

PRIVACY POLICY

At SELF APP, we want to give you the best possible experience to ensure that you enjoy our Services. Your privacy and the security of your personal data is, and will always be, enormously important to us. So, we want to transparently explain how and why we gather, store, share and use your personal data - as well as outline the controls and choices you have around when and how you choose to share your personal data. That is our objective, and this Privacy Policy ("Policy") will explain exactly what we mean in further detail below.

This privacy policy applies to mobile app SELF APP ("SELF APP", "we," "our," "us"). The terms used in this Privacy Policy shall have the same meaning as in the Terms of Use, unless noted otherwise.

We respect your privacy and are committed to protecting it through our compliance with this policy. Please read this policy carefully to understand our policies and practices regarding your information and how we will treat it.

If you do not agree with our policies and practices, do not register with, access, or use the SELF APP. By registering with, accessing, or using SELF APP, you agree to this Privacy Policy. This policy may change from time to time. Your continued use of or access to the SELF APP after we make changes is deemed to be acceptance of those changes, so please check this.

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ABOUT THIS POLICY

This Policy sets out the essential details relating to your personal data relationship with UAB Interplay Digital, a company incorporated and existing under the laws of Lithuania, registration number 306156183, with registered address at Vilnius, Vilkpėdės g. 22, LT-03151, Lithuania.

The Policy applies to the features of app SELF APP and any associated services (referred to as the "SELF APP Services"). The terms governing your use of the SELF APP app are defined in our Terms and Conditions of Use (the "Terms and Conditions of Use").

From time to time, we may develop new or offer additional services. If the introduction of these new or additional services results in any material change to the way we collect or process your personal data we will provide you with more information or additional terms or policies. Unless stated otherwise when we introduce these new or additional services, they will be subject to this Policy.

The aim of this Policy is to:

- Ensure that you understand what personal data we collect about you, the reasons why we collect and use it, and who we share it with;

- Explain the way we use the personal data that you share with us in order to give you a great experience when you are using the SELF APP; and
- Explain your rights and choices in relation to the personal data we collect and process about you and how we will protect your privacy.

We hope this helps you to understand our privacy commitments to you. Alternatively, if you do not agree with the content of this Policy, then please remember it is your choice whether you want to use the SELF APP.

YOUR RIGHTS

If You are a citizen or resident of Ukraine, You have the following rights under the [Law of Ukraine "On Personal Data Protection"](#):

1. to know about the sources of collection, location of your personal data, the purpose of their processing, location or place of residence (stay) of the personal data owner or manager, or give an appropriate order to receive this information to persons authorized by him, except in cases established by law;
2. to receive information about the conditions for granting access to personal data, in particular, information about third parties to whom your personal data is transferred;
3. access to your personal data;
4. not later than thirty calendar days from the date of request receipt, except in cases provided for by law, receive a response on whether your personal data is being processed, as well as receive the content of such personal data;
5. to submit a reasoned request to the personal data owner with an objection to the processing of your personal data;
6. to submit a reasoned request for modification or destruction of your personal data by any personal data owner and manager, if this data is processed illegally or is unreliable;
7. to protect your personal data from illegal processing and accidental loss, destruction, damage due to deliberate concealment, failure to provide data or its untimely provision;
8. to submit complaints about your personal data processing to the Authorised Representative or to the court;
9. to make reservations regarding the restriction of the right to process your personal data when providing consent;
10. to withdraw consent to the personal data processing;
11. to know the mechanism of automatic personal data processing;
12. be protected from an automated solution that has legal consequences for you.
13. Other rights according to the Ukrainian legislation.

If You are a citizen or resident of the the European Economic Area or European Union, you have the rights under the General Data Protection Regulation ([GDPR](#)).

The General Data Protection Regulation or "GDPR" gives certain rights to individuals in relation to their personal data. Accordingly, we are happy to offer transparency and access controls to help users take advantage of those rights. As available and except as limited under applicable law, the rights afforded to individuals are:

- Right of access - the right to be informed of, and request access to, the personal data we process about you;
- Right to rectification - the right to request that we amend or update your personal data where it is inaccurate or incomplete;
- Right to erasure - the right to request that we delete your personal data;
- Right to restrict - the right to request that we temporarily or permanently stop processing all or some of your personal data;
- Right to object -
 - the right, at any time, to object to us processing your personal data on grounds relating to your particular situation;
 - the right to object to your personal data being processed for direct marketing purposes;
- Right to data portability - the right to request a copy of your personal data in electronic format and the right to transmit that personal data for use in another party's service; and
- Right not to be subject to automated decision-making - the right to not be subject to a decision based solely on automated decision making, including profiling, where the decision would have a legal effect on you or produce a similarly significant effect.

