

MTNFX

Privacy Policy

Effective Date: August 10, 2026

1. Introduction

MTNFX, LLC, a Colorado limited liability company ("Company," "we," "us," or "our") provides a cloud-based mountain operations and avalanche mitigation platform (the "Platform") to our mountain and resort customers as their service provider/processor. This Privacy Policy describes how we collect, use, disclose, and safeguard personal information when you use our website (the "Website", and together with the Platform, the "Service"), or that is provided to us by our customers when using the Platform.

This Privacy Policy applies to all users of the Service, including administrators, operators, field personnel, and any other individuals who access the Website or Platform. By using the Service, you consent to the data practices described in this Policy.

2. Personal Information We Collect

2.1 Information You Provide Directly to the Website

- **Account Information:** Name, email address and messages.
- **Communications:** Messages, support requests, and feedback you send to us.

2.2 Information Collected Automatically from the Website

- **Device and Usage Data:** IP address, browser type, operating system, device identifiers, pages visited, features used, and timestamps of interactions with the Website.
- **Log Data:** Server logs, error reports, and performance metrics.
- **Cookies and Similar Technologies:** We use cookies, local storage, and similar technologies to maintain session state, remember preferences, and analyze usage patterns.

2.3 Information Our Customers Provide to the Platform

- **Account Information:** Name, email address, phone number, job title, organization name, and role within your organization.
- **Profile Information:** Professional qualifications, certifications, and emergency contact details as provided by you or your organization's administrator.
- **Communications:** Messages, support requests, and feedback you send to us.
- **Payment Information:** Billing address and payment details (processed through secure third-party payment processors; we do not store full credit card numbers).
- **Accident Information** (for individuals involved in accidents on mountains): Name, date of birth, gender, height and weight, phone number, email address, mailing address, occupation, skiing/riding ability, whether wearing a helmet or involved in a lesson,

location and nature of potential injury(ies), injury history, type and nature of aid rendered and whether care was accepted or refused, details regarding transportation to a medical facility, medical facility check in/departure information, discharge diagnosis and OHSA recordability data

- **Accident Witness Information:** Name, phone number and email address, relationship to involved parties, and witness statements
- **Staff and Responder Information:** identity of responder(s) and role
- **Incident Circumstances:** date, time, day of week and precise location data (including GPS coordinates)

2.4 Information Collected Automatically from the Platform

- **Device and Usage Data:** IP address, browser type, operating system, device identifiers, pages visited, features used, and timestamps of interactions with the Platform.
- **Location Data:** GPS coordinates and location data from mobile devices and wearable applications when you use field data collection features. Location tracking is active only during operational use and can be controlled through device settings.
- **Log Data:** Server logs, error reports, and performance metrics.
- **Cookies and Similar Technologies:** We use cookies, local storage, and similar technologies to maintain session state, remember preferences, and analyze usage patterns.

2.5 Information from Third-Party Sources

- **Organization Data:** Information provided by your employer or organization's administrator for account provisioning.

We have collected the following categories of personal information from or about individuals within the last 12 months. The table below also indicates whether each category was sold or shared for cross-context behavioral advertising.

Category	Examples	Collected	Sold/Shared
Identifiers	Name, email address, phone number, IP address, account username	Yes	No
Personal Records	Physical address, date of birth	Yes	No
Protected Classifications	Age and gender	Yes	No

Category	Examples	Collected	Sold/Shared
Internet / Network Activity	Browsing history on our site, search queries, page interaction data	Yes	No
Geolocation Data	State and ZIP code	Yes	No
Professional / Employment Info	Occupation, employer name, professional qualifications and certifications	Yes	No
Sensitive Personal Information	Social security number, injury data, precise geolocation	Limited	No

Commented [CC1]: Please update the chart for missing data points, along with updating the collected, sold/shared column

We collect personal information directly from you, from our customers, and from publicly available sources.

