



Merkl Privacy Policy

Last revised: October 5th, 2026

This Privacy Policy describes how Angle Labs, Inc., a company incorporated in the British Virgin Islands (“Merkl”, “we”, “our”, or “us”), collects and uses information when you visit our websites and online interfaces, including **merkl.xyz**, **app.merkl.xyz**, the Merkl Studio, and any other interface that links to this Privacy Policy (together, the “Interfaces”).

This policy only covers information collected through the Interfaces themselves. It does not cover information recorded on public blockchains, which by their nature are decentralized, permissionless, and outside our control.

By using the Interfaces, you agree to the practices described in this Privacy Policy. If you do not agree, please stop using the Interfaces.

1. Scope

This Privacy Policy applies to all visitors and users of the Interfaces. It does not apply to:

- Data stored on public blockchains, such as transactions, wallet activity, and on-chain reward distributions, which is publicly accessible and not controlled by us.
- Third-party websites or services linked from the Interfaces, which have their own privacy policies.
- Our internal business operations or commercial relationships with clients, which are governed by separate agreements.

2. What We Collect

We aim to collect as little personal data as possible. Our focus is on understanding aggregate behavior across the Interfaces, not on identifying individual visitors.

2.1 Information collected automatically

When you visit our Interfaces, we and our analytics providers automatically collect technical and usage information, such as:

- Device and browser information (browser type and version, operating system, screen size, language).
- Approximate location derived from IP address, typically at country or city level.
- Usage information, including pages visited, time spent on pages, referring URL, buttons clicked, and navigation paths.
- Error reports and diagnostic information when the Interfaces fail to load or behave unexpectedly.

This information is collected and analyzed in aggregate. We use it to understand how the Interfaces are used as a whole, not to build profiles of individual visitors.

2.2 Information you provide

Some interactions involve information you actively provide, for example when you:

- Contact us by email or through a form, in which case we receive the contact details and the content of your message.

- Subscribe to a mailing list or product update, in which case we receive your email address.
- Connect a self-custodial wallet to an Interface. In that case, the Interface reads your public wallet address to display relevant information. We do not request or store private keys, and we do not custody any funds.

3. Cookies and Similar Technologies

We use cookies and similar technologies for two main purposes:

- **Strictly necessary cookies**, which are required for the Interfaces to function, for example remembering your session or your preferences. These cannot be disabled.
- **Analytics cookies**, which help us understand aggregate usage patterns of the Interfaces. These are used to improve the product, not to track individual users across the web.

You can configure your browser to refuse cookies or to alert you when cookies are being sent. If you disable cookies, some parts of the Interfaces may not work properly.

4. Analytics and Monitoring Providers

We use the following third-party analytics and monitoring tools. These tools may set cookies or collect technical information when you use the Interfaces:

4.1 Google Analytics

We use Google Analytics, provided by Google LLC, to understand how visitors interact with the Interfaces. Google Analytics collects information such as pages viewed, session duration, and approximate location. We configure Google Analytics with IP anonymization where available. You can opt out of Google Analytics by installing the browser add-on available at <https://tools.google.com/dlpage/gaoptout>.

4.2 Mixpanel

We use Mixpanel, provided by Mixpanel, Inc., to analyze how features of the Interfaces are used. Mixpanel collects information about events triggered in the Interfaces, such as clicks and page views, along with basic device information. We use this data in aggregate to improve product flows and prioritize features.

4.3 Sentry

We use Sentry, provided by Functional Software, Inc., to monitor errors and performance issues. When the Interfaces encounter an error, Sentry receives technical information about the error, including the affected page, browser, and a stack trace. We use this strictly to detect and fix bugs.

4.4 Langfuse

We use Langfuse, provided by Langfuse GmbH, to monitor and debug our AI-assisted features. When you use an AI-assisted feature, Langfuse receives the prompts and messages you submit, the responses and tool calls generated, and technical metadata such as timestamps, latency, and token usage. Do not include confidential or personal information in these prompts unless you are comfortable with it being processed this way. We use this data strictly to debug, evaluate, and improve these features.

Each of these providers acts as a separate data controller or processor under their own terms. We recommend reviewing their privacy policies for full details.

5. How We Use Information

We use the information described above to:

- Operate, maintain, and secure the Interfaces.
- Understand aggregate usage patterns and improve the product.
- Detect, prevent, and fix bugs, errors, and abuse.
- Respond to your messages and support requests.
- Comply with applicable laws and respond to lawful requests from authorities.

We do not sell your personal information, and we do not use it for behavioral advertising.

6. How We Share Information

We share information only in limited circumstances:

- **Service providers**, such as our analytics, error-monitoring, hosting, and email providers, who process information on our behalf and under contractual confidentiality and security obligations.
- **Professional advisors**, such as lawyers, accountants, and auditors, where necessary for legal or regulatory compliance.
- **Corporate transactions**, in connection with a merger, acquisition, financing, reorganization, or sale of all or part of our business.
- **Legal obligations**, where required by law, court order, or other valid legal process.
- **With your consent**, or at your direction.

7. International Transfers

Some of our service providers are located outside the European Economic Area, in particular in the United States. When we transfer personal data outside the EEA or the United Kingdom, we rely on appropriate safeguards, such as Standard Contractual Clauses, to ensure that your data benefits from an equivalent level of protection.

8. Data Retention

We keep personal data only for as long as needed for the purposes described in this Privacy Policy, or as required by applicable law. Aggregate or de-identified analytics data may be kept for longer periods, as it no longer identifies you.

9. Security

We use reasonable technical and organizational measures to protect the information we collect. No method of transmission over the Internet is fully secure, however, and we cannot guarantee absolute security.

10. Your Rights

Depending on where you are located, you may have rights regarding your personal data, including the right to:

- Access the personal data we hold about you.
- Request correction of inaccurate data.

- Request deletion of your data.
- Object to or restrict certain processing.
- Request portability of your data.
- Withdraw consent at any time, where processing is based on consent.
- Lodge a complaint with your local data protection authority. In France, this is the Commission Nationale de l'Informatique et des Libertés (CNIL).

Please note that we cannot modify or delete data recorded on public blockchains. Such data is outside our control.

To exercise any of these rights, contact us at **contact@merkl.xyz**. We will respond within the timeframes required by applicable law, typically within one month under the GDPR.

11. Children

The Interfaces are not directed to children under the age of 16, and we do not knowingly collect personal data from them. If you believe a child has provided personal data to us, please contact us so we can delete it.

12. Changes to This Policy

We may update this Privacy Policy from time to time. When we do, we will update the “Date of latest revision” at the top of the page. Material changes will be communicated through the Interfaces or by other appropriate means.

13. GDPR: Controller and Legal Bases

For users in the European Economic Area and the United Kingdom, the data controller is **Angle Labs, Inc.**, a company incorporated in the British Virgin Islands. Our legal bases for processing personal data are:

- **Legitimate interests**, in operating, securing, and improving the Interfaces, where these interests are not overridden by your rights and freedoms.
- **Consent**, in particular for non-essential cookies and for marketing communications.
- **Legal obligations**, where processing is necessary to comply with applicable law.
- **Performance of a contract**, where processing is necessary to provide a service you have requested.

14. Contact

If you have any questions about this Privacy Policy or our data practices, contact us at **contact@merkl.xyz**.

15. Conflict or Inconsistency

In the event of any conflict between this Privacy Policy and any non-English translation, the English version controls.