

Rainbow Data Privacy Policy

In this privacy policy we, **Various MB**, company code 302904149, registered address at Raitininku 2A-48, Vilnius, Lithuania (“**Company**”, “**we**”, “**us**” or “**our**”), explain how we handle your personal data when you visit our App, use our Rainbow Data mobile application (“**Application**”, “**App**”), contact us through our official social

In case of any inquiries or if you would like to exercise any of your rights provided in this notice, you may submit such inquiries and requests by means provided in Contacts section.

You may also contact us regarding all privacy related issues by email:
hello@rainbowdata.app

All the definitions used in this privacy policy have the same meaning as prescribed in Company’s General Terms and Conditions unless expressly provided otherwise in this privacy policy. This privacy policy forms an integral part of Company’s General Terms and Conditions.

In the event this privacy policy is translated into other languages and if there are differences between the English version and such translation, the English version shall prevail, unless otherwise provided.

1. How do we use your personal data?

1. This Section provides the following information:(a) categories of personal data, that we process;(b) in case of the personal data that we did not obtain directly from you, the source and specific categories of that data;(c) the purposes for which we may process your personal data; and(d) the legal bases of the processing.
2. We process *your account data* (“**account data**”). The account data may include your name, surname, email address, phone number, age and other data that you provide while registering or using our services as well as your purchase history. We obtain such data directly from you. We process account data for the purposes of operating our App, providing our services, ensuring the security of our App and services and communicating with you. The legal basis for this processing is the performance of a contract between you and us and/or taking steps, at your request, to enter into such a contract as well as our legitimate interest, namely monitoring and improving our App and services.

3. We process *information relating to provision of services by us to you* (“**service data**”). The service data may include your medical records, cycle information, cycle forecast and other data you choose to enter to the App, in addition to transaction details, contact details (such as your email address and billing address) as well as other information that you provide to us while using the App. The service data is processed to provide cycle tracking and forecasting services. The legal basis for this processing is the performance of a contract between you and us and/or taking steps, at your request, to enter into such a contract and our legitimate interests, namely the proper administration of our App, App and business.
4. We may process *information that you provide to us for the purpose of subscribing to our email messages and newsletters* (“**messaging data**”). The messaging data is processed to send you the relevant messages and newsletters. The legal basis for this processing is your consent. Also, if we have already sold goods or provided services for you via our App, and you do not object, we may also process messaging data on the basis of our legitimate interest, namely seeking maintain and improve customer relations.
5. We may process *information relating to any communication that you send to us* (“**correspondence data**”). The correspondence data may include the communication content and metadata associated with the communication. The correspondence data is processed for the purposes of communicating with you and record-keeping. The legal basis for this processing is our legitimate interests, namely the proper administration of our App and business, ensuring uniform and high quality consultation practice and for investigating disputes between you and our employees.
6. We may process *information on your use of our App as well as on your device* (“**device data**”) when you are using our App. Device data may include IP address, geographical location, browser type and version, operating system, device type, screen resolution and (in case you agree to share such) your location data as well as information on the motion activity, use of our App (i.e. referral source, length of visit, page views and App navigation paths, as well as information about the timing, frequency and pattern of your service use). We obtain such data through the use of cookies and similar technologies. Device data is processed to enhance the App as well as to set default options. We also use such data to have a better understanding of how you use our App and services as well as for securing the App. The legal basis for this processing is our legitimate interest, namely the proper management of our App and business.
7. We may process any of your personal data identified in this notice where necessary for the establishment, exercise or defence of legal

claims, whether in court proceedings or in an administrative or out-of-court procedure. The legal basis for this processing is our legitimate interests, namely the protection and assertion of our legal rights, your legal rights and the legal rights of others.

8. We may process any of your personal data identified in this notice where necessary for the purposes of obtaining or maintaining insurance coverage, managing risks, or obtaining professional advice. The legal basis for this processing is our legitimate interests, namely the proper protection of our business against risks.
9. In addition to the specific purposes for which we may process your personal data set out in this Section, we may also process any of your personal data where such processing is necessary for compliance with a legal obligation to which we are subject, or in order to protect your vital interests or the vital interests of another natural person.

2. When do we provide your data to others?

1. We may disclose your personal data *to our insurers and/or professional advisers* insofar as reasonably necessary for the purposes of obtaining or maintaining insurance coverage, managing risks, obtaining professional advice, or the establishment, exercise or defence of legal claims, whether in court proceedings or in an administrative or out-of-court procedure.
2. We may disclose your personal data to our *anti-fraud, risks and compliance providers* insofar as reasonably necessary for the purposes of protecting your personal data and fulfilling our legal obligations.
3. We may disclose your personal data *to our payment service providers*. We will share service data with our payment services providers only to the extent necessary for the purposes of processing your payments, transferring funds and dealing with complaints and queries relating to such payments and transfers.
4. We may disclose your personal data *to other service providers* insofar as it is reasonably necessary to provide specific services (including, providers of servers and maintenance thereof, software development services, email service providers, service providers used for data analysis or marketing, call centres, customer satisfaction surveys or market research). We take all the necessary measures to ensure that such subcontractors would implement proper organisational and technical measures to ensure security and privacy of your personal data.
5. In addition to the specific disclosures of personal data set out in this Section, we may disclose your personal data where such disclosure is necessary for compliance with a legal obligation to which we are subject, or in order to protect your vital interests or the vital interests of another natural person.