If you have concerns around our processing of your personal data, we hope you will continue to work with us to resolve them. However, you can also contact and have the right to lodge a complaint with your local data protection authority.

If You are outside the European Economic Area or European Union or Ukraine your country may have other privacy laws that accord You different rights, but the GDPR is one of the most comprehensive privacy laws in the world, so You are pretty much covered here.

INFORMATION WE COLLECT AND HOW WE COLLECT IT

We collect information from and about users of SELF APP:

- Directly from you when you provide it to us;
- Automatically when you use SELF APP (some information – such as IP address and/or browser and device characteristics, etc.); and
- Data we collect from our partners.

1. Data You can Provide:

1. Registration Data
 - User's name (or nickname)
 - Email address
 - Password (stored in encrypted form)
2. Personal Profile Information (if an extended profile is available):
 - Gender (if the user chooses to provide it)
 - Other details the user voluntarily enters into their profile
3. Content You Create/Upload in SELF APP
 - Journal entries (about emotional state, thoughts, etc.)
 - Responses to psychological questionnaires or tests, including data on wellbeing, mood, stress
4. Payment Data (If Paid Features Exist)
 - If payment is processed via the App Store, Google Play, or another external system, financial data (credit card numbers) are typically handled by the payment service, not directly by SELF APP APP. We may receive information on whether a payment succeeded or your subscription status.
5. Customer Support Requests
 - Any information you provide through support channels (email, feedback forms, or other communication methods)

2. Data Collected Automatically

1. Technical Information About Device and Connection
 - IP address
 - Device type (smartphone, tablet)
 - Operating system and version (iOS, Android, etc.)
 - Device model, language/region
 - Unique device identifiers (Device ID)
2. Information on How You Use SELF APP
 - Activity within the app (which sections you visit, how long you use it, frequency of visits)
 - Date and time of access
 - Application errors, crash reports
3. Log Files and App Logs
 - System event data (error codes, crashes)
 - Session statistics (which pages/screens are visited)
4. Cookies / Similar Technologies (if used within a web-based component or if the mobile app interacts with a browser version)
 - Cookies, web beacons, or similar tracking technologies for statistics, analytics, or functionality
5. Approximate Location Data (with your consent)
 - If SELF APP provides geolocation-based content or offers localized content
 - Collected only with your permission, via device settings

3. Data We Receive from Our Partners

1. Analytics and Marketing
 - Data from analytics platforms (e.g., Google Analytics for Firebase, Amplitude) about how users interact with the app
 - Information about installation/registration from advertising channels (conversion tracking services)
 - Aggregated, anonymized audience metrics from advertising networks (if ads are used)
2. Social Media or Authorization Services
 - If SELF APP allows sign-up/sign-in via Google, Facebook, or other platforms, we may obtain basic account data (name, email, etc.) depending on the permissions granted
3. Payment Operators / App Stores
 - Information about your payment status, subscription, or cancellation (but not full credit card details)
4. Mental Health Partner Services (if applicable)
 - If SELF APP integrates with an external therapy service or has partner programs, we may exchange minimal data (e.g., user ID, indication that the user has accessed the partner's service)

4. Handling Sensitive Data

Because SELF APP is related to mental health, some information you provide or that is collected may be considered sensitive personal data (concerning health, psychological state). In this case, you should clearly state that you treat such information with a heightened level of protection and handle it only with users' consent and in compliance with confidentiality principles.

5. Possible Additional Categories (Optional)

- Feedback or Testimonials: if you allow public reviews within the app/website
- Push Notification Data: if you track whether a user opens push notifications or clicks on them
- Health Metrics / Data from Other Apps (Apple HealthKit, Google Fit) — only with the user's explicit permission if you sync such data.

OUR PRINCIPLES REGARDING USER PRIVACY AND DATA PROTECTION

- Lawfulness, transparency and fairness;
- Purpose Limitation;
- Data Minimisation;
- Accuracy;
- Storage limitation;
- Confidentiality and integrity.

Your privacy and security are of the utmost importance to us. We will always follow these principles.

