

Privacy Policy — Cheri: Chair Yoga for Seniors

Effective Date: September 19, 2025

This Privacy Policy explains how **Sofia Naumova** ("Company," "we," "us," or "our") collects, uses, shares, and protects your personal information when you use the **Cheri: Chair Yoga for Seniors** mobile application (the "App"), related websites, and services (together, the "Service").

1. Who We Are

Controller: Sofia Naumova

Email: support@anxietyrelief.app

2. Information We Collect

a) Information You Provide

- Name, email address, and contact details.
- Age range, gender, and other basic profile information.
- Health and wellness information you choose to provide to tailor the App experience (e.g., fitness level, limitations, goals).
- Payment information if you purchase a subscription (processed by third-party payment providers; we do not store full card details).

b) Automatically Collected Information

- Device details (model, operating system, unique device identifiers).
- IP address, language, time zone, app version.
- Usage data (frequency of sessions, features used, in-app preferences).
- Crash logs and troubleshooting data.

c) Cookies, SDKs, and Similar Technologies

On our website we use cookies and similar tools; in our App we may use SDKs for analytics and, where applicable, advertising/attribution. In regions that require it (e.g., EEA/UK), **non-essential cookies/SDKs are used only**

with your consent, which you can manage via **Cookie Settings** (web) or in-app **Privacy Controls**.

3. How We Use Your Information

- Provide and operate the App (create routines, track progress, deliver content).
- Personalize your experience based on your goals and needs.
- Communicate with you (customer support, updates, and — where consented — marketing).
- Process payments and manage subscriptions.
- Ensure safety, prevent fraud, and comply with legal obligations.
- Improve the App, troubleshoot, and analyze performance.

4. Legal Bases for Processing

- **Contract** – to provide the Service you requested.
- **Consent** – for marketing communications, optional features, and certain analytics/SDKs.
- **Legitimate Interests** – to improve the Service, prevent fraud, and ensure security (balanced against your rights).
- **Legal Obligation** – to comply with applicable laws (e.g., tax, accounting).
- **Explicit Consent (GDPR Art. 9(2)(a))** – when processing **health data** that you choose to provide.

Special Category Data & Explicit Consent. Certain information you provide (e.g., fitness level, limitations, goals) may qualify as **health data**. We process such data **only with your explicit consent** (e.g., a dedicated checkbox during onboarding), which you may withdraw at any time in settings or by contacting us. If you withdraw consent, some personalization features may be unavailable, but the core App experience will remain accessible.

5. Sharing Your Information

We do **not** sell your personal data. We may share your data with:

- **Service Providers** (hosting, analytics, customer support, and payment processing).

- **Advertising/Attribution Partners** (to deliver relevant ads or measure campaigns — never including health data).
- **Affiliates** within our corporate group.
- **Authorities** when required by law or to protect rights, safety, and security.

6. International Data Transfers

Where we transfer personal data outside your country (including from the EEA/UK to third countries), we use appropriate safeguards such as the **EU Standard Contractual Clauses (SCCs)** and the **UK International Data Transfer Addendum (IDTA)**, plus additional technical and organizational measures where appropriate.

7. Data Retention

We retain personal data only as long as necessary for the purposes described:

- **Account data:** while your account is active and **24 months** after last activity.
- **Support & communications:** **24 months**.
- **Technical logs/crash data:** **12 months**.
- **Consent records:** life of the account + **5 years**.
- **Billing records (from payment providers):** as required by tax/accounting laws (typically **5–7 years**).

When no longer needed, we **delete or anonymize** the data.

8. Data Security

We implement technical and organizational measures to protect your data, including encryption in transit and at rest, role-based access, and vulnerability monitoring. We maintain an incident response program and will notify you and/or regulators **where required by law** in the event of a data breach affecting your personal information.

9. Children's Privacy

The App is intended for adults. We do not knowingly collect personal data from **children under 13** (US) or **under 16** (EEA/UK). If you believe a child has provided data, contact us and we will delete it.

10. Your Privacy Rights

Depending on your location, you may have rights such as access, correction, deletion, restriction, objection, portability, withdrawal of consent, and the right to lodge a complaint with a supervisory authority. To exercise your rights, use **[link to request form]** or email **support@anxietyrelief.app**. We may ask for information to verify your identity. We respond within **1 month** (EEA/UK) or **45 days** (California), extendable where permitted by law.

11. California Privacy Rights (CCPA/CPRA)

California residents have the rights to **know**, **access**, **correct**, and **delete** personal information; to **opt out of the sale or sharing** of personal information for cross-context behavioral advertising; and to **limit the use and disclosure of sensitive personal information**. We honor the **Global Privacy Control (GPC)** signal for opt-out requests. You can exercise these rights via **[link to in-app/web form]** or **support@anxietyrelief.app**. We do **not** sell your personal information for money, and we do **not** use health data for advertising.

12. Changes to This Privacy Policy

We may update this Privacy Policy from time to time. Any changes will be posted within the App and/or website with the updated effective date. We encourage you to review this Policy regularly.

13. Contact

Email: support@anxietyrelief.app