



Privacy Policy

1. Who We Are & Scope

Controller: BEAUTY APP DEV PROPRIETARY LIMITED (operator of beautyapp.io).

Contact: info@beautyapp.io

Scope: This Privacy Policy explains how we collect, use, disclose, and safeguard your information when you use our mobile application and related services (the “App”).

Consent & Eligibility: By using the App, you agree to this Privacy Policy. If you do not agree, please do not use the App.

Last updated: 31 December 2025

2. Information We Collect

We collect information to provide, improve, and secure the App.

Personal Information

- Name and contact details (e.g., email)
- Profile information (e.g., location you choose to provide, preferences)
- Account credentials (username, password)
- Profile photos you choose to upload

Hair-Related Data

- Hair type, length, and texture information
- Hair goals and care preferences



- Progress photos and measurements
- Hair routine and product usage data
- Challenge participation and completion data

Usage & Device Data

- App events (screen views, taps), feature interactions
- Device information (type, OS, device identifiers)
- Log data (IP address, timestamps, crash logs)
- Non-precise location (derived from IP or device settings)
- Analytics data to improve performance and stability

Communication Data

- Messages sent through our AI chat feature
- Communications you initiate (e.g., support requests)
- Feedback, ratings, and survey responses

3. Legal Bases for Processing (where applicable)

We rely on one or more of the following legal bases:

Contract

- Create and manage your account
- Deliver core features (scans, tips, reminders, challenges)
- Provide support and service notices



Legitimate Interests

- Keep the App secure; prevent abuse/fraud
- Run analytics and improve features (balanced against your rights)
- Perform limited non-marketing personalization of tips and reminders

Consent

- Marketing communications and notifications not strictly necessary
- Access to device features (e.g., camera, photos, precise location)
- Use of your content for improving our AI models (opt-in only)

Legal Obligation

- Comply with applicable laws and regulatory requests

You can withdraw consent at any time in Settings or by emailing info@beautyapp.io.

4. How We Use Your Information

Service Provision

- Provide personalized hair-care recommendations
- Track your hair growth progress and achievements
- Enable AI-powered chat and analysis
- Send reminders/notifications for your routine (where enabled)
- Maintain safety, integrity, and availability of the App

Improvement & Analytics



- Analyze aggregate usage to improve functionality and stability
- Develop new features based on user needs
- Troubleshoot issues and perform diagnostics

Communication

- Send important account or service updates
- Provide customer support
- Send optional promotional content (with your consent)

Legal & Security

- Comply with legal obligations and requests
- Protect against fraud, abuse, and security threats
- Enforce our Terms of Service

5. Information Sharing and Disclosure

We **do not sell** your personal information. We share data only as described below.

With Your Consent

- When you choose to share content or connect with third parties
- When you enable features that require data sharing

Service Providers (Processors)

- Hosting and storage



- Analytics and crash reporting
- Customer support tooling
- Payment processing for premium features
We require appropriate contractual safeguards and confidentiality.

Aggregated/De-Identified Data

- We may share anonymized statistics and trends that do not identify you

Legal & Safety

- When required by law or to respond to legal processes
- To protect our rights, property, or safety, or that of users
- In connection with a merger, acquisition, or asset transfer (we will notify you when reasonable)

6. Mobile SDKs, Analytics & Device Permissions

We use mobile software development kits (SDKs) and device permissions to operate and improve the App.

Examples of purposes

- Analytics and performance (event tracking, crash diagnostics)
- Push notifications and A/B testing
- Payments/subscriptions management
- **AI image analysis** to power AI features

Your controls



- Manage notification, camera, photo library, microphone, and location permissions in your device settings
- Toggle analytics/marketing preferences in App Settings (where available)

Disclosure

- We maintain an up-to-date list of key processors/SDKs and will provide it upon request at info@beautyapp.io

Vendors

- We use **OpenAI** as a processor for AI image analysis via API; by default, OpenAI does **not** train its models on API inputs/outputs. API data may be retained **up to 30 days** for operations and abuse prevention (or **not retained** when Zero Data Retention is enabled on eligible endpoints).

7. Data Security and Protection

We implement technical and organizational measures to protect your data.

Technical safeguards

- Encryption in transit and at rest (where appropriate)
- Modern, security-hardened infrastructure
- Regular updates and patching
- Secure development practices and code reviews

Access controls

- Role-based access limited to personnel with a need to know
- Employee training on privacy and security



- Periodic access reviews

Limitations

- No method of transmission or storage is 100% secure. We regularly improve our protections and monitor for vulnerabilities.
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8. Data Retention

We keep data only as long as necessary for the purposes described.

