

# PRIVACY POLICY.

Last updated December 23, 2022

This Privacy Policy is aimed to inform you (“You”) as a user of the Mimika app, a service available via the link <https://faceyoga-ar.com> (“Website”) and application software distributed via application store(s) <https://apps.apple.com/us/app/id1558414615> (“Application”, “App”), collectively referred to as the “Service”, about collection, usage, sharing of Your information:

- if through the Website - by CM MENTALGROWTH LTD Incorporated (HE 372828 34) a company having its registered address at Riga Feraiou Str., Office 33, 1087, Nicosia, Cyprus; and
- if via the App - by CM MENTALGROWTH LTD Incorporated, a company having its registered address at Riga Feraiou Str., Office 33, 1087, Nicosia, Cyprus -

collectively, “we”, “us”, “our”, acting as data controllers for your data.

You are also hereby informed on the options available to You in terms of usage and disclosure and Your information by us. This Privacy Policy is incorporated into, and is subject to, the Service Terms of Use.

By choosing to use our Service You: (I) agree to the collection and use of information in relation to this Privacy Policy, (II) warrant and guarantee that You are over 16 years of age (or are a parent or guardian with such authority to agree to this Privacy Policy for the benefit of an individual under 16 years of age). Please do not use the Service or access the services provided by it if You do not agree to this Privacy Policy.

## What kind of information do we collect?

We may collect information that can identify You, such as Your name and email address (“Personal Information”), and other information that does not directly identify You, as listed below.

### *I. Information You Provide*

- First name, email address, gender, date of birth, sleep condition, wellbeing details, product feedback, communication details for feedback collection. We may collect and store the above-mentioned information when You register and use the Service or provide it to us in some other manner, for example by corresponding with us by email when You report a problem with the Service or when You subscribe to any of our services or search for a service.

*Note: Information about a third party*

When You provide us with information about a third party, You must have the consent of that third party before providing us with that information. By providing us with information regarding a third party You warrant that You have their permission to provide that information to us.

### *II. Information collected automatically*

- Device information: may include information specific to Your mobile device (e.g., OS Version, hardware, unique device identifier, mobile network information); information about Your logging in, use of features, functions, or notifications on the device. We also collect and use Your Apple Identifier for Advertising (IDFA) and Google Advertising ID (AAID) to recognize Your device and support advertising activities on our Services. These number values are not permanently tied to Your device and, depending on Your operating system, You can reset it through Your device settings.
- Usage information: Information collected automatically from Site/Account (or third party in connection with the Services \), which can include: the IP addresses or domain names of the computers utilized by the Users who use this Application, the URI addresses (Uniform Resource Identifier), the time of the request, the method utilized to submit the request to the server, the size of the file received in response, the numerical code indicating the status of the server's answer (successful outcome, error, etc.), the country of origin, the features of the browser and the operating system utilized by the User, the various time details per visit (e.g., the time spent on each page within the Application) and the details about the path followed within the Application with special reference to the sequence of pages visited, and other parameters about the device operating system and/or the User's IT environment.

If You purchase the access to or otherwise use the Service through the Website, we may additionally collect the following data:

- Transaction data: when You make payments through the Website, You need to provide financial account data, such as Your credit card number, residence address, to our third-party service providers. We do not collect or store full credit card number data, though we may receive credit card-related data, data about the transaction, including: date, time and amount of the transaction, the type of payment method used, payment transaction identification number.
- Cookies. We may use cookies in a range of ways to improve the Your experience on the Website, including understanding how You use the Website and approving Your Website usage experience.

## What do we collect this information for?

- Enhancing Your user experience on our Service by operating, maintaining, and providing You with all of the content and features of the Service (“maintaining Service functionality purposes”);
- managing Your account and providing You with customer support. We may use Your Personal Information to respond to Your requests for technical support, Service information or to any other communication You initiate (“customer support purposes”);
- performing research and analysis about Your use of, or interest in, our products, services or content, or products, services or content offered by others (“analytics purposes”);
- communicating with You via push notifications, reminders about the Service, Service updates and relevant to Service information. You can opt out of receiving push notifications by changing the settings on Your device or in Your browser;
- detecting and resolving any fraud or other illegal or undesirable user behavior;
- arranging of advertising campaigns, analysis of advertising campaigns effectiveness (“marketing purposes”) to the extent permitted by the law;

- taking legally required actions, defence from legal claims.

