

KeenFace API and Studio Privacy Policy

Last updated: 14 October 2026

This Privacy Policy describes Our policies and procedures on the collection, use, and disclosure of Your information when You use KeenFace API or KeenFace Studio, and tells You about Your privacy rights and how the law protects You.

By using the Service, You agree to the collection and use of information in accordance with this Privacy Policy. The data controller is KeenTools LLC, M. Khorenatsi street, 26A, office 210, 0010, Yerevan, Republic of Armenia. Where KeenTools processes personal data of Depicted Individuals on a Customer's behalf, KeenTools acts as that Customer's processor, as described in "Biometric Data and Individuals Depicted in Uploaded Content" below and in Section 5.6 of the KeenFace API and Studio Terms of Service.

Enterprise and Custom Agreements: For enterprise customers and customers with custom contracts, additional terms regarding data handling, storage, retention, processing locations, security measures, and compliance requirements may be specified in a custom agreement with KeenTools. In case of conflict between this Privacy Policy and a custom agreement, the terms of the custom agreement shall prevail to the extent permitted by applicable law.

By uploading health-related or patient data, or any data otherwise subject to HIPAA, to the Service — including Studio — the Customer represents and confirms that they have obtained the patient's consent for that data to be uploaded to and processed by KeenTools and its third-party service providers.

Interpretation and Definitions

- **You** ('Customer') — the individual accessing or using the Service, or the company or legal entity on behalf of which such individual acts.
- **KeenTools** ('the Company', 'We', 'Us', 'Our') — KeenTools LLC, M. Khorenatsi street, 26A, office 210, 0010, Yerevan, Republic of Armenia.
- **KeenFace API and Studio** ('the Service') — KeenTools' KeenFace API and KeenFace Studio web application, including their account system and credit-based billing.
- **KeenTools Website** — any website owned by KeenTools, including keentools.io and keenface.ai.
- **Personal Data** — any information that relates to an identified or identifiable individual.
- **Depicted Individual** — any identifiable natural person whose image, likeness, or biometric data appears in a photograph, image, or 3D model uploaded to or generated by the Service, other than the Customer.

Data We Collect

Categories of data involved in processing include: names, email address, cookies, IP address, company information, payment information, uploaded images and photos, generated 3D head models and mesh data, solved camera data, content-screening results, API keys and authentication tokens, API request and response data, API usage logs (endpoints accessed, request frequency, processing times, request parameters and configuration data, access patterns), web services login credentials and session data, credit purchase and usage history, upload and processing activity logs, reseller account management data, and user portal activity logs.

For enterprise customers, additional categories may include: administrator contact information, billing/invoicing data, volume usage analytics, compliance/audit documentation, and other data specified in a custom enterprise agreement.

Where appropriate, we will prompt you to give consent to this collection and processing within the Service, on the KeenTools Website, or in another environment set up by KeenTools, in a clear and conspicuous manner.

Biometric Data and Individuals Depicted in Uploaded Content

Photographs and 3D head models processed by the Service may constitute biometric data under applicable data protection law, as they are capable of uniquely identifying a natural person. Where required, KeenTools relies on the consent of the uploading Customer, obtained at the point of signing up, as the legal basis for processing this data. The Customer can withdraw this consent at any time by contacting privacy@keentools.io

Where a Customer uploads a photograph or image depicting a Depicted Individual, that individual's image — and any 3D model generated from it — constitutes personal data (and, where a face is depicted, biometric data) about that individual. KeenTools processes this data solely on the instructions of the Customer who uploaded it, as that Customer's processor under Section 5.6 of the Terms of Service. It is the Customer's responsibility to ensure they have an appropriate legal basis (such as the Depicted Individual's consent) before uploading such content. Individuals who believe their image has been uploaded to the Service without appropriate authorization may contact privacy@keentools.io. Anyone may also report content they believe is illegal or violates the Terms of Service to team@keentools.io.

AI Processing of Uploaded Images

At photo upload, you can turn the Scan Reconstruction setting on or off. Scan Reconstruction is OFF by default.

