

PRIVACY POLICY – FLUID FOCUS

Thank you for using our website and/or our App.

Before using the Fluid Focus App or Services, someone over 18 acting on your behalf (such as a parent or guardian)) need to have agreed to our standard user Terms of Use.

If you are younger than 13, you cannot use the Fluid Focus App. If we believe you are underage or have (or anyone else has) misrepresented your age or consent for you to use the App, we will revoke access to the services and delete all information relating to you from our system (without notice and without liability).

This Policy

This privacy policy (**policy**) is applicable for those under the age of 18 and is just a scaled-back version of our full privacy policy which is available here: <https://www.fluidfocus.app/our-privacy-policy>. Please read that full policy (or ask a parent or guardian to help you) to get the full level of detail. Or please contact us directly – we'd love to hear from you.

This policy talks about how we look after your information when you interact with our website, our app (which is called "**Fluid Focus**") and the Services available through it. It explains how we handle information that identifies you (which is called your "**personal data**"), your privacy rights, and the legal protections in place.

You should be aware that there are risks of giving out your information, and only ever disclose the least amount possible and only to people and companies you trust.

Third parties

Please be aware that, if you download the Fluid Focus App through an App Store, you will also be subject to their terms and privacy policy, which you should read separately. Our website and the App may also include links to third-party websites, plug-ins and applications. We are not responsible for any content or material you may see or your interactions with such third parties – please take care when interacting with them or anyone on the internet. When you do so, you could be giving them your information – and we can't control or be responsible for how they could use it.

1. WHO WE ARE

1.1 Contact Details

Full Name of Legal Entity:	Fluid Focus Ltd, a company incorporated in England under registered company number 14337365.
Postal Address:	Ulster Bank Accelerator Hub 11-15 Donegall Square East Belfast BT1 5HD
ICO Registration Number:	ZB660175
Contact email address:	help@fluidfocus.app

- 1.2 Under data protection law (like GDPR), we are known as the "controller" of your information. We may occasionally appoint third parties to access or use your information on our behalf (and those third parties are known as "processors").

2. FLUID FOCUS APP

What kind of information do we use on the App?

- 2.1 When you use our App, we may collect and use different kinds of information about you, which we have grouped together as follows:

- **Technical Data** which is your device ID, which will be used to facilitate support queries related to your device profile; and

- **Usage Data** which is a record of all completed “focus sessions” and “rest sessions” associated with your device profile, which may include your interactions with ‘focus music’, ‘focus breathwork’ and ‘focus meditation’ sessions, the active and inactive screen-time metrics for the device on which the Fluid Focus App has been installed and how you have earned and used “Fluid Coins”; and
- **Identity Data** which is a record of your general occupation (with the following options; School Student, College Student), and age range (bucketed into the following; Under 18).

Other than the Health Data that you choose to put into the App (as described in further detail below), we do not collect any “sensitive information” about you.

2.2 When you choose to create an account with the Fluid Focus App, we may also collect, receive, use, store and transfer the following different kinds of personal data about you:

- **Account Registration Data** which is the data you provide to us when creating an in-app account in the Fluid Focus App. This may include your name, surname, online username or similar identifier, your email address and telephone number.

If you choose to create an account with your Apple Inc. (USA) (**Apple**) account or Meta Platforms Ireland Ltd. (Ireland), Meta Platforms, Inc. (USA) (**Facebook**), or Google Ireland Ltd. (Ireland), Google LLC (USA) (**Google**) or you later decide to connect your Apple, Facebook or Google account to your Fluid Focus App account, you will be transferred from the Fluid Focus App to the website of Apple, Facebook or Google and asked to enter the log-in details for your Apple ID, Facebook or Google account.

In these circumstances, we will receive certain data from Apple, Facebook or Google (as applicable) as follows:

- If you enter your Apple ID log-in details, we will receive the following data from Apple regarding your Apple ID account (you may choose not to provide your email address by using Apple’s Private Email Relay Service): full name; email address; and Apple ID.
- If you enter your Facebook log-in details, we will receive the following data from Facebook regarding your Facebook account (you may choose not to provide your email address): full name; email address; and Facebook account ID.
- If you enter your Google log-in details, we will receive the following data from Google regarding your Google account: profile photo; full name; Google account ID; and email address.

Please note that the profile photo and/or name used for your Apple ID, Facebook or Google account will not be used for your Fluid Focus App account and will not be visible to other users of the Fluid Focus App.

