

# Privacy Policy

**Effective Date: 17:11:2024**

TOBY & ABI LTD, MyBrainPill and its subsidiaries or affiliates (collectively, "MyBrainPill", "we", "us" and "our"), takes your privacy seriously. This privacy policy ("Privacy Policy") explains how we collect, use and share Personal Information when you use our brain training mobile application ("App") or visit our website ("Site") (collectively, the "Services").

## Data Controller Information

The data controller for the purposes of the General Data Protection Regulation (GDPR) and other applicable data protection laws is:

TOBY & ABI LTD

7 Cambridge Street

READING

RG1 7PA

United Kingdom

**Email:** [kayode@mybrainpill.com](mailto:kayode@mybrainpill.com)

**Website:** <https://www.mybrainpill.com>

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## **What Information Do We Collect?**

### **Information You Provide Directly**

#### **Account Information**

- Username/display name (optional)
- Email address (for account recovery and communication)
- Age range (for age-appropriate content)
- Unique user ID (generated automatically)

#### **Training Data**

- Game scores and performance metrics
- Training session duration and frequency
- Cognitive assessment results
- Progress tracking data
- Training preferences and settings

#### **Device and Technical Information**

- Device type and model (iPhone, iPad, Android device)
- Operating system and version
- App version
- Language settings
- Country/region where app was downloaded
- IP address (for security and fraud prevention)
- Advertising identifiers (Google Advertising ID, Apple IDFA/IDFV)

#### **Optional Information**

- Feedback and support requests
- Survey responses
- User-generated content (if applicable)

### **Information Collected Automatically**

#### **Usage Analytics**

- App opens and session duration
- Button clicks and page views
- Feature usage patterns
- Training completion rates

- Time spent on different activities
- Crash reports and error logs

## How Do We Use Your Information?

We use your information for the following purposes:

### Core App Functionality

- Provide personalized brain training experiences
- Track your cognitive progress and performance
- Deliver customized daily workouts
- Sync data across your devices
- Provide customer support

### Service Improvement

- Analyze app performance and user engagement
- Develop new games and features
- Fix bugs and technical issues
- Conduct research to improve cognitive training effectiveness

### Communication

- Send important service updates
- Provide customer support responses
- Deliver push notifications (with your consent)
- Send marketing communications (with your consent)

### Legal and Business Operations

- Comply with legal obligations
- Prevent fraud and abuse
- Protect our rights and property
- Business transfers (with notice)

## Legal Basis for Processing

Under GDPR, we process your data based on:

- **Consent (Art. 6(1)(a))**: For marketing communications, optional features, and advertising
- **Contract Performance (Art. 6(1)(b))**: To provide our services and app functionality
- **Legal Obligations (Art. 6(1)(c))**: To comply with applicable laws

- **Legitimate Interests (Art. 6(1)(f)):** For analytics, security, fraud prevention, and service improvement

## How Do We Share Your Information?

We do not sell your personal information. We may share your information in the following circumstances:

### Service Providers

- Cloud hosting services (AWS, Google Cloud)
- Analytics providers (Firebase, Google Analytics)
- Customer support platforms (Zendesk)
- Payment processors (Google Play, Apple App Store)

### Legal Requirements

- Law enforcement agencies when legally required
- Regulatory authorities for compliance
- Legal proceedings and court orders

### Business Transfers

- In connection with mergers, acquisitions, or asset sales
- You will receive 2 weeks' notice and can delete your account before transfer

### Aggregated Data

- We may share anonymized, aggregated statistics that cannot identify you

## Data Storage and Security

### Data Protection Measures

- Encryption of data in transit and at rest
- Regular security assessments and vulnerability testing
- Access controls and authentication measures
- Secure cloud infrastructure with AWS/Google Cloud

### Data Location

- Primary servers located in the EU/UK/US
- Backup servers may also be located in the US (with appropriate safeguards)
- All international transfers comply with GDPR requirements

## International Data Transfers

When we transfer your data outside the UK/EU, we ensure adequate protection through:

- Adequacy decisions by the European Commission
- Standard Contractual Clauses (SCCs)
- Certification schemes (e.g., EU-US Data Privacy Framework)

US-based service providers are certified under the EU-US Data Privacy Framework where applicable.

