

# Privacy Policy

## Data Controller and Owner:

**CM MENTALGROWTH LTD Incorporated and registered in the Republic of Cyprus, Registration No. HE 372828 34, RIGA FERAIOU STR., OFFICE 33, 1087, NICOSIA CYPRUS**

**Owner contact email: [support@mentalgrowth.app](mailto:support@mentalgrowth.app).**

## Types of Data collected

Among the types of Data that **Aspectica** (hereinafter the «Application») collects, by itself or through third parties, there are: Cookies and Usage Data, Contact data, Physical data, Account data, Correspondence data, Session data, Preference data.

Other Personal Data collected may be described in other sections of this privacy policy or by dedicated explanation text contextually with the Data collection.

The Personal Data may be freely provided by the User, or collected automatically when using this Application.

Any use of Cookies- or of other tracking tools - by this Application or by the owners of third party services used by this Application, unless stated otherwise, serves to identify Users and remember their preferences, for the sole purpose of providing the service required by the User. Failure to provide certain Personal Data may make it impossible for this Application to provide its services.

Users are responsible for any Personal Data of third parties obtained, published or shared through this Application and confirm that they have the third party's consent to provide the Data to the Owner.

## Mode and place of processing the Data Methods of processing

The Data Controller processes the Data of Users in a proper manner and shall take appropriate security measures to prevent unauthorized access, disclosure, modification, or unauthorized destruction of the Data.

The Data processing is carried out using computers and/or IT enabled tools, following

organizational procedures and modes strictly related to the purposes indicated. In addition to the Data Controller, in some cases, the Data may be accessible to certain types of persons in charge, involved with the operation of the site (administration, sales, marketing, legal, system administration) or external parties (such as third party technical service providers, mail carriers, hosting providers, IT companies, communications agencies) appointed, if necessary, as Data Processors by the Owner.

### **Place**

The Data is processed at the Data Controller's operating offices and in any other places where the parties involved with the processing are located. For further information, please contact the Data Controller.

### **Retention time**

The Data is kept for the time necessary to provide the service requested by the User, or stated by the purposes outlined in this document, and the User can always request that the Data Controller suspend or remove the data.

## **The use of the collected Data**

The Data concerning the User is collected to allow the Owner to provide its services, as well as for the Analytics. You will find below explanations regarding the reasons why we may collect data and the legal bases we rely on in each case:

### We may use your Contact Data to:

- respond to communications that you send to us. The legal basis for such processing is your and our legitimate interests; and
- market products and services to you only where you have requested that we do so, or otherwise provided your explicit consent. The legal basis for such processing is that you have consented to us doing so; and
- for customer relationship management ("CRM") purposes;
- additionally, we may request access to your device's contacts for the purposes of enabling social functionality.

### We may use your Account Data to:

- enable you to personalize your use of our services;
- enable you to save and maintain your profile and administer your account with us; and - enable us to identify you.

The legal basis for such processing is for the performance of the contract between you and us.

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We may use your Correspondence Data to:

- help address issues you raise with us and to improve the Application and our services. The legal basis for such processing is your and our legitimate interests.

We may use your Session Data to:

- administer, maintain and improve the Application and our services, including identifying you or your device. Additionally, Session Data is used to identify and respond to potential risks to the security of the Application. The legal basis for such processing is our legitimate interest. This Data is provided ONLY by the Platforms our App is published on, such as AppStore and Google Play. We do not store this Data in any way.

We may use your Preference Data to

- infer your interests, including serving and suggesting content that you might like, and tailoring advertising to you based on such preferences.

## Detailed information on the processing of Personal Data

Personal Data is collected for the Analytics purposes and using the following services: The services contained in this section enable the Owner to monitor and analyze web traffic and can be used to keep track of User behavior.

### **1. Appsflyer**

Appsflyer is an analytics service.

Personal Data collected: Cookies and Usage Data. Place of processing: US

### **2. MixPanel**

MixPanel is an analytics service.

Personal Data collected: Cookies and Usage Data. Place of processing: US

### **3. Facebook Analytics**

Facebook Analytics is an analytics service.

Personal Data collected: Cookies and Usage Data. Place of processing: US

#### **4. Google Analytics**

Google Analytics is an analytics service.

Personal Data collected: Cookies and Usage Data. Place of processing: US

#### **5. TestFlight**

TestFlight is an analytics service.

Personal Data collected: Cookies, email address and Usage Data. Place of processing: US

#### **6. Amplitude**

Amplitude is an analytics service.

Personal Data collected: Cookies and Usage Data. Place of processing: US

#### **7. Adapty**

Adapty is an analytics service.

