacy standards

### **Technical Safeguards**

- Encryption of personal information both in transit and at rest using industry-standard protocols
- Multi-factor authentication (MFA) for accessing internal systems and administrative tools
- Routine application of software updates, patches, and security configurations

- Firewalls, intrusion detection tools, and other technologies to protect our digital infrastructure

## **In the Event of a Security Breach**

If we become aware of a data breach involving your personal information, we will act swiftly to contain the incident, assess impact, and notify affected individuals as required by applicable laws.

### ***10. Data Retention***

We may retain information longer if required by law or to resolve disputes. Retention periods are determined based on the duration of your account relationship, legal obligations, dispute resolution needs, and operational necessity.

We retain personal information based on the following criteria:

- Account data: Retained while account is active and up to 5 years after closure for legal and tax compliance
- Transaction metadata: Retained for up to 7 years for accounting and compliance purposes
- Usage data: Typically retained for up to 24 months
- Marketing data: Retained until opt-out or inactivity for 24 months

### ***11. Your Privacy Rights***

We want you to feel informed and in control of your personal information. We comply with applicable U.S. state privacy laws where they apply to our operations.

Depending on your state of residence, you may have the following rights:

- Right to access personal information
- Right to correct inaccuracies
- Right to delete personal information
- Right to data portability
- Right to opt out of:
  - Sale of personal data
  - Targeted advertising
  - Profiling in furtherance of decisions producing legal or significant effects

To exercise your rights:

Email: [servicedesk@meetrichie.com](mailto:servicedesk@meetrichie.com)

Mail: 3965 Bethel Rd SE, Suite 1 #112 Port Orchard, WA 98366

We may verify your identity before fulfilling your request. We will respond to verified consumer requests within the timeframes required by applicable law (generally within 45 days, subject to lawful extension where permitted).

If you are a California resident, you may designate an authorized agent to submit a request on your behalf. We may require the authorized agent to provide written permission signed by you and may require you to verify your identity directly with us before processing the request.

For clarity, we do not engage in profiling that produces legal or similarly significant effects.

## **12. Appeals Process (Required in Certain States)**

If we deny your request, you may appeal by emailing [servicedesk@meetrichie.com](mailto:servicedesk@meetrichie.com) with “Privacy Appeal” in the subject line. We will respond within the time required by applicable law.

## **13. Children’s Privacy (COPPA)**

Our services are not directed to children under the age of 13, and we do not knowingly collect personal information from children under 13. If we become aware that we have collected personal information from a child under 13 without verifiable parental consent, we will take reasonable steps to delete that information.

If you believe we may have collected information from a child under 13, please contact us using the information provided in the Contact Us section below.

## **14. Email Communications (CAN-SPAM)**

We send both transactional and marketing email communications in connection with our services.

### **14.1 Marketing Communications**

We may send marketing or promotional emails about new features, service updates, product announcements, or other information that may be of interest to you.

In accordance with the Controlling the Assault of Non-Solicited Pornography and Marketing Act (“CAN-SPAM Act”), our marketing emails:

- Clearly identify the message as a promotional communication where required by law
- Include a clear and conspicuous explanation of how you can opt out of receiving future marketing emails
- Provide a functioning unsubscribe mechanism that remains active for at least 30 days after the message is sent
- Include our valid physical postal mailing address
- Honor opt-out requests promptly and in accordance with applicable law.

You may opt out of receiving marketing emails at any time by clicking the unsubscribe link included in the email or by contacting us directly. Opting out of marketing communications will not affect your receipt of transactional or service-related communications. We may retain a record of your opt-out preference to ensure we honor it.

### **14.2 Transactional and Service Communications**

We may send transactional or service-related communications that are necessary to provide and administer your account and our services. These communications may include:

- Account confirmations
- Billing notices and payment receipts
- Subscription updates
- Security alerts
- Customer support responses
- Important policy or service updates

These communications are not promotional in nature and are required for account administration and service delivery. As long as you maintain an active account, you may not opt out of receiving these essential communications.

If you close your account, we will cease sending non-essential communications, subject to applicable legal, regulatory, or recordkeeping obligations.

### ***15. Third-Party Links***

We are not responsible for third-party privacy practices. Please review their privacy policies.

### ***16. Changes to This Policy***

We may update this Privacy Policy from time to time to reflect changes in our business, services, or applicable laws. When we make updates, we will revise the “Last Updated” date at the top of this page.

If any change materially affects how we handle your personal information, we will notify you by email and provide a summary of the updated terms.

Minor or non-material updates may be made without direct notice. We encourage you to review this Privacy Policy periodically to stay informed about how we collect, use, and protect your information.

Your continued use of Richie’s services after an update means that you accept the revised version of this policy.

