

## Privacy Policy

This Privacy Policy governs your use of mytruehuman.com and our application (collectively referred to as "Product"). It describes the types of data we collect, how we store it, how it may be used, with whom it may be shared, and your choices regarding these uses and disclosures. Please make sure to carefully read the entire Privacy Policy when using our Product.

"GDPR" means the General Data Protection Regulation (EU) 2016/679 of the European Parliament and of the Council of 27 April 2016 on the protection of natural persons concerning the processing of personal data and on the free movement of such data.

"EEA" includes all current member states of the European Union and the European Economic Area.

"CCPA" means the California Consumer Privacy Act of 2018.

"Processing," in relation to personal data, includes collecting, storing, using, and disclosing it to others.

Refer to TrueHuman's Terms of Use and Service (the "Terms") for the meaning of defined words (those capitalized) not explicitly defined in this Privacy Policy.

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## 1. DATA CONTROLLER

TrueHuman LLC, 5830 E 2ND ST, STE 7000 #30633 CASPER, WY 82609 USA, will be the data controller of your personal data.

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## 2. WHAT CATEGORIES OF PERSONAL DATA DO WE COLLECT?

We collect data that you voluntarily provide to us (e.g., email address, name, date of birth). We also collect data automatically when you use the Product (e.g., your IP address, device type).

### 2.1. Data You Provide to Us

You provide data about yourself when you register and/or use the Product, for example, when creating a user profile ("Profile"), responding to our emails, or reporting an issue. The data you provide includes:

- **Profile Data:** This includes your email address and password.

### 2.2. Data We Collect Automatically

- **Data on How You Found Us:** We collect data about your referral URL (i.e., the place on the web where you were when you clicked on our ad).

- **Cookies and Similar Technologies:** As detailed in our Cookie Policy, our Product uses cookies that record data about your use of the Product to distinguish you from other users. You can control cookies via your browser settings.
  - **Browser and Device Data:** We collect data from or about the devices you use to access the Product, depending on the permissions you grant. We may link data we collect from your different devices, which helps us provide consistent Services across all your devices. Examples of such data include language settings, IP address, location, time zone, device type and model, device settings, operating system, internet service provider, mobile carrier, hardware ID, and Facebook ID.  
We also collect your Apple Identifier for Advertising ("IDFA") or Google Advertising ID ("AAID") (depending on your device's operating system). Typically, you can reset these numbers via your device's operating system settings (but we have no control over this).
  - **Transaction Data:** When you make payments through the Product, you need to provide financial account data, such as your credit card number, to our third-party service providers. We do not collect or store full credit card numbers, though we may receive data related to credit cards and transactions, including transaction date, time, amount, and payment method type.
  - **Usage Data:** We record how you interact with our Product. For example, we log the messages you send to your virtual coach, the features and content you interact with, the frequency and duration of Product use, sections visited, and other interactions.
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### 3. FOR WHAT PURPOSES DO WE PROCESS YOUR PERSONAL DATA?

We process your personal data for the following purposes:

#### 3.1. To Provide You with Services

This includes enabling you to use the Product seamlessly and preventing or resolving errors or technical issues with the Product. For example, we use your data to authenticate you and authorize access to our Product.

To provide personalized support and improve your experience with our AI assistant, we process information you share within our chat and how you interact with the chat. This includes details about the features you access, chat updates, pop-ups you've responded to, quick clicks, exit actions, and usage frequency, helping us better understand general engagement patterns, including your feedback.

We collect and store the specific content of your messages to train and improve the AI assistant (the virtual coach) you interact with. Chat data may be retained indefinitely unless you explicitly request the deletion of your data by emailing us at [help@mytruehuman.com](mailto:help@mytruehuman.com).

We could use the following companies as a third-party provider for AI chat functionality within our app: OpenAI, xAI, LLama (Meta), Anthropic, Gemini (Google), Mistral AI. In the event that data is shared with one of these companies, each of them may retain chat data for a maximum of 30 days exclusively for security purposes and abuse monitoring. They do not

use this data to train or improve their models and implement security measures to protect the data.

### **3.2. To Research and Analyze Your Use of the Product**

This helps us better understand our business, analyze operations, maintain, improve, innovate, plan, design, and develop the Product and our new offerings. We conduct surveys, research, and test features in development. We analyze the data we have to assess our Product and perform audits and troubleshooting activities to improve the content and layouts of our Product. For example, if we discover that users rarely use a particular section of the Product, we may focus on improving that section.

### **3.3. To Personalize the Product for You**

We may select the payment processor available to you; we may also use your data to determine your eligibility for promotions, sweepstakes, and contests.

