

# Privacy Policy for SleepFactory

## Introduction

Klinika TES s.r.o. ("we," "us," or "our") is committed to protecting your privacy. This Privacy Policy explains how the SleepFactory mobile application ("SleepFactory" or "the App") collects, uses, stores, and protects your data. It is designed to be transparent and easy to understand, in compliance with the EU General Data Protection Regulation (GDPR) and the Google Play Store policies. By using SleepFactory, you agree to the practices described in this Privacy Policy.

## About SleepFactory

SleepFactory is a Cognitive Behavioral Therapy for Insomnia (CBTi) assistive wellness app that helps you track your sleep patterns and daily habits. The App is not a medical device and does not provide any medical diagnosis, tests, or medication-related advice. It is intended as a standalone wellness and mental health support tool for individual use. SleepFactory does not require therapist supervision.

## Information We Collect

### No Personal Identifiers

SleepFactory does not collect personally identifiable information such as your name, address, phone number, or email through the App. We do not access your contacts, device ID, or any other personal identifiers.

### User-Inputted Sleep and Habit Data

The primary data collected by SleepFactory is the information you manually input about your sleep and daily habits. This can include, for example:

- Sleep diary entries: Bedtimes, wake-up times, sleep quality ratings, etc.
- Lifestyle or habit information: Caffeine intake, exercise, screen time before bed, etc.
- Wellness questionnaires: Responses to in-app exercises or questionnaires designed to help improve your sleep habits.

This data is provided directly by you and is used only to personalize your experience and assist you in tracking and improving your sleep.

## Diagnostic or Medical Data

SleepFactory does not ask for or collect any medical diagnostic data. It will not request information about your medical history, other health conditions, or medications. Any guidance or recommendations provided in the App are general wellness tips based on CBTi principles and are not medical advice.

## How We Use Your Information

- To Provide the App's Services:  
Your sleep and habit entries are used to populate your sleep diary, generate personalized tips or feedback, and help you observe patterns over time. For example, the App may summarize your weekly sleep schedule or suggest behavioral techniques based on the data you provide.
- Improving User Experience:  
We may use aggregated, anonymized data to understand how users engage with the App's features (for example, which screens are most used or general completion rates of any wellness programs). This aggregated data contains no personal details and cannot be linked back to you. It is used solely to improve the App's content, user interface, and overall effectiveness.
- Research:  
We may use aggregated, anonymized data to understand how sleep patterns develop over time. This data, which cannot be linked back to you, helps us assess the potential effectiveness of the App and refine its features.
- Customer Support:  
If you contact us at [office@klinikates.cz](mailto:office@klinikates.cz) for assistance or to exercise your data rights, we will use the information you provide (such as your email query) solely to address your request. This information will not be stored longer than necessary.

We do not use your data for advertising or marketing purposes. Your sleep and habit data is never sold or shared with third-party advertisers or data brokers.

## Legal Basis for Processing (GDPR)

If you are located in the European Union or European Economic Area, our processing of your data is governed by the GDPR. The legal bases for processing your data include:

- Consent:

By using the App and inputting your information, you consent to our processing of that data for the purposes described in this policy. You may withdraw your consent at any time by discontinuing use of the App and requesting deletion of your data (see Your Rights below).

- Performance of a Service:

Processing is necessary for providing the wellness service you expect from SleepFactory.

- Legitimate Interests:

We may process anonymized and aggregated data to improve our application and ensure security; we consider this a legitimate interest that does not override your privacy rights.

We do not collect sensitive personal health information beyond your self-reported sleep patterns and related habits. Should any of the data be considered health-related, it is processed only with your explicit consent and solely to help you meet your wellness goals.

## Data Storage and Security

### Local Storage (On Your Device)

All data saved on your device by SleepFactory is stored using encrypted storage mechanisms. This means your sleep logs and other information are encrypted, helping to prevent unauthorized access—even if someone gains physical access to your device. We recommend using a secure lock (PIN, password, fingerprint, etc.) on your phone for additional safety. Uninstalling the App or clearing its data will remove the locally stored information.

## Cloud Server Storage

SleepFactory securely stores your inputted data on a cloud server so that it can be backed up. The connection between the App and the cloud server is encrypted via SSL (Secure Socket Layer), ensuring that any data transmitted (such as new sleep entries or syncing progress) is protected from interception. The App also uses an in-app secret key or token as part of its communication with the server, adding an extra layer of authentication. Data on the server is kept in a secured database with strict access controls, accessible only to a minimal number of authorized personnel for maintenance or support purposes.

We regularly review our data collection, storage, and processing practices to prevent unauthorized access or alteration. However, no method of transmission or storage is 100% secure. In the unlikely event of a data breach affecting your personal data, we will follow all applicable laws to inform you and the relevant authorities promptly.

## Data Retention

Your sleep and habit data will be stored and accessible in the App and on our backup cloud servers until you choose to delete it or request its deletion. If you no longer wish to use SleepFactory, you may:

- Delete the App: This will remove all locally stored data.
- Request Data Deletion: Email us at [office@klinikates.cz](mailto:office@klinikates.cz) to have your data permanently deleted from our cloud servers.

We do not keep your personal data longer than necessary. Should you withdraw your consent or request deletion, we will remove your data from our systems promptly. Backup copies of the data (kept for reliability) are also removed or overwritten periodically.

