

Privacy Policy

Last Updated: July 5, 2025

1. Introduction

Welcome to Business Advisor! This Policy describes how we ("the Company") collect, use, disclose, and process personal data in connection with your use of our website and mobile application (the "Service").

By using the Service, you confirm that you have read and agree to this Policy and our Terms of Use.

2. What Data We Collect

We collect the following categories of data:

- **Personal Information:** name, email address, payment identifiers.
- **Data Collected Automatically:** IP address, device identifiers, cookies, activity logs, and performance metrics.

We do not knowingly collect sensitive categories of personal data, unless it is voluntarily provided by the user (e.g., in a support request).

3. Legal Basis and Purposes for Processing Data

We process your data only when we have a lawful basis to do so under the General Data Protection Regulation (GDPR).

- **Performance of a Contract:** To register you as a user and provide our services.
- **Legitimate Interest:** For analytics and fraud protection.
- **Based on your Consent:**
 - To send you marketing materials you have opted-in to receive.
 - To improve our Service and train our artificial intelligence algorithms on anonymized (pseudonymized) data, if you have provided separate consent for this.

4. Data Sharing with Third Parties

We do not sell your personal data. Data may be shared only with trusted third-party providers (Data Processors) to the extent necessary for the purposes described in this Policy and in strict compliance with confidentiality and security requirements.

Provider	Purpose of Use	Cross-border Transfers
PostHog	Anonymous usage analytics and crash reports to improve stability.	Data may be processed outside the EEA (e.g., in the US) under the EU-US Data Privacy Framework; Standard Contractual Clauses (SCCs) or other GDPR-compliant safeguards are used. https://posthog.com/docs/privacy
OpenRouter	Sending and processing AI agent requests based on the described idea.	Data may be processed outside the EEA (e.g., in the US) under the EU-US Data Privacy Framework; Standard Contractual Clauses (SCCs) or other GDPR-compliant safeguards are used. https://openrouter.ai/privacy

Data may be transferred to the following payment providers: Stripe, Google Pay, and Apple Pay, to the minimum extent necessary to process payments. You can review their privacy policies at the following links:

- **Stripe:** <https://stripe.com/privacy>
- **Google Pay:** <https://policies.google.com/privacy>
- **Apple Pay:** <https://www.apple.com/legal/privacy/>

5. Cookies and Analytics

We use first-party and third-party cookies for authentication, analytics, and service improvement. Users can manage cookie or analytics settings in their browser or through the application settings.

6. Data Security

We implement technical and organizational measures to protect your data, including encryption of data in transit (TLS 1.2 and higher), access control, regular security audits, and incident response procedures, including notifying users and relevant authorities within 72 hours of a breach. However, no method of transmission over the Internet or method of electronic storage is 100% secure.

7. Data Retention

- **Personal Data (Name, Email):** Retained as long as your account exists, or until you request its deletion.

- **Usage/Device Data:** Retained in an aggregated/anonymized form for statistical and Service improvement purposes and cannot be linked to you.

Upon completion of the retention period, data is deleted or anonymized. Your data may be stored and processed in data centers located in:

- (a) The European Union;
- (b) The United Kingdom;
- (c) The United States.

8. Your Rights

You may request to access, correct, delete, or port your data, as well as to restrict or object to its processing. A response will be provided within 30 days, and the actual deletion of data will be completed no later than 30 days after the request is confirmed.

Users can withdraw their consent for the collection of analytical data at any time and request the complete deletion of their profile and all associated data through the application.

Please send your requests to support@vaultoria.com.

Important Note on Deletion from Trained Models: We are committed to deleting your personal data from all our operational systems, databases, and backups in accordance with your request. However, please be aware that data that has been used in an anonymized form to train our models (subject to your explicit consent) cannot be technically extracted from an already trained model. We take all necessary measures to minimize risks, including the pseudonymization of data before it is used in the training process.

8.1 Your U.S. Privacy Rights

If you are a resident of a state that grants specific privacy rights (e.g., California under CCPA/CPRA), you may have additional rights, including:

- **Right to Opt-Out of Sale/Sharing:** We do not sell your personal data for monetary consideration. However, the use of certain analytical tools may be considered "sharing" of data under California law. You can opt out of such sharing by using the cookie or analytics settings on our website or in the application.

9. Children's Privacy

The Service is not intended for individuals under the age of 18. We do not knowingly collect data from children under 18 and will delete it if we become aware of it. If you believe a child has provided us with data, please contact us to have it deleted.

10. Changes to This Policy

We may update this Policy from time to time to reflect changes in our practices or the law. We will notify you of material changes via email or through an in-app notification. The "Last Updated" date at the top of this Policy reflects the current version.

Material changes to the Policy will be communicated via email 30 days before they take effect. Your continued use of the Service after such changes constitutes your consent to the new policy.

11. Contact Us

If you have any questions about this Policy or our data processing practices, please contact us at:

support@vaultoria.com.