WELLCOME-APP

PRIVACY POLICY

Effective: October 2026

A. General Information

1 In accordance with the applicable data protection provisions of the EU General Data Protection Regulation ("**GDPR**"), we provide the following information regarding the processing of your personal data by wellcome gGmbH ("**we**," "**us**") in connection with the use of our mobile application "Eltern-App" (hereinafter "**App**").

2 The App is an accessible, digital service designed to support parents during the first 1,000 days after the birth of a child; it aims to strengthen parenting skills, alleviate the burdens of daily family life, and promote parental well-being.

3 This Privacy Policy applies to all processing of personal data that takes place in connection with the use of the App – including registration, use of the App's features, communication via the App, and management of your user account.

B. Contact Information for the Data Controller

4 The controller within the meaning of Art. 4(7) GDPR is:

wellcome gGmbH
Hoheluftchaussee 95
20253 Hamburg
Email: datenschutz@wellcome-online.de

If you have any questions regarding data protection, please contact us using the contact information provided above.

5 You can reach our Data Protection Officer using the following contact information:

DIP Datenschutz GmbH
Ulrich Schreiber, Managing Director
Groenerstr. 25
71636 Ludwigsburg

C. Categories of Data Subjects

6 To operate the App, we process personal data about:

- **Users of the App** (parents and legal guardians who use the App);
- **Children**, to the extent that their data is processed through their legal guardians' use of the App;
- **Partners and service providers**, as well as their employees, to the extent that their data is processed in connection with the use of the App.

7 The following sections provide further details on the data processing activities for the aforementioned groups of individuals. General information applicable to all groups of individuals can be found in Sections F through L.

D. Processing of Personal Data of App Users

I. What data do we process?

8 In connection with the use of the App, we process the following categories of data in particular:

- **Data on children:** name, date of birth, age, gender (if applicable), and profile photo, as well as other information about children voluntarily provided by the user (e.g., developmental status, health information, allergies);
- **Communication data:** messages and content sent via the App (e.g., chat messages, forum posts, feedback);
- **Usage data:** information about the use of the App, in particular content accessed, interactions within the App, time and duration of use, and features used;
- **Personalization data:** voluntarily provided information regarding family situation and living circumstances, in particular relationship status (e.g., married, separated parents raising children, co-parenting), whether there are siblings, parental role (e.g., mother, father), as well as general interests or preferred topics;
- **Registration and account data:** username, password (encrypted), language settings, notification preferences, profile photos of users and their children;
- **Personal and contact information:** first name or pseudonym, email address, date of birth;
- **Location data:** postal code (required during onboarding) to display local support services;
- **Mood and well-being data:** results of well-being surveys or self-reflection tests (e.g., Edinburgh Postnatal Depression Scale), information regarding psychological stress, sentiment analysis results from chat histories;

- **Technical device data:** device type, operating system and version, App version, unique device identifiers (e.g., device ID), IP address, device language settings.

II. Data Sources

9 We generally receive personal data directly from you, particularly during registration and while you are using the App. In addition, data may come from the following sources:

- **App store providers** (Apple App Store, Google Play Store), to the extent that they transmit data to us during the download process;
- **Publicly available sources**, to the extent necessary for the provision of content;
- **Technical data** automatically transmitted by your device when you use the App (e.g., IP address, device information).

III. Purposes of Processing and Legal Bases

10 We process your personal data to provide and improve the App, to deliver our services, and to communicate with you.

11 Specifically, we process your data for the following purposes and on the following legal bases:

Purpose	Legal Basis
Provision of App features and content	Art. 6(1)(b) GDPR (performance of a contract)
Registration and management of your user account, including user authentication and identification (e.g., login) as well as the storage and management of user settings (e.g., selected App language, notification preferences)	Art. 6(1)(b) GDPR (performance of a contract)
Communication with users (e.g., notifications, support)	Art. 6(1)(b) GDPR (performance of a contract)
Processing of data when using the AI-powered chatbot, as well as the creation of AI-based summaries as a chat memory; AI-assisted generation of "milestone emails" about milestones in parenting and the child's development	Art. 6(1)(b) GDPR (performance of a contract); to the extent that health data is involved, Art. 9(2)(a) GDPR (consent)
Personalization of the App and provision of personalized article, course, and training recommendations, as well as	Art. 6(1)(a) GDPR (consent); to the extent that health data is involved, Art. 9(2)(a) GDPR (consent)

