SULORO PRIVACY POLICY

Effective November 5, 2026

When you use Suloro apps, websites and services, you trust us with your information. We understand this is a significant responsibility, and we work diligently to protect your information and give you full control over your privacy.

1. Who We Are and How to Contact Us

This Privacy Policy applies to all Suloro apps, websites and services provided under the brand Suloro. It explains what personal data we collect, why we collect it, how it is handled, and how you can exercise your privacy rights.

Suloro provides centralized accounts, digital tools, mobile applications, and web services. When you create an account, access our websites, or use our mobile applications, Suloro acts as the data controller of your personal data.

Primary Contact: For any privacy inquiries, data requests, or questions regarding this policy, contact us directly at support@suloro.com.

Account Management Portal: You can review and adjust your account settings at https://accounts.suloro.com.

2. Privacy Principles

Suloro is built on foundational principles designed to safeguard your digital privacy:

- **Zero Data Sales:** We do not sell, rent, or lease your personal information to third parties or data brokers under any circumstances.
- **Data Minimization:** We only collect the data necessary to provide, protect, and improve our services, avoiding unnecessary personal information.
- **Robust Encryption:** Your information is encrypted during transit and while stored securely on our servers, safeguarding it against unauthorized access.
- **User Sovereignty:** You have full visibility and control over your data, including the right to obtain a copy of your records, rectify them, or permanently delete your account.
- **Transparent Consent:** When connecting with authorized applications, you are presented with clear, granular consent choices before any information is shared.
- **Child Protection:** We enforce strict age verification to prevent underage use and protect children from unauthorized data collection.

3. Information We Collect

We collect information in three ways: information you provide directly, information collected automatically through your use of our services, and information obtained through authorized device permissions.

A. Information You Provide to Us

- **Account Information:** When you register a Suloro Account, you provide your name, email address, password, date of birth, and optional gender. Your email serves as your primary sign-in and security notification identifier.
- **Profile Details:** Optional details you add to your profile, such as a display name or profile image.

- **Content You Create or Upload:** Files, notes, habit records, preferences, images, or documents you create, edit, or upload while using Suloro apps and services.
- **Customer Support Inquiries:** Communications, feedback, or error reports you send to our support team, including your contact email and message contents.
- **Purchase and Billing Information:** If you purchase in-app items, subscriptions, or premium features, transactions are processed through standard platform app store billing. We receive transaction identifiers, subscription status, and purchase verification details, but never store your full payment card details.

B. Information Collected Automatically

- **Device and Usage Information:** Technical details such as device model, operating system version, browser type, language preference, screen resolution, and diagnostic logs to ensure application compatibility and performance.
- **Approximate Location and Network Data:** IP address, general country-level geographic location, and connection type used solely for security monitoring, fraud prevention, and limit enforcement.
- **Authentication and Session Activity:** Timestamps of sign-ins, active session tokens, security verification events, and sign-out actions to manage account sessions and prevent unauthorized access.
- **Ad Interaction Telemetry:** In services displaying ads, basic interaction signals such as impression counts and interaction timestamps are processed solely to verify legitimate delivery, prevent fraud, and audit operations without tracking your cross-site browsing history.

C. Device Permissions (Requested Only When Needed)

Certain mobile applications request specific device permissions to enable core features. You can grant or revoke these permissions at any time through your device operating system settings:

- **Camera:** Requested only when a feature requires image capture, photo creation, or visual input within an app. Images are processed locally or uploaded only when you choose to save them.
- **Photos and Storage:** Requested to let you select, upload, or save images, files, or application documents.
- **Notifications:** Requested to deliver essential reminders, security alerts, habit schedules, and account updates. You can silence notifications at any time in device settings.
- **Alarms and Reminders:** Requested on mobile devices to trigger scheduled user reminders and habit notifications accurately at times set by the user.

4. How We Use Information

We use the information we collect for specific, legitimate operational purposes:

- **Providing and Maintaining Services:** Delivering account authentication, synchronizing data across your devices, and providing features in Suloro apps and websites.
- **Account Security and Fraud Prevention:** Protecting your account from credential stuffing, brute-force attacks, unauthorized access, and malicious bots. We apply limits on account creation and login attempts.
- **Communication:** Sending vital security alerts, account verification messages, password reset links, transaction receipts, and updates to our policies.
- **Processing Purchases and Subscriptions:** Verifying entitlement to paid features, renewing subscriptions, and handling customer billing inquiries.

- **Application Quality and Diagnostics:** Resolving technical glitches, improving response speeds, analyzing aggregate usage patterns, and ensuring smooth performance.
- **Delivering Relevant Features and Advertising:** Providing appropriate in-app features and contextual advertising without selling personal profile data or conducting cross-site behavioral surveillance.