As regards emails, during in-app registration/onboarding process we may ask you to login into the app based on the email in order to create an account/save your progress. In this regard, we will process your email data because we need to perform a contract with you. As regards phone numbers, we may use it for service-related communications.

In addition to above, we may also use your email address to verify whether such email is correct; let you know about important updates to our terms and policies; communicate with you about our Service or similar products that might be of interest for you; ask for your feedback. Should you opt-in (or we are allowed based on your country laws), we may also send you other marketing communications, such as product updates, offers, discounts, and provide news and information that we think will be of interest to you. All email communications are performed based on our legitimate interest.

Please note that when we process your email data on the basis of legitimate interests for direct marketing purposes, you have an unrestricted right to object to the processing; this also applies to matching and attribution. Should you wish to exercise your right to object, please email us via any of the contact options available below.

In a very limited number of cases depending on application store's requirements, we may also use your phone number for matching and attribution. Such marketing activities are also based on our legitimate interest.

With respect to Your purchase of the access to the Service through the Website, Your information may be collected to process Your payments as described in detail below.

We provide paid Content (as defined in the [Terms of Use](#)) within the Service. For this purpose, we use third-party services for payment processing (for example, payment processors). As a result of this processing, You will be able to make a payment for the Content and we will be notified that the payment has been made and either completed or not completed.

We will not store or collect Your payment card details ourselves. This information will be provided directly to our third-party payment processors, referred to in the next section. Our payment processors adhere to the standards set by PCI-DSS as managed by the PCI Security Standards Council. Payment processors who follow PCI-DSS requirements are committed to ensuring the secure handling of payment information.

## **With whom and what do we share this information for and how may we disclose it**

### ***I. Service Providers***

We may share Your Personal Information with third parties that perform certain services on our behalf, such as our authorized service providers or analytics providers. In general, the third-party providers engaged by us will only collect, use and disclose Your information to the extent necessary to allow them to perform the services they provide to us, e.g. facilitating our Service, arranging marketing campaigns on Our behalf and analyzing how our Service is used.

You can learn more about main service providers with whom we may share Your Personal Information as described above hereunder, along with links to such service providers privacy policies, which we recommend You read, depending on whether You use the Website or the App.

## **SERVICE PROVIDERS AS TO WEBSITE**

### **1. Amazon Web Services**

We use Amazon Web Services, which is a hosting and backend service provided by Amazon, for personal data hosting and enabling our Service to operate and be distributed to its users.

### **2. AppsFlyer**

We use AppsFlyer for analytics purposes, specifically for research and analysis of users interaction with the Website. Appsflyer helps us to understand, in particular, how users find our Website (for example, which advertiser served an ad that led You to our Website). Appsflyer also provides us with different analytics tools that enable us to research and analyze Your use of the Service.

In order to receive these services from Appsflyer, we share such data as:

- IP address (which may also provide general location information), user agent, Google Advertiser ID and other similar unique identifiers (“Technical Identifiers”).

AppsFlyer Privacy Policy is available via the link: <https://www.appsflyer.com/privacy-policy/>.

Please note that You may cancel collection of Your Personal Information for and sharing it with AppsFlyer here: <https://www.appsflyer.com/optout>.

### **3. Bugsnag**

Bugsnag is a service, which allows us to track application performance, i.e. we can discover the causes and severity of crashes in our website.

In order to provide the services, Bugsnag collects your device-related and App-interaction data, such as the timestamp of when the crash occurred, technical characteristics of particular crash and your device etc.

Please review [Privacy and Security in Bugsnag](#) to learn more about data collection related to Bugsnag.

**4. Facebook Pixel** (if data processing concerns EU, UK citizens and certain other jurisdictions: by Facebook Ireland Ltd., 4 Grand Canal Square, Grand Canal Harbour, Dublin 2 Ireland; for processing of data originating from other jurisdictions: Facebook, Inc., 1 Hacker Way, Menlo Park, CA 94025, USA)

The Facebook pixel is an analytics tool that allows us to measure the effectiveness of our advertising by understanding the actions the users take within the Service. Facebook may collect or receive information from our Product and use that information to provide measurement services and targeted ads.

