

TML FREE RESEARCH API TIER

PRIVACY NOTICE

Last updated August 20, 2026

1. Introduction

Thinking Machines Lab, Inc. (“Thinking Machines”) is an artificial intelligence research and product company. This Privacy Notice (the “Notice”) describes how we collect, use, and disclose your information when you interact with our proprietary artificial intelligence models (“Company Models”) via third-party application programming interfaces (“API”) listed in Exhibit B of [TML Free Research API Tier Terms of Service](#) (collectively, the “Model API Services” or “Services”). For further details on how we process information in relation to our website, please see our [Website Privacy Notice](#). For details on our processing of information when you access Tinker, please see our [Service Terms of Use](#).

For the purpose of this Privacy Notice, Thinking Machines is the data controller of your information. By using our Services, you agree to our collection, use, and disclosure of your information described here. If you do not understand or agree with this Privacy Notice, please do not use our Services.

2. Changes to the Privacy Notice

We may update this Privacy Notice from time to time. If we do, we will publish an updated version here with an effective date informing you of the update. If we make material changes to how we use or disclose information, we will use reasonable efforts to notify you in accordance with applicable law.

3. Personal information we collect and how we use it

When you access the Company Models through the Services, you may choose to input information or content (“Prompts”) into the Company Models, and such Prompts may include personal information. We use Prompts to generate and output new information or content (“Outputs”) as part of the Services, as required to perform our contract with you. We may use Prompts and Outputs to improve our services, including by training, fine-tuning, or otherwise improving the Company Models, because it is in our legitimate interests to develop and improve our products and services.

We may also collect usage data about your use of the Services, including technical data about your interactions with the Services such as request metadata, token counts, timestamps, and error and execution logs. This information is collected and used because it is in our legitimate interests to provide the Services, tailor your experience with the Services and improve our services, run analytics, and better understand user interactions.

In addition, we may use the above information for our legitimate interest to maintain our business relationship, enhance the safety and security of our Services, provide customer support, comply with applicable legal obligations, enforce any applicable terms of service,

prevent fraud, illegal activity, and misuse of our Services, and protect our rights and the rights of our employees, users or other third parties.

4. How we disclose personal information

We may disclose personal information to the following third parties for the reasons listed below:

- Vendors or service providers: We may disclose your personal information to third parties who help us provide our Services, including for system administration, cloud storage, AI model distribution, content moderation, and security.
- Affiliates: We may disclose your personal information to our affiliates and others within our corporate group, as a matter of our legitimate interests to provide our Services and operate our business.
- Professional advisors: We may disclose your personal information to auditors, law firms, or accounting firms to comply with our legal and regulatory obligations and in our legitimate interests to assess, protect, enforce, and defend our rights and those of our employees and users.
- Business transactions: We may disclose your personal information to third parties in connection with or anticipation of an asset sale, merger, bankruptcy, or other business transaction, as a matter of our legitimate interests to run a successful and efficient business.
- Government authorities or other related third parties: We may disclose your personal information to government authorities or other related third parties in our legitimate interest to comply with legal requirements, law enforcement or regulatory inquiries, to enforce our terms of service, and to ensure the safety and security of our business, employees, and users.

5. How long we store personal information

We keep personal information for as long as reasonably necessary for the purposes explained in this Privacy Notice. The length of time depends on several factors, including whether we need the personal information to develop, improve, or provide our services, to resolve any disputes, to comply with any contractual or legal obligations, to enforce our contracts, to prevent harm, to promote safety, security, and integrity, or to protect ourselves, including our rights or those of our employees. We also consider the amount and nature of the personal information, as well as the risk of harm if that personal information was lost or stolen.

6. How we protect personal information

We make reasonable efforts to protect your personal information from loss, misuse, or unauthorized access or disclosure but we cannot guarantee “perfect security.” We encourage you to take care when disclosing information to us.

7. Your personal information rights

Depending on where you live, your legal rights over your data may include the right to:

- Access or know what personal information we have about you and how it is processed;
- Delete your personal information that we hold about you;
- Update or correct inaccurate personal information that we hold about you
- Transfer a copy of your personal information to a third-party;
- Restrict, stop, or suspend our processing of your personal information;
- Object to our processing of your personal information;
- Withdraw your consent to our processing of your personal information, to the extent we rely on consent for such processing.

These rights are not absolute and we may decline your request where permitted by law. You can email us at privacy@thinkingmachines.ai to exercise these rights. We will not discriminate against you for doing so. For your security, we may require you, or any agent acting on behalf, to verify your identity and any agent authorization before exercising these rights. If we deny your request, and where permitted by law, you may appeal our decision by emailing us at privacy@thinkingmachines.ai.

8. Children's privacy

Our Services are not intended for or directed at children under the age of 13 and we do not knowingly collect personal information about them. If you believe we have unknowingly done so please email us at privacy@thinkingmachines.ai, and we will make commercially reasonable efforts to delete such information.

9. Additional U.S. state disclosures

Some U.S. states, such as California, require additional disclosures about what personal information we collect and how we use or disclose it. For purposes of this Section, personal information also includes "sensitive personal information" as defined under the California Consumer Privacy Act ("CCPA").

We collect and disclose, and have collected and disclosed over the past 12 months, information contained within Prompts and Output, and Internet and similar network activity information, such as information about your use of our Services. For information regarding the specific purposes for which we collect, use and disclose your information, and the categories of sources from which we collect such information, including our practices over the past 12 months, please see the sections above, "Personal information we collect" and "How we disclose personal information". Information about our retention practices is described above in "How long we store personal information". We only use and disclose sensitive personal information for the purposes specified in the CCPA or otherwise in line with your consent.

We do not "sell" or "share" personal information as those terms are defined in the CCPA nor have we done so in the prior 12 months. Further, we do not have actual knowledge that we sell or share personal information of individuals under 16 years of age.

10. Data transfers

We are based in the United States. If you are using the Services outside the United States, please be aware that the information we collect from you may be transferred to, stored and processed in the United States or other countries outside of your country of residence, which may have data privacy or protection rules that are different from your country of residence.

11. How can you contact us?

Please email us at privacy@thinkingmachines.ai if you have any questions or would like to exercise any of your personal information rights.