

# Refyn: Data Privacy Policy

**Effective Date: July 12, 2025**

This Data Privacy Policy ("Policy") describes how Refyn, operated by Paul Vincent, a UK-based sole trader ("Refyn," "we," "us," "Ryzomi", "Paul Vincent", or "our"), collects, uses, stores, shares, and protects your personal data when you use our application and website, refyn.art (the "Service").

We are committed to protecting your privacy and handling your personal data in a transparent and lawful manner, in compliance with the UK General Data Protection Regulation (UK GDPR) and the Data Protection Act 2018.

## 1. Identity and Contact Details of the Data Controller

Refyn is the data controller responsible for your personal data processed through the Service.

**Data Controller:** Paul Vincent; **Email for Privacy Inquiries:** ryzomi@gmail.com

## 2. Categories of Personal Data We Collect

We collect various types of personal data to provide and improve the Service:

- **Account Information:** When you create an account, we collect your name, email address, and contact details. If you subscribe to a paid tier, we collect payment card information and transaction history.
- **User Content:** This includes the artwork files (images, video, audio, PDF) you upload to the Service, as well as the prompts you submit to our AI models. These files may contain personal data if they depict identifiable individuals or include personal information.
- **AI Interaction Data:** This encompasses the AI-generated feedback on your artwork and the notes created from that feedback.
- **Location Information:** For the cultural discovery feature, we collect your general location based on your IP address, or precise location if you grant us permission.
- **Usage Data:** We automatically collect information about your interactions with the Service, such as the types of content you view, features you use, actions you take, device information (e.g., IP address, browser type, operating system), and access times.
- **Communication Information:** If you communicate with us (e.g., via email or support tickets), we collect your name, contact information, and the content of your messages.
- **Cookies and Tracking Data:** We use cookies and similar technologies to collect information about your browsing activities on our website and app. Please see our Cookie Policy for more details.

## 3. Sources of Personal Data

We collect personal data from the following sources:

- **Directly from you:** When you register for an account, upload files, submit prompts, make payments, or communicate with us.
- **Automatically:** Through your use of the Service, via cookies and other tracking technologies.
- **From third-party service providers:** If you sign up using a social media account, we

may receive information from those services in accordance with your privacy settings. Our payment processor, Stripe, provides us with transaction data.

## 4. Purposes and Lawful Bases for Processing Your Personal Data

We process your personal data for the following purposes and rely on the following lawful bases under UK GDPR:

Purpose of Processing	Lawful Basis (UK GDPR Article 6)
<b>To Provide and Maintain the Service:</b> This includes managing your account, processing subscriptions, providing AI artwork feedback, generating notes, and offering customer support.	<b>Contractual Necessity (Article 6(1)(b)):</b> Processing is necessary for the performance of a contract with you (our Terms of Service) or to take steps at your request before entering into a contract.
<b>To Enable the Cultural Discovery Feature:</b> Using your location data to provide relevant cultural insights.	<b>Consent (Article 6(1)(a)):</b> We will obtain your explicit consent before collecting and processing your precise location data for this feature. You can withdraw your consent at any time.
<b>To Process Payments:</b> Handling your subscription payments and managing billing.	<b>Contractual Necessity (Article 6(1)(b)):</b> Necessary to fulfill our payment obligations under the Terms of Service. <b>Legal Obligation (Article 6(1)(c)):</b> Necessary for compliance with legal obligations related to financial transactions and tax.
<b>To Improve and Develop the Service:</b> Analyzing usage data, AI interaction data, and feedback to enhance features, performance, and user experience.	<b>Legitimate Interests (Article 6(1)(f)):</b> Our legitimate interest in continually improving our Service for the benefit of our users. Where AI model training is involved (e.g., for OpenAI APIs), this is done with an opt-out mechanism.
<b>For Security and Fraud Prevention:</b> Monitoring for security incidents, protecting against fraud, and ensuring the safety and integrity of the Service.	<b>Legitimate Interests (Article 6(1)(f)):</b> Our legitimate interest in protecting our Service and users from harm. <b>Legal Obligation (Article 6(1)(c)):</b> Compliance with legal requirements related to security and fraud.
<b>To Comply with Legal Obligations:</b> Responding to legal requests, complying with tax and accounting requirements, and adhering to regulatory mandates (e.g., Online Safety Act).	<b>Legal Obligation (Article 6(1)(c)):</b> Necessary to comply with a legal obligation to which Refyn is subject.
<b>For Marketing Communications:</b> Sending you updates, promotions, or information about our services.	<b>Consent (Article 6(1)(a)):</b> For direct electronic marketing, where required. <b>Legitimate Interests (Article 6(1)(f)):</b> For certain types of marketing where we have a legitimate interest and your rights and freedoms are not overridden. You have the right to object or

Purpose of Processing	Lawful Basis (UK GDPR Article 6)
	opt-out at any time.