Please mind that you may opt-out of the collection and use of information for ad targeting. Options you may use in order to opt-out, are described below in this Privacy Policy. Some of the mechanisms for exercising the choice to opt out are via the links:

<http://www.aboutads.info/choices> and <http://www.youronlinechoices.eu/>.

## **5. Customer.io**

In order to deliver customized emails, web push-notifications or SMS-notifications to our customers, we transfer customer-related data, such as e-mail address, phone number, device information, payment status, subscription date and user's precise location to a Customer.io – marketing personalization platform

You can access the Customer.io Privacy Policy via the link:

<https://customer.io/legal/privacy-policy/>

## **6. Google Analytics/Google Optimize**

In order to keep the content of the Web-site up-to-date, user-oriented and complete, we use Google Analytics and Google Optimize, web-analytics tools which enable us to optimize our services, including advertising, to Your needs. We transfer certain data, related to You, to mentioned services, however such data is anonymized, i.e. Google Analytics/Google Optimize shall not be able to identify You based on the data they are going to have access to.

You can learn more about the Google Analytics Privacy Policy here:

<https://policies.google.com/privacy>.

## **7. Advertising services providers**

We engage certain third-party service providers in order to help us spread the word about the Service and help the Service reach its potential users through reports and insights on how to optimize our promotional campaigns. For these providers, we recommend that You read their privacy policies so You can understand the manner in which Your Personal Information will be handled by these providers:

- Snapchat (<https://www.snap.com/en-US/privacy/privacy-center>);
- Meta (<https://www.facebook.com/privacy/policy/>);
- Google AdWords (<https://policies.google.com/privacy>);
- TikTok (<https://www.tiktok.com/legal/privacy-policy?lang=en>)

## **8. Payment services providers**

Certain third-party service providers, such as payment gateways and other payment transaction processors, have their own privacy policies with respect to the information we are required to provide to them for Your purchase-related transactions. For these providers, we recommend that You read their privacy policies so You can understand the manner in which Your Personal Information will be handled by these providers:

- PayPal Holdings, Inc. (<https://www.paypal.com/va/webapps/mpp/ua/privacy-full>);
- Paddle (<https://www.paddle.com/legal/privacy>);

- BrainTree (<https://www.braintreepayments.com/pl/legal/braintree-privacy-policy>);
- Nuvei (<https://developer.nuvei.com/privacy-policy>)

## **9. Zendesk**

We use Zendesk - a customer-support assistant service, in order to react to customer support request more actively and efficiently. In course of cooperation with Zendesk, we will transfer to the latter the following data: name, surname, email address and IP address, location and word and/or numeric rating provided by the user. This data will be retained by the Zendesk as long as we will cooperate with Zendesk and, afterwards, deleted.

## **10. Tableau**

We use Tableau for analytics and customer support purposes, specifically to understand how customers use our App.

As for analytics purposes, Tableau helps us to understand, in particular, how users find our App (for example, which advertiser had delivered an ad that led You to our App in App store). Tableau also provides us with different analytics tools that enable us to research and analyze Your use of the Service, which helps us to decide what Application features we should focus on.

As for customer support purposes, Tableau helps us to respond to Your requests for technical support. For example, it enables us to track Your interaction with our App and in order to detect particular technical issues with the App.

In order to receive these services from Tableau, we share such data as:

- Platform, device type (phone or tablet), device family, country, city, region, carrier, OS, time zone, language, IP Address, locale, referral source (“technical information”);
- Your interaction with the App (i.e. taps on the particular screens) and age, gender, email, (“user related information”);
- Unique identifiers (such as IDFA).

You can learn more about the Tableau Privacy Policy here:

<https://www.tableau.com/legal/regional-privacy-laws>

## **11. Yandex Appmetrica**

We use Yandex Appmetrica for analytics and customer support purposes, specifically to understand how customers use our App.

As for analytics purposes, Yandex Appmetrica helps us to understand, in particular, how users find our App (for example, which advertiser had delivered an ad that led You to our App in App store). Yandex Appmetrica also provides us with different analytics tools that enable us to research and analyze Your use of the Service, which helps us to decide what Application features we should focus on.

