**PRIVACY POLICY**

**last updated …**

# What is the Privacy Policy?

When you use the iYoni app, you entrust us with your personal data, including data about your health and lifestyle. This Policy explains how we process the data we obtain from you to provide you with information and support your fertility care and pregnancy seeking.

Working with new technologies, **we know how important it is to adequately protect personal data**. We therefore make a **special effort** to protect your privacy and the information you share with us.

We carefully select and apply appropriate technical measures, in particular those of a **programmatic and organisational** nature, to ensure the protection of the personal data processed.

In our Privacy Policy you will find **all the most important information regarding our processing of your personal data.**

We ask you to read it and we promise that **it will not take you more than a few minutes.**

## Who is the administrator of the iYoni mobile application?

The administrator of the iYoni mobile application is Katarzyna Goch, running the business activity under the name LIFEBITE KATARZYNA GOCH, registered in the Business Activity Central Register and Information Record conducted by the minister competent for the business affairs of the Republic of Poland. The company is located ul. Prof. Aleksandra Martyniaka 16/ 1, 10-763 Olsztyn, NIP 6912282020, REGON 386045360 (hereinafter referred to as ***we***).

# Personal data

## What legal act governs the processing of your personal data?

Your personal data is collected and processed in accordance with the provisions of **Regulation (EU) 2016/679 of the European Parliament and of the Council of 27 April 2016 on the protection of natural persons with regard to the processing of personal data and on the free movement of such data, and repealing Directive 95/46/EC (General Data Protection Regulation) (Official Journal of the European Union EU L 119, p. 1), commonly referred to as: *GDPR***. To the extent not regulated by the GDPR, the processing of personal data is governed by the **Data Protection Act of 10 May 2018.**

## Who is the controller of your personal data?

The controller of your personal data is:

Katarzyna Goch, trading as LIFEBITE KATARZYNA GOCH

ul. Prof. Aleksandra Martyniaka 16/ 1, 10-763 Olsztyn

e-mail: dane@lifebite.pl

For all matters relating to your personal data, you can **contact us** by email: dane@lifebite.pl

# How we process the Personal Data you share with us

## What personal data do we process and for what purposes?

In our application, we offer you many different services for which we process different personal data, based on different legal bases.

### purpose: **registration and maintenance of the account, including making available the functionalities in the account**

personal data: e-mail address, username

legal basis: Art. 6(1)(b) of GDPR, i.e. processing for the purpose of taking steps at your request prior to entering into an agreement and processing necessary for the performance of an agreement to which you are party

data retention time: until the account is deleted

### purpose: **conclusion and performance of the access service agreement**

personal data: e-mail address, username

legal basis: Art. 6(1)(b) of GDPR, i.e. processing for the purpose of taking steps at your request prior to entering into an agreement and processing necessary for the performance of an agreement to which you are party

data retention period: until the statute of limitations

### purpose: **to monitor the menstrual cycle**

personal information: username, age,

legal basis: Art. 6(1)(b) of GDPR, i.e. processing for the purpose of taking steps at your request prior to entering into an agreement and processing necessary for the performance of an agreement to which you are party

data retention time: until the account is deleted

### purpose: **recording of fertility symptoms**

personal data: measurements of body temperature, observations of cervical mucus, data on intercourse and libido, results of ovulation tests and gynaecological ultrasound (impression), body symptoms, mood

legal basis: Art. 9(1)(a) of GDPR, i.e. processing on the basis of your consent to the processing of specific data

data retention period: until withdrawal of consent

### purpose: **recording of daily activities**

personal data: information about your diet, sleep patterns, physical activity, use of stimulants

legal basis: Art. 9(1)(a) of GDPR, i.e. processing on the basis of your consent to the processing of specific data

data retention period: until withdrawal of consent

### objective: **completion of forms to assess fertility**

personal data: data concerning your health and lifestyle, medical history, pregnancies, family medical history, risk factors for fertility, medications and supplements you are taking, test results

legal basis: Art. 9(1)(a) of GDPR, i.e. processing on the basis of your consent to the processing of specific data

data retention period: until withdrawal of consent

### purpose: **establishment, assertion and enforcement of claims and the defence of claims in proceedings before the courts and other state bodies**

personal data: name, surname, correspondence address, NIP, e-mail address, telephone number, IP address

legal basis: Art. 6(1)(f) of GDPR, i.e. processing for the purpose of pursuing our legitimate interests in the establishment, investigation, enforcement and defence of claims before the courts and other state bodies

data retention period: until the expiry of the period of limitation for claims concerning the performance of the agreement

### purpose: **to fulfil legal obligations arising from legislation, in particular tax and accounting legislation**

personal data: name, surname, PESEL number, NIP number, e-mail address, telephone number, correspondence address, bank account number, payment card number

legal basis: Art. 6(1)(c) of GDPR, i.e. processing is necessary for compliance with legal obligations imposed on us by law, in particular tax and accounting regulations

data retention period: until the expiry of the legal obligations incumbent on the Controller which justified the processing of the personal data

### purpose: **direct marketing of own services, including remarketing**

personal data: data provided in your account, in particular your username and your behaviour in the application, e.g. clicks

legal basis: art. 6 (1) (f) GDPR, i.e. processing for the purpose of pursuing our legitimate interest in direct marketing of our own services, including remarketing

data retention period: until you object to the processing of your personal data

## Voluntariness of providing personal data

You provide your personal data **voluntarily**, but this provision is a condition for us if we are to provide services to you (e.g. to create an account).

