Elite Breathing App: Privacy Policy

1. Introduction

This Privacy Policy explains how Elite Breathing Ltd, located at 3239 Green Lake Drive, Fort Collins, CO 80524 ("we," "us," or "our"), collects, uses, shares, and protects your personal information when you use the Elite Breathing app ("the App"). By using the App, you consent to the practices described in this policy. We may update this policy periodically and will notify you of material changes via the App or email. This policy complies with applicable data protection laws, including GDPR (EU), CCPA (California), and COPPA (US).

2. Information We Collect

We collect the following types of information:

- **Personal Information**: Name, email, profile picture, age, sport, position, and level of play, provided during registration or profile updates.
- **Assessment and Progress Data**: Breathing assessment scores, protocol progress, bootcamp progress, bootcamp quiz scores, and breath hygiene survey responses.
- **Payment Information**: Processed securely via Stripe, Apple, or Google for premium features; we do not store payment details directly.
- **Usage Data**: App interactions, device information (e.g., OS, device type), IP address, and crash logs, collected automatically.
- **Analytics Data**: Collected via Google Analytics to monitor app performance and user engagement.
- **Communication Data**: Information related to consultation bookings or shared results with coaches.

3. How We Use Your Information

We use your information to:

- Provide and personalize App services, such as generating breathing protocols and tracking bootcamp progress.
- Process payments and manage subscriptions via third-party providers.
- Send notifications and reminders (e.g., for assessments or consultations).
- Display targeted advertisements via Google AdMob (free version only).
- Analyze app usage and performance to improve functionality (e.g., via Google Analytics, Firebase Crashlytics).
- Facilitate consultation bookings and communication with coaches.
- Comply with legal obligations (e.g., tax reporting for payments).

4. Sharing Your Information

We share your information with:

- Third-Party Service Providers:
 - <u>Stripe</u> for payment processing.
 - Apple and Google for OAuth login authentication.
 - **Firebase / Google Cloud** for data storage, hosting, analytics, and crash reporting.
 - Google AdMob for serving advertisements (free version only).
 - **Zoom** or Google Calendar for consultation scheduling.
- **Coaches**: Assessment results shared explicitly by you with your coach.
- Legal Authorities: If required by law or to protect our rights, safety, or property. We do not sell your personal information to third parties for marketing purposes. All third-party providers are bound by their own privacy policies, which you should review.

5. Data Storage and Security

Your data is stored securely on Firebase and Google Cloud servers, using encryption and access controls to ensure GDPR and HIPAA compliance. We retain your data for as long as your account is active or as needed to provide services, comply with legal obligations (e.g., tax records), or resolve disputes. Upon account deletion, we will remove your personal information, except where retention is required by law.

6. Your Data Protection Rights

Depending on your location, you may have the following rights:

- Access: Request a copy of your personal data.
- Correction: Update inaccurate or incomplete data.
- **Deletion**: Request deletion of your data, subject to legal retention requirements.
- **Restriction**: Limit how we process your data.
- **Portability**: Receive your data in a structured, machine-readable format.
- **Opt-Out**: Opt out of non-essential data processing (e.g., analytics, targeted ads). To exercise these rights, contact us at info@elitebreathing.com.. For EU users (GDPR), we will respond within one month. For California users (CCPA), we will respond within 45 days. If you are under 13, we require verifiable parental consent in compliance with COPPA.

7. Cookies and Tracking Technologies

The App uses cookies and similar technologies (e.g., pixels) for analytics (Google Analytics) and advertisements (Google AdMob). You can manage cookie preferences through your device or App settings. Essential cookies are required for App functionality, while non-essential cookies (e.g., for ads) can be disabled.

8. International Data Transfers

As the App is available globally, your data may be transferred to and stored in 3239 Green Lake Drive, Fort Collins, CO 80524 or other regions where our service providers (e.g., Google Cloud, Firebase) operate. For EU users, we ensure compliance with GDPR through Standard Contractual Clauses or other approved mechanisms.

9. Children's Privacy

The App is not intended for users under 13 without parental consent, in compliance with COPPA. If we learn that we have collected data from a child under 13 without consent, we will delete it promptly. Parents or guardians can contact us at info@elitebreathing.com to provide consent or request data deletion.

10. Contact Information

For questions or concerns about this Privacy Policy, contact:

- Elite Breathing Ltd.
- info@elitebreathing.com
- 3239 Green Lake Drive, Fort Collins, CO 80524
- If required by GDPR, our Data Protection Officer can be reached at info@elitebreathing.com

11. Compliance with Regulations

We comply with applicable data protection laws, including:

- GDPR: For EU users, ensuring rights to access, deletion, and data portability.
- CCPA: For California users, providing transparency and opt-out options.
- **COPPA**: For users under 13, requiring parental consent. Users in other regions may have additional rights under local laws.