As for customer support purposes, Yandex Appmetrica helps us to respond to Your requests for technical support. For example, it enables us to track Your interaction with our App and in order to detect particular technical issues with the App.

In order to receive these services from Yandex Appmetrica, we share such data as:

- Platform, device type (phone or tablet), device family, country, city, region, carrier, OS, time zone, language, IP Address, locale, referral source (“technical information”);
- Your interaction with the App (i.e. taps on the particular screens) and age, gender, email, (“user related information”);
- Unique identifiers (such as IDFA).

You can learn more about the Yandex Appmetrica Privacy Policy here:

<https://appmetrica.yandex.com/about/privacy-policy>

## 12. Banuba

We use Banuba to enhance our product with AR and AI technologies, including, but not limited to Banuba Face AR SDK.

In order to receive these services from Banuba Limited, we share such data as:

- Platform, device type (phone or tablet), device family, country, city, region, carrier, OS, time zone, language, IP Address, locale, referral source (“technical information”);
- Your interaction with the App (i.e. taps on the particular screens) and age, gender, email, (“user related information”);
- Unique identifiers (such as IDFA).

You can learn more about the Banuba Limited Privacy Policy here:

<https://www.banuba.com/privacy-policy>

We recommend that You read all the privacy policies indicated above so You can understand the manner in which Your Personal Information will be handled by these providers.

## **SERVICE PROVIDERS AS TO THE APP**

### **1. Amazon Web Services**

We use Amazon Web Services (“AWS”), which is a hosting and backend service provided by Amazon, for personal data hosting and enabling our Application to operate and be distributed to its users.

### **2. AppsFlyer**

We use AppsFlyer for analytics purposes, specifically for research and analysis of users' interaction with the Application. Appsflyer helps us to understand, in particular, how users find our App (for example, which advertiser served an ad that led You to our App in AppStore or GooglePlay). Appsflyer also provides us with different analytics tools that enable us to research and analyze Your use of the Service.

In order to receive these services from Appsflyer, we share such data as:

- device type and model, CPU, system language, memory, OS version, Wi-Fi status, time stamp and zone, device motion parameters and carrier (“Technical Information”);

- IP address (which may also provide general location information), User agent, IDFA (Apple identifier for advertisers), Android ID (in Android devices), Google Advertiser ID and other similar unique identifiers (“Technical Identifiers”);

You can learn more about the AppsFlyer Privacy Policy here:

<https://www.appsflyer.com/privacy-policy/>. Please note that You may cancel collection of Your Personal Information for and sharing it with AppsFlyer here: <https://www.appsflyer.com/optout>.

### 3. Amplitude

We use Amplitude for analytics and customer support purposes, specifically to understand how customers use our App.

As for analytics purposes, Amplitude helps us to understand, in particular, how users find our App (for example, which advertiser had delivered an ad that led You to our App in App store). Amplitude also provides us with different analytics tools that enable us to research and analyze Your use of the Service, which helps us to decide what Application features we should focus on.

As for customer support purposes, Amplitude helps us to respond to Your requests for technical support. For example, it enables us to track Your interaction with our App and in order to detect particular technical issues with the App.

In order to receive these services from Amplitude, we share such data as:

- Platform, device type (phone or tablet), device family, country, city, region, carrier, OS, time zone, language, IP Address, locale, referral source (“technical information”);
- Your interaction with the App (i.e. taps on the particular screens) and age, gender, email, (“user related information”);
- Unique identifiers (such as IDFA).

You can learn more about the Amplitude Privacy Policy here: <https://amplitude.com/privacy>.

### 4. Firebase

We use a number of Firebase services with different level of access to your data. Please see below the details:

- **Firebase Cloud Messaging (powered by Google Ireland Limited, with offices at Gordon House, Barrow Street, Dublin 4, Ireland)**

We use Google-powered service Firebase Cloud Messaging in order to deliver in-app messages (notifications or data messages) which may be of interest for you, as well as analyse effectiveness of such in-app messages, check their delivery status so that such messages are as relevant as possible (through Firebase Analytics).

Firebase Cloud Messaging collects your user-related data to process the delivery of in-app messages and allows us to assess their effectiveness. Such user-related data may include characteristics of your device, advertising identifier, app store, device’s language, OS version, your age, interactions with notifications, data messages, status of messages delivery etc, subscription status and some other data.