individualized, AI-generated daily inspiration	
Processing of special categories of personal data (e.g., conducting well-being surveys and self-reflection tests; processing information regarding psychological stress; chat histories, to the extent they contain health-related information; and health data of children, to the extent voluntarily provided)	Art. 6(1)(a) GDPR in conjunction with Art. 9(2)(a) GDPR (consent)
Forwarding of counseling inquiries to external experts and midwives	Art. 6(1)(a) GDPR (consent); to the extent that health data is involved, Art. 9(2)(a) GDPR (consent)
Processing of data relating to children (e.g., age and developmental information to provide age-appropriate content)	Art. 6(1)(a) GDPR (consent) or Art. 6(1)(b) GDPR (performance of a contract)
Location-based services (e.g., searching for nearby services)	Art. 6(1)(f) GDPR (legitimate interest in displaying local support services based on your postal code)
Analysis and improvement of the App (e.g., usage statistics, error analysis)	Art. 6(1)(a) GDPR (consent); Art. 6(1)(f) GDPR (legitimate interest)
IT security measures and fraud prevention, as well as error tracking and technical logging	Art. 6(1)(f) GDPR (legitimate interest)
Sending advertising and marketing content (newsletters, product recommendations)	Art. 6(1)(a) GDPR (consent)
Compliance with legal obligations (e.g., tax and commercial law retention requirements)	Art. 6(1)(c) GDPR (legal obligation)
Assertion, exercise, or defense of legal claims	Art. 6(1)(f) GDPR (legitimate interest)

IV. Necessity of Providing Data

12 Providing your personal and contact information, as well as your registration data, is necessary for the establishment and performance of the user agreement. Without the required data, we cannot grant you access to the App or provide the App's features.

13 Providing additional data (e.g., health data, profile photo) is voluntary. Without this information, certain features of the App may not be available to you or may be available only to a limited extent.

V. Use Without Registration (Guest Mode)

14 You have the option to skip registration and use the AI-powered chatbot for seven days without creating a user account ("Guest Mode"). In this case, we process only the data that is technically necessary for the operation of the chatbot or that you actively provide in the chat; we do not collect personal, contact, or registration data (see Section D.I.). In Guest Mode, we process, in particular, the communication data you provide during the chat as well as technical device data (each described in more detail in Section D.I.). Depending on the information you provide to the chatbot, this may also involve special categories of personal data, in particular health data.

15 The legal basis for processing in Guest Mode is the performance of a contract (Art. 6(1)(b) GDPR) and, to the extent that health data is involved, your explicit consent (Art. 9(2)(a) GDPR). We obtain this consent before you use the chatbot for the first time; the chatbot function is activated only after you have given your consent. Without this consent, you cannot use the chatbot.

16 You may also withdraw your consent at any time in Guest Mode, effective for the future. You may also exercise your rights as a data subject (see Section I. "Your Rights as a Data Subject") without a user account; to do so, please use the contact information provided in Section B. To process your request, it may be necessary for you to provide us with additional information that allows us to associate the data processed in Guest Mode with you.

VI. Retention Period

17 Your personal data will be deleted as soon as it is no longer necessary to achieve the purpose for which it was collected.

- **Chat histories and AI summaries:** are deleted upon deletion of the user account or upon withdrawal of consent; anonymization takes place if the data is further used for analytical purposes;
- **Communication data:** will be deleted upon completion of the communication, provided there are no legal retention requirements;
- **Account data:** will be deleted after your user account is deleted, provided there are no legal retention requirements to the contrary;
- **Usage data:** is generally anonymized or deleted after 12 months;
- **Mood and well-being data:** is deleted upon deletion of the user account or upon withdrawal of consent.

E. Processing of Children's Personal Data

I. Special Protection of Children's Data

18 The protection of children's personal data is particularly important to us. The App is intended for parents and legal guardians. Independent use by children is not intended. To the extent that

children's personal data is processed in connection with the use of the App, this is done exclusively through input by the legal guardians and under their responsibility.

II. Types of Data and Legal Bases

19 The processing of children's data (e.g., name, date of birth, age, profile photo, and, if applicable, health data) is carried out exclusively for the purpose of providing the App's features (e.g., age-appropriate content, developmental information). The legal basis is Art. 6(1)(b) GDPR (performance of a contract) in conjunction with the consent of the legal guardian(s). To the extent that special categories of personal data (e.g., health data) are processed, we base this processing on consent pursuant to Art. 6(1)(a) GDPR in conjunction with Art. 9(2)(a) GDPR.

III. Retention Period

20 Children's data is deleted after the user account is deleted or after the relevant data is removed by the parent or legal guardian, provided that no statutory retention obligations preclude this.

F. Tools and Service Providers Used

I. Hosting and Infrastructure

21 The App and the associated backend systems are hosted by Amazon Web Services ("**AWS**")

Amazon Web Services EMEA SARL
38 Avenue John F. Kennedy
1855 Luxembourg

as the cloud infrastructure provider. The data is stored and processed within the EU. No data is transferred to third countries. A data processing agreement exists in accordance with Art. 28 GDPR.

