

SELF

Privacy Notice

Effective date: 12.12.2023

Interplay Digital UAB, registered in Lithuania, LT-02194, Vilnius Eišiškių Sodų 18-oji g. 11 under the registration code 306156183 and Our subsidiaries, agents, partners and affiliates (“We”, “Us”, “Our”) can process and be a controller of Your personal data within the use of the Application/the Website or the Services.

We own, operate and provide <https://Yourself.digital/> (hereinafter referred to as the “Website”) and an application Self that the User can download on the Apple Store or Google Play (hereinafter referred to as the “Application”) as Well as any other related products or services (collectively “Services”). We provide all Services to the User through the Application and/or the Website.

This Privacy Notice constitutes an explanation of the personal data processing of a capable natural person (“User”, “You”, “Your”), who uses Our Services according to the Terms of Service.

You agree that by accessing the Services and Application, You have read, understood, and agreed to be bound by this Privacy Notice. If You don’t agree with this Privacy Notice, then You are expressly PROHIBITED using the Services and Application, so You must discontinue Your usage immediately.

Supplemental terms and conditions or documents that may be posted with regard to the Services and Application are hereby expressly incorporated herein by reference. We reserve the right to change this Privacy Notice from time to time, without prior notice and Your consent.

Other terms that are used in this Privacy Notice, but not defined, have similar meanings to the terms in the Terms of Services.

I. Terminology

Services. All services provided by Us to the User through the application Self and Website, including, but not limited to, services for analysing and consulting on the User’s psychological state, suggestions and tools for resolving certain psychological matters, depending on the level of psychological immunity and other services available through the Application or the Website.

Application. Self mobile application is a software program which We have designed specifically for use on different devices with operation systems Android and/or IOS.

Consent. Any freely given, specific, informed, and unambiguous indication of the data subject’s wishes, signifies agreement to the processing of personal data relating to him or her.

Controller. The natural or legal person (and others) who determines the purposes and means of processing.

Co-controller. The natural or legal person (and others) who determines the purposes and means of processing with another controller.

Data Protection Authority. The public organization or governmental body protects the data subjects from unlawful processing.

Data Subject. The natural person, whose personal data is processed.

Legal Ground for Processing. One of the legally defined grounds for which the processing of personal data is permitted. There are the following reasons:

- Consent.
- Legitimate interest.
- Obligation.

Personal Data. Any information relating to an identified or identifiable natural person.

Personal Data Breach. A breach of security leading to the accidental or unlawful destruction, loss, alteration, unauthorized disclosure of, or access to, personal data transmitted, stored, or otherwise processed.

Processing. Any action or set of actions with personal data.

Processor. The natural or legal person, who processes personal data on behalf of the Controller.

Profiling. Any form of automated processing of personal data consisting of the use of personal data to evaluate certain personal aspects relating to a natural person to analyse or predict aspects concerning that natural person's performance at work, economic situation, health, personal preferences, interests, reliability, behaviour, location or movements.

Third-Party. Any person, except the subject of personal data, the Controller or Processor and the Data Protection Authority, to whom the Controller or Processor transfers personal data.

II. Data Subject's Rights

Right to access personal data. You can receive information regarding specific personal data We have collected about You, as follows:

- Purpose of the processing;
- Categories of personal data concerned;
- Recipients of categories of recipients to whom the personal data has been, or will be, disclosed;
- The envisaged period for which the personal data will be stored or the criteria used to determine that period;
- The existence of the right to rectification, erasure, or restriction of processing personal data concerning You or to object to such processing;
- The right to lodge a complaint with a supervisory authority;
- Where personal data is not collected from You, any available information as to the source;
- The existence of any automated decision-making, including profiling as Well as the significance and envisaged consequences of such processing for You;
- Where personal data is transferred outside of the EEA (which consists of EU member states and Iceland, Lichtenstein, and Norway), You have the right to make a request the appropriate safeguards in place and to a copy of them.

Right to rectification of personal data. You can correct Your personal data if it has been changed or incorrectly collected.

Right to erasure (deletion) of personal data. You can ask us to delete Your personal data.

Right to restrict processing of Your personal data. You can temporarily restrict the processing of personal data.

Right to personal data portability. You may receive personal data in a human and machine-readable format for transmission to another controller.

Right to object. You may object to data processing if We:

- Process personal data for direct marketing purposes, including profiling related to direct marketing.
- Process personal data that We consider necessary for its or a Third Party's legitimate interest.

