

Privacy Policy

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Introduction

Monroy Industries, LLC ("we," "us," or "our") having its principal place of business at 522 W Riverside Ave Ste 6698 Spokane, WA, 99201-0580, United States ("Company", "We", "Our", or "Us") is committed to protecting Your privacy as a data subject ("You" or "Your") and ensuring the secure processing of Your personal data. We strive to limit the processing of personal data as far as possible and do not collect personal data beyond what is necessary.

All processing of personal data, including the collection, registration, storing, and general handling is governed by applicable privacy legislation. While we are based in the United States, we adhere to multiple privacy frameworks to provide comprehensive protection for all our users:

1. **General Data Protection Regulation (GDPR):** Although we are US-based, we voluntarily apply GDPR standards to all users globally as a best practice for data protection.
2. **California Consumer Privacy Act (CCPA):** For California residents, we comply with all CCPA requirements. Under the CCPA, the terms in this privacy policy should be understood as follows: "personal data" includes "personal information"; "data subject" includes "consumer"; "controller" includes "business"; and "processor" includes "service provider", all as defined under the CCPA.
3. **Children's Online Privacy Protection Act (COPPA):** As our app may be accessed by children, we strictly adhere to COPPA requirements. Under COPPA, "personal data" includes "personally identifiable information" and "processor" includes "service provider", as defined by COPPA regulations.

We strive to ensure that all processing of personal data is conducted in accordance with these regulations and applicable local laws. This privacy policy explains how we collect, use, disclose, and safeguard your information when you use our mobile application **ColorVerse AI** ("Application").

Please read this privacy policy carefully. If you disagree with the terms of this privacy policy, please do not access or use the Application.

When does this privacy policy apply?

This Privacy Policy applies to all users of our Application, regardless of location. It covers all personal data collected and processed through your use of our Application, including any information you provide when you:

- Create an account or use our services
- Make in-app purchases or subscribe to premium features
- Use our coloring and drawing features
- Submit feedback or contact our support team
- Interact with any part of our Application

This privacy policy describes how We collect and use Your personal data when You are using Our services, playing Our apps or interacting with Us. It applies to all visitors, end users (including paying and non-paying users, adults and children), and those who interact with Our social media channels. Note that Our social media accounts are intended for anyone over the age of 13 (or any other age applicable in your country).

Your Rights as a Data Subject

Depending on your location, you may have certain rights regarding your personal data. We respect these rights and aim to accommodate all valid requests, regardless of your location. If you would like to access, correct, erase, or limit the use or disclosure of any of Your personal data that has been collected and is stored by Us or exercise any other right under applicable data protection legislation, please notify Us at privacy@monroyindustries.xyz so that We may consider and respond to Your request in accordance with applicable law.

For All Users

You have the right to:

- **Information:** Request information about the personal data we hold about you, how we use it, and who else might receive your personal data.
- **Access:** Obtain confirmation as to whether we are processing your personal data and, if so, access that personal data.
- **Rectification:** Request that we correct or update inaccurate or incomplete information about you.

- **Erasure ("Right to be Forgotten"):** Request deletion of your personal data under certain circumstances, such as when the data is no longer necessary for the original purpose, if you withdraw consent, or if the data has been unlawfully processed. This right may be limited if we have legal obligations to retain your data or if our interests in keeping the data outweigh your interests in having it deleted.
- **Restriction of Processing:** Request that we restrict the processing of your data in certain circumstances, such as if you contest the accuracy of your data or if the processing is unlawful but you oppose erasure.
- **Data Portability:** Request a copy of your personal data in a structured, commonly used, and machine-readable format, and to transmit that data to another controller where technically feasible.
- **Objection:** Object to the processing of your personal data in certain circumstances, including when we process your data based on our legitimate interests.
- **Not be Subject to Automated Decision-Making:** Not be subject to a decision based solely on automated processing, including profiling, which produces legal or similarly significant effects concerning you.

For European Union and UK Residents (GDPR)

In addition to the rights listed above, you have the right to:

- Lodge a complaint with your local data protection authority.
- Withdraw consent at any time (where processing is based on consent).
- Not be subject to automated decision-making, including profiling, that produces legal or similarly significant effects.
- Request a Data Subject Access Request.

For California Residents (CCPA)

California residents have the right to:

- Know what personal information is being collected about them.
- Know whether their personal information is sold or disclosed and to whom.
- Say no to the sale of their personal information.
- Access their personal information.
- Request deletion of their personal information.
- Not be discriminated against for exercising their privacy rights.

