



Calm Soul – Privacy Policy

1. Who We Are

Calm Soul (“we,” “us,” or “our”) is provided by BPA TARGET SRL, which operates the Calm Soul mobile application and related services (“Services”) to provide guided rituals, affirmations, and well-being tools.

We are committed to protecting your privacy and handling your data transparently and in accordance with applicable laws, including the **General Data Protection Regulation (GDPR)**, **California Consumer Privacy Act (CCPA/CPRA)**, and other relevant privacy regulations.

By using our Services, you confirm that you have read, understood, and agreed to this Privacy Policy and our Terms of Use. If you do not agree, you must not use the Services.

2. Information We Collect

We only collect the minimum information necessary to operate and improve Calm Soul. This may include:

- **Account Information:** Email address, account creation date.
- **App Usage Data:** Actions within the app (e.g., completing a ritual), device type, OS version, app version.
- **Subscription Data:** Purchase history, subscription status (managed via RevenueCat).
- **Analytics Data:** Interaction events, performance metrics (collected via Firebase and Mixpanel).
- **Optional User Content:** Reflections or feedback you choose to submit within the app.

We integrate with Apple Health (HealthKit) **only to write Mindfulness minutes** that you choose to log from CalmSoul. We **do not read** data from Apple Health, and we **do not transfer Health data to our servers**. Health data is controlled on-device by iOS. You can revoke access anytime in iOS Settings ► Health ► Apps ► CalmSoul. We do **not** use Health data for advertising or marketing, and we do **not** store Health data in iCloud.

We do **not** collect:

- Government-issued IDs
 - Payment card details (handled securely by Apple and RevenueCat)
 - Biometric identifiers
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3. How We Use Your Data



We use the information we collect to:

- Provide and maintain the Services
- Personalize your app experience
- Monitor performance and improve features
- Process and manage subscriptions
- Respond to user support requests
- Comply with legal obligations

We do **not** sell your personal data or use it for targeted advertising.

4. International Data Storage & Transfers

Some of our trusted service providers, such as **Firebase (Google)**, **RevenueCat**, and **Mixpanel**, store and process data in the **United States**.

This is **solely for the purpose of securely hosting and operating the Calm Soul Services**.

We do **not** transfer or disclose your personal data to these providers for their own independent use.

When data is stored outside the European Union:

- We rely on **Standard Contractual Clauses (SCCs)** approved by the European Commission.
- We apply additional safeguards such as encryption, strict access controls, and minimization of stored personal data.

These measures ensure that your data remains protected and processed only in accordance with this Privacy Policy.

5. Legal Basis for Processing (GDPR)

We process your personal data based on:

- **Contractual necessity** (to provide you with the Services)
 - **Legitimate interests** (to improve and protect the app)
 - **Legal obligations** (where required by law)
 - **Consent** (where explicitly required, e.g., for optional features)
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6. Your Rights

Depending on your location, you may have the right to:

- Access, correct, or delete your personal data



- Restrict or object to its processing
- Withdraw consent at any time
- Request a copy of your data in portable format
- File a complaint with your local data protection authority

To exercise these rights, contact us using the details in Section 10. We respond to all privacy-related requests within 30 days.

7. Data Retention

We keep your data only as long as necessary to provide the Services, or as required by law:

- Account & usage data: Until you delete your account
 - Analytics data: Up to 24 months for performance and feature improvement.
 - Support communications: Up to 12 months after resolution
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8. Tracking Technologies

We do not use traditional browser cookies in the Calm Soul mobile app.

However, we use similar technologies, such as unique device identifiers and in-app event tracking, to:

- Maintain core functionality (e.g., keeping you signed in, processing subscriptions)
- Measure app performance and usage trends for improvement

These identifiers are stored locally on your device or within secure analytics services (e.g., Firebase, Mixpanel). You can limit or reset these identifiers in your device's privacy settings, though some features may not function properly without them.

9. Children's Privacy

Calm Soul is not directed to children under **13 years of age**. We do not knowingly collect personal data from children. If we learn that we have inadvertently collected such data, we will delete it promptly.

10. Security Measures

We protect data with encryption in transit (TLS) and at rest, strict access controls, and regular reviews. No system can be 100% secure, but we take every reasonable step to safeguard your information.



11. Changes to This Policy

We may update this Privacy Policy periodically to reflect changes in our practices or applicable laws. The latest version will always be available at the link above. Continued use of the Services after updates constitutes acceptance of the revised Terms of Use and Privacy Policy.

12. Contact & Effective Date

For questions about this Privacy Policy or your data:

Contact: support@bpatarget.com, via the Contact Us form in our app or use the details from our App Store listing

Effective Date: 01.08.2025