Data we collect for our analytics

- Device info including the device model and IP address;
- UI activity events (e.g. clicked on active buttons/ elements of the SELF APP): information about your interactions with the SELF APP such as your search queries (including the date and time of any requests you make), history, ry, your browsing history, and your interactions with the SELF APP, content. This also may include details of your use of third-party applications in connection with the SELF APP:
 - Inferences drawn about your interests and preferences based on your usage of the SELF APP:
 - Certain technical data, which may include:
 - URL information;
 - online identifiers including cookie data and IP addresses;
 - information about the types of devices you are using such as unique device IDs, network connection type (e.g. Wi-Fi, 3G, LTE), provider, network and device performance, browser type, language, information enabling digital rights management, operating system;
 - device attributes of devices on your WIFI network that are available to connect to the SELF APP;
 - your location, which may be derived or inferred from certain technical data (e.g., your IP address, language setting of your device), to comply with geographic requirements in our licensing agreements, and deliver personalized content to you.

DATA WE COLLECT FROM OUR PARTNERS

We may collect limited data about you from various third parties such as public databases, marketing partners, social media platforms, and other outside sources. These third-party sources vary over time and include the following:

- Authentication partners: if you register for or log into our services using third party credentials, we will import your information from such third party to help create your account with us;
- Technical service partners: we work with technical service partners that provide us with certain data, such as mapping IP addresses to location data (e.g., city, state), to enable us to provide us services, content, and features;
- Payment partners;
- Advertisers and other advertising partners: we may obtain certain data about you, such as cookie id, mobile device id, or email address, and inferences about your interests and preferences from certain advertisers and advertising partners that allow us to deliver more relevant ads and measure their effectiveness.

INFORMATION YOU PROVIDE TO US

When you register with, access, or use SELF APP, we may ask you to provide information (a) by which you may be personally identified, such as name, mobile number, email address, or any other personal or personally identifiable information under applicable law ("personal information"), and/or (b) that is about you but individually does not identify you.

This information includes:

- Information that you provide by filling in forms on SELF APP. This includes information provided at the time of registering to use or access SELF APP. We may also ask you for information when you interact with us (such as when responding to notices and announcements from us), and when you report a problem with SELF APP or otherwise correspond with us. If you use a third-party service to create an account, we will receive personal data via that third party service but only when you have consented to that third party service sharing your personal data with us.
- Records and copies of your correspondence (including email addresses), if you contact us;
- Your responses to surveys that we might ask you to complete for research purposes;
- Details of transactions you carry out through SELF APP.

COOKIES, INFORMATION COLLECTION AND TRACKING TECHNOLOGIES

The technologies we use for automatic information collection may include:

- Cookies (or mobile cookies). A cookie is a small file placed on your Device. Like most online services, we use cookies and similar technologies to provide and personalize the SELF APP, analyze use, and prevent fraud. You can disable cookies in your settings, but some parts of SELF APP may then not function properly; and Specific information about how we use Cookies and how you can refuse certain cookies is set SELF APP [Cookie Policy](#).
- Web Beacons. Parts of the SELF APP and our emails may contain small electronic files known as web beacons (also referred to as clear gifs, pixel tags, and single-pixel gifs) that permit us, for example, to count users who have SELF APP those pages or opened an email and for other related or SELF APP statistics (for example, recording the popularity of certain SELF APP content, features, functionality, and services, and verifying system and server integrity).
- Some information – such as IP address and/or browser and device characteristics – is collected automatically when you use SELF APP.

We automatically collect certain information when you visit, use or navigate the SELF APPs. This information does not reveal your specific identity (like your name or contact information) but may include device and usage information, such as your IP address, browser and device characteristics, operating system, language preferences, referring URLs, device name, country, location, information about how and when you use SELF APP and other technical information. This information is primarily needed to maintain the security and operation of SELF APPs, and for our internal analytics and reporting purposes.

Device information, such as your mobile device ID, model, and manufacturer, and information about the location of your device.

Additionally, we may use third-party software to serve ads on the SELF APP, implement email marketing campaigns, and manage other interactive marketing initiatives. This third-party software may use cookies or similar tracking technology to help manage and optimize your online experience with us.

THIRD-PARTIES

When you use or access SELF APP or its/their content, certain third parties may use automatic information collection technologies to collect information about you or your Device, or you may otherwise be accessing and using third-party platforms, software, and applications.

We do not control these third parties' tracking technologies or how they may be used. If you have any questions about a third party's processing of your information, you should contact the responsible provider directly. You acknowledge and agree that your access and use of such third-party tools may be subject to their respective terms of use and privacy policies.