- **Health Data** which is health data that you choose to input into the Fluid Focus App. You may choose to record mood and/or sleep quality information (for example, mood can be logged via an emoji reaction, while sleep can be logged through a swipeable time bar) while using the Fluid Focus App. This information will not be visible to other users of the Fluid Focus App. You may withdraw your consent to this use of your data at any time by deleting your Fluid Focus App account.
- **Location Data** - there is no location data tracking occurring in our App. The only location-related information used during sign-up is the country provided by the App Store / Google Play, which is used for eligibility and regional checks. Beyond that, we do not perform ongoing location tracking or collect GPS/location data.
- **Financial Data** where you (or someone on your behalf) choose to purchase a premium subscription through the Fluid Focus App, all payments are processed entirely by Apple Inc. via the Apple App Store or Google LLC via Google Play. Payment transactions are handled directly by Apple or Google under their respective terms; we do not collect, process or store any payment card or financial details.

- We may receive limited transaction data from Apple or Google – such as confirmation of a successful purchase or current subscription status – solely to verify entitlement to premium features within the Fluid Focus App.
- If you are making a purchase using an account that is not yours (for example, a parent's Apple ID or Google account), you must bring this notice to the account holder's attention and obtain their permission before proceeding. The account holder is responsible for all purchases made under their account, remains the primary account holder, and is the data subject in respect of any personal data processed in relation to that payment account.
- For further information on how payment data is handled, please refer to Apple's App Store Terms of Service at <http://www.apple.com/legal/internet-services/itunes/us/terms.html> and Google Play's Payment Policy at https://payments.google.com/payments/apis-secure/get_legal_document?ldo=0&ldt=buyertos&ldr=uk.
- Please note: if you access the Fluid Focus App through your school, college or academic institution's licence, premium features are provided through your institution and this section does not apply to you.

2.3 Where we need to collect information by law, or under the terms of a contract we have with you, and you don't provide that information, we may not be able to perform the contract we have or are trying to enter into with you. In this case, you may not be able to use the App.

2.4 It is important that the data we hold about you is correct and current. Please let us know if your information changes.

How do we use that app information?

2.5 We use your information when you use our app:

- to operate, maintain support and improve the App and its features and Services;
- to give you access to and allow your use of the App and Services and benefits (including the generation of statistics and insights regarding use of the App, and support generation and use of our "Fluid Coins");
- to anonymise your information so that it can't be used to identify you anymore. We might then package that anonymous information and use it to run and expand our business and to share it with your school, college or academic institution who has authorised your use of the App and Services;
- ancillary purposes, such as back-ups and archiving;
- dealing with legal obligations (such as compliance with tax law, identity verification requirements and preparing company accounts) and disputes.

2.6 We rely upon your consent in order to: (a) place the App on your device, and for it to operate alongside the other apps on your phone and gather the metrics used to support "focus sessions" and "rest sessions" and generate "Fluid Coins". You give your consent for us to do this by downloading, opening and configuring use of the App; and (b) process your Health Data. You give your consent for us to do this when you choose to record your mood and/or sleep quality information while using the App.

This consent can be withdrawn by you by deleting the App from your phone or by emailing help@fluidfocus.app.

2.7 We may also use your information where needed for a contract with you, where required by law or where it is in our legitimate interests.

3. OUR WEBSITE & SERVICES AND OTHER INTERACTIONS WITH US

What kind of information do we use when you use the website and services?

3.1 We may collect the following types of information depending on how you use our website or contact us:

- your name, last name, online username or similar identifier (**Identity data**);
- email address and telephone number (**Contact data**);

- technical information about your phone, computer or device that you use to access our website or App (**Technical data**);
- information about your use of our website, including your journey through the login and sign-up process (**Usage data**); and
- information provided by you in a survey or questionnaire.

We do not collect any “sensitive information” about you.

3.2 Where we need to collect information by law, or under the terms of a contract we have with you, and you don't provide that information, we may not be able to perform the contract we have or are trying to enter into with you. In this case, you may not be able to use the App.

3.3 It is important that the data we hold about you is correct and current. Please let us know if your information changes.

How is this information used?

