

# Privacy Policy

*Last updated: 25 September, 2025*

## **Operator (Pre-Incorporation Notice)**

Until incorporation, the Services are operated by the founder team of V1. All rights and obligations under this Privacy Policy will automatically transfer to **V1 Technologies OÜ**, to be incorporated in Estonia.

This Privacy Policy explains how V1 (“we,” “our,” or “us”) collects, uses, and protects your personal data when you use our Services. We are committed to handling your information transparently, securely, and in compliance with the **EU General Data Protection Regulation (GDPR)** and the **EU AI Act**.

## **1. Data We Collect**

1.1 We may collect the following categories of personal data:

- a) Account information, such as email address (if provided)
- b) Usage logs and engagement data, including session frequency and interaction patterns
- c) Anonymous emotional self-reports, aggregated and non-identifiable
- d) Technical information, such as device type, IP address, browser type, and cookies (for login security and standard analytics)

1.2 We do not collect or process special categories of sensitive personal data (such as health records, racial or ethnic origin, or political opinions).

## **2. Purposes of Data Processing**

2.1 We process personal data for the following purposes:

- a) To provide access to the platform and wellbeing programs
- b) To monitor engagement and usage trends
- c) To improve existing programs and develop new features
- d) To generate aggregated, anonymized reports for Organizations
- e) To maintain security and prevent misuse
- f) To send onboarding communications and service-related updates (no third-party marketing)

## 3. Data Sharing

3.1 At present, data is processed internally.

3.2 We may use secure third-party service providers (e.g. cloud hosting, analytics, communications) where necessary.

3.3 All third-party providers will be subject to GDPR-compliant data processing agreements.

3.4 We will never sell or misuse personal data.

## 4. Legal Basis for Processing

4.1 Data processing is carried out under the following legal grounds:

- a) Contractual necessity – to provide Services to Organizations and Users
- b) Legitimate interests – to improve the platform and ensure secure operations
- c) Consent – where optional communications are provided
- d) Legal obligation – where required by applicable laws

## 5. User Rights

**5.1 Users have the following rights under GDPR:**

- a) Right of access – to request a copy of personal data held
- b) Right to rectification – to correct inaccurate or incomplete data
- c) Right to erasure – to request deletion of personal data
- d) Right to restriction of processing – to limit processing in certain cases
- e) Right to data portability – to receive data in a machine-readable format
- f) Right to object – to object to processing under legitimate interests
- g) Right to lodge a complaint with a supervisory authority

5.2 To exercise these rights, Users may contact us at **privacy@tryv1.com**.

## 6. Data Retention

6.1 Personal data is retained for the duration of the subscription plus **six (6) months**.

6.2 Data may be deleted earlier upon user request.

6.3 Aggregated and anonymized data may be retained indefinitely for research and service improvement.

## 7. Cookies and Tracking

### 7.1 We may use cookies or similar technologies for:

- a) Authentication and login sessions
- b) Basic analytics and performance monitoring

7.2 Cookies will not be used for advertising or profiling.

7.3 Users may disable cookies in their browser settings, but certain functions of the platform may not operate correctly.

## 8. International Data Transfers

8.1 All data is hosted and processed within the European Union.

8.2 If future transfers outside the EU are required, appropriate safeguards such as Standard Contractual Clauses (SCCs) will be applied.

## 9. Security Measures

### 9.1 We implement industry-standard technical and organizational measures, including:

- a) Encrypted communications (TLS/SSL)
- b) Secure cloud infrastructure within the EU
- c) Access controls and regular monitoring

## 10. Updates to this Policy

10.1 We may update this Privacy Policy from time to time.

10.2 The most recent version will always be available on our website.

10.3 Continued use of the Services constitutes acceptance of the updated Privacy Policy.

## 11. Contact Information

For any questions or to exercise your data rights, please contact:

**V1 (*founder team, pre-incorporation*)**

 [privacy@tryv1.com](mailto:privacy@tryv1.com)

 [www.tryv1.com](http://www.tryv1.com)

*Upon incorporation, the data controller will be:*

**V1 Technologies OÜ**

Estonia