

LunaBalance Privacy Policy

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1. Introduction

1.1 Commitment to Privacy

LunaBalance (“App,” “Service,” “we,” “us,” or “our”) is committed to protecting your privacy. This Privacy Policy explains how Commerce Pluvieux LLC (“Company”) collects, uses, discloses, and safeguards your personal information when you use our mobile application and related services.

1.2 Scope

This Privacy Policy applies to: - The LunaBalance mobile application - Our website at lunabal-ance.app - Related services and communications - All users regardless of location

1.3 Consent

By using LunaBalance, you consent to the collection and use of your information as described in this Privacy Policy. If you do not agree, please do not use the Service.

1.4 Health Data Sensitivity

We recognize that menstrual cycle data, symptom tracking, and fasting logs are sensitive personal information. We handle this data with the highest standards of care and security.

2. Information We Collect

2.1 Information You Provide Directly

a) Account Information: - Email address - Username or display name - Password (encrypted) - Date of birth - Profile photo (optional)

b) Menstrual Cycle Data: - Period start and end dates - Cycle length and regularity - Flow intensity levels - Predicted ovulation dates - Fertility window information

c) Symptom Tracking Data: - Physical symptoms (cramps, headaches, bloating, fatigue, etc.) - Emotional/mood symptoms (mood swings, anxiety, irritability, etc.) - Energy levels - Sleep quality - Skin changes - Digestive symptoms - Custom symptoms you add

d) Fasting and Nutrition Data: - Fasting schedules and logs - Fasting duration records - Eating windows - Food intake logs (if provided) - Dietary preferences and restrictions - Hydration tracking

e) Health Profile Information: - Height and weight (optional) - Health goals - Activity level - Medical conditions (if voluntarily disclosed) - Medications (if voluntarily disclosed)

f) **Communications:** - Support requests and correspondence - Feedback and survey responses - In-app messages

2.2 Information Collected Automatically

a) **Device Information:** - Device type and model - Operating system and version - Unique device identifiers - Mobile network information - IP address - App version

b) **Usage Data:** - Features accessed and frequency - Time spent in app - Screens viewed - Button clicks and interactions - Search queries within the app - Notification interactions

c) **Log Data:** - Access times and dates - Error logs and crash reports - Performance data

2.3 Information from Third Parties

a) **Sign-In Services:** If you sign in using Google, Apple, or other providers: - Basic profile information (name, email) - Profile photo (if public) - Unique identifier from the provider

b) **Health Integrations (with your permission):** - Apple Health data - Google Fit data - Other connected health apps

c) **Analytics Partners:** - Aggregated usage statistics - Performance metrics

3. How We Use Your Information

3.1 Primary Service Functions

We use your information to:

a) **Provide Core Features:** - Track and predict menstrual cycles - Generate personalized fasting recommendations based on cycle phase - Provide food and nutrition recommendations - Power AI-driven personalization algorithms - Display symptom patterns and insights - Store and sync your data across devices

b) **Personalization:** - Customize recommendations to your cycle and preferences - Improve prediction accuracy over time - Adapt content to your health goals - Learn from your feedback and corrections

3.2 Service Improvement

a) **Analytics and Development:** - Understand how features are used - Identify bugs and technical issues - Develop new features - Improve existing functionality - Conduct research (using anonymized data only)

b) **AI/ML Training:** - Improve recommendation algorithms - Enhance prediction models - All training uses de-identified, aggregated data

3.3 Communications

a) **Service Communications:** - Account verification - Password resets - Important updates about the Service - Cycle and fasting reminders (if enabled) - Support responses

b) Marketing (with consent): - New feature announcements - Tips and educational content - Promotional offers - Surveys and feedback requests

You can opt out of marketing communications at any time.

3.4 Safety and Legal

- Protect against fraud and abuse
- Enforce our Terms of Service
- Comply with legal obligations
- Respond to legal requests
- Protect rights and safety

4. Legal Basis for Processing (GDPR)

If you are in the European Economic Area (EEA), UK, or other jurisdictions requiring a legal basis, we process your data under:

Purpose	Legal Basis
Providing the Service	Contract performance
Account management	Contract performance
Core feature functionality	Contract performance
Marketing communications	Consent
Service improvement	Legitimate interests
Analytics	Legitimate interests
Legal compliance	Legal obligation
Safety and security	Legitimate interests
Health data processing	Explicit consent

5. Data Sharing and Disclosure

5.1 We Do NOT Sell Your Data

We do not sell, rent, or trade your personal information to third parties for their marketing purposes.