II. Push Notifications

22 To send push notifications to Apple devices, we use the "Apple Push Notification Service" from

Apple Distribution International Limited
Hollyhill Industrial Estate
Cork
Ireland
("**Apple**")

and for Android devices, "Google Firebase Cloud Messaging" from

Google Ireland Limited,
Gordon House, Barrow Street

Dublin 4
Ireland
("**Google**").

23 In this process, technical device data (e.g., device tokens) is transmitted to Apple or Google. You can disable push notifications at any time in your device's settings.

III. AI-Powered Chatbot

24 The App includes an AI-powered chatbot for non-medical parenting advice. The chatbot is based on the Amazon Nova Large Language Model ("**LLM**") from

Amazon Web Services EMEA SARL
38 Avenue John F. Kennedy
1855 Luxembourg.

25 In addition, we use the "Arize Phoenix" application from

Arize AI Inc.
740 Edgewood Avenue
Mill Valley
CA 94941
USA

26 for monitoring and optimizing LLM performance. As part of this monitoring, access to chat histories is also possible. The application is hosted on our own servers.

IV. Analysis and Tracking Tools

27 To analyze App usage and improve our services, we use the "PostHog" application from

PostHog Inc.
2261 Market Street
Suite 4008 San Francisco
CA 94114
USA.

28 PostHog is used to conduct product analysis, track events and performance metrics (e.g., number of daily users), and log errors. In this process, pseudonymized usage data (e.g., device type, App version, usage behavior) is collected and analyzed. No content, such as chat histories or other particularly sensitive data, is transmitted to PostHog. Data is stored within the EU.

29 Analytics tools are used only with your consent in accordance with Art. 6(1)(a) GDPR. You may withdraw your consent at any time with future effect.

V. Marketing

30 To analyze the use of our App, we use the "Google Analytics" application provided by

Google Ireland Limited
Gordon House, Barrow Street
Dublin 4
Ireland.

31 Google Analytics is used to evaluate the use of our website/App and to generate reports on activity and user behavior. In this process, data such as device type, browser information, and user behavior is collected via cookies and transmitted to Google.

32 To send our newsletters and analyze recipient behavior, we use the "CleverReach" service provided by

CleverReach GmbH & Co. KG
//CRASH Building
Schafjückenweg 2
26180 Rastede.

33 CleverReach is used to organize and analyze newsletter distribution, including the evaluation of open and click-through rates.

34 To measure reach and display personalized ads, we use the "Meta Pixel" service provided by

Meta Platforms Ireland Limited
4 Grand Canal Square
Grand Canal Harbour
Dublin 2
Ireland.

35 Meta Pixel is used to measure the effectiveness of advertising campaigns and to create audiences for retargeting on Facebook and Instagram.

VI. Communication and Support Services

36 When you communicate with us via the App or contact our customer service, we process the personal data you provide (e.g., name, email address, message content) to handle your inquiries.

G. Recipients of Personal Data

37 Personal data is only disclosed to third parties if permitted or required by law. We take all necessary security and legal precautions to ensure the security and integrity of the data transmitted. In particular, we disclose personal data to the following parties:

- **Analytics and tracking service providers**, provided consent has been given;
- **Government agencies and public authorities**, to the extent that there is a legal obligation;
- **Development agency** commissioned to develop and maintain the App;

- **Think-it GmbH,** Friedrichstraße 114a, 10117 Berlin;
- **Hosting and infrastructure providers** in connection with the operation of the App;
- **Other partners**, to the extent necessary to provide the services;
- **External experts and midwives as cooperation partners**, provided you have consented to the referral of your counseling request; if health data is processed in this context, your explicit consent is required;
- **LLM service providers**, to the extent that user data is transmitted to the LLM provider in connection with the use of the chatbot;
- **Push notification services** (Apple, Google) for delivering notifications.

38 Furthermore, personal data will only be disclosed to third parties if this is permitted or required by law. Data is not disclosed for advertising purposes. To the extent that we use data processors, we have entered into data processing agreements with them in accordance with Art. 28 GDPR.

H. Transfers to Third Countries

39 We generally process personal data within the European Union (EU) or the European Economic Area (EEA). To the extent that a transfer to a third country—in particular to the United States—is necessary for individual services, it is carried out using appropriate safeguards in accordance with Art. 44 et seq. GDPR.

40 If an adequacy decision by the European Commission pursuant to Art. 45 GDPR exists for the respective country (e.g., the EU-U.S. Data Privacy Framework), we base the transfer on that decision. If no adequacy decision exists, the transfer is based on the Standard Contractual Clauses (SCCs) adopted by the European Commission pursuant to Art. 46(2)(c) GDPR. We would be happy to provide you with a copy of the Standard Contractual Clauses upon request. To do so, please contact us using the contact information provided in Section B.

