

PRIVACY POLICY

Effective date: 27th March 2025

BullTech Core DMCC ("Company," "we," "us," or "our") respects your privacy and is committed to protecting your personal data. This **Privacy Policy** explains how we collect, process, and safeguard your information when you use our mobile application ("**App**").

This Privacy Policy applies to all users worldwide, with specific compliance to **United Arab Emirates (UAE) Personal Data Protection Law (PDPL), General Data Protection Regulation (GDPR) for users in the EU/EEA, and other applicable data protection laws.**

By using our App, you acknowledge that you have read, understood, and agreed to the practices described in this Privacy Policy. If you do not agree, **please discontinue use of the App immediately.**

1. INTRODUCTION

- This Privacy Policy explains:
 - What data we collect and why.
 - How we process and protect your data.
 - Your rights under **UAE PDPL, GDPR, and other applicable laws.**
 - How you can contact us regarding your privacy concerns.
- The App is designed for **nutrition tracking, AI-generated meal analysis, and movement monitoring.** We do not provide **medical advice**, and our AI-generated outputs are for **informational purposes only.**
- This Privacy Policy applies **only to this App** and does not cover third-party services that may be integrated, such as **Apple Health, Google Fit, or AI processing services.**

2. DEFINITIONS

For clarity, the following definitions apply:

- **"Personal Data"** – Any information that can directly or indirectly identify an individual, such as name, email, or health data.
- **"Processing"** – Any action performed on Personal Data, including collection, storage, sharing, and deletion.
- **"Data Controller"** – BullTech Core DMCC, responsible for determining how and why Personal Data is processed.

- **"Data Processor"** – Third parties that process data on behalf of the Data Controller (e.g., AI service providers).
 - **"AI Processing"** – The use of artificial intelligence to analyze user-provided images, text, and other inputs.
 - **"Third-Party Services"** – External services integrated with the App, such as **Apple Health, Google Fit, and AI data processing providers.**
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3. LEGAL BASIS FOR DATA PROCESSING

We process Personal Data based on the following legal grounds:

3.1 Consent (*Article 6(1)(a) GDPR & UAE PDPL Compliance*)

- We **only process data with your explicit consent**, such as when you upload meal images or connect Apple Health/Google Fit.
- You may **withdraw your consent at any time** via App settings.

3.2 Legitimate Interests (*Article 6(1)(f) GDPR*)

- We may process data to **improve App performance, detect fraud, and enhance security.**
- We ensure that our interests **do not override your privacy rights.**

3.3 Contractual Necessity (*Article 6(1)(b) GDPR*)

- If you **subscribe to premium features**, data processing is required to fulfill the contract.

3.4 Compliance with Legal Obligations (*Article 6(1)(c) GDPR & UAE PDPL*)

- We may process data to comply with **UAE laws, EU regulations, or other legal obligations.**
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4. TYPES OF DATA WE COLLECT

When you use our App, we may collect the following data:

4.1 Personal Data (Provided by You)

- Name, email address, height, age, weight, daily activity metrics, weight goals, diet preferences, and other profile-related information (if provided).
- Data from connected services like Apple HealthKit, Google Fit, or fitness trackers (caloric burn, step count, activity logs).

4.2 Device & Usage Data (Collected Automatically)

- Device model, OS version, app analytics, usage patterns, and synchronization data.

- Most user inputs and outputs from third-party are stored on our centralized servers to enable multi-device account data synchronization.

4.3 AI-Processed Data (User-Submitted Content)

- Meal images, text descriptions, and nutritional logs processed via third-party AI services. These inputs are analyzed and temporarily stored on our servers before being discarded.

4.4 Health & Fitness Data

- Data accessed from Apple Health, Google Fit, or similar services is processed locally on your device or by third-party AI providers. This data is not transmitted to or stored on our servers.

4.5 Payment Information

- We do not store payment details. Transactions are processed through Apple App Store and Google Play Store.

4.6 Analytics & Behavioral Data (If Enabled)

We may use privacy-conscious analytics tools, to collect anonymized or pseudonymized information about how users interact with the App. This may include feature usage frequency, navigation flows, session length, and click events.