- **Google Analytics for Firebase (powered by Google Ireland Limited, with offices at Gordon House, Barrow Street, Dublin 4, Ireland)**

As to iOS devices, we use Google Analytics for Firebase in order to assess app performance/minimize crashes, as well to assess effectiveness of messaging campaigns in complex with Firebase Crashlytics and Firebase Cloud Messaging respectively. User-related data transferred with regard to mentioned processing may include characteristics of your device, advertising identifier, app store, device's language, OS version, your age, interactions with notifications, data messages, status of messages delivery etc, subscription status and some other data.

For Android devices, we use Google Analytics for Firebase not only to assess app performance/minimize crashes and access messaging campaigns effectiveness, but also to assess effectiveness of our advertising campaigns. In this regard, we may share/receive some of your additional data with/from Google, for example your Android Advertising Identifier, IP address, fact of purchase, interactions with ads.

**5. Facebook Conversion API** (if data processing concerns EU, UK citizens and certain other jurisdictions: by Facebook Ireland Ltd., 4 Grand Canal Square, Grand Canal Harbour, Dublin 2 Ireland; for processing of data originating from other jurisdictions: Facebook, Inc., 1 Hacker Way, Menlo Park, CA 94025, USA)

We use Facebook Conversion API in order to maximize effectiveness of our marketing/advertising campaigns, measurement services and targeted ads. At that, Facebook may collect or receive certain information from the App, for example, information on your interaction within the App.

Please mind that you may opt-out of the collection and use of information for ad targeting. Options you may use in order to opt-out, are described below in this Privacy Policy. Some of the mechanisms for exercising the choice to opt out are via the links: <http://www.aboutads.info/choices> and <http://www.youronlinechoices.eu/>.

## **6. Tableau**

We use Tableau for analytics and customer support purposes, specifically to understand how customers use our App.

As for analytics purposes, Tableau helps us to understand, in particular, how users find our App (for example, which advertiser had delivered an ad that led You to our App in App store). Tableau also provides us with different analytics tools that enable us to research and analyze Your use of the Service, which helps us to decide what Application features we should focus on.

As for customer support purposes, Tableau helps us to respond to Your requests for technical support. For example, it enables us to track Your interaction with our App and in order to detect particular technical issues with the App.

In order to receive these services from Tableau, we share such data as:

- Platform, device type (phone or tablet), device family, country, city, region, carrier, OS, time zone, language, IP Address, locale, referral source (“technical information”);
- Your interaction with the App (i.e. taps on the particular screens) and age, gender, email, (“user related information”);.
- Unique identifiers (such as IDFA).

You can learn more about the Tableau Privacy Policy here:

<https://www.tableau.com/legal/regional-privacy-laws>

## **9. Mixpanel**

We use Mixpanel for analytics and customer support purposes, specifically to understand how customers use our App.

As for analytics purposes, Mixpanel helps us to understand, in particular, how users find our App (for example, which advertiser had delivered an ad that led You to our App in App store).

Mixpanel also provides us with different analytics tools that enable us to research and analyze Your use of the Service, which helps us to decide what Application features we should focus on.

As for customer support purposes, Mixpanel helps us to respond to Your requests for technical support. For example, it enables us to track Your interaction with our App and in order to detect particular technical issues with the App.

In order to receive these services from Mixpanel, we share such data as:

- Platform, device type (phone or tablet), device family, country, city, region, carrier, OS, time zone, language, IP Address, locale, referral source (“technical information”);
- Your interaction with the App (i.e. taps on the particular screens) and age, gender, email, (“user related information”);.
- Unique identifiers (such as IDFA).

You can learn more about the Mixpanel Privacy Policy here:

<https://mixpanel.com/legal/privacy-policy/>

## **10. TestFlight**

We use TestFlight for analytics and customer support purposes, specifically to understand how customers use our App.

As for analytics purposes, TestFlight helps us to understand, in particular, how users find our App (for example, which advertiser had delivered an ad that led You to our App in App store).

TestFlight also provides us with different analytics tools that enable us to research and analyze Your use of the Service, which helps us to decide what Application features we should focus on.