Right to reject automated individual decision-making (profiling). You shall have the right not to be subject to a decision based solely on automated processing, including profiling, which produces legal effects.

Right to withdraw consent. You can withdraw Your consent on personal data processing if We use this ground for processing.

Right to opt-out from Marketing/Send Out. You can withdraw Your consent on personal data processing for marketing and send-out purposes.

Right to ask a question and/or make a claim on data processing. You are allowed to ask us any question according to data processing or privacy legislation.

III. Personal Data

User's Website Visit. When the User visits the Website, he gives us his personal data under the following conditions:

- **Personal Data.** A version of a Web browser, IP address, time zone, device model and name, device information, what sites or products the User views, search terms, and how the User interacts with the Websites.
- **Purpose of collection.** To load the Website accurately for the User, and to perform analytics on Website usage, to optimize Our Website.
- **Source of collection.** Collected automatically when the User accesses Our Website.
- **Legal Ground.** Legitimate interest.
- **Terms.** While the User is using Our Website and 3 years after.

User's Application Visit. When the User visits the Application, the User gives Us His/Her personal data under the following conditions:

- **Personal Data.** IP address, device model and name, device information, geolocation, login time and how the User interacts with the Application.
- **Purpose of collection.** To load the Application accurately for the User, to perform analytics on Application usage, and to optimize the Application.
- **Source of collection.** Collected automatically when the User interacts with the Application.

- **Legal Ground.** Legitimate interest.
- **Terms.** While the User is using Our Application and 3 years later.

User's Application using without Registration. When the User exploits the Application, the User gives Us His/Her personal data under the following conditions:

- **Personal Data.** User's age, User ID, Device ID, usage process (achievements, information spent in the Application), and settings.
- **Purpose of collection.** To provide the Services to the User.
- **Source of collection.** Collected automatically when the User interacts with the Application. All personal data is stored on the User's device.
- **Legal Ground.** Terms of Services.
- **Terms.** While the User is using Our Application and 3 years later.

User's Application Registration via Google. When the User registers in the Application via Google, the User gives us His/Her personal data under the following conditions:

- **Personal Data:**
 - Username;
 - User ID;
 - Device ID;
 - Google Play ID;
 - date of account creation;
 - email, country of registration;
 - Language;
 - List of apps the User has purchased from Google Play;
 - List of apps that the User has installed from Google Play;
 - Date of the last installation of each Application;
 - The total amount of time the User has spent using the Application;
 - The number of times the User has launched the Application;
 - The progress made by the User;
 - Other statistics about the User's performance.
- **Purpose of collection.** Services provision, analytics, marketing, Application improvement, user experience enhancement, and communication.
- **Source of collection.** Collected automatically when the User registers in the Application.
- **Legal Ground.** Terms of Services.

- **Terms.** While the User is using the Application and 3 years later.

User's Application Registration via Apple. When the User registers in the Application via Apple, the User gives us His/Her personal data under the following conditions:

- **Personal Data:**
 - Username;
 - Email address;
 - User ID;
 - Device ID;
 - Application Store ID;
 - Account creation date;
 - Country of account registration;
 - Account language;
 - List of apps the user has purchased from the App Store;
 - List of apps that the user has installed from the App Store;
 - Date of the last installation of each app;
 - The total amount of time the User has spent using the Application;
 - The number of times the User has launched the Application;
 - The progress made by the User;
 - Other statistics about the User's performance.
- **Purpose of collection.** Services provision, analytics, marketing, Application improvement, user experience enhancement, and communication.
- **Source of collection.** Collected automatically when the User registers in the Application.
- **Legal Ground.** Terms of Services.
- **Terms.** While the User is using the Application and 3 years later.

User's Application Registration via Facebook. When the User registers in the Application via Facebook, the User gives us His/Her personal data under the following conditions:

- **Personal Data:**
 - Username;
 - Email address;
 - User ID;
 - Device ID;
 - Facebook ID;

- Date of account creation;
 - Country of account registration;
 - Account language;
 - List of Facebook User's friends;
 - List of groups in which the Facebook user is a member;
 - List of pages the User has followed on Facebook;
 - List of applications that the User uses on Facebook;
 - Other information about the User's Facebook profile.
- **Purpose of collection.** Services provision, analytics, marketing, Application improvement, user experience enhancement, and communication.
 - **Source of collection.** Collected automatically when the User registers in the App.
 - **Legal Ground.** Terms of Services.
 - **Terms.** While the User is using Our Application and 3 years later.