5.2 Service Providers

We share data with trusted third parties who assist in operating our Service:

Provider Type	Purpose	Data Shared
Cloud hosting	Data storage	Encrypted data
Analytics	Usage analysis	Anonymized usage data
Payment processors	Subscription billing	Payment info (not stored by us)
Email services	Communications	Email address, name

Provider Type	Purpose	Data Shared
Customer support	Help desk	Support ticket data
Push notifications	Reminders	Device tokens

All service providers are contractually bound to protect your data and use it only for specified purposes.

5.3 Legal Requirements

We may disclose information when required to: - Comply with applicable laws or regulations - Respond to valid legal process (subpoenas, court orders) - Protect our rights, property, or safety - Protect users or the public from harm - Detect and prevent fraud

5.4 Business Transfers

In the event of a merger, acquisition, or sale of assets, your information may be transferred. We will notify you of any change in ownership or use of your data.

5.5 With Your Consent

We may share information for other purposes when you provide explicit consent.

5.6 Aggregated/De-identified Data

We may share aggregated, anonymized data that cannot identify you for: - Research and publications - Industry benchmarks - Marketing materials

6. Data Storage and Security

6.1 Data Storage

- **Location:** Data is stored on servers located in the United States
- **Retention:** See Section 7 for retention periods

6.2 Security Measures

We implement industry-standard security measures:

Technical Safeguards: - Encryption in transit (TLS 1.2+) - Encryption at rest (AES-256) - Secure password hashing (bcrypt) - Regular security audits - Penetration testing - Intrusion detection systems - Firewalls and access controls

Organizational Safeguards: - Employee security training - Access limited to authorized personnel - Background checks for employees with data access - Incident response procedures - Regular security reviews

6.3 Your Security Responsibilities

You can help protect your data by: - Using a strong, unique password - Enabling two-factor authentication - Not sharing your account - Logging out on shared devices - Keeping your device secure

6.4 Breach Notification

In the event of a data breach affecting your personal information, we will: - Notify affected users within 72 hours (or as required by law) - Notify relevant supervisory authorities - Take immediate steps to mitigate harm - Provide information about protective measures

7. Data Retention

7.1 Retention Periods

Data Type	Retention Period
Account information	Duration of account + 30 days
Cycle and symptom data	Duration of account + 30 days
Fasting logs	Duration of account + 30 days
Usage analytics	24 months (anonymized)
Support communications	3 years
Payment records	7 years (legal requirement)
Marketing consent records	Duration of consent + 3 years

7.2 Account Deletion

Upon account deletion: - Personal data is deleted within 30 days - Backup copies are purged within 90 days - Anonymized/aggregated data may be retained - Data required for legal purposes may be retained

7.3 Data Export

You may export your data at any time through the App settings before deletion.

8. Your Privacy Rights

8.1 Universal Rights

Regardless of your location, you have the right to: - **Access:** Request a copy of your personal data - **Correction:** Update or correct inaccurate data - **Deletion:** Request deletion of your data - **Export:** Download your data in a portable format - **Withdraw Consent:** Revoke consent for optional processing - **Opt-Out:** Unsubscribe from marketing communications

8.2 GDPR Rights (EEA/UK Users)

If you are in the EEA or UK, you also have: - **Restriction:** Limit processing in certain circumstances - **Objection:** Object to processing based on legitimate interests - **Portability:** Receive data in a machine-readable format - **Automated Decisions:** Not be subject to solely automated decisions with legal effects - **Complaint:** Lodge a complaint with a supervisory authority

Supervisory Authorities: - UK: Information Commissioner's Office (ICO) - EU: Your local Data Protection Authority

8.3 CCPA/CPRA Rights (California Residents)

California residents have additional rights under the CCPA/CPRA:

a) **Right to Know:** - Categories of personal information collected - Sources of personal information - Purposes for collection - Categories shared with third parties - Specific pieces of information collected

b) **Right to Delete:** Request deletion of personal information, with certain exceptions.

c) **Right to Opt-Out of Sale/Sharing:** We do not sell personal information. We do not share personal information for cross-context behavioral advertising.

d) **Right to Non-Discrimination:** We will not discriminate against you for exercising your rights.

e) **Right to Correct:** Request correction of inaccurate information.

f) **Right to Limit Use of Sensitive Personal Information:** Menstrual cycle data may be considered sensitive. You can limit its use to providing the Service.

Categories of Personal Information Collected (CCPA): - Identifiers (email, device ID) - Personal information (name, account info) - Health information (cycle data, symptoms) - Internet activity (usage data) - Geolocation (general location from IP) - Inferences (predictions, recommendations)

Shine the Light: California residents may request information about disclosures to third parties for direct marketing purposes. Contact us at privacy@lunabalance.app.