5. HOW WE COLLECT DATA

- **Directly from you** (when you input meal data, connect health trackers, or interact with the App).
- **Automatically through App usage** (device data, analytics).
- **From third-party integrations** (Apple Health, Google Fit).
- **From AI processing services** (when analyzing meal images and text).
- **Third-party sign-in options (e.g., Sign-in with Apple/Google) may be added in future updates** (data collected via these methods is subject to the providers' policies).
- Through behavioral analytics tools, which record interactions with App features in an anonymized or pseudonymized form.

6. PURPOSE OF DATA COLLECTION

We process data for the following reasons:

- **To provide core app functionalities** (AI-based nutrition & movement tracking).
- **To improve AI accuracy and user experience.**
- **To ensure security and fraud prevention.**

- **To comply with legal obligations** (where applicable).

6.1 Communications & Newsletter

If you opt in to receive our newsletter or product updates, we may use your email address to send occasional announcements, feature releases, or wellness content.

You may unsubscribe from these communications at any time using the unsubscribe link in the email.

7. DATA RETENTION POLICY

- **We do not store AI-processed data** (meal images/text are processed and discarded).
- Personal Data is **retained only as long as necessary** for stated purposes.
- Users can **request deletion of their personal data** at any time.

8. HOW WE SHARE DATA

We never sell or rent user data. However, we may share data under the following circumstances:

8.1 Third-Party AI Services

- Your meal images/text may be transmitted to AI providers for processing. These third parties are essential for core app functionalities. We are not responsible for their data handling practices.

8.2 Cloud-Based Storage & Device Syncing

- Data synced via HealthKit or local fitness tracking API sources is managed by their respective services. Most data, however, is stored on our centralized servers.

8.3 Legal & Regulatory Compliance

- We may disclose data if required by UAE laws, GDPR, or other legal obligations.

8.4 Analytics Services (If Used)

We may use privacy-compliant analytics platforms to better understand usage patterns and improve the App. These services may collect device and interaction data but do not receive or process health, fitness, or personally sensitive data.

All data shared with analytics providers is strictly for internal operational use and is never used for advertising or resold.

9. THIRD-PARTY SERVICES & INTEGRATIONS

- **Apple Health & Google Fit:** Data is accessed **only with user consent** and remains within the device.

- **AI model providers:** Data is processed by AI services but is these services do not retain the data beyond what is required to generate the requested output, according to their published API policies.
 - **Users should review third-party privacy policies separately.**
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10. INTERNATIONAL DATA TRANSFERS

- If data is transferred outside the UAE/EU, we ensure it meets **legal safeguards**, such as:
 - **Standard Contractual Clauses (SCCs).**
 - **Adequate protection mechanisms** required by UAE PDPL & GDPR.
 - Users **will be notified** if international transfers affect their rights.
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11. USER RIGHTS UNDER GDPR, UAE PDPL, AND OTHER APPLICABLE LAWS

Users have specific rights regarding their personal data under **UAE Personal Data Protection Law (PDPL)**, the **General Data Protection Regulation (GDPR)**, and other applicable laws.

11.1 Right to Access (*Article 15 GDPR & UAE PDPL Compliance*)

- Users can request a copy of the personal data we hold about them.
- Requests will be processed within **30 days**, unless an extension is required by law.

11.2 Right to Rectification (*Article 16 GDPR & UAE PDPL*)

- Users can correct **inaccurate or incomplete** personal data.

11.3 Right to Erasure ("Right to Be Forgotten") (*Article 17 GDPR & UAE PDPL*)

- Users can request **deletion of their personal data** subject to legal exceptions.
- **Exceptions:** Data may not be deleted if required for legal obligations or dispute resolution.

11.4 Right to Restrict Processing (*Article 18 GDPR*)

- Users can request **temporary restriction of processing** while disputes about accuracy or legal basis are resolved.

11.5 Right to Data Portability (*Article 20 GDPR*)

- Users can request an **export of their personal data in a structured, machine-readable format.**

11.6 Right to Object to Processing (*Article 21 GDPR*)

- Users can object to data processing based on **legitimate interests**, including profiling.

11.7 Right to Withdraw Consent (*If Processing Is Based on Consent*)

- Users can withdraw consent **at any time** via App settings.
- This does not affect **lawful processing before consent was withdrawn**.