We may also partner with selected third-party vendors (processors) to allow tracking technologies and remarketing services on the SELF APP through the use of first party cookies and third-party cookies, to, among other things, analyze and track users' use of the SELF APP, determine the popularity of certain content or features and better understand online activity. By accessing the SELF APP, you consent to the collection and use of your information by these third-party vendors. You are encouraged to review their privacy policy and contact them directly for responses to your questions. We do not transfer personal information to these third-party vendors.

WHY DO WE COLLECT YOUR DATA

When you use or interact with the SELF APP, we use a variety of technologies to process the personal data we collect about you for various reasons. We have set out below the reasons why we process your personal data, the associated legal bases we rely upon to legally permit us to process your personal data, and the categories of personal data for these purposes:

Description of why We processes your personal data ("processing purpose")	Legal Basis for the processing purpose	Categories of personal data used by SELF APP for the processing purpose
To provide and personalize the SELF APP	- Performance of an agreement - Legitimate Interest - Consent	- User Data - Usage Data - Payment Data - Verification Data
To understand, diagnose, troubleshoot, and fix issues with the SELF APP	- Performance of an agreement - Legitimate Interest	- User Data - Usage Data
For marketing, promotion, and advertising purposes.	- Legitimate Interest - Consent	- User Data - Usage Data
To comply with legal obligations and law enforcement requests.	- Compliance with legal obligations - Legitimate interest	- User Data - Usage Data - Payment Data - Verification Data
To fulfill contractual obligations with third parties, for example licensing agreements and to take appropriate action with respect to reports of intellectual property infringement and inappropriate content	- Legitimate interest	- User Data - Usage Data - Payment Data
To conduct business planning, reporting, and forecasting	- Legitimate interest	- User Data - Usage Data - Payment Data
To process your payment	- Performance of an agreement - Compliance with legal obligations	- User Data - Payment Data
To detect fraud, including fraudulent payments and fraudulent use of the SELF APP	- Performance of a Contract - Compliance with legal obligations - Legitimate Interest	- User Data - Usage Data - Payment Data - Verification Data

To conduct research, contests, surveys	- Performance of a Contract - Legitimate Interest - Consent	- User Data - Usage Data
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DISCLOSURE OF YOUR PERSONAL DATA

We only share information with your consent, to comply with laws, to protect your rights, or to fulfill business obligations.

We may disclose aggregated information about our users, and information that does not identify any individual or device, without restriction.

The following personal data will only be shared with the categories of recipients outlined in the table below if:

- you choose to make use of a specific SELF APP feature where sharing of particular personal data is required for the proper use of the SELF APP feature; or
- you grant us your permission to share the personal data, e.g. by selecting the appropriate setting in the SELF APP or authorizing SELF APP through a presented consent mechanism.

In addition, we may disclose personal information for following categories of recipients and for the following reasons:

Service providers	We work with service providers that work on our behalf which may need access to certain personal data in order to provide their services to us. These companies include those we've hired to provide customer service support, operate the technical infrastructure that we need to provide the Service, assist in protecting and securing our systems and services, and help market own products and services as well as partner products, services, events, and co-branded promotions in which we involved. This information may be used to, among other things, analyze and track data, determine the popularity of certain content and better understand online activity
Payment processors	We will share your personal data with our payment processors as necessary to enable them to process your payments, and for anti-fraud purposes.
Advertising partners	We work with advertising partners to enable us to customize the advertising content you may receive via SELF APP. These partners help us deliver more relevant ads and promotional messages to you, which may include interest-based advertising (also known as online behavioral advertising), contextual advertising, and generic advertising on the SELF APP. We and our advertising partners may process certain personal data to help SELF APP understand your interests or preferences so that we can deliver advertisements that are more relevant to you.
Our partners	Depending on how you sign up for the SELF APP (e.g. through a third-party service or a mobile provider), we share your username or other User Data as necessary to enable your account. We may also share personal data with that third party about your use of the SELF APP, such as whether and to what extent you have used the offer, activated account, or actively used the Service.
Affiliates	We may share your information with our affiliates, in which case we will require those affiliates to honor this privacy policy. Affiliates include our parent company and any subsidiaries, joint venture partners or other companies that we control or that are under common control with us.
Law enforcement and data protection authorities	We may share your personal data when we in good faith believe it is necessary for us to do so in order to comply with a legal obligation under applicable law, or respond to valid legal process, such as a search warrant, a court order, or a subpoena. We also may share your personal data where we in good faith believe that it is necessary for the purpose of our own, or a third party's legitimate interest relating to national security, law enforcement, litigation, criminal investigation, protecting the safety of any person, or to prevent death or imminent bodily harm, provided that we deem that such interest is not overridden by your interests or fundamental rights and freedoms requiring the protection of your personal data.