If Scan Reconstruction is OFF, the uploaded images are sent to third-party AI service providers for two purposes: (1) automated screening for compliance with the content rules in Sections 5.1 and 7 of the Terms of Service, using a downsized copy of the photo, and (2) processing and 3D head generation, using the photo at full resolution. A photo that does not pass content-policy screening is not processed or charged, and you will be given the option to remove it before proceeding. See keentools.io/subprocessors for the specific third parties involved.

This processing is used to generate a standardized set of reference images — with consistent geometry, a neutral expression, and full texture coverage — which the underlying reconstruction model requires to produce an accurate 3D head. This is what allows a 3D head to be created from a casual photo set, or even a single photo, rather than requiring a specialized studio photo shoot. In this mode, the output does not include solved cameras.

If Scan Reconstruction is ON, your photos are not sent to these third-party AI providers and are not subject to the automated content screening described above. The reconstruction is performed using your original photos, and the output includes solved cameras — the estimated position, orientation, and parameters of the camera for each input photo — which you can optionally download.

We collect this information for the following purposes:

- To enable account creation and authentication for the Service
- To process your API requests for automated head creation and related services
- To process image uploads and generate 3D head models via Studio
- To process photographs using third-party AI services — for automated content-policy screening and for image generation — when Scan Reconstruction is OFF. This does not apply when Scan Reconstruction is ON.
- To generate and deliver 3D head models and processing results
- To manage credit purchases and usage
- To provide access to the main website for learning about, purchasing, and getting support for the Service
- To improve our services, Website, and how we operate our business based on usage
- To understand and enhance your experience using our Website, products, and services
- To send you related information, including confirmations, technical notices, updates, security alerts, support, and administrative messages
- To protect us from piracy and unlawful use of our services
- For internal evidence of KeenTools and to protect the rights and interests of KeenTools and other users
- To promote and market our Products and Services

KeenTools does not use uploaded photographs or generated models to train machine learning models, except where separately and explicitly disclosed and consented to. KeenTools personnel access uploaded photographs and generated models only where necessary to provide support you request, to investigate and fix technical problems, or to investigate suspected abuse or violations of the Terms of Service. We do not use them in marketing, showcases, or other publicity without your prior consent.

Where We Store Your Personal Information

Your personal information and files are stored on KeenTools' servers and the servers of companies we hire to provide services to us — see Third-Party Services below.

Uploaded source photographs are stored on KeenTools cloud infrastructure (Cloudflare R2) until deleted by Customer. The 3D model reconstruction itself is performed using an ephemeral processing pipeline — meaning the reconstruction step does not retain your data beyond generating the output — but this does not affect the separate storage of the source images and generated models described above. Generated 3D models are stored until you request deletion, or in accordance with our retention policies. When your account is closed, uploaded photographs and generated models are deleted within 30 days, unless we are required by law to retain them.

For API integrations using our ephemeral processing mode, no photographs or generated models are retained on KeenTools servers beyond the active processing session, in accordance with the client's chosen configuration.

Account information, including email addresses and login credentials, is securely stored to enable access to the Service. Credit purchase transactions, usage history, and reseller account management data are maintained to track your account balance and service usage.

Enterprise Customer Data Storage: Enterprise customers with custom agreements may have specific data storage location, retention, or processing arrangements as detailed in their custom agreement.

Data Security

KeenTools takes the protection of customer data seriously and has technical measures in place to prevent unauthorised or unlawful access, and against accidental loss, destruction, or damage. We assess the compliance and security standards of any partners we use to host our services or process your data.

Sharing

Collected personal data is shared based on this Privacy Policy and the KeenFace API and Studio Terms of Service. We may share your data with third parties who help us provide the Service or run our business (e.g., providers of data storage, backup, hosting, or billing services), with individual representatives of your company, or where we've obtained your consent. We may also share data where required by law (e.g., with tax authorities) or where necessary to protect our rights or those of others.

We update the list at keentools.io/subprocessors before engaging a new sub-processor, and Customers may object by closing their account, as described in Section 5.6 of the Terms of Service. Enterprise customers with a signed Data Processing Agreement may request KeenTools' current sub-processor list and will be notified in advance of any material change to that list, with an opportunity to object, in accordance with the terms of their Data Processing Agreement.

