

OPULUME PRIVACY POLICY

EffectiveDate: June 30th, 2026

Last Updated: June 30th, 2026

1. Introduction

Opulume ("Opulume", "we", "our", or "us") respects your privacy and is committed to protecting your personal information.

This Privacy Policy explains how we collect, use, store, protect and disclose your personal information when you use the Opulume mobile application, website and related services (collectively, the "Service").

This Privacy Policy has been prepared to comply with:

- UK General Data Protection Regulation (UK GDPR)
- EU General Data Protection Regulation (EU GDPR), where applicable
- UK Data Protection Act 2018
- Apple App Store Review Guidelines
- Google Play User Data Policy
- Applicable privacy and consumer protection laws.

2. Data Controller

Opulume is the data controller responsible for processing your personal information.

Contact

Opulume Limited

Website: www.opulumeskin.com

Email: customerservice@opulumeskin.com

3. Information We Collect

Personal Information

We may collect:

- name
- email address
- authentication credentials

- account preferences
 - skin profile information
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Wellness Information

With your explicit consent we may collect:

- skin journals
- symptoms
- body map entries
- mood information
- sleep information
- hydration
- nutrition
- lifestyle information
- wellbeing information
- treatment history
- AI-generated wellness reports

These constitute special category data under UK GDPR.

Device Information

We may collect:

- device type
 - operating system
 - browser information
 - IP address
 - application version
 - crash information
 - performance diagnostics
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Authentication Information

Authentication information includes:

- encrypted passwords
- authentication tokens
- login timestamps
- sign-in provider
- authentication events

Passwords are never stored in plaintext.

4. Skin Images

Where you use skin image analysis:

- photographs are processed solely to generate an analysis;
- photographs are processed in volatile memory;
- photographs are permanently discarded immediately after processing;
- photographs are never written to permanent storage;
- photographs are never retained in databases;
- photographs are never logged.

Only the resulting text analysis may be retained.

5. How We Use Your Information

We process information to:

- create your account;
 - authenticate users;
 - provide wellness tracking;
 - generate AI wellness insights;
 - produce Skin Comfort assessments;
 - improve user experience;
 - maintain security;
 - detect abuse;
 - comply with legal obligations;
 - respond to support requests.
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6. Lawful Bases for Processing

Depending on the processing activity, we rely upon:

Contractual Necessity

To provide the Service.

Explicit Consent

For:

- health information;
- wellness information;
- AI analysis;
- analytics where applicable;
- optional leaderboard participation.

Legitimate Interests

For:

- fraud prevention;
- security monitoring;
- platform integrity;
- system improvement.

Legal Obligation

Where processing is required by law.

7. Health Information

Health and wellness information is processed only after obtaining explicit consent.

You may withdraw consent at any time.

Withdrawal of consent does not affect processing lawfully carried out before withdrawal.

8. Artificial Intelligence

Certain features utilise artificial intelligence.

AI processing may include:

- symptom analysis;
- wellness insights;
- educational content;
- personalised recommendations.

AI outputs:

- are informational only;
 - do not constitute medical advice;
 - should not replace professional healthcare.
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9. Data Security

We implement technical and organisational measures including:

- TLS encryption in transit;
- encrypted hosting infrastructure;
- bcrypt password hashing;

- secure authentication;
 - JWT session management;
 - HTTP-only cookies;
 - SameSite protections;
 - rate limiting;
 - access controls;
 - security monitoring.
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10. Data Retention

We retain information only for as long as necessary.

Current retention periods include:

Information	Retention
AI image data	Deleted immediately after processing
AI cache	Approximately 1 hour
Wellness reports	30 days
Authentication logs	Operational necessity
Operational logs	Anonymised after 12 months

Account information is retained until account deletion unless legal obligations require otherwise.

11. Data Sharing

We do not sell personal information.

We may share information with authorised processors solely to provide the Service.

These include hosting, authentication, AI processing, communications and infrastructure providers.

12. International Transfers

Where information is transferred outside the UK or European Economic Area, appropriate safeguards are implemented, including Standard Contractual Clauses or other legally recognised transfer mechanisms.

13. Third-Party Service Providers

Authorised processors may include:

- Google LLC
- Apple Inc.
- Render
- SendGrid
- Twilio

Additional processors may be added from time to time.

An up-to-date processor list is maintained on our website.

14. User Rights

Depending upon your jurisdiction, you may have the right to:

- access your information;
 - correct inaccurate information;
 - delete your information;
 - restrict processing;
 - object to processing;
 - withdraw consent;
 - receive a portable copy of your data;
 - lodge a complaint with the Information Commissioner's Office or another supervisory authority.
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15. Account Deletion

You may request deletion of your account at any time.

Upon deletion:

- personal information will be removed where legally permissible;
- wellness information will be deleted;
- authentication credentials will be invalidated.

Certain information may be retained where required by law.

16. Cookies and Similar Technologies

We use:

- essential authentication cookies;

- security cookies;
- session cookies;
- functional cookies.

Where analytics cookies are used, consent will be obtained where required.

Further information is available in our Cookie Policy.

17. Children

The Service is not intended for children under the minimum age permitted under applicable law without parental or guardian consent.

We do not knowingly collect personal information from children unlawfully.

18. Automated Decision Making

AI-generated outputs support wellness information only.

No solely automated decision producing legal or similarly significant effects is made without appropriate safeguards.

19. Security Monitoring

We maintain security monitoring to:

- detect fraud;
- prevent abuse;
- protect accounts;
- investigate security incidents.

Authentication events may be logged for security purposes.

20. Data Breaches

Where required by applicable law:

- appropriate authorities will be notified without undue delay;
 - affected individuals will be informed where required.
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21. Changes to this Policy

We may update this Privacy Policy periodically.

Material changes will be communicated through the Service or by other reasonable means.

Continued use after changes become effective constitutes acceptance of the updated Privacy Policy.

22. Contact Us

If you have questions regarding this Privacy Policy or your personal information, please contact:

Opulume Limited

Email: customerservice@opulumeskin.com

Website: www.opulumeskin.com

23. Complaints

If you believe your information has been processed unlawfully, you may contact us in the first instance.

You also have the right to lodge a complaint with the Information Commissioner's Office (ICO) or your local supervisory authority.

24. Additional Information for Google Play and Apple App Store

We collect only the information necessary to provide the Service.

We do not sell user data.

We process special category health and wellness information only with your explicit consent.

Skin analysis photographs are processed transiently and are not retained after analysis.

Users may withdraw consent and request deletion of their personal information at any time through the Service or by contacting us.

Data is protected using industry-standard security measures, including encrypted communications, secure authentication mechanisms and access controls.

25. Contact Details

Privacy enquiries:

Email: customerservice@opulumeskin.com

Website: www.opulumeskin.com

Postal Address:

Opulume Limited

3rd Floor, 86-90 Paul Street

London, EC2A 4NE

United Kingdom

Data Protection Officer:

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