8.4 Other Jurisdictions

We comply with applicable privacy laws in other jurisdictions, including: - Canada (PIPEDA) - Australia (Privacy Act) - Brazil (LGPD) - Other applicable laws

8.5 Exercising Your Rights

To exercise any privacy right:

In-App: Settings > Privacy > Manage My Data

Email: privacy@lunabalance.app

Mail: 30 N Gould St STE N, Sheridan WY 82801

We will respond within: - GDPR: 30 days (extendable to 90 days) - CCPA: 45 days (extendable to 90 days)

We may need to verify your identity before processing requests.

9. International Data Transfers

9.1 Transfer Mechanisms

If you are outside the United States, your data may be transferred to and processed in the United States. We ensure appropriate safeguards through:

- **Standard Contractual Clauses (SCCs):** EU-approved data transfer agreements
- **Data Processing Agreements:** Contracts with service providers
- **Adequacy Decisions:** Transfers to countries with adequate protection
- **Your Consent:** Where applicable

9.2 EU-US Data Transfers

For transfers from the EU to the US, we rely on: - Standard Contractual Clauses - Supplementary measures where required

10. Cookies and Tracking Technologies

10.1 What We Use

In the Mobile App: - Device identifiers for analytics - Local storage for app functionality - SDK-based analytics tools

On Our Website: - Essential cookies (required for functionality) - Analytics cookies (with consent) - Marketing cookies (with consent)

10.2 Cookie Categories

Category	Purpose	Consent Required
Essential	Core functionality	No
Analytics	Usage understanding	Yes (where required)
Marketing	Advertising	Yes

10.3 Managing Cookies

Website: Use our cookie preference center or browser settings

Mobile App: Adjust privacy settings in the App or device settings

10.4 Do Not Track

We honor Do Not Track (DNT) browser signals where technically feasible.

11. Children’s Privacy (COPPA)

11.1 Age Restriction

LunaBalance is intended for users aged 18 and older. We do not knowingly collect personal information from children under 13 (or 16 in certain jurisdictions).

11.2 Parental Notification

If we learn that we have collected information from a child under the applicable age: - We will delete the information promptly - We will notify the parent/guardian if required - We will take steps to prevent future collection

11.3 Reporting

If you believe a child has provided us with personal information, please contact us immediately at privacy@lunabalance.app.

12. Third-Party Links and Services

12.1 External Links

Our Service may contain links to third-party websites or services. We are not responsible for their privacy practices. Review their privacy policies before providing information.

12.2 Health App Integrations

If you connect LunaBalance to Apple Health, Google Fit, or other health platforms: - Data sharing is controlled by your permissions - We access only data you authorize - You can disconnect integrations at any time - Third-party platforms have their own privacy policies

13. Changes to This Privacy Policy

13.1 Updates

We may update this Privacy Policy periodically. Changes become effective upon posting unless otherwise specified.

13.2 Notification

For material changes, we will: - Update the “Last Updated” date - Provide in-app notification - Send email notice (for significant changes) - Obtain new consent where required by law

13.3 Review

We encourage you to review this Privacy Policy regularly.

14. Data Protection Officer

14.1 DPO Contact

For privacy questions, data requests or deletion:

Commerce Pluvieux LLC

Privacy Contact Email: privacy@lunabalance.app

15. Contact Us

15.1 Privacy Inquiries

For questions, concerns, or requests regarding this Privacy Policy or your personal data:

Commerce Pluvieux LLC

Privacy Team Email: info@lunabalance.app

General Support: support@lunabalance.app

Mailing Address: 30 N Gould St STE N Sheridan, WY 82801

Phone: 907-231-1637

15.2 Response Time

We aim to respond to all privacy inquiries within: - General questions: 5 business days - Data subject requests: 30 days (GDPR) / 45 days (CCPA)

16. Additional Disclosures

16.1 California Residents

“Do Not Sell or Share My Personal Information”

We do not sell your personal information. We do not share your personal information for cross-context behavioral advertising. No opt-out is necessary, but you may still submit a request at privacy@lunabalance.app.

Authorized Agents: California residents may designate an authorized agent to make requests on their behalf. Verification may be required.

16.2 Nevada Residents

Nevada residents may opt out of the sale of personal information. We do not currently sell personal information as defined under Nevada law. To submit an opt-out request, contact privacy@lunabalance.app.

16.3 Virginia, Colorado, Connecticut, Utah Residents

Residents of these states have rights similar to CCPA. Contact us to exercise your rights.

17. Glossary

Personal Information/Data: Information that identifies, relates to, or could reasonably be linked to you or your household.

Processing: Any operation performed on personal data (collection, storage, use, disclosure, deletion).

Controller: The entity that determines purposes and means of processing (LunaBalance/Commerce Pluvieux LLC).

Processor: A third party that processes data on our behalf.

Sensitive Personal Information: Health data, precise geolocation, and other categories requiring enhanced protection.

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