

Privacy Policy - Sentie App

Last updated: December 2025

This Privacy Policy is aimed to inform you (“You”) as a user of the Sentie app, a service available via the link <https://sentie-app.com> (“Website”) referred to as the “Service, app”, about the collection, usage, and sharing of Your information:

- If through the Website - by CM MENTALGROWTH LTD Incorporated (HE 372828 34), a company having its registered address at Riga Feraiou Str., Office 33, 1087, Nicosia, Cyprus;
- If via the App - by CM MENTALGROWTH LTD Incorporated, a company having its registered address at Riga Feraiou Str., Office 33, 1087, Nicosia, Cyprus - collectively, “we”, “us”, “our”, acting as data controllers for your data.

You are also informed about the options available to You regarding the usage and disclosure of Your information by us. This Privacy Policy is incorporated into, and is subject to, the Service Terms of Use.

By choosing to use our Service, You:

1. Agree to the collection and use of information in relation to this Privacy Policy.
2. Warrant and guarantee that You are at least 13 years of age, or have parental consent if you are between 13 and 16 years old.

If You do not agree to this Privacy Policy, please do not use the Service or access the services provided by it.

Owner contact email: support@sentie-app.com

What kind of information do we collect

We may collect information that can identify you, such as your name and email address (“Personal Information”), along with other information that does not directly identify you, as listed below.

I. Information You Provide

- First name, email address, gender, date of birth, sleep condition, wellbeing details, product feedback, and communication details for feedback collection. We may collect and store this information when you register and use the Service or provide it to us in another

manner, such as when corresponding with us via email to report a problem with the Service or when subscribing to or searching for a service.

Note: Information about a third party

If you provide us with information about a third party, you must obtain their explicit consent before sharing their data. By submitting information about a third party, you confirm that you have their authorization to provide it to us.

II. Information Collected Automatically

- **Device information:** This may include details specific to your mobile device (e.g., OS version, hardware, unique device identifier, mobile network information), as well as information about your logins, use of features, functions, or notifications on the device. We also collect and use your Apple Identifier for Advertising (IDFA) and Google Advertising ID (AAID) to recognize your device and facilitate advertising activities on our services. These identifiers are not permanently tied to your device, and you may reset them via your device settings.
- **Usage information:** We automatically collect information from the website and account (or through third parties in connection with the services), including IP addresses or domain names of devices used to access the application, URI addresses (Uniform Resource Identifier), time of requests, request submission methods, file sizes received in response, numerical status codes from the server's response (e.g., successful, error), country of origin, browser features, operating system details, time spent on pages within the application, navigation paths within the application, and other parameters related to the device operating system and IT environment.

III. Additional Data Collected for Transactions

If you purchase access to or otherwise use the service through the website, we may also collect:

- **Transaction data:** When you make payments through the website, you may need to provide financial details, such as your credit card number and residence address, to our third-party service providers. We do not collect or store full credit card numbers, but we may receive transaction-related data, including the transaction date, time, amount, payment method, and payment transaction identification number.
- **Cookies:** We may use cookies in various ways to enhance your experience on the website, including understanding how you interact with the website and improving your overall browsing experience.

What do we collect this information for

- **Enhancing your user experience on our Service** by operating, maintaining, and providing you with all of the content and features of the Service.
- **Managing your account and providing you with customer support.** We may use your personal information to respond to your requests for technical support, Service information, or any other communication you initiate.

- Performing research and analysis about your use of, or interest in, our products, services, or content, or products, services, or content offered by others.
- Communicating with you via push notifications, reminders about the Service, Service updates, and other relevant information. You can opt out of receiving push notifications by changing the settings on your device or in your browser.
- Detecting and resolving fraud or other illegal or undesirable user behavior.
- Arranging advertising campaigns and analyzing their effectiveness to the extent permitted by law.
- Taking legally required actions and defending against legal claims.

During in-app registration or onboarding, we may ask you to log in using your email address to create an account or save your progress. In this context, we will process your email data because it is necessary to perform a contract with you. Regarding phone numbers, we may use them for service-related communications.

In addition, we may also use your email address to verify its accuracy, inform you about important updates to our terms and policies, communicate with you about our Service or similar products that might be of interest to you, and request your feedback. If you opt in (or if applicable laws in your country permit it), we may also send you other marketing communications, such as product updates, offers, and discounts, as well as news and information that we believe will be of interest to you.

Please note that when we process your email data based on legitimate interest for direct marketing purposes, you have the unrestricted right to object to this processing, including matching and attribution. If you wish to exercise your right to object, please contact us using any of the methods listed below.

In a very limited number of cases, depending on application store requirements, we may also use your phone number for matching and attribution. Such marketing activities are also based on our legitimate interest.