## Data Sharing and Disclosure

- Service Providers:

We do not share your personal data with advertising companies or data analytics firms. We may use reputable third-party services (for example, for cloud hosting or email support), but these providers process data solely on our behalf and under strict confidentiality and security agreements. If any of these providers are outside the EU, we ensure lawful data transfer mechanisms (such as standard contractual clauses) are in place to maintain GDPR compliance.

- **No Selling or Advertising Use:**  
We never sell your information or use your data for advertising purposes. You will not see third-party ads in SleepFactory based on your data.
- **Legal Requirements:**  
We will not disclose your information to any government or law enforcement agency or to other third parties unless required by law and in accordance with proper legal process. If compelled to disclose data, we will only provide the minimum necessary information and, unless prohibited, will inform you of the request.

Aside from the above, no other parties have access to your data. You remain in control of your information at all times.

## Your Rights and Choices

We respect your rights over your personal data under the GDPR. As a user of SleepFactory, you have the following rights:

- **Access Your Data:**  
You have the right to access the data you have provided. You can view most of your sleep and habit entries directly within the App. If you require a complete export of your data in a common format, please contact us, and we will assist you.
- **Rectification (Correcting Data):**  
If you notice that some of your information is incorrect or incomplete, you have the right to correct it. SleepFactory allows you to update or edit certain entries directly within the App. For data that cannot be edited via the App, please contact us to request a correction.
- **Erasure (Deletion of Data):**  
You have the right to request deletion of your personal data. If you no longer wish to use SleepFactory or want your data removed from our systems, email us at [office@klinikates.cz](mailto:office@klinikates.cz). We will permanently delete your data from our cloud servers. Note that if you continue to use the App after deletion, the previously synced data will not be recovered.

- **Withdrawal of Consent:**  
If the processing of your data is based on your consent, you may withdraw that consent at any time by discontinuing use of the App and requesting deletion of your data. Withdrawing consent does not affect the lawfulness of any processing carried out before your withdrawal.
- **Data Portability:**  
You can request that we provide your data in a commonly used, machine-readable format (e.g., CSV) so that you can transfer it to another service or provider. Contact us via email to arrange this.
- **Restriction of Processing:**  
In certain circumstances—such as if you contest the accuracy or lawfulness of processing—you have the right to request that we restrict further processing of your data. If needed, please contact us, and we will discuss how to accommodate your request.
- **Objection:**  
You have the right to object to certain types of processing. SleepFactory does not engage in direct marketing or profiling, but if you have concerns about how we handle your data, you may object, and we will review your request.
- **Automated Decision-Making:**  
SleepFactory does not use your data for automated decision-making or profiling that produces legal or significant effects on you. All analyses or suggestions are rule-based, and any outcomes are interpreted by you.

To exercise any of your rights or if you have questions about your rights, please contact us at [office@klinikates.cz](mailto:office@klinikates.cz). We may need to verify your identity before fulfilling certain requests to ensure that we protect your data appropriately. We will respond to your requests as promptly as possible, and generally within 30 days as required by law.

If you believe your data protection rights have been violated, you have the right to lodge a complaint with your local data protection authority (for example, the Office for Personal Data Protection in the Czech Republic or the supervisory authority in your country of residence). We encourage you to contact us first so we can address your concerns directly.

## Children's Privacy

SleepFactory is intended for use by adults as a standalone wellness tool. It is not marketed to or designed for children under the age of 16. We do not knowingly collect personal data from anyone under 16 years old without parental consent. If you are a parent or guardian and believe that a child under 16 has used our App, please contact us at [office@klinikates.cz](mailto:office@klinikates.cz). We will take appropriate steps to delete such data and, if necessary, disable access to the App.

## Changes to This Privacy Policy

We may update this Privacy Policy from time to time as our practices or relevant laws change. When we make changes, we will update the "Last Updated" date at the top of this document. For significant changes affecting your rights or how we use your personal data, we will provide a more prominent notice (such as a notification within the App or on our website) and, if required, obtain your consent again. We encourage you to review this Privacy Policy periodically to stay informed about our data protection practices.

Your continued use of SleepFactory after any modifications to this Privacy Policy will signify your acceptance of the changes. If you do not agree with any changes, please stop using the App and request deletion of your data as outlined above.

## Contact Us

If you have any questions, concerns, or requests regarding this Privacy Policy or your personal data, please do not hesitate to contact us. We are here to help and address any issues regarding privacy and data protection.

- Contact Email: [office@klinikates.cz](mailto:office@klinikates.cz)
- Data Controller: Klinika TES s.r.o. (the provider of SleepFactory)
- Registered Address: Londynska 254/7, Vinohrady, 12000 Praha 2, ICO: 22369872
- Data Protection Officer (DPO): Martin Bednar ([dpo@klinikates.cz](mailto:dpo@klinikates.cz))

Please reach out to us in English or Czech (or your preferred language if you do not speak English or Czech) – we will do our best to accommodate and respond promptly. Your privacy and trust are paramount to us, and we will strive to resolve any questions or concerns to your satisfaction.

---

Thank you for choosing SleepFactory. We appreciate the confidence you place in us to keep your data secure and confidential as you work towards better sleep. Remember, you are in control of your data, and we are committed to supporting your wellness journey in a safe and private manner.