User's Application using with Registration. When the User uses the Application with registration, the User gives us His/Her personal data under the following conditions:

- **Personal Data.** User's age, User ID, Device ID, usage process (progress, information) and settings.
- **Purpose of collection.** To provide the services to the User, to perform analytics on Application usage and to optimize the Application.
- **Source of collection.** Collected automatically when the User interacts with the Application.
- **Legal Ground.** Terms of Services.
- **Terms.** While the User is using the Application and 3 years later.

User's In-app Purchase. When the User makes in-app purchases in the Application, the User gives Us His/Her personal data under the following conditions:

- **Personal Data.** Payment amount, currency, date and time of payment, transaction ID, User country, User ID, payment method, and the Application's version.
- **Purpose of collection.** Acceptance of payments for services rendered and analytics.
- **Source of collection.** Collected automatically when the User accesses the Services available in the Application.
- **Legal Ground.** Tax legislation on source documentation.
- **Terms.** While the User is accessing the Application and 10 years later.

Customer Support Information. When You contact Our customer support, You give us Your personal data under the following conditions:

- **Personal Data collected.** It depends on a specific case but may include name, username, payment information (including credit and debit card numbers, email address, phone number, etc).
- **Purpose of collection.** To provide information about Our product and services, consult how to use Our Software, etc.
- **Source of collection.** Collected from the User.
- **Legal ground.** Consent.
- **Terms.** While the User is accessing the Application and 3 years after.

Other processing conditions. These are other conditions apply to Your data processing:

- **Data source.** We process personal data received from You and public sources. If in the future, We process personal data obtained from the Third Parties, We will notify You about this.
- **Data storage.** Your personal data is stored on servers around the globe.

IV. List of Processors

Software	Processor	Goal of use	Privacy Notice
Play Fab	Microsoft Corporation	Web hosting and analytics	Link
Microsoft Azure		Web hosting	
Graphy		SDK	
Google Cloud	Google LLC	Web hosting	Link
Google Workspace		Office work	
Google Play Console		Mobile application control	
Google Sign-in		Sign in	
GitLab	GitLab B.V. and GitLab, Inc	Software development and version storage	Link
Rider IDE	JetBrains s.r.o	Software development	Link
Unity Plus	Unity Technologies SF	Splash screen customization, error-reporting etc	Link
Unity 3d		Design	
Facebook Developer	Meta Platforms Inc	Software development	Link
Facebook SDK			
Apple Developer Console	Apple Inc	Mobile application control	Link
Apple Sign In		Sign In	
Miro	RealttimeBoard, Inc. dba Miro	Office work and mind maps	Link

Figma	Figma Inc	Design and mind maps	Link
Adobe Photoshop	Adobe Systems Software Ireland Limited	Design	Link
Illustrator		Design	
After Effects		Design	
Spine 2d	Esoteric Software LLC	Design	Link
Procreate	Savage Interactive Pty Ltd	Design	Link
We may share Your personal data with any Processors when it is necessary to provide Services to You or for Our business.			

V. List of Co-controllers

Software	Co-controller	Goal	Privacy Notice
Google Ads	Google LLC	Advertisement and analytics	Link
Facebook Ads	Meta Platforms Inc	Advertisement and analytics	Link
ironSource Ads	ironSource Ltd	Advertisement and analytics	Link
AppsFlyer	AppsFlyer Ltd	Advertisement and analytics	Link
We may share Your personal data with any co-controller when it is necessary to provide services to You or for Our business.			

VI. Advertising

Direct marketing. We will send You emails, SMS, push messages, and other types of electronic messages and make a phone call if You give a consent or ask Us to do so.

Advertisement in the Application. We will display advertisements in the Application based on a legitimate interest to promote the Services and earn money on Our business, or if You give consent to another physical or legal entity to use Your personal data through, for example, Google AdSense or Facebook Network Audience.

Targeting Marketing. We will use targeting marketing via Co-controllers services based on Your consent given to Our Co-controller (for example, social networks, search engines, Websites, mobile applications and other Internet platforms).

Data for Targeting Marketing. We may use the next type of personal data for targeting You:

- Full name;
- Sex, gender, marital status and age;
- Registration and residence address;
- Phone number links to social networks, and instant messengers;

- Information about friends and contacts;
- Physical and email address;
- Place of work;
- Search terms and preferences;
- Reactions;
- Information from accounts;
- Any other relevant information.

Basis of targeting marketing. We process this personal data based on joining to the Terms of Services and under the Privacy Notices of Our Co-controllers, on the grounds and for the purposes specified in the documents of the respective platforms.