Standard periods

- Account & profile: life of account + up to 24 months of inactivity, then delete or anonymize
- Hair photos/analysis & routine logs: 12 months by default (or longer if you keep them in your journal); immediate deletion if you delete the items or your account
- Support tickets and communications: up to 24 months
- Backups: rolling 30–90 days

Requests

- You can request deletion at any time via Settings or info@beautyapp.io. Backup copies fall out of rotation within the standard backup window.
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9. Your Rights & How to Exercise Them

Depending on your region, you may have rights to:

- Access and obtain a copy of your data



- Correct inaccurate or incomplete data
- Delete your data (erase)
- Restrict or object to certain processing (including personalization)
- Data portability (receive data in a portable format)
- Withdraw consent (e.g., marketing, training use)
- Lodge a complaint with your local data-protection authority

How to exercise

- In-App: Settings → Privacy
- Email: info@beautyapp.io (describe your request and verify your identity)
We generally respond within 30 days (or 45 days where law allows an extension).

10. Automated Analysis (Profiling) & Your Choices

We use automated analysis (“profiling”) to personalize your experience. For example, we analyze your photos, routine logs, challenge activity, and in-App behavior to estimate moisture/protein balance, group similar patterns, and suggest routines, products, stylists, and reminder timing. These are **recommendations only** and do not have legal or similarly significant effects.

How it works (plain language)

- We extract simple signals from your inputs (e.g., dryness indicators, routine frequency)
- We compare your pattern with similar, de-identified profiles
- We generate suggestions or adjust challenge prompts and reminders

Your choices



- Turn off marketing personalization in Settings
- Limit service personalization (tips/reminders) in Settings; core features may be less accurate if disabled
- View/correct data used for recommendations; delete photos/logs; download your data
- Object to profiling or request human review of an outcome at info@beautyapp.io

We run AI image analysis through OpenAI's API; by default, OpenAI does **not** use API data for training, and we have **not opted in** to share data for model improvement.

Model training

We use OpenAI's API to run AI image analysis. By default, OpenAI does **not** use API inputs/outputs to train its models, and we have **not opted in** to share data for model improvement. OpenAI may retain API data for **up to 30 days** to operate the service and detect abuse; **Zero Data Retention** is available on eligible endpoints, which we use where feasible.

Why we process your photos (plain language)

- To analyze visible hair attributes (e.g., apparent dryness/shine and frizz patterns) so we can tailor tips for you
- To generate progress visuals over time if you choose to track
- To verify the context you provide (for example, protective styles) so suggestions make sense
- To operate and improve the scan feature. We only use photos for model training if you opt in

You can use the App **without** uploading photos; some features may be limited.

11. International Data Transfers

Your information may be processed in countries other than your own. When transferring data internationally, we implement appropriate safeguards (e.g., EU Standard Contractual Clauses and, where applicable, the UK IDTA/Addendum) and require our processors to maintain



equivalent protections. You can request a copy or summary of these safeguards by emailing info@beautyapp.io.

12. Children & Teens

The App is not intended for children under 13. We do not knowingly collect personal information from children under 13. If you believe a child has provided us data, contact info@beautyapp.io so we can delete it.

Teens aged 13–17 should use the App with parental guidance. For certain regions (e.g., California), we obtain opt-in consent for any sale/share of personal information of users aged 13–15.

13. Payments

If you purchase premium features, payments are processed by third-party providers that comply with PCI-DSS standards. We do not store full payment card numbers on our servers.

14. Changes to This Privacy Policy

We may update this Policy to reflect changes in our practices or for legal, operational, or regulatory reasons.

Notice

- We will update the “Last updated” date above
- We may notify you in-App or by email
- For material changes, we may ask for your consent where required

We encourage you to review this Policy periodically.



15. Region-Specific Disclosures

Botswana

- We process personal information in accordance with the Botswana Data Protection Act to the extent applicable. You may lodge a complaint with the Botswana Data Protection Commissioner. We welcome the chance to address your concerns first at info@beautyapp.io.

UK/EU (GDPR/UK GDPR)

- Controller: **Beauty App Dev (operator of beautyapp.io)**
- Legal bases: see Section 3
- International transfers: see Section 11
- Rights: access, rectification, erasure, restriction, portability, objection, and the right to lodge a complaint with your local supervisory authority (e.g., the ICO in the UK). If required, we will appoint an EU/UK Representative and update this Policy.

California (CCPA/CPRA)

- We do **not** sell or share personal information for cross-context behavioral advertising. We honor Global Privacy Control (GPC) signals where applicable.
- California residents have rights to know/access, delete, correct, and to limit use of sensitive information. Submit requests via Settings or info@beautyapp.io. We respond within 45 days (extensions as permitted).

16. Contact Us

Questions, concerns, or requests about this Privacy Policy or our data practices?

Email: info@beautyapp.io

For faster routing, include “Privacy” in the subject line and describe your request (e.g., access, deletion, correction, objection).



17. Data Subject Request Template

You can use the following template to request access, deletion, correction, restriction, objection, or portability of your personal data.

Email to: info@beautyapp.io

Subject: Data Subject Request — [Access / Deletion / Correction / Portability / Restriction / Objection] — [Your Name]

Body:

- Full name:
- Phone number (including country code) used in the App:
- Request type (choose one above):
- Details of your request
- Identity verification: I confirm I am the account holder or have authority to act for the data subject. I will provide proof of identity if requested.

We aim to respond within 30 days (or 45 days where law allows an extension).