

Privacy Policy – Menty

Effective Date: 06-03-2025

This Privacy Policy explains how Menty B.V. ("Menty," "we," "our," or "us") collects, uses, discloses, and protects your personal data when you use our mobile application and related services (the "Services"). We are committed to protecting your privacy and complying with applicable data protection laws, including the EU General Data Protection Regulation (GDPR).

1. Who We Are

Menty B.V. is a company based in The Netherlands, offering AI-powered coaching services through a mobile app. We are the data controller responsible for processing your personal data under this Privacy Policy.

2. What Data We Collect

You may voluntarily provide information about your emotional, mental, or relational wellbeing through the app. This data is only processed to provide personalized coaching and is never shared without your consent.

We may collect the following categories of personal data:

- **Account Information:** Username and phone number.
- **Demographic Data:** Age and language preferences.
- **User Input:** Messages and interactions within the app.
- **App Usage Data:** Feature usage, session duration, error logs, and diagnostics.
- **Payment Information:** If you subscribe to premium features, we collect transaction details via third-party payment processors (e.g. Apple, Google, Stripe).

We do not knowingly collect personal data from users under 16 years of age.

3. How We Use Your Data

We use your personal data to:

- Provide and personalize the Services.

- Operate, maintain, and improve our Services and app functionality.
- Process payments and manage subscriptions.
- Communicate with you (e.g. support, updates, reminders).
- Monitor compliance with our Terms of Use.
- Comply with legal obligations.

We do not use your personal data to train AI models unless you have given us explicit consent.

4. Legal Bases for Processing

We rely on the following legal bases under the GDPR:

- **Contract:** To provide and manage your use of the Services.
- **Legal Obligation:** To comply with applicable laws.
- **Legitimate Interests:** To improve Services and ensure security, where not overridden by your rights.

5. Data Sharing and Third Parties

We may use tracking technologies for analytics and diagnostics within the app. Where required, you will be asked for consent before such tracking is activated.

We may share your data with:

- **Service providers** (e.g. cloud hosting).
- **Payment processors** (e.g. Apple, Google, RevenuCat).
- **Legal authorities**, if required to comply with laws or enforce our Terms.

We do **not** sell your data to third parties.

6. Data Retention

We retain your personal data as long as necessary to provide the Services, comply with legal obligations, and resolve disputes. Inactive accounts may be deleted after a period of inactivity, typically 12 months or longer, unless otherwise required by law or justified by business needs. to provide the Services, comply with legal obligations, and resolve disputes.

7. Your Rights

You have the right to lodge a complaint with your local data protection authority, such as the Autoriteit Persoonsgegevens in the Netherlands.

You have the following rights under the GDPR:

- Access your data
- Correct inaccurate data
- Delete your data (right to be forgotten)
- Restrict or object to processing
- Data portability
- Withdraw consent (where applicable)

To exercise your rights, please contact us at support@menty.ai.

8. Data Security

We implement appropriate technical and organizational measures to protect your data, including encryption, secure servers, and access controls.

9. Changes to this Policy

We may update this Privacy Policy from time to time. If we make material changes, we will notify you at least 30 days in advance through the app or by email.

10. Contact

If you have questions or concerns about this Privacy Policy, please contact:

Email: support@menty.ai