Personal Data collected: Cookies and Usage Data. Place of processing: US

#### **8. Firebase**

Firebase is an analytics service.

Personal Data collected: Cookies and Usage Data. Place of processing: US

## **Additional information about Data collection and processing Legal action**

The User's Personal Data may be used for legal purposes by the Data Controller, in Court or in the stages leading to possible legal action arising from improper use of this Application or the related services.

The User declares to be aware that the Data Controller may be required to reveal personal data upon request of public authorities.

## Additional information about User's Personal Data

In addition to the information contained in this privacy policy, this Application may provide the User with additional and contextual information concerning particular services or the collection and processing of Personal Data upon request.

## System logs and maintenance

For operation and maintenance purposes, this Application and any third-party services may collect files that record interaction with this Application (System logs) or use for this purpose other Personal Data (such as IP Address).

## Information not contained in this policy

More details concerning the collection or processing of Personal Data may be requested from the Data Controller at any time. Please see the contact information at the beginning of this document.

## The rights of Users

Users have the right, at any time, to know whether their Personal Data has been stored and can consult the Data Controller to learn about their contents and origin, to verify their accuracy or to ask for them to be supplemented, canceled, updated or corrected, or for their transformation into anonymous format or to block any data held in violation of the law, as well as to oppose their treatment for any and all legitimate reasons. Requests should be sent to the Data Controller at the contact information set out above. This Application does not support "DoNot Track" requests. To determine whether any of the third party services it uses honor the "Do Not Track" requests, please read their privacy policies.

Users also have the right to lodge a complaint with their local data protection authority about any of activities that are deemed not to be in compliance with GDPR.

# POLICIES CONCERNING CHILDREN

We recognize we have a special obligation to protect personal data obtained from children. Legally you must be at least 13 years old to use this application. We do not and will not knowingly collect personal data from any child under the age of 13 without consent from their parent or guardian.

## **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 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 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. Or you may use the ‘Delete my account’ function from the Settings Tab, thereby deleting all your Data.

### **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.

### **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 usable 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 a 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.

## Definitions and legal references

### **Personal Data (or Data)**

Any information regarding a natural person, a legal person, an institution or an association, which is, or can be, identified, even indirectly, by reference to any other information, including a personal identification number. Data may include:

- **Contact Data:** This may include your name and your email address. This information will be collected by us if you communicate with us, for example if you use the links on the Application to communicate with us via email.
- **Account Data:** If you create an account in the Application to benefit from our Platforms, you may need to provide your name, email address.
- **Physical Data:** This may include your gender identity, age, date and place of birth.
- **Correspondence Data:** This includes the information you provide when you request support through the Application, contact us via the email address provided in this Privacy Policy and elsewhere on our website and your views, opinions and feedback which you choose to provide in relation to the App and our services, including any comment facilities and message boards.
- **Session Data:** This includes your IP address, your device's unique identifier details, browser details including version, device operating system, geo-location, time zone setting and time/date of access requests, the amount of data transmitted and the requesting provider. We may also capture other information about visits to the Application such as



traffic patterns.

- **Cookie Data:** Cookies are small files which are downloaded to your device when accessing our platform. Most web browsers automatically accept cookies.

- **Preference data:** This includes any information you choose to provide us.

## Usage Data

Information collected **automatically** from this Application (or third party services employed in this Application), 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.

### User

The individual using this Application, which must coincide with or be authorized by the Data Subject, to whom the Personal Data refers.

### Data Subject

The legal or natural person to whom the Personal Data refers.

### Data Processor (or Data Supervisor)

The natural person, legal person, public administration or any other body, association or organization authorized by the Data Controller to process the Personal Data in compliance with this privacy policy.

### Data Controller (or Owner)

The natural person, legal person, public administration or any other body, association or organization with the right, also jointly with another Data Controller, to make decisions regarding the purposes, and the methods of processing of Personal Data and the means used, including the security measures concerning the operation and use of this Application. The Data Controller, unless otherwise specified, is the Owner of this Application.

### This Application

The hardware or software tool by which the Personal Data of the User is collected (**Aspectica**). **Cookies**

Small piece of data stored on the User's device.

## How long we store data

Your data will be stored on our system as long as you are registered. Beyond that, we are only storing data if it is legally necessary or otherwise required by law.

## Changes to this privacy policy

The Data Controller reserves the right to make changes to this privacy policy at any time by giving notice to its Users on this page. It is strongly recommended to check this page often, referring to the date of the last modification listed at the bottom. If a User objects to any of the changes to the Policy, the User must cease using this Application and can request that the Data Controller remove the Personal Data. Unless stated otherwise, the then-current privacy policy applies to all Personal Data the Data Controller has about Users.

Latest update: December 29, 2023

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