As for customer support purposes, TestFlight helps us to respond to Your requests for technical support. For example, it enables us to track Your interaction with our App and in order to detect particular technical issues with the App.

In order to receive these services from TestFlight, we share such data as:

- Platform, device type (phone or tablet), device family, country, city, region, carrier, OS, time zone, language, IP Address, locale, referral source (“technical information”);
- Your interaction with the App (i.e. taps on the particular screens) and age, gender, email, (“user related information”);.
- Unique identifiers (such as IDFA).

You can learn more about the TestFlight Privacy Policy here:

<https://www.apple.com/legal/internet-services/itunes/testflight/sren/terms.html>

## 11. Adapty

We use Adapty for analytics and customer support purposes, specifically to understand how customers use our App.

As for analytics purposes, Adapty helps us to understand, in particular, how users find our App (for example, which advertiser had delivered an ad that led You to our App in App store). Adapty also provides us with different analytics tools that enable us to research and analyze Your use of the Service, which helps us to decide what Application features we should focus on.

As for customer support purposes, Adapty helps us to respond to Your requests for technical support. For example, it enables us to track Your interaction with our App and in order to detect particular technical issues with the App.

In order to receive these services from Adapty, we share such data as:

- Platform, device type (phone or tablet), device family, country, city, region, carrier, OS, time zone, language, IP Address, locale, referral source (“technical information”);
- Your interaction with the App (i.e. taps on the particular screens) and age, gender, email, (“user related information”);.
- Unique identifiers (such as IDFA).

You can learn more about the Adapty Privacy Policy here: <https://adapty.io/privacy>

## 12. Banuba

We use Banuba to enhance our product with AR and AI technologies, including, but not limited to Banuba Face AR SDK.

In order to receive these services from Banuba Limited, we share such data as:

- Platform, device type (phone or tablet), device family, country, city, region, carrier, OS, time zone, language, IP Address, locale, referral source (“technical information”);
- Your interaction with the App (i.e. taps on the particular screens) and age, gender, email, (“user related information”);.
- Unique identifiers (such as IDFA).

You can learn more about the Banuba Limited Privacy Policy here:

<https://www.banuba.com/privacy-policy>

## ***II. Law enforcement agencies and other public authorities***

We may use and disclose personal data to enforce our Terms of Use, which can be found here: [Terms of Use](#), to protect our rights, privacy, safety, or property, and/or that of our affiliates, you or others, and to respond to requests from courts, law enforcement agencies, regulatory agencies, and other public and government authorities, or in other cases provided for by law.

## ***III. Third parties as part of a merger or acquisition***

As we develop our business, we may buy or sell assets or business offerings. Information on customers is generally one of the transferred business assets in these types of transactions. We may also share such information with any affiliated entity (e.g. parent company or subsidiary) and may transfer such information in the course of a corporate transaction, such as the sale of our business, a divestiture, merger, consolidation, or asset sale, or in the unlikely event of bankruptcy.

### **International Data Transfers**

Please note that our business is global, so when You provide Personal Information through our Service, the information may be sent to servers located in different countries around the world.

# **HOW YOU CAN ACCESS YOUR INFORMATION**

Your use of the Service, You may use the Service to do so. If You need help with rectification of data You think is inaccurate, please contact us via the applicable email specified in section “Contact Us” below.

You can erase Your Personal Information through the Profile menu of the Service. Please note that it may affect the Services provided, and You will not be able to use the full scope of the Services. When we delete any information, it will be deleted from the active database, but it may remain in our archives due to legal obligations. Should You require the deletion of such Personal Information from our archives, please contact us at the email specified in section “Contact Us” below. Please note that we may be required to keep such information in our archives and not delete it (or to keep this information for a certain time, in which case we will comply with Your deletion request only after we have fulfilled such requirements). Please also note that the erasing of Your Personal Information does not mean the automatic cancellation of Your subscription purchased via the App or the Website or refund of Your payments.

You can make a request to receive the Personal Information related to You through contacting us via [support@mentlagrowth.app](mailto:support@mentlagrowth.app). Should You make such a request, You will be required to provide us with an email address, which we would be able to send Your Personal Information to. Please note that You confirm and guarantee that the email address You provide to us in order to receive Your Personal Information shall belong to You and You shall be solely responsible for its correctness and validity and therefore we shall in any case not be liable for any breach of Your Personal Information due to sending it to that email address.