For Children Under 13 (COPPA)

Parents or guardians of children under 13 have the right to:

- Review their child's personal information.
- Request deletion of their child's personal information.
- Refuse further collection or use of their child's personal information.
- Agree to the collection and use of their child's information without consenting to disclosure to third parties.

To exercise any of these rights, please contact us at privacy@monroyindustries.xyz. We will respond to your request within a reasonable timeframe and in accordance with applicable laws.

Information we collect

We strive to collect only information that is necessary to provide our services. Here's what we collect:

Information You Provide to Us

- **Account Information:** When you create an account using third-party services (like Apple or Google), we may receive information from those accounts with your permission, such as your email to authenticate you within our services.
- **Profile Information:** You may choose to provide additional information about yourself, such as demographic information (age, gender, preferred language) to personalize your experience.
- **Subscription and Payment Information:** When you purchase a subscription, we collect information necessary to process your payment and manage your subscription, including payment history and purchasing tendencies.
- **User Preferences:** We collect information about your preferences within the app, such as complexity, style, and line thickness settings.
- **Content Creation Data:** When you create content using our app, we store the generated content but not the prompts you enter.
- **Social Media Information:** Information about You and Your Interactions with ColorVerse fan pages on social media - such as name and/or user name, posts You like and comment.
- **Customer Support Information:** Information you provide when you contact us for support, share feedback, or report issues, including the details of your

inquiry. When you report inappropriate content, we may collect the prompt that generated the reported content for content moderation and safety purposes only.

Information Collected Automatically

- **Unique Identifiers:** Information from Your account - such as account ID, email address, and IP address. IP address is stored separately from user accounts for operational purposes only.
- **Device Information:** We collect information about your device, including device identifiers (such as device IDs), operating system, platform, screen resolution, and similar technical information to help maintain and improve our service. Device IDs are stored separately from user accounts for operational purposes only.
- **Location Information:** We approximate your location based on your IP address or device settings to provide relevant services and ensure account security.
- **Log Data:** Our servers automatically record information about your interactions with our services, including where you navigate within our app, the date and time of your visit, features you use, and how long you use them.
- **Usage Information:** We collect information about how you interact with our app, including features you use, time spent in the app, in-app generated events, and error or crash reports.
- **Credit System Information:** We track your credit usage history and total credits used within our app.

Information We Do Not Collect from Children Under 14

For users who indicate they are under 14 years of age, we do not collect:

- Email addresses (unless with verifiable parental consent, such as after subscription purchase)
- Demographic information such as gender
- Prompts entered to generate coloring pages

How we use the information we collect, and legal bases for use

How We Use Information

We use the information we collect for the following purposes:

- **To Provide and Maintain Our Service:** Including processing your requests, creating and maintaining your account, storing your preferences, providing customer support, and processing payments and subscriptions.
- **To Improve Our Service:** Analyzing usage patterns and device information helps us understand how users interact with our app, allowing us to diagnose technical issues, improve existing features, and develop new ones.
- **To Personalize User Experience:** Tailoring your experience based on your preferences, usage history, and demographic information to make our app more relevant to you.
- **To Manage User Accounts:** Setting up, verifying, and maintaining your registration, subscription, and credit system.
- **To Communicate With You:** Responding to your inquiries, providing notifications about your account, and sharing important updates about our services.
- **To Ensure Security and Prevent Fraud:** Monitoring and preventing potentially fraudulent activity and protecting our services and community.
- **For Research and Development:** Conducting research to improve our app and develop future products.
- **To Comply With Legal Obligations:** Meeting requirements imposed by applicable laws and regulations.

Legal Bases for Processing (GDPR)

For users in the European Economic Area (EEA) and the UK, we process your personal data based on the following legal grounds:

Performance of a Contract

Processing necessary to deliver our services and fulfill our commitments to you.

This includes:

- Setting up and maintaining your account
- Processing your payments and subscriptions
- Providing the core functionality of our app
- Responding to your customer service requests

Legitimate Interests

Processing for our legitimate business interests, provided these interests are not overridden by your rights. This includes:

- Improving and developing our services
- Protecting the security of our app and preventing fraud
- Understanding how you use our service to create a better experience
- Diagnosing technical problems and administering our app
- Handling legal matters and disputes

You can contact us to understand a specific legitimate interest and obtain information on how we balance our interests with your privacy rights.

Compliance with Legal Obligations

Processing necessary to comply with applicable laws, including:

- Verifying your identity when required by law
- Retaining records as required by law
- Responding to valid legal requests from authorities

Consent

Processing based on your specific consent, which you can withdraw at any time. This may include:

- Marketing communications (unless you opt out)
- Certain types of personalization and targeted content
- The use of certain cookies or similar technologies

How and when we share your information

We may share Your information, including Your personal data which includes but is not limited to billing information or user names, with Our agents, contractors, or service providers who are hired to perform services on Our behalf.