41 Transfers based solely on your consent are based on Art. 49(1)(a) GDPR.

I. Your Rights as a Data Subject

42 The following rights apply uniformly to all processing of personal data by us. You may exercise your rights at any time by contacting us at the address listed in Section B.

- **Access (Art. 15 GDPR):** You have the right to obtain information regarding whether we process personal data about you and, if so, which personal data we process. This includes, in particular, the purposes of processing, categories of data, recipients or categories of recipients, the planned retention period, and—if a transfer to a third country takes place—the relevant safeguards. Upon request, we will provide you with a copy of the personal data we process.
- **Rectification (Art. 16 GDPR):** You have the right to have inaccurate personal data concerning you rectified and to have incomplete data completed.

- **Erasure (Art. 17 GDPR):** You have the right to request the erasure of your personal data, in particular if the data is no longer necessary for the purposes for which it was collected, if you have withdrawn your consent and there is no other legal basis, or if we have processed your data unlawfully. Statutory retention requirements or overriding legitimate interests may preclude erasure in individual cases. In such cases, we will restrict the processing of your personal data.

- **Restriction of Processing (Art. 18 GDPR):** You may request that the processing of your personal data be restricted if you contest the accuracy of the data (for the duration of the review), the processing is unlawful and you request restriction instead of erasure, we no longer need the data for the purposes of processing, but you need it to assert, exercise, or defend legal claims, or if you have objected to the processing and it has not yet been determined whether our legitimate grounds override your interests.

- **Data Portability (Art. 20 GDPR):** You have the right to receive personal data that you have provided to us—and that we process on the basis of consent or to fulfill a contract using automated means—in a structured, commonly used, and machine-readable format, and to have this data transmitted directly to another controller, to the extent technically feasible.

- **Objection to Processing Based on Legitimate Interests (Art. 21(1) GDPR):** You have the right to object at any time, on grounds relating to your particular situation, to the processing of your personal data that is carried out on the basis of Art. 6(1)(f) GDPR. We will no longer process your personal data following an objection, unless we can demonstrate compelling legitimate grounds for the processing that override your interests, rights, and freedoms, or the processing is necessary for the establishment, exercise, or defense of legal claims.

- **Objection to Direct Marketing (Art. 21(2) GDPR):** If we process your personal data for the purpose of direct marketing, you have the right to object at any time to the processing of your personal data for such marketing purposes. This right applies regardless of any specific circumstances and without the need to provide a reason.

- **Withdrawal of Consent (Art. 7(3) GDPR):** You may withdraw any consent you have given to us at any time with future effect, without affecting the lawfulness of the processing carried out prior to the withdrawal.

- **Right to File a Complaint:** In addition, you have the right to file a complaint with a data protection supervisory authority if you believe that the processing of your personal data violates data protection law. The supervisory authority responsible for us is the Hamburg Commissioner for Data Protection and Freedom of Information, Ludwig-Erhard-Str. 22, 20459 Hamburg. Further information and contact details can be found at https://datenschutz-hamburg.de/.

43 Exercising your rights is generally free of charge. However, if requests are manifestly unfounded or excessive, we may charge a reasonable fee or refuse to process them. To process your requests, we may request additional information necessary to verify your identity and ensure the proper exercise of your rights.

J. General Data Retention and Deletion Policy

44 Unless a more specific retention period is stated in this Privacy Policy, we process your data only until the purpose for data processing no longer applies. Furthermore, if you submit a legitimate request for erasure or withdraw your consent to data processing, your data will be erased unless we have other legally permissible grounds for storing your personal data (e.g., retention periods under tax or commercial law). In the latter case, the data will be deleted once these grounds no longer apply. In this instance, the processing of the data in question will be restricted, and the data will be retained solely for the purposes prescribed by law.

K. Automated Decision-Making / Profiling

45 We do not use automated decision-making, including profiling, as defined in Art. 22 GDPR, that produces legal effects concerning you or similarly significantly affects you. To the extent that we use personalization features within the App (e.g., sentiment analysis, well-being surveys), these serve exclusively to fulfill our contractual relationship and to improve the user experience, and do not result in decisions with legal or similarly significant effects.

L. Updates and Changes to This Privacy Policy

46 We reserve the right to amend this Privacy Policy as necessary, in particular to account for changes in legal requirements, new processing activities, or technical advancements to the App. The most current version is available within the App and on our website. We recommend that you review the Privacy Policy regularly. We will notify you of any material changes within the App.

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