Privacy & Data Protection Compliance

1. Privacy Policy Requirements

1.1 Public Availability

- ■ Privacy policy publicly hosted on website
- ■ Accessible from app settings
- ■ Linked in app store listings
- ■ Available before account creation

1.2 Required Disclosures

The privacy policy **must include** the following sections:

Data Collection

Data Type	Collected	Purpose	Retention
Profile Information	✓	User account, matching	Account lifetime
Location Data	✓	Proximity matching	Active session only
Messages	✓	Communication	Until deleted/account closure
Photos	✓	Profile display	Until deleted/account closure
Preferences	✓	Matching algorithm	Account lifetime
Device IDs	✓	Security, analytics	90 days after last use

Data Usage Disclosure

- ■ Matching algorithm functionality explained
- ■ Personalization methods described

- ■ AI/ML usage disclosed (if applicable)

Third-Party Sharing

Document all third-party services:

Service	Purpose	Data Shared
Analytics (e.g., Mixpanel)	Usage tracking	Anonymized events
Cloud Hosting (AWS/GCP)	Infrastructure	All user data (encrypted)
Content Moderation (e.g., Hive)	Safety	Photos, messages
Payment Processors	Billing	Transaction data
Push Notifications	Communication	Device tokens

Data Retention Periods

Data Category	Retention Period	Deletion Method
Active Account Data	Account lifetime	User request or closure
Deleted Messages	30 days	Automated purge
Inactive Accounts	2 years	Automated purge
Backup Data	90 days	Rolling deletion
Analytics Data	2 years	Anonymization

User Rights

- ■ Right to access personal data
- ■ Right to correct/update data
- ■ Right to delete data (account deletion)
- ■ Right to export data (data portability)
- ■ Right to opt-out of marketing
- ■ Right to restrict processing

Contact Information

- ■ Privacy inquiry email address
- ■ Physical mailing address
- ■ Response time commitment (e.g., 30 days)

---

2. Regulatory Compliance

2.1 GDPR Compliance (EU Users)

Required if serving users in the European Union:

- ■ Legal basis for processing documented
- ■ Data Processing Agreement (DPA) with vendors
- ■ EU representative appointed (if no EU establishment)
- ■ Data Protection Impact Assessment (DPIA) completed
- ■ Cookie consent mechanism implemented
- ■ Right to erasure ("Right to be forgotten") enabled
- ■ Data portability (export in machine-readable format)
- ■ 72-hour breach notification capability

GDPR Legal Bases for Processing

Processing Activity	Legal Basis
Account creation	Contract performance
Matching algorithm	Legitimate interest
Marketing emails	Consent
Fraud prevention	Legitimate interest
Legal compliance	Legal obligation

2.2 CCPA/CPRA Compliance (California Users)

Required if:

- Gross revenue > $25M, OR
- Buy/sell data of 100,000+ consumers, OR
- 50%+ revenue from selling personal information

- ■ "Do Not Sell My Personal Information" link
- ■ "Limit the Use of My Sensitive Personal Information" link
- ■ Privacy policy updated with CCPA-specific disclosures
- ■ Consumer request intake mechanism
- ■ 45-day response capability
- ■ Opt-out preference signals honored (GPC)
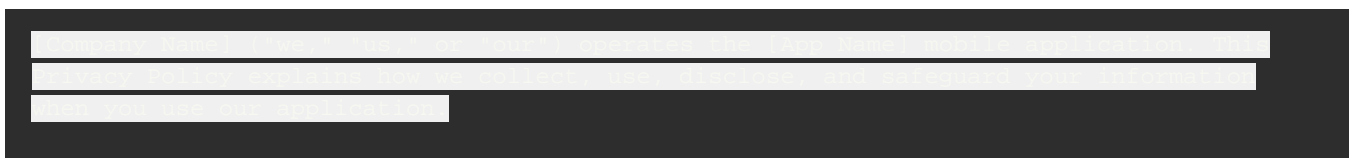
2.3 Age Restrictions

- ■ App clearly states 18+ requirement
- ■ Age gate implemented at registration
- ■ Date of birth collection and verification
- ■ COPPA compliance documentation (no users under 13)

---

3. Privacy Policy Template Sections

Section 1: Introduction

```
[Company Name] ("we," "us," or "our") operates the [App Name] mobile application. This
Privacy Policy explains how we collect, use, disclose, and safeguard your information
when you use our application.
```

Section 2: Information We Collect

```
We collect information you provide directly: Account information (email, phone, name),
Profile information (photos, bio, preferences), Communications (messages with other
users). We collect information automatically: Device information (device ID, OS version),
Location data (with your permission), Usage data (features used, time spent).
```

Section 3: How We Use Your Information

Section 4: Your Rights and Choices

Section 5: Contact Us

---

4. Implementation Checklist

Immediate Actions

- ■ Draft privacy policy using template
- ■ Legal review of privacy policy
- ■ Publish privacy policy on website
- ■ Link privacy policy in app

Technical Implementation

- ■ Data export functionality
- ■ Account deletion functionality
- ■ Consent management system
- ■ Cookie banner (web)
- ■ Privacy request intake form

Ongoing Maintenance

- ■ Annual privacy policy review
- ■ Vendor DPA reviews
- ■ Privacy training for team
- ■ Regulatory update monitoring

Last Updated: December 2024
Review Due: December 2025