### **3.4. To Process Your Payments**

We provide paid products and/or services within the Product. To do so, we use third-party services to process payments (e.g., payment processors). As a result of this processing, you will be able to make payments for the paid features of the Product.

### **3.5. To Enforce the Terms and Prevent, Detect, Investigate, and Resolve Disputes or Harmful Activities**

We use personal data to enforce our agreements and contractual commitments, detect, prevent, and combat fraud. As a result of this processing, we may share your information with others, including law enforcement (especially if a dispute arises concerning the Terms).

### **3.6. To Communicate with You About Your Use of Our Product**

We may communicate with you via email or directly on the Product, including through push notifications. As a result of this processing, we may send you messages about your statistics.

### **3.7. To Show and/or Send You Marketing Communications**

We process your personal data for our marketing campaigns. We may add your email address to our mailing list. As a result, you will receive information about our Product, features, offers, promotions, contests, and events, or we may provide you with other news or information about third-party services that may interest you. You can unsubscribe from marketing communications by clicking the "Unsubscribe" button in any email you receive.

### **3.8. To Provide You with Assistance and Customer Support**

As a result of this processing, we will send you messages about Product security availability, payment transactions, order status, legal notices, or other Product-related information.

### **3.9. To Customize Our Ads**

We and our partners use your personal data to customize advertisements and potentially show them to you at the right time.

### **3.10. To Comply with Legal Obligations**

We may process, use, or share your data when required by law, particularly if a law enforcement authority requests your data through legally available means.

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## **4. LEGAL BASIS FOR PROCESSING (EEA ONLY)**

This section applies only to users located in the EEA. Here, we inform you about the legal basis we rely on for processing your personal data for specific purposes. For more details on a particular purpose, refer to Section 3.

We process your personal data based on the following legal bases:

### **4.1. Your Consent**

We process your data when you have given consent for a specific purpose. For example, we may process your data to send you marketing communications if you have consented to this.

### **4.2. To Perform Our Contract With You**

Under this legal basis, we process your data for purposes such as:

- Providing services,
- Personalizing your experience,
- Communicating with you about your use of the Product,
- Verifying your identity,
- Managing your account and providing customer support,
- Processing your payments.

### **4.3. For Our (or Others') Legitimate Interests**

We process your personal data based on legitimate interests, provided these interests are not outweighed by your interests, rights, or freedoms. Examples include:

- **Communicating with you about your use of the Product:** This may involve sending notifications. Our legitimate interest is encouraging you to use the Product more often while considering the potential benefits for you.
- **Researching and analyzing your use of the Product:** Our legitimate interest lies in improving our Product to better understand user preferences and provide a better experience.
- **Sending you marketing communications:** Our legitimate interest is promoting our Product in a measured and appropriate way. Depending on your jurisdiction, we may rely on your consent instead of legitimate interest.

- **Customizing our ads:** Our legitimate interest is promoting our Product in a targeted and reasonable manner. Depending on your jurisdiction, we may rely on your consent instead of legitimate interest.
- **Enforcing the Terms and preventing fraud:** Our legitimate interests include enforcing our legal rights, preventing fraud, and combating unauthorized use of the Product or non-compliance with the Terms.

#### 4.4. To Comply with Legal Obligations

Under this legal basis, we process your data to fulfill obligations such as verifying your identity.

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## 5. CALIFORNIA PRIVACY RIGHTS

This section provides additional details about how we process the personal data of California consumers and the rights available to them under the California Consumer Privacy Act of 2018 ("CCPA") and California's Shine the Light law. This section applies only to California residents.

### 5.1. Your Rights Under the CCPA

If you are a California resident, you have the right to:

- **Request to Know:** You may request that we disclose the categories and specific pieces of personal data we have collected about you, the sources of this data, the purposes for collecting it, and the categories of third parties with whom we share it.
- **Request Deletion:** You may request that we delete the personal data we have collected about you, subject to certain exceptions.
- **Opt-Out of Sale of Personal Information:** If applicable, you may opt out of the sale of your personal data.

### 5.2. Submitting Requests

To exercise your rights under the CCPA, you can submit a request by emailing us at [help@mytruehuman.com](mailto:help@mytruehuman.com). Include "California Privacy Rights Request" in the subject line, along with your name, address, city, state, and zip code.

We may need to verify your identity and the validity of your request before processing it. You may also submit requests through an authorized agent, in which case we will verify the agent's identity and their authority to act on your behalf.

### 5.3. Shine the Light Law

California residents can request information about our sharing of personal data with third parties for their direct marketing purposes. Such requests can be made once per year, free of charge, and pertain to the last 12 months. Submit requests to [help@mytruehuman.com](mailto:help@mytruehuman.com) under the subject line "California Shine the Light Request."