Business Transfers	We may share or transfer your information in connection with, or during negotiations of, any merger, sale of company assets, financing, or acquisition of all or a portion of our business to another company.
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DATA SECURITY

We are committed to protecting our Users' personal data. We implement appropriate technical and organisational measures to help protect the security of your personal data; however, please note that no system is ever completely secure.

Your password protects your user account, so we encourage you to use a strong password that is unique to your SELF APP account, never share your password with anyone, limit access to your device.

We have implemented appropriate technical and organizational security measures designed to protect the security of any personal information we process which included:

- multi-factor authentication;
- access control (physical and technical);
- link encryption.

However, please also remember that we cannot guarantee that the internet itSELF APP is 100% secure. Although we will do our best to protect your personal information, transmission of personal information to and from SELF APP is at your own risk. You should only access the services within a secure environment.

Unfortunately, the transmission of information via the internet and mobile platforms is not completely secure. Although we do our best to protect your personal information, we cannot guarantee the security of your personal information transmitted through SELF APP. Any transmission of personal information is at your own risk. We are not responsible for circumvention of any privacy settings or security measures we provide.

We are not responsible for the safety of any information that you share with third-party providers who advertise, but are not affiliated with SELF APP.

Personal information will be pseudonymized and encrypted to ensure the user privacy. The collected information will be handled for standard cases of use described in this Privacy Policy.

INTERNATIONAL DATA TRANSFERS

Personal data collected within the European Union and the European Economic Area or Switzerland may, for example, be transferred to and processed by third parties located outside of the European Union and the European Economic Area or Switzerland. In such instances SELF APP shall ensure that the transfer of your personal data is carried out in accordance with applicable privacy laws and, in particular, that appropriate contractual, technical, and organisational measures are in place such as the Standard Contractual Clauses approved by the EU Commission.

DATA RETENTION

We will only keep your personal information for as long as it is necessary for the purposes set out in this privacy policy, unless a longer retention period is required or permitted by law (such as tax, accounting or other legal requirements).

We retain your data for as long as your Account is active or unless you request us to delete your data. Note that if you ask us to remove your personal data, we may retain your data as necessary to comply with our legal obligations.

If you request, we will delete or anonymise your personal data so that it no longer identifies you, unless we are legally allowed or required to maintain certain personal data, including situations such as the following:

- If there is an unresolved issue relating to your account, such as an outstanding credit on your account or an unresolved claim or dispute we will retain the necessary personal data until the issue is resolved;
- Where we need to retain the personal data for our legal, tax, audit, and accounting obligations, we will retain the necessary personal data for the period required by applicable law; and/or,
- Where necessary for our legitimate business interests such as fraud prevention or to maintain the security of our users.

CHANGES TO OUR PRIVACY POLICY

We may update our privacy policy from time to time. If we make material changes to how we treat your personal information, we will post the new privacy policy on this page, and we may also send a courtesy email to you to the email address we have on file for you, or displaying a prominent notice within the SELF APP, if any.

The date the privacy policy was last revised is identified at the top of the page. You are responsible for periodically visiting this privacy policy to check for any changes.

AGE LIMITS

We do not knowingly collect or solicit personal data about or direct or target interest-based advertising to anyone under the age of 18 or knowingly allow such persons to use or access the SELF APP. If you are under 18, please do not send any data about yourSELF APP to us, including your name, address, or email address. No one under the age of 18 may provide any personal data. If we learn that we have collected personal data about a child under age 18, we will delete that data as quickly as possible. If you believe that we might have any data from or about a child under the age of 18, please contact us.

LINKS

We may display advertisements from third parties and other content that links to third-party webSELF APPs. We cannot control or be held responsible for third parties' privacy practices and content. If you click on a third-party advertisement or link, please understand that you are leaving the Service and any personal data you provide will not be covered by this Policy. Please read their privacy policies to find out how they collect and process your personal data.

CONTACT US

If you have any questions or suggestions regarding our Privacy Policy, please contact us at support@yourself.digital