3. How We Use Your Personal Information

We use the information we collect for the following purposes:

3.1 Service Delivery and Operations

- Providing, maintaining, and improving the Service
- Processing and displaying operational reports, weather data, and avalanche assessments
- Generating PDF reports and operational documents
- Enabling mobile and wearable device data collection in the field
- Sending operational notifications, alerts, and reminders

3.2 Account Management

- Creating and managing your account
- Authenticating your identity and managing access permissions
- Processing payments and managing subscriptions
- Providing customer support

3.3 Analytics and Improvement

- Analyzing usage patterns to improve the Service
- Developing new features and functionality

- Generating aggregated, anonymized industry benchmarks and statistics
- Troubleshooting technical issues and optimizing performance

3.4 Communication

- Sending service-related notices, updates, and security alerts
- Responding to your inquiries and support requests
- Providing information about new features or changes to the Service

3.5 Legal and Safety

- Complying with legal obligations
- Enforcing our Terms of Service and other legal terms and conditions
- Protecting the rights, safety, and property of MTNFX, our users, and the public

4. How We Share Your Personal Information

We do not sell your personal information or share it for cross context behavioral advertising. We may share your personal information with third parties in the following circumstances:

4.1 Within Your Organization

Information you enter into the Service, including operational data, accident data, reports, and observations, may be visible to other authorized users within your organization based on role-based access controls configured by your administrator.

4.2 Service Providers

We share information with third-party service providers who assist us in operating the Service, including hosting providers, payment processors, email delivery services, and analytics providers. These providers are contractually obligated to use your information only for the purposes of providing services to MTNFX and to maintain confidentiality and appropriate security measures. We do not share accident data with third party service providers, other than hosting providers

4.3 Legal Requirements

We may disclose your information if required to do so by law, regulation, legal process, or governmental request.

4.4 Business Transfers

In the event of a merger, acquisition, reorganization, or sale of assets, your information may be transferred as part of that transaction. We will notify our customers of any such change in ownership or control of your personal information.

4.5 With Your Consent

We may share your information in other circumstances with your explicit consent.

5. Data Security

We implement industry-standard technical and organizational measures to protect your information, including:

- Encryption of data in transit (TLS/SSL) and at rest
- Role-based access controls and multi-factor authentication
- Regular security assessments and monitoring
- Secure server infrastructure with redundant backups
- Employee access controls and confidentiality obligations

While we strive to protect your information, no method of electronic storage or transmission is completely secure. We cannot guarantee absolute security of your data.

6. Data Retention

We retain your information for as long as your account is active or as needed to provide the Service. Specific retention periods include:

- **Account Data:** Retained for the duration of your subscription and for thirty (30) days following account termination.
- **Operational Data:** Retained in accordance with your organization's data retention settings and applicable regulatory requirements. Explosive inventory records may be subject to ATF-mandated retention periods.
- **Log and Usage Data:** Retained for up to twenty-four (24) months for analytics and troubleshooting purposes.
- **Backup Data:** Retained in accordance with our backup schedule and may persist for up to ninety (90) days after deletion from the production environment.
- **Accident Data:** [insert description of how long this is retained]

Following the applicable retention period, we will securely delete or anonymize your information unless retention is required by law.

Commented [CC2]: Can you align these with the categories of data in Section 2 above?

7. Your Rights and Choices

Depending on your state of residency, you (including parents of minor children) may have the following rights regarding your personal information (or personal information of your children):

- **Confirm:** You may confirm whether we process your personal information.
- **Access:** You may request a copy of the personal information we hold about you.
- **Correction:** You may request correction of inaccurate or incomplete information.
- **Deletion:** You may request deletion of your personal information, subject to legal retention requirements.
- **Data Portability:** You may request an export of your data in a commonly used, machine-readable format.
- **Opt-Out:** You may opt out of marketing or non-essential communications by adjusting your notification settings or contacting us (see Section 13 below). You may also opt-out

of personal data processing for targeted advertising and sales (we do not engage in these activities), along with profiling in furtherance of decisions that produce legal or similarly significant effects (we do not engage in these activities).

- **Location Tracking:** You may control GPS and location data collection through your device settings.