We share your information with third parties only when necessary to provide our services or as required by law. We do not sell your personal information.

Service Providers

We share information with third-party service providers who help us operate our app:

- **Firestore:** We use Google Firestore for authentication, database storage, and cloud services. Firestore collects certain information (such as IP addresses, device identifiers, and usage data) for security purposes, spam prevention, and to maintain the integrity of our services. This data collection is limited to what's necessary for internal operations for all users.
- **RevenueCat:** We use RevenueCat to manage subscriptions and in-app purchases. RevenueCat collects information including device information, App User IDs, purchase history, country/locale, language, platform, and usage to facilitate transactions and manage subscriptions and user entitlements. For subscribers (including children under 13), payment processing through app stores (Apple App Store) serves as a form of verifiable parental consent.
- **Customer Support Tools:** We use customer support platforms to assist with your inquiries and technical issues. If you contact our support team, we may collect and store your contact information and details about your request to improve our service.
- **Analytics Providers:** We use analytics services to help us understand app usage and improve our service. These providers collect device information and usage patterns but do not collect personally identifiable information.

Each service provider must agree to use reasonable security procedures and practices appropriate to the nature of the information involved. Service providers may only use your personal information for the specific purposes we authorize.

Content Sharing

- **User-Initiated Sharing:** You may share content you create using our app through your device's sharing options. When you choose to share content, you control who receives it.

Legal Requirements

We may disclose your information if required to do so by law or in response to valid requests by public authorities (e.g., a court or government agency). This includes:

- Responding to legal process (such as a court order or subpoena)
- Protecting our rights and property
- Preventing fraud or abuse

- Supporting auditing and compliance functions

Business Transfers

If we are involved in a merger, acquisition, or sale of all or a portion of our assets, your information may be transferred as part of that transaction. We will notify you via email and/or a prominent notice on our Application of any change in ownership or uses of your personal information.

With Your Consent

We may share your information with third parties when you have given us your consent to do so.

Special Considerations for Children Under 13

Our application follows a data minimization approach for all users, including children under 13. We only collect information necessary for basic functionality and maintain separation between user identifiers and generated content.

For users under 13 years of age, we limit data sharing even further:

- We only share the minimum information necessary for the operation of our service with our service providers
- We obtain verifiable parental consent before sharing any personal information
- We do not share information with analytics providers beyond what is strictly necessary for internal operations
- Device identifiers used for credit system integrity are stored separately from user accounts
- We do not collect or store prompts entered for generating coloring pages

For safety and content moderation purposes, we collect prompts for reported content only. This information is used solely to investigate the report and improve our filtering systems.

Your options

Account Information

You can access, review, and update your personal information by logging into your account in our Application and going to the Settings tab. Through your the Settings tab, you can also:

- Update your notification preferences
- Manage your linked devices
- Make other changes to your account preferences
- Modify other device-level settings that affect your experience

If you want to delete your account, you can do so in the App or by contacting us at privacy@monroyindustries.xyz.

Subscription Management

You can manage your subscription through the App Store settings on your iOS device.

Communications Preferences

You can opt out of receiving marketing emails by using the "unsubscribe" link or other means specified in marketing emails you receive from us. However, you cannot opt out of receiving all emails from us, such as service announcements and emails about the status of your account.

Data Subject Rights

Our Application provides you the option to access, correct, or delete the personal information we have collected about you. As described in the "Your Rights as a Data Subject" section, depending on your location, you may have additional rights regarding your personal information.

To exercise any of these rights, including deleting your data, please check the App's Settings tab first as most options are available there or contact us at privacy@monroyindustries.xyz.

For more specific information about your privacy rights based on your location, please review the "European Union and UK Privacy Rights" and "US State Privacy Rights" sections of this policy.

Retention and Deletion

We retain your personal information only for as long as necessary to fulfill the purposes for which we collected it, including for the purposes of satisfying any legal, regulatory, tax, accounting, or reporting requirements.

Data Retention Periods

- **Account Information:** We retain your personal data that is tied to your account and your usage of our app as long as you use the services and for a period of 2 years after you last used the service, unless you contact us asking for removal.
- **Device Identifiers:** After account deletion, we may retain device identifiers and records of free credits awarded (de-identified from personal information) to maintain the integrity of our free credit system and prevent abuse.
- **Basic Usage Data:** Information about preferences (complexity, style, line thickness) and credit usage may be anonymized after account deletion so that no direct or indirect identifiers remain, after which we may store the aggregated information for analytical purposes.
- **Customer Support Communications:** We retain information related to customer support inquiries for one year before deletion.
- **Reported Content:** We retain prompts and images for reported content for up to 90 days for investigation purposes, after which they are deleted unless required for legal compliance or ongoing safety improvements.