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## 6. DATA RETENTION

We retain personal data for as long as necessary to fulfill the purposes outlined in this Privacy Policy unless a longer retention period is required or permitted by law.

Please note that we are obligated to retain certain data you provide for purposes such as ensuring transactions are processed correctly, detecting fraud, and complying with anti-money laundering and other applicable laws and regulations. Therefore, even if you disable or delete your Profile, we may retain certain data to meet these obligations.

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## 7. WHO DO WE SHARE YOUR PERSONAL DATA WITH?

We share your data with third parties that help us manage, provide, improve, integrate, personalize, support, and market our Product. These include:

### 7.1. Service Providers

We share personal data with third parties we hire to provide services or perform business functions on our behalf. These include:

- **Cloud storage providers** (e.g., Google Cloud Platform, servers.com),
- **Data analytics providers** (e.g., Facebook, Google, Amplitude),
- **Marketing partners** (e.g., social networks, marketing agencies, email delivery services),
- **Payment processors** (for handling transactions).

### 7.2. Law Enforcement and Public Authorities

We may use and disclose personal data to enforce the Terms, protect our rights, privacy, safety, or property (and that of our affiliates, you, or others), and respond to legal requests from courts, law enforcement agencies, regulatory bodies, or other public authorities.

### 7.3. Third Parties in the Context of a Merger or Acquisition

As we grow our business, we may buy or sell assets or business offerings. Customer information is typically one of the business assets transferred in such transactions. We may also share such information with affiliates (e.g., parent or subsidiary companies) or transfer it during business transactions such as mergers, acquisitions, bankruptcies, or sales of all or part of our business.

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## 8. INTERNATIONAL DATA TRANSFERS

We may transfer personal data to countries other than the one in which it was originally collected to provide the Product as outlined in the Terms and this Privacy Policy. If these countries do not have the same data protection laws as your country, we will implement special safeguards.

For example, when transferring data from the EEA to countries with inadequate data protection levels, we rely on:

- Standard contractual clauses approved by the European Commission;
  - The EU-U.S. Data Privacy Framework; or
  - Adequacy decisions by the European Commission on certain countries.
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## 9. CHANGES TO THIS PRIVACY POLICY

We may modify this Privacy Policy at any time. If we make material changes, we will notify you via the Product or other available means and provide an opportunity to review the revised Privacy Policy. By continuing to access or use the Product after changes take effect, you agree to the updated Privacy Policy.

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## 10. AGE LIMITATION

We do not knowingly process personal data of individuals under the age of 18. If you become aware that someone under 18 has provided us with personal data, please contact us at [help@mytruehuman.com](mailto:help@mytruehuman.com).

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## 11. PRIVACY RIGHTS

You have the following rights regarding your personal data:

- **Access/Review/Update/Correct Your Data:** You can review, edit, or change the data you provided by logging into the Product.
  - **Delete Your Data:** You may request the deletion of your data by emailing [help@mytruehuman.com](mailto:help@mytruehuman.com).
  - **Object or Restrict Processing:** You can request that we stop using some or all of your personal data or restrict its use.
  - **Data Portability:** You can request your data in a machine-readable format by emailing [help@mytruehuman.com](mailto:help@mytruehuman.com).
  - **File a Complaint:** You have the right to file a complaint with a data protection authority in the EU or your place of residence.
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## 12. HOW DO WE HANDLE “DO NOT TRACK” REQUESTS?

Unless otherwise stated in this Privacy Policy, the Product does not support “Do Not Track” requests. To learn whether any third-party services we use honor these requests, please refer to their respective privacy policies.

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## 13. CONTACT US

For any questions or concerns about this Privacy Policy or our data collection, use, or storage practices, please contact us at:

- **Email:** [help@mytruehuman.com](mailto:help@mytruehuman.com)
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## 14. Community Privacy Policy

**Effective Date:** 7/7/2025

### The Lawyer-Free Summary (Our Privacy Promise to You)

Your privacy is sacred to us. We built this sanctuary on a foundation of trust, and this policy is our promise to you.

1. **We Collect Only What We Need:** We collect the information needed to run the community safely and effectively (your posts, usage data, etc.).
  2. **Your Identity is Protected:** You participate with a username. We strongly advise against sharing personal details.
  3. **We DO NOT Sell Your Data. Period.**
  4. **How We Use Your Data:** We use it to operate the community, keep it safe, and improve our services. We do NOT use your community posts to train our AI models.
  5. **You Are in Control:** You have rights to access, correct, or delete your data.
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### 1. Introduction

This Privacy Policy explains how TrueHuman ("we," "us," "our") collects, uses, and protects your information when you use our Community feature. This policy supplements the main TrueHuman Privacy Policy.