If you are a California, Colorado, Connecticut, Delaware, Florida, Indiana, Iowa, Kentucky, Maryland, Minnesota, Montana, Nebraska, New Hampshire, New Jersey, Oregon, Rhode Island, Tennessee, Texas, Utah and Virginia resident, in addition to the rights listed above, you have the right to request details about third parties that we have disclosed your personal information to, if any, and to limit the processing of sensitive personal information.

As states enact additional rights on behalf of their residents, we will comply with such laws to the extent applicable to our business activities. This Privacy Policy is not intended to be an exhaustive list of all such state rights now or in the future.

To exercise any of these rights, please contact us at privacy@mtnfx.com. Either we (if we obtained information from you directly), or the customer from whom we obtained your information, will respond to your request within forty-five (45) days, or such shorter timeframe as required by applicable law.

To protect your information, we must verify your identity in compliance with applicable law before fulfilling a request, and if you designate an authorized agent, your agent must provide a written permission signed by you to confirm your authorization. If we deny your request, you may appeal it by emailing us at privacy@mtnfx.com.

We will not discriminate against you for exercising any of your privacy law rights. Unless otherwise permitted by law, we will not:

- Deny you goods or services
- Charge you different prices or rates for goods or services
- Provide you a different level or quality of goods or services
- Suggest that you will receive a different price or quality of goods or services

8. Sensitive Personal Information

Some state laws grants residents of those states listed above specific rights with respect to "sensitive personal information," a defined category that includes Social Security numbers, precise geolocation, racial or ethnic origin, religious beliefs, and certain biometric and health data.

We limit our use and disclosure of sensitive personal information to purposes that are necessary to provide our services, comply with applicable law, or as otherwise permitted by applicable

privacy laws or regulations. We do not use sensitive personal information to infer characteristics about you.

By providing your sensitive personal information to us, you are giving us explicit consent to process and store this information for the purposes detailed in this Privacy Policy. You have the right to direct us to limit our use of your sensitive personal information to that which is necessary to perform the services you requested. To exercise this right, please contact us at privacy@mtnfx.com.

9. Children's Privacy

The Service is not intended for use by individuals under the age of 16, however, we may store accident information for minors on behalf of our customers, when they have provided parental consent to do so. We do not otherwise knowingly collect personal information from children, including from the Website or for any other purpose. If we become aware that we have collected personal information from a child that is unrelated to an accident and/or provided without parental consent, we will take steps to delete such information promptly. Parents may withdraw consent at any time by contacting us at privacy@mtnfx.com. Upon withdrawal, we will promptly delete the child's personal information from our records, unless retention is required by law. We only share accident data involving minors with our hosting provider and do not share this data with any other third party.

10. International Data Transfers

The Service is operated in the United States. If you access the Service from outside the United States, your information may be transferred to, stored, and processed in the United States. By using the Service, you consent to the transfer of your information to the United States, where data protection laws may differ from those in your country of origin.

11. Cookies and Tracking Technologies

We use cookies and similar technologies to operate and improve the Service. The types of cookies we use include:

- **Essential Cookies:** Required for the Service to function properly, including authentication and session management.
- **Functional Cookies:** Remember your preferences and settings to enhance your experience.
- **Analytics Cookies:** Help us understand how the Service is used and identify areas for improvement.

You can manage cookie preferences through your browser settings. Note that disabling essential cookies may prevent you from using certain features of the Service.

12. Changes to This Privacy Policy

We may update this Privacy Policy from time to time to reflect changes in our practices, technology, or legal requirements. We will notify you of material changes by posting the updated policy on our website and, where appropriate, by sending you an email notification. The "Effective Date" at the top of this policy indicates when it was last updated. Your continued use of the Service after any changes constitutes your acceptance of the updated policy.

13. Contact Information

If you have any questions, concerns, or requests regarding this Privacy Policy or our data practices, please contact us at:

MTNFX

Privacy Inquiries: privacy@mtnfx.com

General Inquiries: sales@mtnfx.com

Website: <https://mtnfx.com>