## Recipients of personal data

The recipients of your personal data may be entities providing accounting, legal, debt recovery, analytical and IT services to us.

## Automated decision-making (including profiling)

We will display personalised recommendations to you based on the information you complete in your account, in particular regarding your test results, lifestyle or monthly cycle. Recommendations contain information automatically tailored to your needs, taking into account the parameters you have entered, and serve to improve your chances of getting pregnant. The app analyses the data you have completed and then identifies factors that affect your health and fertility as part of its recommendations.

In addition, based on your activity in the Application, i.e. interest in services, click history and viewed content we tailor the marketing message then displayed to you in the form of push notifications.

## Will we transfer your personal data outside the EEA or to an international organisation?

We do not transfer your personal data outside the EEA or to an international organisation. However, the shops from which you can download our Application and which process payments on the Application may store your personal data on servers located in the USA. For this purpose, please refer to their privacy policies.

Google LLC is on the list of entities participating in the Privacy Shield programme (link: https://www.privacyshield.gov/participant?id=a2zt000000001L5AAI&status=Active), and also applies the model contractual clauses on data security approved by the European Commission. Privacy Policy: https://policies.google.com/privacy?hl=pl&fg=1

For cross-border transfers of personal data, Apple uses standard contractual clauses approved by the European Commission. Privacy Policy: https://www.apple.com/legal/privacy/pl/

# How we process your personal data that we receive from app users

Our mobile application allows you to share the information you have completed in your account with people you specify via SMS. In order to do so, the user shall provide details of the person to whom they wish to make their selected information available. In such cases, we receive your personal data not from you, but from a user of our application. In order to give you full control over your data, we have provided information about our processing of your personal data below.

* 1. **Categories of respective personal data**

We process the following categories of respective personal data:

- contact details (i.e. personal data provided by you for the purpose of sending SMS notifications to you).

* 1. **Source of personal data**

We received your personal data from a user of our mobile application.

* 1. **Purposes and legal basis of personal data processing**

Your personal data that we have obtained from a user of our application will be processed for the following purposes:

### purpose**: to receive SMS notifications**

personal data: telephone number

legal basis: Art. 6(1)(f) GDPR, i.e. processing for the purpose of pursuing our legitimate interest in enabling you to receive SMS notifications regarding information which you have completed in your account

data retention period: until you object to our processing of your data or until the user who provided your phone number for the purpose of sending you notifications deletes your account or your number is deleted from the application by that user

* 1. **Recipients of personal data**

The recipients of your personal data may be: entities providing IT services to us.

* 1. **Automated decision-making (including profiling)**

Your personal data will not be used for profiling or making any automated decisions about you.

* 1. **Transfers of personal data outside the EEA or to an international organisation**

We do not transfer your personal data outside the EEA or to an international organisation.

# What rights do you have in relation to our processing of your personal data?

Under the GDPR you have the right to:

request **access** to your personal data (Art. 15 of GDPR);

request the **rectification of** your personal data (Art. 16 of GDPR);

request the **deletion of** your personal data, the so-called "right to be forgotten" (Art. 17 of GDPR);

to request the **restriction of the processing of** personal data (Art. 18 of GDPR);

**object** to the processing of personal data (Art. 21 of GDPR);

request for personal data to be **transferred** (Art. 20 of GDPR)

If you submit any of the above-mentioned requests to us, we will inform you without undue delay – and in any case **within one month of receipt of** the request – about the action taken on your request.

If necessary, we may extend the one-month period **by a further two months** because of the complexity of the request or the number of requests.

In any event, we will inform you of the extension within **one month of receipt of the request** and give you the reasons for the delay.

## Can you withdraw your consent to the processing of personal data?

You may **withdraw** the consent you have given to the processing of your personal data at **any time.**

The withdrawal of your consent to process your personal data **does not affect** the lawfulness of the processing carried out by us on the basis of your consent **before** its withdrawal.

If you wish to withdraw your **consent** to the processing of your personal data, please submit your request to: dane@lifebite.pl.

In the event that you wish to withdraw your consent to the processing of your personal data for the purpose of sending you the "Newsletter" service, you can opt out by emailing us.

## Complaint to the supervisory authority

If you believe that the processing of your personal data breaches data protection legislation, you have the right to lodge a **complaint with a supervisory authority**, in particular in the Member State of your habitual residence, your place of work or the place where the alleged breach occurred.

In Poland, the supervisory authority under the GDPR is the **Polish Data Protection Commissioner**, which replaced the GIODO as of 25 May 2018.

More information can be found [here](https://www.uodo.gov.pl/pl/134/233).