

PRIVACY

Privacy Policy

How GlowUP collects, uses, shares and protects your information, and the choices you have.

[COMPANY LEGAL NAME] · [STREET ADDRESS, CITY, STATE ZIP, USA] · support@glowup.app ·

Last updated [LAST UPDATED DATE]

1. Who we are and what this covers

This Privacy Policy explains how [COMPANY LEGAL NAME], a [ENTITY TYPE, e.g. Delaware limited liability company] located at [STREET ADDRESS, CITY, STATE ZIP, USA] (“GlowUP”, “we”, “us”), handles personal information when you use our website, our quiz, our checkout and the GlowUP - Face Yoga mobile app (together, the “Service”). Effective date: [EFFECTIVE DATE]. Last updated: [LAST UPDATED DATE].

The Service is intended for adults in the United States who are 18 or older. By using it you confirm that you are at least 18.

2. Information we collect

Information you give us

- **Quiz answers.** Your goals, areas of focus, schedule, lifestyle habits, skin feel and sensitivity, skin tone, and whether you currently have pain or tenderness on your face or skin. Some of these answers can relate to your physical wellbeing, so we handle them as described in section 5.
- **Account and contact details.** Your email address, a password hash (we never store your password itself), and the messages you send to support.
- **Purchase details.** The plan you chose, the amount, the date and the status of your payment. Your card number is entered on a secure page run by our payment processor and is never stored by us.

Information collected automatically

- **Device and usage data.** App and browser version, operating system, language, approximate location derived from your IP address, pages and screens viewed, which quiz step you reached, and error reports.
- **Marketing source.** If you arrive from a link or an ad, the campaign or referrer information in that link, so we can tell which sources work.

- **Cookies and similar storage.** Our quiz saves your progress in your browser so you can come back to it. We use only the storage needed to run the Service and keep it secure. See section 7 for advertising and analytics tools.

Information that stays on your device

Your practice history, favorites, reminder settings and any progress photos you choose to take are stored on your device. We do not receive your progress photos.

3. How we use information

- To build your personal plan and show it to you.
- To create your account, process your purchase, give you access to paid features and send receipts and sign-in codes.
- To provide support, answer requests and handle refunds.
- To keep the Service secure, prevent fraud and abuse, and fix errors.
- To understand which parts of the quiz and the app work well, using aggregated product events that do not contain your health-related answers.
- To comply with the law and enforce our Terms of Use.

4. How we share information

We do not sell your personal information, and we do not share it with advertisers for cross-context behavioral advertising. We share it only as follows:

- **Service providers** that work for us under written terms: payment processing (Stripe), hosting ([HOSTING PROVIDER AND U.S. REGION]), email delivery ([E-MAIL PROVIDER]), and error monitoring.
- **Legal and safety.** When required by law, court order or a valid government request, or to protect the rights, safety and property of you, us or others.
- **Business changes.** If we are involved in a merger, financing, acquisition or sale of assets, your information may be transferred, and we will tell you if it will be handled under a different policy.
- **With your direction.** When you ask us to, for example when you contact support.

5. Consumer health information

Some quiz answers, such as whether you have facial pain or tenderness, and details about your skin, may be treated as consumer health information under laws in some states, including Washington, Nevada and Connecticut. We therefore handle them with extra care:

- We ask for them only to shape your plan and to decide whether practice is suitable for you.
- We tell you before you answer why we ask, and you can stop the quiz at any time.
- We do not send them to advertising platforms or third-party analytics tools, and we do not sell them.
- We keep an anonymous quiz session for up to 30 days if you do not buy or create an account, then delete it. If you buy, the answers are linked to your account until you delete it.
- You can ask us to access or delete them at any time (section 6).

GlowUP is a wellness service. It does not diagnose, treat or prevent any condition, and the answers are not used to make medical decisions. [LEGAL REVIEW: add the separate consumer health data consent flow if counsel requires one.]

6. Your privacy rights

Depending on where you live, you may have the right to:

- know and access the personal information we hold about you, and get a portable copy;
- correct information that is wrong;
- delete your information;
- opt out of the sale or sharing of personal information, targeted advertising and certain profiling (we do none of these today, see section 7);
- limit the use of sensitive personal information;
- appeal a decision about your request;
- not be treated worse for using these rights.

These rights are available under laws in states including California, Colorado, Connecticut, Virginia, Utah, Texas, Oregon and others. We offer them to all U.S. users, whichever state you live in.

How to ask. You can delete your account and server data yourself at [Delete your account](#). For any other request, email privacy@glowup.app from the address linked to your account, or use [Your Privacy Choices](#). We will confirm your request and respond within 45 days. We may need to verify your identity first, and you can use an authorized agent if you give them written permission. If we decline a request you can appeal by replying to our message, and you may also contact your state attorney general.

7. Advertising, analytics and “Do Not Sell or Share”

Today we do not use advertising pixels, cross-site tracking or third-party advertising cookies on the Service, and we do not sell or share personal information for targeted advertising. If this changes we will update this policy first, show a clear choice before any such tool loads, and add a “Do Not Sell or Share My Personal Information” link. We will honor browser signals such as Global Privacy Control as an opt-out.

8. Retention

- **Account data:** kept until you delete your account, then removed from our servers, except what the law requires us to keep, such as purchase records for tax and accounting.
- **Anonymous quiz sessions:** deleted after 30 days unless you buy or sign in.
- **Support messages:** [RETENTION PERIOD, set with counsel].
- **Backups and logs:** deleted on a rolling schedule.

9. Security

We use encryption in transit, hashed passwords, access controls, short-lived sign-in codes and regular backups. No method is perfectly secure. If a breach affects your information we will notify you and regulators as the law requires.

10. Where your information is processed

We process and store information in the United States. If you use the Service from outside the United States, you understand that your information will be transferred to and handled in the United States. The Service is offered to users in the United States only.

11. Children

The Service is not for anyone under 18. We do not knowingly collect information from people under 18. If you answer the quiz as under 18 we stop the purchase. If you think a minor gave us information, write to privacy@glowup.app and we will delete it.

12. Links to other sites

The Service can link to other sites, for example the Apple App Store and our payment processor. They have their own privacy practices, and this policy does not cover them.

13. Changes to this policy

We will post updates on this page with a new “Last updated” date. If a change is material, we will tell you in the app or by email before it takes effect.

14. Contact us

[COMPANY LEGAL NAME], [STREET ADDRESS, CITY, STATE ZIP, USA]. Privacy requests: privacy@glowup.app. General support: support@glowup.app.