

Happiness Rings – Privacy Policy

1. Who We Are

Happiness Rings (“we,” “us,” or “our”) is provided by **BPA TARGET SRL**. The app helps users track uplifting activities, positive habits, and well-being moments.

Happiness Rings is designed as a **local-first wellness app**, where all user-generated content remains stored **only on the device**. We do not operate servers and cannot access user data.

By using the app, you agree to this Privacy Policy and our Terms of Use.

2. Information We Collect

2.1. Data Stored on Your Device

Happiness Rings stores certain information **locally on your device**, such as activity logs, custom activities, streaks, usage counters, and notification settings.

This information:

- remains exclusively on your device
- is **not transmitted to BPA TARGET SRL**
- is **not accessible to BPA TARGET SRL**
- is **not shared with third parties**
- is **not processed or collected by the developer in any form**

Important Note: Deleting the app permanently removes all locally stored data from your device.

2.2. Anonymous Analytics (Mixpanel)

We use **Mixpanel** to collect **anonymous analytics** to understand feature usage, debug and improve app performance.

Mixpanel receives:

- Event names
- Device/OS type
- App version
- General performance metrics
- Error/debug events

Mixpanel does **not** receive:

- Name
- Email
- Activities you logged
- Any personal content
- Device identifiers that can identify *you*



All analytics are **de-identified**, meaning we cannot know who performed an action.

You cannot be identified from Mixpanel logs.

2.3. Subscription Status (RevenueCat)

We use **RevenueCat** to manage in-app purchases.

RevenueCat receives only:

- Anonymous App User ID (auto-generated)
- Purchase status (active/inactive)
- Entitlements
- Subscription renewal/cancellation details

RevenueCat does **not** receive:

- Name
- Email
- Payment card info
- Activities from the app
- Any personal content

Apple processes all payments. We do not see billing details.

2.4. We Do NOT Collect:

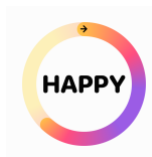
- Personal identifiers
 - Contact information
 - Health data
 - Location data
 - IP addresses linked to identity
 - Crash logs tied to identity
 - Cookies or cross-app tracking
 - User content stored in the app
-

3. How We Use Your Data

We use data strictly for:

- App functionality (stored locally)
- Anonymous feature analytics (Mixpanel)
- Subscription validation (RevenueCat)

Happiness Rings **does not collect any personal data**. As a result, we do not sell, share, or use personal information for advertising or any other purpose.



4. International Data Transfers

Mixpanel and RevenueCat may process *anonymous* analytics and subscription metadata in the United States.

These providers:

- Receive **no personal identifiable information**
- Process data only to provide services to us
- Use Standard Contractual Clauses (SCCs) for GDPR compliance
- Apply encryption and strict safeguards

No personal data is transferred because no personal data is collected.

5. Legal Basis for Processing (GDPR)

We rely on:

- **Legitimate Interests** → to improve app performance via anonymous analytics
- **Contractual Necessity** → to activate subscriptions via RevenueCat
- **Consent** → for push notifications (Apple-managed)

Because we do not store identifiable data, GDPR rights apply only to anonymous data scope.

6. Your Rights

You may have the right to:

- Request deletion (by deleting the app — data is only local)

Because we cannot identify users, we cannot honor requests such as “delete my account” — no account exists.

7. Data Retention

- Local data: stays until you delete the app
 - Mixpanel analytics: retained up to 24 months, **anonymous**
 - RevenueCat receipts: retained per Apple rules, **without personal data**
-

8. Tracking Technologies

We do **not** use cookies, ad tracking, fingerprinting, or advertising identifiers.

Mixpanel uses anonymous event identifiers that cannot identify individuals.



9. Children's Privacy

We do not knowingly collect personal data from children.

Since no identifiable data is collected, we have no method to determine user age.

10. Security

Because we do not store user data on servers, risks are limited to device-level storage protected by Apple.

Third-party processors (Mixpanel, RevenueCat) encrypt all data in transit and at rest.

11. Changes to This Policy

We may update this policy periodically. Continued use of the app signifies acceptance.

12. Contact & Effective Date

support@bpatarget.com

Effective Date: **01.12.2025**