To adhere to the CCPA, KeenTools will not retain, use, sell, or disclose Personal Data for any purpose other than to provide the Service, or outside the direct relationship between Customer and KeenTools, or other than as described in this Privacy Policy or the Terms of Service.

Tracking Technologies and Cookies

KeenTools uses cookies and similar technologies to enable core functionality on its Website, and — with your consent — to support marketing. Cookies fall into four categories:

- **Strictly Necessary** — required for core functionality and security (e.g., connecting you to the right service, protecting against abuse). These can't be disabled without affecting your ability to use the Website.
- **Performance** — used for web analytics, measuring product views and errors, and testing design changes. Some are managed by third parties, who are not permitted to use them for any other purpose.
- **Functionality** — remember your settings (layout, language, preferences), whether you've seen a survey prompt or certain content, your login state, and embedded video.
- **Targeting** — track your visits across KeenTools and other websites so third parties (e.g., social networks) can show you relevant ads.

You can control cookies through your browser settings. Disabling Strictly Necessary cookies may prevent parts of the Website from working; disabling others may reduce personalization but won't block access. Questions can be directed to privacy@keentools.io.

Third-Party Services

KeenTools uses third-party processors to host and store uploaded content, provide authentication and backend infrastructure, process payments, run analytics, and communicate with customers. A current, named list of these processors, including their role, the data they process, and hosting location, is maintained at keentools.io/subprocessors.

For international transfers of personal data from the EEA, UK, or Switzerland, KeenTools relies on the transfer mechanisms made available by each processor (including, where applicable, the EU-U.S. Data Privacy Framework or Standard Contractual Clauses).

Use of Log Files

KeenTools gathers certain information automatically in log files, including an anonymized IP address, browser, ISP, referring/exit pages, operating system, date/time stamp, and clickstream data, used to analyze trends and administer the Website and Service.

Data Retention and Your Protection Rights

You can close your account at any time by emailing team@keentools.io from your account's email address, as described in Section 9 of the Terms of Service. Uploaded photographs and

generated models are then deleted within 30 days. You may also ask for your data to be removed by contacting privacy@keentools.io. We may retain pseudonyms of your data solely as a record of the removal. We generally retain data as long as needed to fulfill the purpose it was collected for, to comply with legal obligations, or to defend against violations of the Terms of Service or this Policy.

As set out in applicable law, you may have the right to: access your data; rectify inaccurate or incomplete data; request erasure ("right to be forgotten"); restrict processing; receive your data in a portable format; and object to processing. These rights can be exercised via privacy@keentools.io.

Enterprise Data Retention: Enterprise customers with custom agreements may have specific retention periods or deletion schedules as detailed in their agreement.

Personal Information Security

KeenTools takes reasonable steps to prevent loss, misuse, and unauthorised access to your personal information. It is your responsibility to protect your username and password.

Web Services Security: For the Service, we implement encryption of communications, secure storage of login credentials, API credentials, and authentication tokens, rate limiting, and abuse prevention measures. It is your responsibility to protect your login credentials, API keys, and authentication tokens. Do not share API keys publicly or commit them to version control. KeenTools is not responsible for unauthorized access resulting from compromised credentials.

Children Privacy

The Service is intended only for persons who are at least 18 years old, or the age of majority in their country of residence if that age is higher, as described in Section 2.1 of the Terms of Service. We do not knowingly accept account holders under that age. If you are a parent or guardian and believe your child has created an account, contact privacy@keentools.io.

This section addresses KeenTools' direct relationship with account holders. Separately, where a Customer uploads content depicting a minor, the Customer is responsible for holding appropriate legal authority to do so — see "Biometric Data and Individuals Depicted in Uploaded Content" above.

Links to Other Websites

KeenTools Websites may link to third-party sites not under our control. We are not responsible for their privacy practices — review their own policies.

Your California Privacy Rights

Under the CCPA, California residents may request a notice identifying the categories of Personal Information shared with affiliates or third parties for marketing purposes, and contact information for those parties. Submit requests to privacy@keentools.io.

Changes to this Privacy Policy

We may update this Policy from time to time and will notify you by posting the new version on this page and the KeenTools Website. Material changes affecting previously collected data will be highlighted with advance notice where feasible.

