

OPULUME – GOOGLE PLAY DATA SAFETY DISCLOSURE

Document Version:1.0

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Purpose

This document supports completion of the Google Play Data Safety section and summarises the categories of user data collected, the purposes of processing, security protections, retention practices and user controls implemented within the Opulume platform.

This document should remain consistent with the Opulume Privacy Policy, Terms and Conditions, Data Retention & Deletion Policy and Information Security Statement.

1. Data Collected

Personal Information

Collected:

- Name
- Email address

Purpose:

- Account creation
- User authentication
- Customer support
- Service delivery

Required for core functionality.

Health and Wellness Information

Collected with explicit user consent.

Examples include:

- Skin journals
- Symptoms
- Mood
- Sleep
- Hydration

- Nutrition
- Body map entries
- Wellness reports
- Lifestyle information

Purpose:

- Wellness tracking
- AI-generated insights
- Longitudinal progress monitoring
- Personalised wellness recommendations

This information is treated as sensitive personal information.

Photos and Videos

Users may voluntarily submit skin photographs for AI analysis.

Processing:

- analysed only for requested functionality;
- processed transiently in memory;
- permanently deleted immediately after analysis;
- never stored in databases;
- never retained as image libraries.

Only the resulting text analysis may be retained.

App Activity

Collected:

- Feature usage
- Authentication events
- Performance diagnostics
- Error reporting

Purpose:

- Security
 - Performance improvement
 - Fraud prevention
 - Service reliability
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Device Information

Collected:

- Device type
- Operating system
- Application version
- IP address
- Technical diagnostics

Purpose:

- Security
 - Compatibility
 - Service optimisation
 - Error diagnosis
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2. Data Shared

Opulume does **not** sell user data.

Information may be processed by authorised service providers solely for the purpose of operating the Service.

Current processors may include:

- Hosting provider
- Authentication providers
- Email delivery provider
- AI processing provider

Processing occurs under appropriate contractual safeguards.

3. Security Practices

Opulume implements appropriate technical and organisational security measures including:

- TLS encryption in transit
- Secure hosting infrastructure
- Password hashing using bcrypt
- JWT authentication
- Secure HTTP-only cookies where applicable
- Access controls
- Authentication rate limiting
- Session invalidation
- Security monitoring

Sensitive health information is processed only after explicit user consent.

4. User Control

Users may:

- Access their personal information
- Correct personal information
- Withdraw consent
- Delete their account
- Request deletion of personal information

Deletion requests are handled in accordance with applicable data protection legislation.

5. Retention

Current retention practices include:

Information	Retention
Skin photographs	Deleted immediately after AI processing
AI processing cache	Approximately 1 hour
Wellness reports	Automatically deleted after 30 days
Operational logs	Anonymised after 12 months
Account information	Retained while account remains active or until deletion request, unless legal obligations require longer retention

6. Data Encryption

Data is protected:

- In transit using TLS/SSL encryption.
- At rest where supported by our hosting infrastructure.
- Through secure authentication and access control mechanisms.

Passwords are stored only as cryptographic hashes.

7. Children

The Service is not directed to children below the minimum age permitted under applicable law without parental or guardian consent.

8. Artificial Intelligence

Artificial intelligence is used to generate wellness insights and educational information.

AI outputs:

- support wellness and self-management;
 - do not constitute medical advice;
 - do not provide diagnosis or treatment;
 - are generated from user-provided information.
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9. Medical Status

Opulume is intended to support general wellness.

The Service does not replace qualified healthcare professionals and should not be relied upon as a substitute for medical advice, diagnosis or treatment.

10. Review

This document should be reviewed whenever:

- new categories of information are collected;
- new SDKs are introduced;
- third-party processors change;
- AI functionality changes;
- retention periods change;
- legal or regulatory requirements are updated.

All public privacy disclosures, Google Play declarations and internal operational practices should remain consistent.