In case of legal matters or disputes, the storage period for data is governed by the relevant limitation period, so that we can sufficiently defend ourselves against claims, or by the relevant legal obligations to retain documents.

Data Deletion

You can request deletion of your account and associated personal data through the App or by contacting us at privacy@monroyindustries.xyz. We will process your request within 30 days, subject to any legal obligations that may require us to retain certain information.

Security

We value your trust in providing us your personal information, and we are committed to protecting it. We implement appropriate technical and organizational security measures designed to protect the security of any personal information we process, including:

- Pseudonymization of data where appropriate
- Encryption of sensitive information
- User-based access controls and permission levels
- Regular security assessments

However, please remember that no method of transmission over the Internet or method of electronic storage is 100% secure and reliable. While we strive to use commercially acceptable means to protect your personal information, we cannot guarantee its absolute security and do not accept liability for unintentional disclosure. We regularly review our security procedures to consider appropriate new technology and methods, but even with our best efforts, no security measure is perfect or impenetrable.

Our policy on children's information

Our application is designed to be used by people of all ages, including children under 13. We take specific measures to protect all users' privacy in compliance with the Children's Online Privacy Protection Act (COPPA).

Minimal Data Collection

We follow a minimized data collection approach for all users:

- We collect only what is necessary for the basic functionality of the app
- We maintain separation between user identifiers and generated content
- We do not collect or store prompts entered for image generation
- We do not use collected data for behavioral advertising

Children's Data Limitations

For all users, we only collect:

- Basic usage data (complexity, style, line thickness preferences)
- Limited device information (anonymous identifiers used only for operational purposes such as preventing credit abuse)

- Credit system data (balances and usage for operational purposes)
- Anonymous feedback and suggestions (not linked to user identities)
- Reports of inappropriate content (to maintain a safe experience)

We do not collect:

- Email addresses (unless provided through a subscription process, which requires adult verification)
- Prompts used to generate coloring pages
- Precise geolocation
- Photos or videos
- Voice recordings
- Contact information
- Demographic information

Subscription Information

If a user subscribes to our service:

- The subscription process is handled through app store payments which require adult verification
- We may receive an anonymous identifier for subscription management purposes
- Email addresses collected during subscription are used only for account restoration and customer support

Parental Rights

Parents or guardians have the right to:

- Review any information we have collected that may be associated with their child
- Request that we delete any information associated with their child
- Refuse further collection or use of their child's information
- Request that we no longer make available to third parties any information we have collected

To exercise these rights, please view the options in the App's Settings tab or contact us at privacy@monroyindustries.xyz.

Data Sharing

We limit data sharing for all users:

- We only share information with service providers when necessary for the operation of our service
- We ensure these service providers maintain the confidentiality, security, and integrity of any information they obtain from us
- We require these service providers to use reasonable security measures and to use the information only for the purposes for which we disclosed it

International transfer

Your information, including personal data, may be transferred to and maintained on computers located outside of your state, province, country, or other governmental jurisdiction where data protection laws may differ from those of your jurisdiction.

We operate worldwide and may move, process, and store your data in the United States and any other country where we operate or maintain facilities, which may be outside the country where you live. Not all countries provide the same level of data protection.

Some countries where we transfer personal data may allow government authorities greater access than your home country does.

Data Transfers from the EU and UK

For users in the European Union (EU) and United Kingdom (UK), we implement appropriate safeguards for international data transfers:

- **Adequacy Decisions:** When available, we transfer personal data to countries that have been recognized by the European Commission as providing adequate protection for personal data.
- **Standard Contractual Clauses (SCCs):** For transfers to countries without an adequacy decision, we implement the Standard Contractual Clauses approved by the European Commission, which require the recipient to protect your data and provide you with EU-level rights and protections.
- **EU-US Data Privacy Framework:** For transfers to the United States, we may rely on the EU-US Data Privacy Framework when applicable.
- **Additional Protections:** We also implement additional technical protection measures as needed for each data transfer, such as encryption and pseudonymization.

Your consent to this Privacy Policy followed by your submission of personal information represents your agreement to these transfers.

