Privacy Policy and Cookies Policy

Ovela Interactive SL Current version. Last updated on 31st August 2025

1. Introduction

Ovela Interactive SL ("Ovela Interactive", "we", "our") is committed to the highest standards of transparency, security, and lawful processing of personal data. We respect the privacy of visitors and registered Users of our websites, including https://wellnessgeni.com.

We comply with the **General Data Protection Regulation (EU) 2016/679 (GDPR)**, applicable EU consumer protection law, and Andorran law.

2. Purpose of this Policy

This Policy applies to all Ovela Interactive SL websites (the "Websites"). It explains:

- what data we collect,
- how we use it,
- how long we retain it,
- with whom we share it,
- what rights you have under GDPR, and
- how we use cookies and related technologies.

You will be asked for your **consent** before cookies are placed or optional data is collected.

3. Data Collection and Use

We may process the following categories of data:

- **Technical logs**: IP address, browser type, URL requested, referrer, error codes, timestamps.
- Account data: name, email, login credentials, subscription details.
- Payment data: processed via Stripe (see: https://stripe.com/privacy).
- Interaction data: chat interactions, usage of Al avatar features, personalization settings.

• Recruitment data: CVs and contact details if you apply for internships or roles.

We process personal data only when:

- 1. necessary for **performance of a contract** (Art. 6(1)(b) GDPR), e.g. delivering subscription services,
- 2. to comply with a **legal obligation** (Art. 6(1)(c)), e.g. tax laws,
- 3. based on **legitimate interest** (Art. 6(1)(f)), e.g. fraud prevention, service improvement,
- 4. based on your **consent** (Art. 6(1)(a)), e.g. marketing emails, optional memory storage features.

⚠ We do not knowingly process data of children under **16 years old**. If you believe such data has been provided, please contact us for immediate deletion.

4. Retention Periods

- Technical logs: up to 12 months.
- Account and billing data: retained for as long as the account is active + 6 years for legal/tax obligations.
- Interaction/memory data: stored until the User deletes it or withdraws consent.
- Recruitment data: retained for 12 months after process completion, unless consent for longer is given.

5. Sharing and Transfers

We may share data with trusted third parties:

- Stripe (payments, fraud detection),
- OpenAI (speech-to-text, language processing),
- Service providers (IT hosting, legal, accounting).

International transfers outside the EEA/Andorra are protected by **Standard Contractual Clauses** (SCCs) or equivalent safeguards.

We do not sell or rent personal data.

6. User Rights under GDPR

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As a User, you have the right to:

- Access your data (Art. 15).
- Rectify inaccurate data (Art. 16).
- Request erasure ("right to be forgotten") (Art. 17).
- Restrict processing (Art. 18).
- Data portability (Art. 20).
- Object to processing (Art. 21).
- Withdraw consent at any time (Art. 7).
- Not be subject to automated decision-making, including profiling (Art. 22).

Requests can be made by emailing office@ovelainteractive.com.

You also have the right to lodge a complaint with the Andorran Data Protection Agency (APDA): https://www.apda.ad.

7. Cookies Policy

Our Websites use cookies and similar technologies to:

- deliver services,
- store user preferences,
- secure sessions,
- collect aggregated statistics,
- enable login and account functionality,
- support personalized advertising (only with consent).

Types of cookies used:

- **Session cookies** temporary, expire when browser closes.
- Persistent cookies remain stored until expiry or manual deletion.

You can manage cookies in your browser settings or withdraw cookie consent at any time via our cookie management tool.



Disabling cookies may affect the functionality of our Websites.

8. Marketing and PR

If you consent, your data may be used for marketing purposes, such as newsletters or promotional campaigns. You may withdraw consent at any time.

9. Recruitment

If you apply for a role, your data will be processed solely for recruitment purposes, under your consent.

10. Contact Information

For all privacy and data protection queries:

Ovela Interactive SL

Bonaventura Armengol 15, 3r 3a AD500 Andorra la Vella office@ovelainteractive.com

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