3.4 We use your data for the following reasons:

- To deliver our App, website and services to you;
- To maintain our App and website and facilitate support queries to help ensure your App is functioning as it should be;
- To understand how you use our App and website;
- to anonymise your information so that it can't be used to identify you anymore. We might then package that anonymous information and use it to run and expand our business;
- To develop and improve our App, website and Services;
- To communicate with you about our App and website;

3.5 Our legal basis for using your information in this way is because it is necessary:

- to deliver our agreement with you to provide our App and Services;
- for our legitimate interests in (which might be: running our company; delivering our website and services to you; administering our IT and computer systems or to advertise our business, the app and services);
- with your consent; or
- where we have to by law.

4. WHAT INFORMATION IS SHARED?

4.1 Keeping your information secure is important to us. We do not disclose your information outside Fluid Focus unless it is necessary in the delivery of our Services to you, or where we are required by law.

4.2 We may share your information with the following third parties:

- your school, college or academic institution who has authorised your use of the App and Services. Any data shared with these institutions will be limited to anonymous information that cannot be used to identify you, such as statistics on the usage of particular elements of the Services or App, or details of how users have generally interacted with Fluid Focus or achieved certain outcomes or results via the App;
- service providers who help us to provide and deliver our website and App or who carry out survey and questionnaire services for us;
- with law enforcement authorities or others in connection with legal matters;
- public authorities and regulators;
- professional advisers;
- with people you tell us; and
- if we buy, sell or merge any of our business or assets with another company.

4.3 Most of these recipients are in the UK or Europe. Where they are in other countries (like our app developers, who are based in the European Union and Ukraine, with data stored on UK or EU based servers), we make sure you can expect the same level of data protection as applies in the UK or Europe.

- 4.4** Where we have transferred your information to anyone else, we require them to act in accordance with the law and keep your data secure.

5. HOW IS YOUR INFORMATION SECURED?

- 5.1** No method of transmission, or method of electronic storage, is 100% secure. Therefore, we cannot guarantee absolute security but we have put in place appropriate measures to prevent your information from being accidentally lost, used, or accessed in an unauthorised way, altered or disclosed. We also limit access to your information we hold to only those who have a need to know. They are required to only process your information on our instructions and they are subject to duties of confidentiality.
- 5.2** We have procedures to deal with any suspected breach and will notify you and any applicable regulator of a breach where we are legally required to do so.

6. YOUR LEGAL RIGHTS

- 6.1** Under certain circumstances, you have rights under data protection laws in relation to your information. In relation to your information, you can: ask for a copy; ask us to correct any mistakes; ask us to delete it; complain to us about how we are using it; complain to the ICO about how we are using it (www.ico.org.uk); ask for it to be given to someone else; withdraw your consent to us using it.
- 6.2** If you are a citizen of the United States in California, Colorado, Utah, Connecticut or Virginia, you may have certain rights under the data protection laws for your state.
- 6.3** Please contact us if you want to use any of these rights. We try to respond to all legitimate requests within one month. Occasionally it may take us longer than a month, if this is the case we will notify you and keep you updated. We may not always be able to comply with your request, but we will explain why not.

7. DATA RETENTION & DELETION

- 7.1** We will only retain your information for as long as needed for the reason it was originally collected. Depending on the information, this usually means we will keep it whilst either: a) valid grounds for using it exist; or b) for up to two months following termination of your App user account; or c) for fourteen months following last use of your Fluid Focus account.
- 7.2** In some circumstances we may anonymise your information (so that it can no longer be associated with you) for research or statistical purposes in which case we may use this information indefinitely without further notice to you.

8. WHAT HAPPENS IF YOU HAVE A QUESTION OR COMPLAINT?

- 8.1** If you any questions or are concerned about the way Fluid Focus is handling your information, please do not hesitate in contacting us by emailing us directly at help@fluidfocus.app with the subject line "Data Privacy".
- 8.2** If you would like to cancel your Fluid Focus App user account and initiate deletion of your information, you may do so by contacting us at: help@fluidfocus.app. As above, we will retain and use your information as necessary to comply with our legal obligations, resolve disputes, maintain security, and enforce our agreements, but barring legal requirements, the timeframe above will be observed for deletion.

9. LEGAL

This policy shall be governed by and interpreted in accordance with the laws of Northern Ireland, and you agree that the courts of Northern Ireland shall have exclusive jurisdiction to settle any dispute which may arise out of, under, or in connection with this policy, the Fluid Focus website or Fluid Focus App or Fluid Focus' use of your information.