## 5. Data Sharing with Third Parties

We share your personal data with the following third-party service providers who act as data processors on our behalf:

- **Google Gemini AI:** For processing your uploaded artwork and prompts to generate feedback.
- **OpenAI GPT-4o:** For processing AI feedback to generate concise notes.
- **Stripe:** For secure payment processing and fraud prevention.
- **Replit:** For hosting the Service and storing your uploaded files in a PostgreSQL database.
- **Analytics Providers:** To help us understand how users interact with our Service and improve it.

We have Data Processing Agreements (DPAs) in place with these third parties, where required, to ensure they process your data in compliance with UK GDPR and our instructions. They are obligated to protect your data and use it only for the purposes for which we provide it.

## 6. International Data Transfers

As some of our service providers (Google, OpenAI, Stripe, Replit) are based in the United States, your personal data may be transferred to and stored in countries outside the UK. When we transfer your personal data outside the UK, we ensure that appropriate safeguards are in place to protect your data, such as:

- Transfers to countries deemed to provide an adequate level of protection by the UK government.
- Using Standard Contractual Clauses (SCCs) approved by the UK Information Commissioner's Office (ICO).
- Reliance on approved data privacy frameworks, such as the UK Extension to the EU-US Data Privacy Framework, where applicable.

## 7. Your Data Protection Rights

Under UK GDPR, you have the following rights regarding your personal data:

- **Right to be Informed:** You have the right to be informed about how your personal data is collected and used, which is the purpose of this Policy.
- **Right of Access (Subject Access Request - SAR):** You have the right to request a copy of the personal data we hold about you.
- **Right to Rectification:** You have the right to request that we correct any inaccurate or incomplete personal data we hold about you.
- **Right to Erasure ('Right to be Forgotten'):** You have the right to request the deletion of your personal data in certain circumstances, for example, when it is no longer necessary for the purposes for which it was collected, or if you withdraw your consent. This includes our policy to delete paid-tier files 30 days after subscription cancellation if you do not re-subscribe.
- **Right to Restriction of Processing:** You have the right to request that we restrict the

processing of your personal data in certain situations.

- **Right to Data Portability:** You have the right to receive your personal data in a structured, commonly used, and machine-readable format, and to transmit that data to another controller, where technically feasible.
- **Right to Object:** You have the right to object to the processing of your personal data where we are relying on legitimate interests as the lawful basis, or for direct marketing purposes.
- **Rights related to Automated Decision-Making and Profiling:** You have the right not to be subject to a decision based solely on automated processing (including profiling) that produces legal or similarly significant effects concerning you, unless certain exceptions apply. Where such decisions are made, you have the right to obtain human intervention, express your point of view, and contest the decision.

## How to Exercise Your Rights:

To exercise any of these rights, please contact us at [ryzomi@gmail.com](mailto:ryzomi@gmail.com). We will respond to your request in accordance with applicable data protection laws.

## Right to Lodge a Complaint:

You have the right to lodge a complaint with the Information Commissioner's Office (ICO), the UK's supervisory authority for data protection issues, if you have concerns about how we handle your personal data. Their website is [www.ico.org.uk](http://www.ico.org.uk).

## 8. Data Security Measures

We implement appropriate technical and organizational measures designed to protect your personal data from unauthorized access, destruction, loss, alteration, or misuse. These measures include, but are not limited to, encryption, access controls, and regular security testing. While we strive to protect your personal data, no internet transmission or electronic storage system is entirely secure, and we cannot guarantee absolute security. We encourage you to use strong, unique passwords and protect your login credentials.

## 9. Children's Data

The Service is not intended for individuals under the age of 18. We do not knowingly collect personal data from children under 18. If we become aware that we have collected personal data from a child under 18 without verifiable parental consent, we will take steps to delete that information.

## 10. Changes to This Privacy Policy

We may update this Privacy Policy from time to time. When we do, we will revise the "Effective Date" at the top of this Policy. We will notify you of any material changes by posting the new Policy on this page or by other means, such as email, prior to the change becoming effective. We encourage you to review this Policy periodically for any changes.