## Data Retention

We retain your personal data only as long as necessary for:

- **Account Data:** Until account deletion or 3 years of inactivity
- **Training Data:** Until account deletion or as required for service provision
- **Support Requests:** 2 years after resolution
- **Analytics Data:** 26 months (anonymized after 14 months)
- **Legal Compliance:** As required by applicable laws

## Your Rights Under GDPR

You have the following rights regarding your personal data:

**Right of Access:** Request confirmation of data processing and access to your data **Right to Rectification:** Correct inaccurate or incomplete data **Right to Erasure:** Request deletion of your data under certain circumstances **Right to Restrict Processing:** Limit how we process your data **Right to Data Portability:** Receive your data in a portable format **Right to Object:** Object to processing based on legitimate interests **Right to Withdraw Consent:** Withdraw consent for consent-based processing

### How to Exercise Your Rights:

- Email: [kayode@mybrainpill.com](mailto:kayode@mybrainpill.com)
- In-app settings (for some rights)
- Contact our support team

## Your Rights Under CCPA (California Residents)

If you are a California resident, you have additional rights:

**Right to Know:** What personal information we collect, use, and share **Right to Delete:** Request deletion of your personal information **Right to Opt-Out:** We do not sell personal information **Right to Non-Discrimination:** Equal service regardless of privacy choices

## Children's Privacy

### Age Requirements

- Our app is intended for users 13 years and older
- Users under 16 in the EU need parental consent for data processing
- We do not knowingly collect data from children under 13

### Parental Rights

- Parents can review, modify, or delete their child's information
- Contact [kayode@mybrainpill.com](mailto:kayode@mybrainpill.com) for assistance

## Cookies and Tracking

### Website Cookies

- **Essential Cookies:** Required for website functionality
- **Analytics Cookies:** Help us understand website usage (with consent)
- **Marketing Cookies:** For advertising and marketing (with consent)

### Mobile App Tracking

- We do not track users across third-party apps or websites
- In-app analytics help us improve app performance
- You can opt out of analytics in app settings

## Third-Party Services

### App Store Platforms

- Google Play Store: [Google Privacy Policy](#)
- Apple App Store: [Apple Privacy Policy](#)

### Analytics and Infrastructure

- **Google Firebase:** For app analytics and infrastructure
- **AWS:** For cloud hosting and data storage
- **Google AdMob:** For advertising (with consent)

## Advertising

- We may show ads using Google AdMob and other ads providers
- You can opt out of personalized ads in app settings
- Ads are removed with premium subscription

## Device Permissions

### iOS Permissions

- **Camera:** For profile pictures and feedback (optional)
- **Notifications:** For training reminders (optional)
- **Face ID/Touch ID:** For app security (optional)

### Android Permissions

- **Storage:** For local data backup (optional)
- **Notifications:** For training reminders (optional)
- **Fingerprint:** For app security (optional)
- **Network Access:** For app functionality (required)

All permissions are requested only when needed for specific features.

## Changes to This Policy

We may update this Privacy Policy from time to time. When we do:

- We will post the updated policy on our website and in the app
- We will update the "Effective Date" at the top
- For material changes, we will provide prominent notice
- Continued use constitutes acceptance of changes

## Contact Us

### Privacy Officer

MyBrainPill

Email: [kayode@mybrainpill.com](mailto:kayode@mybrainpill.com)

### General Support

Email: [kayode@mybrainpill.com](mailto:kayode@mybrainpill.com)

### Data Protection Authority

If you have concerns about our data practices, you can contact:

- UK: Information Commissioner's Office (ICO) - <https://ico.org.uk>
- EU: Your local data protection authority