If you purchase access to the Service through the Website, your information will be collected to process your payments as described below.

We provide paid content (as defined in the Terms of Use) within the Service. For this purpose, we use third-party services for payment processing (such as payment processors). As a result, you will be able to make a payment for the content, and we will be notified whether the payment has been successfully completed.

We do not store or collect your payment card details. This information is provided directly to our third-party payment processors, as referenced in the next section. Our payment processors adhere to the standards set by PCI-DSS, as managed by the PCI Security Standards Council. Payment processors who follow PCI-DSS requirements are committed to ensuring the secure handling of payment information.

With whom and what do we share this information for and how may we disclose it

I. Service Providers

We may share Your Personal Information with third-party service providers that perform specific services on our behalf, such as our authorized service providers or analytics providers. In general, these third parties will collect, use, and disclose Your information only to the extent necessary to provide their services, such as facilitating our Service, managing marketing campaigns on our behalf, and analyzing how our Service is used.

You can learn more about the main service providers with whom we may share Your Personal Information below. We recommend reviewing their privacy policies.

Service Providers for the Website

1. Amazon Web Services

We use Amazon Web Services (AWS), a hosting and backend service provided by Amazon, for data hosting and to enable our Service to operate efficiently.

2. Bugsnag

Bugsnag helps us track application performance and detect crash issues on our website. It collects data such as:

- Timestamp of the crash
- Technical details about the crash
- Device information

Bugsnag's Privacy Policy: <https://www.bugsnag.com/product/security>

3. Meta Pixel

The Meta Pixel is an analytics tool that helps us measure the effectiveness of our advertising campaigns. Facebook may collect or receive information from our Service and use it to provide measurement services and targeted ads.

Users can opt out of ad targeting through:

- <http://www.aboutads.info/choices>
- <http://www.youronlinechoices.eu/>

4. Customer.io

We use Customer.io to deliver personalized emails, web push notifications, and SMS notifications. Data shared includes:

- Email address
- Phone number
- Device information
- Payment status
- Subscription date
- User's location

Customer.io Privacy Policy: <https://customer.io/legal/privacy-policy/>

5. eSputnik

We use eSputnik to deliver personalized emails, web push notifications, and SMS notifications. Data shared includes:

- Email address
- Phone number
- Device information
- Payment status
- Subscription date
- User's location

eSputnik Privacy Policy: <https://esputnik.com/data-processing-agreement>

6. Google Analytics/Google Optimize

We use Google Analytics and Google Optimize to keep our Website up to date and user-friendly. These tools help us optimize our Service, including advertising.

Google Analytics Privacy Policy: <https://policies.google.com/privacy>

Advertising Services Providers

We use third-party advertising services to promote the Service. We recommend reviewing their privacy policies:

- Snapchat: <https://www.snap.com/en-US/privacy/privacy-center>
- Meta: <https://www.facebook.com/privacy/policy/>
- Google AdWords: <https://policies.google.com/privacy>
- TikTok: <https://www.tiktok.com/legal/privacy-policy?lang=en>
- Pinterest: <https://policy.pinterest.com/en>

Payment Services Providers

Certain payment providers process transactions on our behalf. We recommend reviewing their privacy policies:

- PayPal Holdings, Inc.: <https://www.paypal.com/va/webapps/mpp/ua/privacy-full>
- Paddle: <https://www.paddle.com/legal/privacy>
- Stripe: <https://stripe.com/en-gb-us/privacy>
- Apple Pay: <https://www.apple.com/legal/applepayments/privacy-notice/>
- Braintree: <https://www.braintreepayments.com/pl/legal/braintree-privacy-policy>

For users based in the United States, payments for the Service will be processed via a payment account owned and operated by EL Moderation Systems. This does not affect the security and confidentiality of payment data, as all payment transactions remain subject to the privacy policies and security compliance requirements of the respective payment providers.

By making a purchase, you explicitly agree to share your payment details with these payment providers.

Other Service Providers

7. Zendesk – used for customer support and issue tracking.
8. Tableau – used for analytics and customer support.
9. Sentry - used to detect crash issues on our service.
10. Clarity by Microsoft – used for analytics and customer support.

Each of these providers collects technical and user-related information necessary for their services. We recommend reviewing their privacy policies for further details.

Service Providers for the App

1. Amazon Web Services

We use Amazon Web Services (AWS), a hosting and backend service provided by Amazon, for personal data storage and to enable our Application to operate efficiently.

2. AppsFlyer

We use AppsFlyer for analytics, specifically for research and analysis of user interactions with the Application. AppsFlyer helps us understand how users discover our App (e.g., which advertiser led You to our App in the App Store or Google Play).