11.8 How to Exercise Rights

- Users can contact support@kalo-app.com to submit requests.
 - Identity verification may be required before processing requests.
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12. DATA SECURITY MEASURES

We take **strong security measures** to protect user data, including:

12.1 Encryption & Anonymization

- **Data encryption** in transit and at rest using industry-standard encryption protocols.
- **AI-processed data (meal images/text) is anonymized and discarded immediately.**

12.2 Access Controls

- Strict **role-based access controls (RBAC)** limit access to personal data.
- Employees and contractors **only access data if necessary for operational purposes.**

12.3 Regular Security Audits

- **Routine vulnerability assessments** and compliance checks.
- **Incident response plan in place** for any data breaches.

12.4 No Guarantee of Absolute Security

- While we follow **best practices**, no system can guarantee **100% security**.
 - Users are encouraged to **use strong passwords and enable device security measures.**
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13. CHILDREN'S PRIVACY (*Compliance with UAE & GDPR Minor Protection Laws*)

13.1 Age Restrictions

- The App is intended for **users aged 18 and above**.

- Users **under 18 must obtain parental or legal guardian consent** before using the App.

13.2 No Intentional Data Collection from Minors

- We **do not knowingly collect** data from individuals under 18.
- If we discover a minor has provided personal data, we will **delete it immediately**.

13.3 Parental Controls & Consent Verification

- Parents or guardians can contact us at support@kalo-app.com to request data deletion of a minor's account.
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14. AUTOMATED DECISION-MAKING & AI USE

14.1 AI Processing of User Data

- Our App uses **AI-based image and text recognition** to estimate nutrition data.
- AI outputs are **for informational purposes only** and should **not be relied upon for medical or dietary decisions**.

14.2 No AI-Based User Profiling

- We do not use AI for **behavioral tracking, targeted advertising, or automated decision-making that affects legal rights**.

14.3 User Control Over AI Processing

- Users may **opt out** of AI-based processing by disabling certain features in App settings.
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15. DATA BREACH NOTIFICATION POLICY

15.1 Incident Response & Notification

- If a **data breach occurs**, we will:
 - **Investigate and assess** the impact.
 - Notify affected users **within legally mandated timeframes**.
 - Report the breach to the **UAE Data Protection Authority, GDPR Supervisory Authorities, or other applicable bodies**.

15.2 User Responsibilities in Case of a Breach

- Users should **update passwords** and enable **two-factor authentication** where applicable.

- Users will be informed of **any recommended security measures** following a breach.
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16. COOKIES & TRACKING TECHNOLOGIES (*Where Applicable*)

- The App **does not use third-party tracking cookies or behavioral analytics**.
 - If cookies or tracking are introduced in future updates, users will be notified and given an **opt-out option**.
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17. COMPLIANCE WITH UAE, GDPR, AND OTHER PRIVACY LAWS

17.1 UAE Data Protection Compliance

- Fully compliant with the **UAE Personal Data Protection Law (PDPL)**.

17.2 GDPR Compliance for EU/EEA Users

- Data processing aligns with **Articles 5, 6, and 7 of GDPR**.

17.3 CCPA Compliance for California Residents (If Applicable)

- While the App is not explicitly marketed to California residents, we provide **CCPA-aligned privacy controls**.

17.4 Other Jurisdictional Compliance

- If additional legal obligations apply in other jurisdictions, they will be **reflected in future updates**.
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18. USER CONTROLS & PRIVACY SETTINGS

- Users can **manage privacy settings in-App**.
 - **Permissions for Apple Health, Google Fit, and AI processing can be revoked at any time**.
 - Users can **update, modify, or delete their data** through the App or by contacting support.
 - Account management features (e.g., data export, account deletion) are available to comply with regulatory requirements.
 - Users can opt out of newsletter communications at any time.
 - Users may request more information about analytics tracking or opt out where applicable, by contacting support@kalo-app.com.
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19. CHANGES TO THIS PRIVACY POLICY

- We **reserve the right to modify this Privacy Policy** at any time.
 - Users will be notified of **material changes via email, in-App notifications, or website updates**.
 - Continued use of the App after updates **constitutes acceptance of the revised policy**.
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20. CONTACT INFORMATION & COMPLAINTS

20.1 How to Contact Us

For privacy inquiries, data access requests, or complaints, contact:

Privacy Officer

BullTech Core DMCC

Email: support@kalo-app.com

Address: Uptown Tower, Level No 11, Dubai, United Arab Emirates

20.2 Complaints to Regulatory Authorities

- Users in the **UAE** may file complaints with the **UAE Data Protection Authority**.
- **EU/EEA users** may contact their local **GDPR Supervisory Authority**.