

## The Quiet Frame — Full Privacy Policy

This policy is designed to meet GDPR requirements while reflecting the tone and principles of The Quiet Frame. It outlines how we handle personal data, what rights you have, and how you can exercise them.

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### 1. Who we are

The Quiet Frame is a project operated by:

Ignea Sàrl

IDE: CHE 351 623 534

Nyon, Switzerland

Email: [hey@thequietframe.com](mailto:hey@thequietframe.com)

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### 2. What data we collect and why

We only collect what is necessary to support the experiences you choose.

#### Reflect

No personal data is collected. Reflections are downloaded locally and never sent to our servers.

#### Coach

Sessions are ephemeral. No content is stored after a session ends. No recordings, transcripts, or logs are kept.

#### Companion

With your explicit consent, we store reflections, preferences, and entries linked to a session ID. This enables continuity and retrieval of your personal journey. Consent is gathered via a visible checkbox before data is stored.

#### Purchases

Billing and transaction data are handled securely by Stripe, our third-party payment processor. We do not store your financial information.

#### Email subscriptions

Your email is stored only if you explicitly opt in. You may unsubscribe at any time.

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### 3. Legal basis for processing

Our legal bases under GDPR are:

- **Consent:** For Companion data, cookies, and email communication
  - **Contract:** For providing paid services and fulfilling user interactions
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### 4. Your rights

Under GDPR, you have the right to:

- Access your personal data
- Correct or update it
- Request deletion ("right to be forgotten")
- Withdraw consent at any time
- Restrict or object to processing

To exercise your rights, email us at [hey@thequietframe.com](mailto:hey@thequietframe.com). We aim to respond within 14 days.

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### 5. Data retention

- Reflect: No data stored
  - Coach: No data stored
  - Companion: Stored data is retained until you withdraw consent or request deletion. Inactive sessions may be deleted after 12 months.
  - Email addresses: Retained until you unsubscribe
  - Payment data: Retained as required by law (e.g. tax and accounting regulations)
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### 6. Cookies and local storage

- Reflect: No cookies used
- Coach: A temporary session cookie is used during a session. It is deleted when the browser is closed
- Companion: Local storage and persistent cookies are used with your consent to support continuity and personalization

We do not use analytics, ad tracking, or third-party profiling.

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### 7. Security

We use encrypted databases and access controls to protect Companion data. Payment data is handled through Stripe's secure infrastructure. While no system can guarantee absolute security, we take appropriate steps to protect your information.

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## **8. International data transfers**

Some services we use may process data outside Switzerland or the EU. Where this is the case, we ensure appropriate safeguards are in place, such as Standard Contractual Clauses or adherence to recognized frameworks.

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## **9. Updates to this policy**

We may update this policy as The Quiet Frame evolves. Any changes will be posted on our website.

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## **10. Contact**

If you have any questions or concerns about this policy or your data, you can contact us at:

**Email:** [hey@thequietframe.com](mailto:hey@thequietframe.com)

**Postal:** Ignea Sàrl, 1260 Nyon, Switzerland

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