If You reside in the European Economic Area You may object to the processing of Personal Information concerning You for marketing purposes by contacting us at the email specified in section “Contact Us” below and the related Personal Information shall no longer be processed for such purposes.

Please note that You may also opt out from collection of Your data for marketing and advertising purposes not only via our App, but also on Your entire device using:

-> Your device settings

- iOS: go to “Settings” -> “Privacy” -> “Advertising” -> “Limit Ad Tracking”. You may additionally reset Your advertising identifier (this also may help You to see less of personalized ads) in the same section.
- Android: for Android 6.0 and higher – go to “Settings” -> “Google” -> “Ads” -> “Opt out of interest-based ads”. For Android 5.2 and lower, use Google Settings app -> “Ads” -> “Opt out of interest-based ads”.

You may additionally reset Your advertising identifier (this also may help You to see less of personalized ads) in the same section for both options mentioned.

-> and links below:

- Network Advertising Initiative – <http://optout.networkadvertising.org/>
- Digital Advertising Alliance – <http://optout.aboutads.info/>
- Digital Advertising Alliance (Canada) – <http://Youradchoices.ca/choices>
- Digital Advertising Alliance (EU) – <http://www.Youronlinechoices.com/>
- DAA AppChoices page – <http://www.aboutads.info/appchoices>

Please note that the result of such objection or cancellation may affect the process of the Services improvement. However, You would still be able to use the App.

If You think that the Personal Information related to You is inaccurate, but You can't rectify it as described above, You may contact us at the email specified in section “Contact Us” below to restrict the processing of such data for the period of time we need to verify the accuracy of the Personal Information, which we will inform You of.

As to the App, You can stop all collection of information by the Application by uninstalling the Application from Your mobile device. You may use the standard uninstall processes as may be available as part of Your mobile device or via the Application marketplace or network.

## How We Secure Your information

Security is our highest priority. Our Service has been designed with Your security and privacy in mind.

- We protect the security of Your information by using encryption protocols and software;
- We aggregate and pseudonymize all of the Users Personal Information;
- We maintain physical, electronic and procedural safeguards in connection with the collection, storage and disclosure of Personal Information;

- We employ Personal Information systematic backups, which are intended to reduce the risk from disk crashes and errors, such as accidental information deletion

While we cannot ensure or guarantee that loss, misuse or alteration of information will never occur, we make all reasonable efforts to prevent it. However, You should bear in mind that submission of information over the internet is never entirely secure. Please note that we do not collect and we are not responsible for the collection or security of Your payment details.

## California residents

Individuals residing in California have certain statutory rights in relation to their Data introduced by California Consumer Privacy Act of 2018 (the "CCPA"). Subject to any exemptions provided by law, you may have the following rights:

### **a. Transparency Rights**

A right to receive certain information about how a business collects and uses your information. Such information must be provided within a privacy policy and upon request.

### **b. Right of Access**

A right to request access to certain information which includes categories of personal information collected or sold, specific personal information, sources, purpose of collection and use and categories of third parties that the Business sold personal information to.

### **c. Portability Rights**

The right to receive the information in a readily useable format that allows you to easily transmit the information to another entity.

### **d. Right of Deletion**

A right to request deletion of data collected from you. Upon such request, a business must delete such data (subject to certain exceptions) and flow down the request to its service providers who must comply.

### **e. Right to Opt Out**

The right to require any business that sells information to third parties to opt out from selling your information. In the case of personal information of children between 13-16, a the child must opt in to permit such sale and under 13 must obtain parental consent.

### **f. Non-Discrimination Rights**

Subject to certain exceptions businesses are prohibited from discriminating against any Consumer who exercises a right granted under the CCPA and must continue to provide equal service or goods and price even if one exercises his rights.

Please keep in mind that in case of a vague access, erasure, objection request or any other request in exercise of the mentioned rights we may engage the individual in a dialogue so as to better understand the motivation for the request and to locate responsive information.