Data shared with AppsFlyer includes:

- Device type and model, CPU, system language, memory, OS version, Wi-Fi status, time zone, and carrier (“Technical Information”).
- IP address (which may also provide general location information), User agent, IDFA (Apple identifier for advertisers), Android ID, Google Advertiser ID, and other unique identifiers (“Technical Identifiers”).

AppsFlyer Privacy Policy: <https://www.appsflyer.com/privacy-policy>

3. Amplitude

We use Amplitude for analytics and customer support, specifically to understand how customers interact with our App.

Data shared with Amplitude includes:

- Platform, device type, device family, country, city, region, carrier, OS, time zone, language, IP Address, locale, and referral source (“Technical Information”).
- Your interaction with the App (e.g., taps on specific screens), age, gender, and email (“User-related Information”).
- Unique identifiers (such as IDFA).

Amplitude Privacy Policy: <https://amplitude.com/privacy>

4. Firebase

We use Firebase services to enhance the App experience:

- Firebase Cloud Messaging: Enables delivery of in-app notifications and analyzes their effectiveness.

- Google Analytics for Firebase: Helps assess app performance, crash prevention, and campaign effectiveness.

Google Firebase Privacy Policy: <https://policies.google.com/privacy>

5. Meta Conversion API (ex Facebook Conversion API)

If data processing concerns EU, UK citizens and certain other jurisdictions: by Facebook Ireland Ltd., 4 Grand Canal Square, Grand Canal Harbour, Dublin 2 Ireland; for processing of data originating from other jurisdictions: Facebook, Inc., 1 Hacker Way, Menlo Park, CA 94025, USA

We use Meta Conversion API in order to maximize effectiveness of our marketing/advertising campaigns, measurement services and targeted ads. At that, Meta may collect or receive certain information from the App, for example, information on your interaction within the App.

Please mind that you may opt-out of the collection and use of information for ad targeting. Options you may use in order to opt-out, are described below in this Privacy Policy. Some of the mechanisms for exercising the choice to opt out are via the links:

Users can opt out of ad tracking via:

- <http://www.youronlinechoices.eu/>

Meta Privacy Policy: <https://www.facebook.com/privacy/policy>

6. Tableau

We use Tableau for analytics and customer support. Tableau helps us analyze user behavior and provide better technical assistance.

Data shared with Tableau includes:

- Platform, device type, OS, IP Address, language, and referral source (“Technical Information”).
- Interaction data (e.g., taps within the App), age, gender, and email (“User-related Information”).

Tableau Privacy Policy: <https://www.tableau.com/legal/regional-privacy-laws>

7. Mixpanel

Mixpanel helps us analyze user interactions and improve customer support.

Mixpanel Privacy Policy: <https://mixpanel.com/legal/privacy-policy>

8. TestFlight

TestFlight helps us test app updates and analyze user feedback.

TestFlight Privacy Policy:

<https://www.apple.com/legal/internet-services/itunes/testflight/sren/terms.html>

9. Adapty

Adapty provides subscription analytics and helps us optimize user experience.

Adapty Privacy Policy: <https://adapty.io/privacy>

II. Law Enforcement Agencies and Public Authorities

We may use and disclose personal data to enforce our Terms of Use, protect our rights, privacy, safety, or property, as well as those of our affiliates, You, or others. We may also disclose data to respond to requests from courts, law enforcement agencies, regulatory bodies, and other public and government authorities, or as otherwise required by law.

III. Third Parties in Mergers or Acquisitions

As we develop our business, we may buy or sell assets or business offerings. Customer information is generally one of the transferred business assets in such transactions. We may also share such information with any affiliated entity (e.g., parent company or subsidiary) and may transfer such information in the course of a corporate transaction, such as a business sale, divestiture, merger, consolidation, asset sale, or, in rare cases, bankruptcy.

International Data Transfers

Please note that our business is global. When You provide Personal Information through our Service, the information may be transmitted to servers in different countries worldwide. Such transfers will be conducted in compliance with applicable data protection laws, including the use of Standard Contractual Clauses (SCCs) where required.

How You Can Access Your Information

You may access and manage your Personal Information through the Service. If You need help rectifying inaccurate data, please contact us via the email specified in the “Contact Us” section below.

You can erase Your Personal Information through the Profile menu of the Service. Please note that deleting Your Personal Information does not automatically cancel your subscription purchased via the App or the Website or entitle You to a refund.

When we delete any information, it will be removed from active databases but may remain in our archives due to legal obligations. If You require the deletion of such Personal Information from our archives, please contact us. However, we may be required to retain some data to comply with legal requirements.

If You reside in the European Economic Area, You may object to the processing of Your Personal Information for marketing purposes by contacting us.

