

Sleep Tracker Privacy Policy

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INTRODUCTION

Welcome to Sleep Tracker Application, provided by Hyperlink Infosystem Inc., registered in New York, New York, USA (“we,” “us,” or “our”). This Privacy Policy describes how we collect, use, share, process and protect your personal data when you use our services and use the Sleep Tracker Application (“Application”, “Platform”), or engage with our sales, marketing, or event offerings. It also explains your privacy rights and choices, and how you can contact us about our privacy practices.

By using the App, you agree to the terms of this Privacy Policy. If you do not agree with these terms, please discontinue use of the Application.

This Privacy Policy applies solely to the data we collect directly through our services. It does not cover data collected or stored by third-party websites and applications accessed via our platform.

1. DATA WE COLLECT

The Sleep Tracker App is designed with privacy in mind. We do not intentionally collect personal information. The Application does not require account creation or login to use its features. However, the Application may collect certain information to provide sleep tracking and analysis features.

We do not intentionally collect, store, transmit, or process personal information, including but not limited to:

- Name
- Email address
- Phone number
- Location data

- Device contacts
- User identity information

A. Optional Personal Information- Users may optionally provide the following information:

- Gender
- Age
- Height
- Weight

Providing this information is completely optional and skippable.

These details are used only to improve the accuracy of sleep insights and AI-generated sleep summaries.

B. Health and Sleep Data- The Application collects certain sleep-related health data generated while using the app, including:

- Sleep duration
- Sleep patterns
- Sleep quality indicators
- Snoring detection data (audio analysis used to detect snoring)
- Sleep activity patterns during tracking sessions

This data is used to:

- Track sleep patterns
- Generate AI-based sleep insights
- Provide sleep summaries and recommendations

The Application does not use this information for medical diagnosis or treatment.

C. Apple Health (HealthKit) Data

If the user chooses to connect the Application with Apple Health, the Application may access certain health-related information such as sleep analysis data through Apple's HealthKit framework, subject to the user's explicit permission.

HealthKit data is accessed only with the user's permission and is used solely to enable sleep tracking and analysis features within the Application.

HealthKit data is processed locally on the user's device and is not transmitted to our servers. We do not sell, share, or use HealthKit data for advertising, marketing, or data-mining purposes. HealthKit information will not be disclosed to third parties, except

where required by law or where necessary to provide core functionality requested by the user. Users may revoke HealthKit access at any time through their device settings. Health data collected through Apple HealthKit will not be used for advertising or shared with third parties for advertising purposes. The Application does not use this information for medical diagnosis or treatment.

D. We may automatically collect certain technical information including:

- Device type
- Operating system version
- App usage information
- Anonymous device identifiers

This information helps us maintain app functionality, improve performance, and detect technical issues.

2. DEVICE PERMISSIONS

The Application may request the following device permissions to enable certain features:

- Microphone (Used only during sleep tracking sessions to analyze audio patterns for snoring detection. Audio analysis is performed locally on the device and recordings are not transmitted to company servers.)
- Notifications (To send sleep reminders, insights, and sleep summaries)

Users may grant or revoke these permissions at any time through their device settings.

3. PURPOSE OF DATA COLLECTION

The information we collect is used to:

- Facilitate the functionality of our services.
- Enhance user experience and address technical issues.
- Comply with legal obligations and safeguard against fraud or security breaches.

4. PROCESSING OF THE INFORMATION

- **Account or preference management:** To manage any settings, communications, or user choices where applicable.
- **Service delivery and support:** To respond to inquiries, provide troubleshooting, and address technical issues.

- **Security and fraud prevention:** To detect, prevent, and investigate security threats or abuse.
- **Legal compliance:** To meet legal obligations and enforce terms.
- **Communications:** To send administrative notices, policy updates, and service-related information where contact information is provided.

5. PURPOSE AND LEGAL BASIS FOR PROCESSING

- **Performance of contract:** Providing the Services, managing purchases/donations, and supporting requested features.
- **Legitimate interests:** Ensuring security, improving the Services, analytics, and operating the platform.
- **Legal obligations:** Maintaining records as required by tax, accounting, and applicable laws.
- **Consent:** Where required for optional cookies/analytics or region-specific rights. Consent can be withdrawn at any time as described below.

6. SHARING OF INFORMATION AND THIRD PARTY SERVICES

A. No Data Sharing With Third Parties- We **do not** sell, trade, or transfer personal information to unrelated third parties for their marketing or advertising. While the App itself does not collect personal information, certain third-party platforms may collect limited technical data when you download or purchase the App. These may include:

- Apple App Store
- Google Play Store

Such services operate under their own privacy policies, and the Company does not control their data practices.

B. We May Share Information With-

- **Service providers:** In limited circumstances, we may use trusted third-party service providers to support specific Application features such as payment processing for in-app purchases or optional AI-generated sleep insights. These

providers process data only as necessary to provide the requested functionality and are contractually obligated to protect user information.