Following the provisions of CCPA we might also require you to prove your identity (for example, by requesting an ID or any other proof of identity) in order for you to invoke the mentioned rights. This is made to ensure that no rights of third parties are violated by your request, and the rights described in this section are exercised by an actual Data subject or an authorized person.

## EU residents

Individuals residing in the countries of the European Union have certain statutory rights in relation to their Data introduced by the General Data Protection Regulation (the “GDPR”). Subject to any exemptions provided by law, you may have the right to request access to Data (including in a structured and portable form), as well as to seek to update, delete or correct Data:

### **a. Rectification of Data and Restriction of Processing**

You are responsible for ensuring the accuracy of your Data that you submit to the Application. Inaccurate information will affect your experience when using the Application and our ability to contact you. If you believe that your Data is inaccurate, you have the right to contact us and ask us to correct such Data by contacting us at [support@mentalgrowth.app](mailto:support@mentalgrowth.app). You shall also have the right to request restriction of processing of your Data, if you contest the accuracy of the Data and we need some time to verify its accuracy.

### **b. Access to your Data and Data Portability**

You shall have the right to request information about whether we have any Data about you, to access your Data (including in a structured and portable form) by writing to us at [support@mentalgrowth.app](mailto:support@mentalgrowth.app).

### **c. Erasure of your Data**

If you believe that your Data is no longer necessary in relation to the purposes for which it was collected or otherwise processed, or in cases where you have withdrawn your consent or object to the processing of your Data, or in cases where the processing of your Data does not otherwise comply with the GDPR, you have right to contact us and ask us to erase such Data as described above. You can simply write to us at [support@mentalgrowth.app](mailto:support@mentalgrowth.app). Please be aware that erasing some Data inserted by you may affect your possibility to use the Application. Erasure of some Data may also take some time due to technical reasons.

### **d. Right to object processing of your Data**

You can object processing your Data and stop us from processing your Data simply by writing to us at [support@mentalgrowth.app](mailto:support@mentalgrowth.app). Please be aware that erasing some Data inserted by you may affect your possibility to utilize the Application.

### **e. Notification requirements**

We commit to notify you within a reasonable period of time and your data protection authority within the timeframe specified in applicable law about any personal data breaches in the Application.

### **f. Data Protection Authorities**

Subject to GDPR, you also have the right to (i) restrict our use of Data and (ii) lodge a complaint with your local data protection authority about any of our activities that you deem are not compliant with GDPR.

Please keep in mind that in case of a vague access, erasure, objection request or any other request in exercise of the mentioned rights we may engage the individual in a dialogue so as to better understand the motivation for the request and to locate responsive information.

Following the provisions of GDPR we might also require you to prove your identity (for example, by requesting an ID or any other proof of identity) in order for you to invoke the mentioned rights. This is made to ensure that no rights of third parties are violated by your request, and the rights described in this section are exercised by an actual Data subject or an authorized person.

## **Children's Privacy**

This Service does not address anyone under the age of 16. We do not knowingly collect personally identifiable information from children under 16. If we discover that a child under 16 has provided us with Personal Information, we shall take steps to delete such information and terminate the child's account. If You are a parent or a guardian and You are aware that Your child has provided us with Personal Information, please contact us so that we will be able to take the necessary actions.

## **Retention**

We will retain Your information for as long (i) as You have an account with the Service, or (ii) as the App is installed on Your mobile device, or (iii) as needed to provide You with our Service. We will also retain and use Your information, including copies of Your information, as necessary to comply with our legal obligations (including for tax and accounting purposes), resolve disputes, and enforce our agreements.

## **Changes to This Privacy Policy**

We may update our Privacy Policy from time to time. Therefore, You are advised to check our Service occasionally to inform Yourself of any changes. We will notify You of any changes by posting the new Privacy Policy on this page. These changes are effective immediately after they are posted on this page. Your continued use of the Service after changes to the Privacy Policy have been posted will constitute Your acceptance of such changes.

## **Contact Us**

Please submit any questions, concerns or comments You have about this Privacy Policy or any requests concerning Your Personal Information via the following email:  
[support@mentalgrowth.app](mailto:support@mentalgrowth.app)

**BY USING THIS APPLICATION, YOU PROMISE THAT YOU HAVE READ, UNDERSTAND AND AGREE TO THIS PRIVACY POLICY.**