To opt out of data collection for marketing purposes, You may:

Adjust your device settings:

- iOS: Go to “Settings” → “Privacy” → “Advertising” → “Limit Ad Tracking”.
- Android 6.0 and higher: Go to “Settings” → “Google” → “Ads” → “Opt out of interest-based ads”.
- Android 5.2 and lower: Use Google Settings → “Ads” → “Opt out of interest-based ads”.

Use opt-out links:

- Network Advertising Initiative: <http://optout.networkadvertising.org/>
- Digital Advertising Alliance: <http://optout.aboutads.info/>
- DAA Canada: <http://Youradchoices.ca/choices>
- DAA EU: <http://www.Youonlinechoices.com/>
- DAA AppChoices: <http://www.aboutads.info/appchoices>

If You think Your Personal Information is inaccurate but cannot correct it through the Service, You may request a restriction of processing until we verify its accuracy.

You may stop all data collection by uninstalling the Application from Your mobile device using standard uninstall processes.

How We Secure Your Information

Security is our highest priority. Our Service is designed with Your security and privacy in mind.

- We protect Your information using encryption protocols and security software.
- We pseudonymize and aggregate Personal Information where possible.
- We maintain strict safeguards for data storage and disclosure.
- We perform systematic backups to prevent accidental data loss.

Although we take reasonable precautions, no data transmission over the internet is completely secure. We do not collect or store Your payment details.

California Residents (CCPA Compliance)

Under the California Consumer Privacy Act (CCPA), California residents have the right to:

- Transparency Rights: Receive details about how their data is collected, used, and shared.
- Right of Access: Request access to categories and specific pieces of personal information collected, sources of data, purpose of collection, and third parties it has been shared with.
- Portability Rights: Obtain personal data in a structured, machine-readable format for easy transfer.

- Right of Deletion: Request the deletion of personal data collected, except where retention is legally required.
- Right to Opt Out: Prevent businesses from selling personal data to third parties. If the user is between 13-16 years old, they must opt in for data sales, and for users under 13, parental consent is required.
- Non-Discrimination Rights: Businesses cannot deny services, increase prices, or otherwise discriminate against users who exercise their privacy rights under CCPA.

If a request for access, deletion, or objection is vague, we may need to request further clarification. Following CCPA regulations, we may also require users to verify their identity (e.g., by providing an ID) before processing requests, ensuring the security of user data.

To verify Your request, we may require proof of identity (e.g., ID or other documentation).

EU Residents (GDPR Compliance)

If You reside in the European Economic Area (EEA), You have the following rights under the General Data Protection Regulation (GDPR):

- Right to Rectification & Restriction of Processing: You are responsible for ensuring the accuracy of the personal data You provide. If You believe Your data is incorrect, You may request correction by contacting us at support@sentie-app.com. If accuracy is disputed, You may request a restriction on processing while verification occurs.
- Right to Access & Data Portability: You may request confirmation of whether we hold personal data about You, request access to this data, or obtain it in a structured, machine-readable format by contacting us at support@sentie-app.com.
- Right to Erasure (“Right to be Forgotten”): If You believe Your data is no longer necessary for the purposes it was collected, or You object to processing, You may request its deletion. However, certain legal obligations may prevent immediate deletion.
- Right to Object to Processing: You may object to the processing of Your personal data at any time by contacting us at support@sentie-app.com. Please note that this may impact Your ability to use the Service.
- Notification Requirements: In compliance with GDPR, we will notify You and the appropriate data protection authorities of any personal data breaches within the legally required timeframe.
- Right to File a Complaint: If You believe Your data rights have been violated, You have the right to lodge a complaint with Your local data protection authority.

To prevent unauthorized access, we may require identity verification before processing certain privacy-related requests.

Children's Privacy

Our Service is not intended for individuals under 13 years old. If You are between 13 and 16 years old, You may only use the Service with parental consent.

We do not knowingly collect data from children under 13. If we discover that a child under 13 has provided Personal Information, we will delete such data and terminate the account. If You are a parent or guardian and believe Your child has provided Personal Information, please contact us.

Retention of Data

We will retain Your information for as long as:

- You have an account with the Service,
- The App is installed on Your mobile device, or
- It is needed to provide You with our Service.

We will also retain and use Your information, including copies of Your information, as necessary to comply with our legal obligations (including for tax and accounting purposes), resolve disputes, and enforce our agreements.

Changes to This Privacy Policy

We may update this Privacy Policy periodically. Changes will be posted on this page and will take effect immediately. Your continued use of the Service after changes have been posted constitutes Your acceptance of the updated Privacy Policy.

Contact Us

If You have any questions about this Privacy Policy or Your Personal Information, contact us
at: support@sentie-app.com

BY USING THIS APPLICATION, YOU PROMISE THAT YOU HAVE READ, UNDERSTAND, AND
AGREE TO THIS PRIVACY POLICY.