6. Persons, indicated in this Section may be established outside the Republic of Lithuania, European Union and European Economic Area. In case we will transfer your personal data to such persons, we will take all the necessary and in the legal acts indicated measures to ensure that your privacy will remain properly secured, including where appropriate, signing standard contractual clauses for transfer of data. To find out more information regarding appropriate safeguards you may contact us via email: hello@rainbowdata.app

3. How long do we store your data?

1. Your personal data that we process for any purpose or purposes shall not be kept for longer than is necessary for that purpose or those purposes. In any case it shall be kept for no longer than:(a) *account data* will be retained for no longer than 5 (five) years following your last update on the account;(b) *service data* will be retained for no longer than 5 (five) years following the end of provision of services; (c) *messaging data* will be retained for no longer than 2 (two) years following the provision of consent or, in case, the messaging data is being sent to the present clients in order to maintain and improve customer relations, for no longer than 2 (two) years following the end of provision of the respective services, unless you respectively withdraw your consent earlier or object to such processing; (d) *correspondence data* will be retained for no longer than 6 (six) months following the end of such communication.
2. In some cases, it is not possible for us to specify in advance the periods for which your personal data will be retained. I. e. *device data* will be retained for as much as will be necessary for the relevant processing purposes.
3. Notwithstanding the other provisions of this Section, we may retain your personal data where such retention is necessary for compliance with a legal obligation to which we are subject, or in order to protect your vital interests or the vital interests of another natural person.

4. Marketing communication

1. In case you consent, we will contact you via email or phone to inform on what we are up to. Also, if we already have provided services to you and you do not object, we will inform you about our Companies or our members of our group Companies other products that might interest you including other information related to such.
2. You may opt-out of receiving marketing communications at any time. You may do so by choosing the relevant link in any of our marketing messages or contacting us via means provided in our App.
3. Upon you having fulfilled any of the provided actions we will update your profile to ensure that you will not receive our marketing communication in the future.

4. Please be informed that as our business activities consists of a network of closely related services, it may take a few days until all the systems are updated, thus you may continue to receive marketing communication while we are still processing your request.
5. In any case, the opt-out of the marketing communications will not stop you from receiving communication directly related to the provision of services.

5. About cookies

1. We will ask you to consent to our use of cookies in accordance with the terms of this notice when you first visit our App.
2. Cookies are small textual files containing identifier that is sent by a web server to your web browser and is stored by the browser. The identifier is then sent back to the server each time the browser requests a page from the server.
3. Cookies do not typically contain any information that personally identifies a user, but personal information that we store about you may be linked to the information stored in and obtained from cookies.

6. Cookies that we use

1. In the App we use cookies of three main types, for the following purposes:(a) Required cookies – used to ensure proper performance of the App, security of customers and their data, provision of high-quality services;(b) Functional cookies – used to enhance the App user experience, analyse the use of the system and in accordance to such improve the provision of services; (c) Advertising cookies – used to observe user online behaviour and optimize marketing campaigns according to such information.

7. Cookies used by our service providers

1. Our service providers use cookies and those cookies may be stored on your computer when you visit our App.
2. We may use:(a) *Stripe cookies* to enable payment on the App without storing any payment information on a server. You can view the privacy policy of Stripe [here](#); (b) *Google Analytics cookies* to observe our App traffic. Cookies used for this purpose help us detect App errors as well as measure App bandwidth. You can view the privacy policy of Google Analytics [here](#); (c) *Youtube cookies* to display in our App content uploaded in Youtube. Cookies used for this purpose help us maintain integrity, create informative and dynamic App. You can view the privacy policy of Youtube [here](#); (d) *Twitter cookies* to display in our App content posted in Twitter. Cookies used for this purpose help us maintain integrity, create informative and dynamic App. You can view the privacy policy of Twitter [here](#); (e) *Google Maps cookies* to, if the user permits, determine users location. Cookies used for this purpose help us adapt App settings in accordance to user's location and improve user experience in our App. You can view the privacy policy of Google Maps

[here](#); (f) *DoubleClick cookies* to control the display of ads to our users. Cookies used for this purpose help us distinguish users that already use our services and reduce or stop displaying our ads to such users. You can view the privacy policy of Doubleclick [here](#); (g) *Facebook cookies* to manage the display of ads to our users. Cookies used for this purpose help us distinguish users that already use our services and reduce or stop displaying our ads to such users. You can view the privacy policy of Facebook [here](#); (h) *Google Tag Manager cookies* to control advertising cookies. Cookies used for this purpose help us properly distribute ads to users. You can view the privacy policy of *Google Tag Manager* [here](#); (i) *Hotjar cookies* to observe how users use our App. Cookies used for this purpose help us observe the performance of the App and analyse how we can improve our App. You can view the privacy policy of Hotjar [here](#);

8. How can you manage cookies?

1. Most browsers allow you to refuse to accept cookies and to delete cookies. The methods for doing so vary from browser to browser, and from version to version. You can however obtain up-to-date information about blocking and deleting cookies via information provided in the relevant browser App, for example [Chrome](#); [Firefox](#); [Internet Explorer](#); [Safari](#).
2. Blocking all cookies will have a negative impact upon the usability of many Apps.
3. If you block cookies, you will not be able to use all the features on our App.

9. Third party Apps

1. In the App you may find links to and from partner sites, information sources and related party Apps. Please take note that such third party App that you will visit by clicking on links have their own privacy policies and we take no responsibility regarding such privacy policies. We recommend familiarising with privacy policies of such Apps before providing any personal data to such.

10. Children personal data

1. Our App and services are targeted at persons over the age of 18.
2. If we have reason to believe that we hold personal data of a person under that age in our databases without having consent from the parent rights holder, we will delete that personal data.

11. Updating your data

1. Please let us know if the personal information that we hold about you needs to be corrected or updated.

12. Changes to the notice

1. Any changes to this notice will be published in the App and, in case of material changes, we may inform you about such via email or by other means which we will deem the most fitting in a particular case.

Last modified 29/12/2021.