- **Affiliate Companies:** We may for provisioning the services share information collected with the Affiliate companies located in India. Appropriate safeguards such as Standard Contractual Clauses or adequacy decisions are implemented with such Affiliates.
- **Corporate events:** In connection with mergers, acquisitions, or asset transfers, subject to this Policy's protections.
- **Legal compliance and safety:** Where required to comply with law, enforce terms, or protect rights, property, safety, or security.

C. International Data Transfers and Storage-

- **EEA/UK transfers:** Where data is transferred outside the EEA/UK, appropriate safeguards such as Standard Contractual Clauses or adequacy decisions are implemented.
- **Updates:** If storage locations materially change, this Policy will be updated accordingly.

7. COOKIES AND ANALYTICS

- Cookies are used to operate the Application, improve user experience, analyze traffic, and enhance security. The Application and its underlying services may use cookies or similar technologies, including mobile device identifiers and local storage, to maintain your usage session and improve app performance.
- Google Analytics may be used to understand service usage patterns on the Application or related pages. Users can opt out via Google's tools. Additional information about Google's processing is available in Google's publicly available materials.

8. DATA STORAGE

All user-generated content is stored locally on the user's device.

The Company:

- does not provide cloud storage

- does not host user content
- does not maintain remote servers containing user data

Users are responsible for managing, backing up, or deleting their content stored on their device. Sleep tracking data, including snoring detection audio and health-related sleep metrics, is stored locally on the user's device unless the user explicitly chooses to use optional premium features requiring limited processing by third-party AI service providers.

9. DATA RETENTION

- Retention is limited to the duration necessary for the purposes described in this Policy.
- For accounts, data is retained while the account remains active and the Services are used.
- Upon a verified deletion request or account closure, associated personal data will be deleted within seven (7) days, subject to retention required by legal obligations (e.g., payments and invoices retained for regulatory periods).

10. DATA SECURITY

We implement appropriate technical and organizational measures to protect your data against:

- Unauthorized access
- Alteration
- Disclosure
- Destruction

We have designed the Application to minimize data collection and maximize user privacy.

Because the Application does not collect or store user data on company servers, the risk of data exposure from our systems is significantly reduced.

Users are responsible for securing their own devices and managing their locally stored content.

While we strive to use commercially acceptable means to protect your data, no method of electronic storage or transmission is 100% secure.

11. IN-APP PURCHASES

Payments are processed by third-party providers; payment credentials entered with those providers are not accessed by us. By making an in-app purchase through our App, you acknowledge and agree that all sales are final. We do not offer refunds or cancellations after purchase, except as required by applicable consumer protection laws.

All subscription plans and pricing are presented clearly within the App prior to purchase. Please review the plan details carefully before confirming your purchase.

For any concerns or support related to your purchase, you may contact us at legal.hyperlinkinfosystem@gmail.com, but please note that refunds will only be issued if mandated by law.

Before you complete a purchase, we clearly display price, recurring periods, billing intervals.

12. YOUR RIGHTS

Depending on jurisdiction, the following rights may apply:

- **Access, rectification, and erasure:** Request copies, corrections, or deletion of personal information.
- **Restriction and objection:** Request processing restrictions or object to certain processing, including where based on legitimate interests.
- **Data portability:** Request portable copies in a machine-readable format where applicable.
- **Consent withdrawal:** Where processing is based on consent (e.g., certain cookies/analytics), consent may be withdrawn at any time via settings or by contacting us; this does not affect the lawfulness of prior processing.
- **Marketing opt-out:** Unsubscribe from marketing communications at any time. Service and transactional messages may still be sent.

13. GDPR-SPECIFIC DISCLOSURES (EEA/UK)

- **Controller:** We the entity managing the Services acts as the controller for personal data processed as described.
- **Lawful bases:** Performance of contract, legitimate interests, legal obligations, and consent (as detailed above).
- **EEA/UK transfers:** Adequacy decisions or Standard Contractual Clauses apply for transfers to non-EEA/UK countries, including the United States.
- **Rights and timelines:** Access, rectification, erasure, restriction, objection, and portability requests will be addressed within thirty (30) calendar days. A nominal fee may be charged where permitted by law for excessive or manifestly unfounded requests.
- **Complaints:** Individuals may lodge a complaint with a competent supervisory authority in the EEA/UK in addition to contacting us.

California “Shine the Light”

California residents may request information about disclosures of certain categories of personal information to third parties for their direct marketing, if any, once per year free of charge.

14. CHILDREN’S PRIVACY

The Services are not intended for individuals under the age of thirteen (13). If it is learned that data has been collected from someone under 13 years of age, access will be terminated and the data will be deleted.

If you believe a child under 13 years of age has provided us with identifiable personal data, please contact us at legal.hyperlinkinfosystem@gmail.com and we will take steps to remove such information.

15. CHANGES TO THIS POLICY

This Policy may be updated from time to time. The “Last Updated” date will reflect changes. For material changes, reasonable efforts will be made to notify via in-app notice or email if available. Continued use of the Services after changes indicates acceptance.

16. CONTACT US

For questions or concerns related to this Privacy Policy, please contact us via email at legal.hyperlinkinfosystem@gmail.com with the subject line “Privacy Policy of Sleep Tracker Application”.