A current version of this Privacy Policy is always available at the footer of our website.

### ***17. Contact Us***

Mene Group Inc.

Email: [servicedesk@meetrichie.com](mailto:servicedesk@meetrichie.com)

Postal Address: 3965 Bethel Rd SE, Suite 1 #112 Port Orchard, WA 98366

## **California Privacy Addendum**

We comply with applicable U.S. state privacy laws where they apply to our operations. We are committed to providing transparency and meaningful privacy choices to all users.

This Addendum describes the categories of personal information we collect, the purposes for which we use it, the categories of third parties to whom we disclose it, and the rights available to California residents.

### ***Categories of Personal Information We Collect***

In the preceding 12 months, we have collected the following categories of personal information:

- **Identifiers** – such as name (if provided), email address, IP address, login credentials, and account identifiers
- **Commercial Information** – including subscription details and limited transaction metadata (such as transaction date, amount, and status)
- **Internet or Other Electronic Network Activity Information** – including browser type, device information, IP address, usage activity, session duration, and interactions with our website or application
- **Professional or Employment-Related Information** – such as business name and business type (for Business Users)
- **Sensitive Personal Information** – limited to account login credentials used for authentication and security purposes

We do not collect biometric information, government-issued identification numbers, precise geolocation data, financial account numbers, or health information.

We may generate **aggregated or de-identified data** for internal analytics and service improvement. Such information cannot reasonably be used to identify an individual and is not treated as personal information under the CCPA.

### ***Sources of Personal Information***

We collect personal information from:

- You directly, when you create an account, use our services, or communicate with us
- Stripe, which provides limited transaction metadata
- Service providers that assist with hosting, email delivery, and analytics
- Automatically, through cookies and similar technologies when you use our website or application

### ***Business and Commercial Purposes for Collection***

We use personal information for the following purposes:

- To provide, operate, and maintain our services
- To manage accounts and subscriptions
- To process and display transaction metadata
- To provide customer support
- To maintain security and prevent fraud
- To improve functionality, performance, and user experience
- To send transactional communications
- To send marketing communications where permitted by law
- To comply with legal obligations

We do not use personal information for automated decision-making that produces legal or similarly significant effects. We do not engage in behavioral profiling or algorithmic scoring.

### **Categories of Third Parties to Whom We Disclose Personal Information**

We may disclose personal information to:

- **Service Providers**, including Stripe (payment processing), Bubble.io (hosting infrastructure), email service providers, and analytics providers. These entities are contractually required to use personal information only for specified business purposes and to implement appropriate safeguards.
- **Internal personnel**, such as support or operational staff, where access is limited by role and business necessity.
- **Regulatory or law enforcement authorities**, when required by law.
- **Successors in interest**, in connection with a merger, acquisition, reorganization, or sale of assets, subject to appropriate safeguards.

### ***Sale and Sharing of Personal Information***

We do not sell personal information.

We do not share personal information for cross-context behavioral advertising. We do not permit third-party advertising networks, tracking pixels, or social media plugins to collect personal information through our services for advertising purposes. We do not offer financial incentives, price differences, or promotional benefits in exchange for the collection, retention, sale, or sharing of personal information.

### ***Retention of Personal Information***

We retain personal information only for as long as reasonably necessary to fulfill the purposes described in our Privacy Policy, including:

- Account data – retained during the life of the account and for a reasonable period thereafter for compliance and recordkeeping
- Transaction metadata – retained for accounting and legal compliance purposes
- Usage data – retained for analytics and security monitoring for a limited duration
- Marketing data – retained until you opt out or as otherwise required by law

### ***Your California Privacy Rights***

If you are a California resident, you may have the following rights under the CCPA:

- The right to know the categories and specific pieces of personal information we have collected about you
- The right to know the categories of sources from which personal information is collected
- The right to know the categories of third parties to whom personal information is disclosed
- The right to request deletion of personal information, subject to applicable exceptions
- The right to request correction of inaccurate personal information
- The right to opt out of the sale or sharing of personal information (we do not sell or share personal information)
- The right to limit the use and disclosure of sensitive personal information (we use sensitive personal information solely for security and authentication purposes)

- The right not to be discriminated against for exercising your privacy rights

To submit a privacy request, please contact us at:

Email: [servicedesk@meetrichie.com](mailto:servicedesk@meetrichie.com)

Mail: 3965 Bethel Rd SE, Suite 1 #112 Port Orchard, WA 98366

We may need to verify your identity before processing your request. We will not discriminate against you for exercising your rights under the CCPA.

### ***Updates to This Addendum***

We may update this California Privacy Addendum from time to time to reflect changes in our data practices or legal obligations. Any material changes will be communicated as required by applicable law.