European Union and UK Privacy Rights

If you reside in the European Union or United Kingdom, you have certain rights under applicable data protection legislation. You can ask us to:

- Confirm we process your personal data and provide access to what personal data we have about you.
- Change, update, or correct your personal data.
- Delete your personal data.
- Restrict or stop using some or all of your data if we have no legal right to keep using it.
- Give you a copy of personal data you provided to us in a machine-readable format.

To exercise any of these rights, including to delete your data, you may do so from the App or contact us at privacy@monroyindustries.xyz. You are not required to pay any charge for exercising your rights. If you make a request, we have one month to respond to you. If you think we haven't complied with applicable data protection laws, you have the right to file a complaint with your local data protection authority.

To verify your identity when you make a request, you must provide us with your email address and respond to an email verification request. We will match that information to the information we have in our systems.

Because we operate worldwide, we may transfer the personal data of EU residents to countries outside of the EU and UK. When we do, we use EU's standard contractual clauses or other appropriate safeguards to ensure the protection of your data.

US State Privacy Rights

If you are a resident of California, Colorado, Connecticut, Oregon, Texas, Utah, or Virginia, you may have the following rights under the applicable privacy laws in your state:

- The right to know what personal information we have collected about you, including sources, purpose of collection, and third parties we have shared it with.
- The right to delete your personal information.
- The right to correct inaccurate personal information.
- The right to opt out of the sale or sharing of your personal information.

To exercise any of these rights, please contact us at privacy@monroyindustries.xyz. For requests to know, delete, or correct, we must verify your identity; you must provide us with your email address and respond to an email verification request. We will match that information to the information we have in our systems.

You must use "Request to Know Information", "Right to Know Categories," "Right to Delete," or "Right to Opt out of Sale/Sharing" or "Right to Correct Information" in the subject line of your email, as appropriate. For requests to know, delete and correct, you must provide us with your device id (found in the App's setting page) and email address you used when you created your account, if applicable. Each request must be sent separately.

To designate an authorized agent to act on your behalf, you must send a signed, written authorization containing your name, email address, and phone number to:

Monroy Industries, LLC

Attn: Privacy Requests

522 W Riverside Ave Ste 6698

Spokane, WA, 99201-0580, United States

We will process your request in an efficient manner, but we may not be able to delete all your personal information in certain circumstances, such as:

- To complete ongoing transactions with you
- To detect or address security incidents

- To protect against fraudulent or illegal activity
- To comply with legal requirements
- Or for other legitimate internal purposes permitted by law

If we delete your personal information, many of our services will not work the same for you. For example, your account will be deleted, any saved content will be deleted, and saved preferences will no longer be available.

Do Not Sell or Share My Personal Information

We do not sell or share your personal information for targeted advertising.

Right to Appeal

If you are a Colorado, Connecticut, or Virginia resident and we were unable to fulfill your request, you may appeal by emailing us at privacy@monroyindustries.xyz within fourteen days of our decision, providing a detailed reason for your appeal and your state of residence.

Sensitive Personal Information

We do not collect or process Sensitive Personal Information for inferring characteristics or use or disclose Sensitive Personal Information for purposes other than those permitted by law. In addition, we do not "sell" or "share" Sensitive Personal Information.

California-Specific Rights

Under California Civil Code sections 1798.83, "Shine the Light Act", California residents are entitled to ask Us for a notice describing what categories of personal data We share with third parties or corporate affiliates for those third parties or corporate affiliates' direct marketing purposes. Please note that We do not share Your personal data with any third parties or affiliates for their direct marketing purposes.

CCPA provides consumers who are California residents with specific rights regarding their personal data:

- **Right to Access:** If You are a California resident, You have the right to request, up to two times each year, access to categories and specific pieces of Your personal data that We collect, use and/or disclose.

- **Right to Delete:** If You are a California resident, You have the right to request that We delete Your personal data that We collect, subject to applicable legal exceptions.
- **Right to Opt Out of Sale of Personal Information:** Our App does not sell any personal data.

To make a request regarding Your rights under CCPA as described above, please send an email to privacy@monroyindustries.xyz or write to us, using the address above.

How we make changes to this policy

We may update this Privacy Policy from time to time. We will notify you of any changes by posting the new Privacy Policy on this page and updating the "Last Updated" date at the top of this Privacy Policy.

For material changes that significantly affect your rights or how we use your data, we will provide a more prominent notice (such as an in-app notification or email to the last email address you provided us). Where required by applicable law, we will obtain your consent before implementing such changes.

You are advised to review this Privacy Policy periodically for any changes. Changes to this Privacy Policy are effective when they are posted on this page, unless stated otherwise.

Contact us

If you have any questions, concerns, or requests regarding this Privacy Policy, please contact us by email: privacy@monroyindustries.xyz.