### 2. Information We Collect

- **2.1. Information You Provide Directly:**
  - **Account Information:** Your chosen username and any optional profile information you provide.]
  - **User Content:** The posts, comments, and messages you submit to the Community.
- **2.2. Information We Collect Automatically:**
  - **Usage Data:** We collect information about your interactions with the Community, such as which channels you visit, what content you view, and the dates and times of your activity. This helps us understand what is valuable to our members and how to improve the service.
  - **Device Information:** We may collect basic information about the device you use to access the Community (e.g., device type, operating system) to help us diagnose technical issues and improve performance.

### 3. How We Use Your Information

We use your information for the following purposes:

- **To Operate and Maintain the Community:** To display your posts and comments, facilitate interaction between members, and manage your account.
- **To Ensure Safety and Security:** To monitor for and enforce our Terms and Conditions, protect the safety of our members, and prevent harmful behavior.
- **To Communicate With You:** To send you important notices about the Community, such as updates to our Terms or Policy.
- **To Improve Our Services:** To analyze usage trends and feedback (on an aggregated and anonymized basis) to understand what features are working and how we can make the TrueHuman experience better.

### 4. How We Share Your Information

Your trust is our most important asset. Our data sharing practices are designed to protect it.

- **We DO NOT sell your personal data to third parties.**
- **With Other Community Members:** Your username and the content you post will be visible to other members of the Community.
- **With Service Providers:** We may share information with third-party vendors who perform services on our behalf, such as cloud hosting (e.g., Amazon Web Services). These providers are contractually obligated to protect your data and are not permitted to use it for their own purposes.

- **Regarding AI Service Providers:** Your 1-on-1 conversations with your AI Coach are processed by our AI partners to generate responses, under strict agreements that prevent them from using your data for training. **However, content posted within the Community is separate and is NOT sent to our AI partners for analysis or response generation.**
- **For Legal Reasons:** We may disclose your information if required to do so by law or in the good faith belief that such action is necessary to comply with a legal obligation, protect our rights, or defend against legal liability.
- **Aggregated and Anonymized Data:** We may share data that has been aggregated and anonymized (and can no longer be used to identify you) with partners for research or business analysis.

## **5. Moderation and Enforcement**

We believe in active moderation to protect the safety of our sanctuary. TrueHuman reserves the right, but not the obligation, to:

- Review, screen, or delete any User Content that, in our sole judgment, violates these Terms.
- Issue warnings to users who violate our guidelines.
- Temporarily suspend or permanently terminate a user's access to the Community for repeated or severe violations.

## **Important Notice: Community Limitations and Responsibilities**

TrueHuman is not responsible for the emotional, psychological, or physical impact of any content encountered in the Community. Participation is voluntary, and all users are encouraged to seek immediate professional help in the event of a crisis. If you or someone you know is in danger or experiencing suicidal thoughts, please contact emergency services or a mental health professional.

TrueHuman does not screen content in real-time and cannot guarantee that all posts will be free from triggering, ambiguous, or distressing material.

While we actively moderate the Community to uphold our rules, we do not pre-approve or monitor all content before it is published. Users are responsible for their interactions, and we strongly encourage mindful participation and self-care.

## **Community Support Only — Not a Crisis Line**

This community offers peer support and encouragement, not medical advice or crisis intervention. If you are in immediate danger or experiencing suicidal thoughts, please seek professional help or contact a local emergency service.

## **6. Disclaimers**

The Community is a peer-support platform. It is not a substitute for professional medical advice, diagnosis, or treatment. Always seek the advice of your physician or other qualified health provider with any questions you may have regarding a medical or mental health condition. Never disregard professional medical advice or delay in seeking it because of something you have read in the Community.

## **7. Data Security**

We implement robust technical and organizational measures to protect your information from unauthorized access, use, or disclosure. This includes data encryption, access controls, and regular security reviews. However, no method of transmission over the Internet is 100% secure.

## **8. Your Rights and Choices**

You have rights over your personal data. You may:

- Access, edit, or delete the content you have posted.
- Request a copy of the information we hold about you.
- Request the deletion of your Community account and associated data.

To exercise these rights, please contact us at [help@mytruehuman.com](mailto:help@mytruehuman.com).

## **9. Changes to This Privacy Policy**

We may update this Privacy Policy from time to time. We will notify you of any significant changes. Your continued use of the Community after the effective date of the new policy will constitute your acceptance of the changes.

## **10. Contact Us**

If you have any questions about this Privacy Policy, please contact us at [help@mytruehuman.com](mailto:help@mytruehuman.com)