Right exercise on targeted marketing. To exercise Your rights to data subjects, You need to check the settings of the respective platforms and/or contact the support services.

VII. Minors

Data Subjects Age. We offer Users a number of Services and activities, most of which are directed at children not under the age of 14. Where the child is below the age of 14 years, such processing shall be lawful only if and to the extent that consent is given or authorised by the holder of parental responsibility over the child. In any case, if such situation occurs the provisions of Children’s Online Privacy Protection Act shall be respected as much as it seems to be possible for us.

If We believe that We have collected and stored personal data from a child (without the necessary parental consent or other legal basis to do so), We will delete the personal data provided as soon as feasibly possible. If You are aware that Your child has provided us with personal data not in accordance with the terms of this Privacy Notice, please contact us at InterplayDigital@gmail.com.

VIII. Other Processing

Profiling. We don’t use profiling on You.

Selling Personal Data. We will not sell Your personal data at all, without Your consent.

Data processing in Corporate Changing. During a corporate change of Our legal entity, Your personal data may be given to a new Controller, Co-controller and/or Processor.

Anonymization. We may process Your personal data for a longer period if We apply anonymization tools to it, which would essentially make it impossible for Us to identify You.

IX. Personal Data Transmission

Transmission in general. We can transmit Your personal data to Processors, Co-controllers and Third Parties, based on the law, court or governmental body decision.

Transmission in specific situations. We have the right to transfer Your personal data by default to countries recognized by the EU Commission as providing an adequate level of protection, generally or partially, in specific industries.

X. Personal Data Protection

Protection in general. We protect Your personal data through technical and organizational measures.

Measures of protection. These measures include:

- HTTP connection with SSL and TLS certificates;
- Training employees in cyber security and data privacy via onboarding;
- Employees distribute access to personal data;
- Distribute storing in different databases;
- Safe servers for Web hosting and data storage;
- Integration with Third Party's software through official APIs;
- Strong password requirements;
- Obfuscator;
- Play Fab protection;
- Server controlling.

XI. Data Breach Notification

Notifying the DPA. We shall notify the respective DPA through any designated by DPA means of communication within 72 hours after We become aware of the data breach and report the following information:

- Describe the nature of the data breach.
- Contains the name and contact details of the responsible person from whom more can be obtained more information.
- Describe the possible consequences of the data breach.
- Describe the measures taken or proposed by Us to address the data breach.

Notifying You. If a data breach may lead to a violation of Your rights and freedoms or has a high risk of this, We shall immediately inform You in any possible means of communication, in particular the e-mail, in-app and push messages of the fact of the data breach and report the following information:

- Describe in clear and simple language the nature of the data breach.
- Contains the name and contact details of the responsible person from whom more can be obtained more information.
- Describe the possible consequences of breaching the security of personal data.
- Describe the measures taken or proposed by us to address the data breach.
- Provide You with useful tips and know-how that can help You in reducing the risks of a data breach.

XII. Contact Information

Contact us. You can ask us any question about Your personal data or make a complaint through the following e-mail: InterplayDigital@gmail.com. We will give You an answer as soon as possible, but no more than 30 calendar days.

Contact Our Processors and Co-controllers. You can make inquiries or complaints to Our Processors and Co-controllers via any available means of contact on Their Websites. The timing and procedure for responding depend on the internal policies of Our Processors and Co-controllers.

Contact DPA. You can ask DPA any question about Your personal data or make a complaint through the following link: https://edpb.europa.eu/about-edpb/about-edpb/members_en. The timing and procedure for responding depend on the internal policies of DPA.

XIII. Miscellaneous

Effective date. This version of the Privacy Notice is valid from the Effective date.

Changes. We may make changes from time to time without Your consent. The new version will be valid from the time of the changes noted at the beginning of this Privacy Notice.

Governing law and Dispute resolution. This Privacy Notice is construed in accordance with Lithuania legislation. All disputes arising from this Privacy Notice are resolved by the respectful court in Lithuania with Lithuanian law as material and processual legislation but only after 20 calendar days of negotiations between Us.

Languages. This Privacy Notice is available in English. If there are any differences between the English and any other translated versions, the English version shall prevail.

XIV. Legal Information

Company Name: Interplay Digital	
Company Number: 306156183	VAT Number: not applicable
Legal Address: Lithuania, LT-02194, Vilnius Eišiškių Sodų 18-oji g. 11	
Email: InterplayDigital@gmail.com.	