Reaching Out

Questions about this Privacy Policy can be sent to privacy@keentools.io.

Subprocessors

This page is referenced from the KeenTools Plugins Privacy Policy and the KeenFace API & Studio Privacy Policy. It lists the third parties KeenTools uses to process personal data, and is kept up to date independently of those policies. Enterprise customers with a signed Data Processing Agreement will be notified in advance of any material change to this list, with an opportunity to object, per the terms of their DPA.

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Used by KeenFace API & Studio

- **Cloudflare** (R2, Pages, Workers, Turnstile) — Hosting, storage, content delivery, anti-bot protection. Data: uploaded photographs, generated 3D models (meshes/textures), IP address, general traffic data. Location: Global / US edge network.
- **Clerk** — Authentication and identity management. Data: name, email address, authentication credentials. Location: United States.
- **Convex** — Backend database. Data: account information, session data, Clerk user ID, credit ledger. Location: United States (hosted on AWS).
- **Retool** — Internal admin panel. Data: user ID, name, email address, transaction records. Location: United States.
- **fal.ai** — Routing layer for two purposes: (1) automated content-policy pre-screening of reference photos, and (2) reference photo processing and 3D head generation. Applies only when the Customer selects Scan Reconstruction OFF at photo upload; not used if Scan Reconstruction ON is selected. Routes onward to third-party AI model providers, including OpenRouter (as fal's own sub-processor), Google, and OpenAI. Data: uploaded reference photographs (full resolution, for generation) and a downsized copy (for content screening).
- **OpenAI** — Default image-generation model provider for reference photo processing, accessed via fal.ai. Applies only when the Customer selects Scan Reconstruction OFF at photo upload. Data: uploaded reference photographs (full resolution).

Used by KeenFace and Plugins

- **PostHog** — Product analytics. Data: behavioral/usage data, distinct ID, IP address. Location: United States.
- **Sentry** — Error tracking. Data: IP address, user ID (personally identifiable fields scrubbed prior to transmission). Location: United States.
- **HubSpot** — CRM — contact sales, onboarding, registration sync. Data: name, email address, company information. Location: United States.

- **Mailchimp** (Intuit) — Email marketing. Data: email address, name, company information. Location: United States.
- **YouTrack** — Error reporting. Data: issue/bug report data, associated user contact information. Location: United States.
- **Paddle** — Billing, Merchant of Record. Data: name, payment data, billing address. Location: United States / European Union.
- **Google Analytics & Tag Manager** — Website analytics. Data: behavioral/usage data, IP address. Location: United States.
- **Facebook Pixel** — Website analytics (Facebook community). Data: behavioral/usage data. Location: United States.
- **Rebrandly** — Short link management. Data: click/usage data. Location: United States.
- **SurveyMonkey** — Surveys. Data: survey responses. Location: United States.
- **Google Forms** — Surveys. Data: survey responses. Location: United States.
- **Gmail** — Security/administrative email. Data: email address, message content. Location: United States.
- **Freshdesk** — Support email management. Data: email address, support ticket content. Location: United States.
- **SendPulse** — License/administrative email. Data: email address, license data. Location: United States.
- **Amazon SES** — License/notification email. Data: email address, message content. Location: United States.
- **Google Adwords** — Ad campaigns. Data: behavioral/usage data. Location: United States.
- **YouTube** — Video hosting. Data: usage data. Location: United States.
- **Facebook** — News/community. Data: public profile data (where applicable). Location: United States.
- **Instagram** — News/images/video content. Data: public profile data (where applicable). Location: United States.
- **Twitter** — News/updates. Data: public profile data (where applicable). Location: United States.
- **Reddit** — News/updates/community. Data: public profile data (where applicable). Location: United States.
- **LinkedIn** — News/updates. Data: public profile data (where applicable). Location: United States.

For international transfers of personal data from the EEA, UK, or Switzerland, KeenTools relies on the transfer mechanisms made available by each processor (including, where applicable, the EU-U.S. Data Privacy Framework or Standard Contractual Clauses).

Questions about this list can be directed to privacy@keentools.io