5. Legal Bases for Processing

We process your personal information under established legal grounds:

- **Contractual Necessity:** To fulfill our agreement with you to provide account services, app features, and customer support.
- **Legitimate Interests:** To protect the security and integrity of our systems, prevent fraud and abuse, improve our products, and maintain service stability, provided these interests do not override your fundamental rights.
- **Consent:** Where you provide explicit consent, such as granting optional device permissions, authorizing third-party applications, or accepting optional cookies. You may withdraw consent at any time.
- **Legal Obligations:** To comply with applicable statutory requirements, legal proceedings, tax regulations, and lawful governmental requests.

6. Sharing and Disclosure

Suloro does not sell, lease, or trade your personal information. We share information only under strictly limited circumstances:

- **Authorized Third-Party Applications:** When you choose to use your Suloro Account to sign in to third-party applications, we share only the specific profile information you explicitly approve on the consent screen. You can revoke this access at any time.
- **Service Partners:** We work with trusted partners solely to maintain our services, protect security, and deliver essential account communications. These partners process information strictly on our instructions and under binding confidentiality and security agreements.
- **Legal Requirements:** We may disclose information if required by applicable law, valid court order, subpoena, or lawful request by public authorities, or where necessary to investigate violations or protect the safety and property of Suloro, users, or the public.
- **Business Transfers:** If Suloro is involved in a reorganization, merger, acquisition, or sale of assets, user data may be transferred as part of that transaction, subject to the recipient honoring the commitments in this Privacy Policy.

7. Cookies and Similar Technologies

This Cookie Policy applies globally to all visitors and users of Suloro apps, websites and services. It provides complete transparency regarding how digital identifiers and preferences are handled.

A. What Technologies We Use

When you visit our websites or use our services, we use essential cookies and browser-level technologies to deliver a secure, dependable experience:

- **Strictly Essential Technologies:** Required for core site operations, including secure account sign-in, maintaining your authenticated session as you navigate, protecting against cross-site request forgery, and enforcing security limits. Because our services cannot operate securely without them, these technologies cannot be switched off in our systems.
- **Display & Preference Settings:** Used to remember your interface preferences, such as your dark or light appearance choices, so you do not have to reselect them on every visit.
- **No Behavioral Tracking or Advertising Cookies:** We do NOT deploy third-party advertising cookies, cross-site tracking scripts, data broker beacons, or surveillance pixels that track your browsing across different websites.

B. Global User Choice and Privacy Safeguards

We respect user choices and privacy rights across all jurisdictions globally:

- Strictly necessary technologies are placed solely to deliver requested services and maintain session security.
- We do not sell personal data, nor do we share personal information for cross-context behavioral advertising. Our services do not use targeted tracking cookies.
- Processing of personal data through web technologies is conducted lawfully, transparently, and solely for specified service purposes with accessible grievance channels.
- We maintain high standards of transparency, minimizing stored data and providing full user control through standard browser settings.

C. How You Can Control Cookies

You can control, block, or delete cookies at any time through your web browser settings. Most browsers allow you to:

- View what cookies are stored on your device and delete them individually or entirely.
- Block third-party cookies from being placed.
- Block all cookies from specific websites or configure your browser to reject all cookies by default.

Please note that if you choose to block or disable strictly essential cookies, you will not be able to sign in or access protected account features.

8. Data Retention

We retain your personal information for as long as your account remains active or as needed to provide our services:

- **Active Account Data:** Retained on our servers while your account is active so you can access your profile, apps, and stored records.
- **Scheduled Deletion Grace Period:** When you submit an account deletion request, your account enters a 30-day grace period. During this period, you can sign in to cancel the deletion request if you change your mind.
- **Permanent Purge:** Once the 30-day grace period expires, your profile details, credentials, stored content, and authorized application links are permanently and irreversibly purged from our active databases by automated retention routines.

- **Temporary Operational Logs:** Security logs and diagnostic telemetry are retained only for temporary periods necessary to protect against abuse and are then automatically erased.

9. Data Security

We implement layered technical and organizational safeguards to protect your personal data:

- **Encryption in Transit:** All data transmitted between your device and our servers is encrypted using modern secure transport protocols.
- **Encryption at Rest:** Data stored on our servers is protected with strong encryption algorithms to ensure confidentiality and integrity.
- **Password Protection:** Passwords are never stored in readable text. We use salted, computationally intensive hashing algorithms that cannot be reversed.
- **Request Limits and Abuse Prevention:** Our authentication endpoints enforce progressive limits to block automated credential stuffing and brute-force attacks. We limit the number of account creations per network over a weekly period.
- **Session Isolation and Revocation:** Account sessions on client devices are isolated from each other. When you update your password, all active sessions across all devices are immediately revoked.

10. Your Rights and Choices

Regardless of where you reside, you have meaningful rights over your personal data:

- **Access and Portability:** You can access your account information at any time and obtain a copy of your personal data in a readable digital format directly from your account dashboard.
- **Correction and Rectification:** You can update your profile name, display information, and account settings in your dashboard. To protect account integrity and prevent impersonation, verified identity details (such as a verified date of birth) become locked once validated. Name updates may also be subject to fair-use limits to prevent fraudulent identity swapping.
- **Erasure (Right to be Forgotten):** You can request the permanent deletion of your account and associated personal data at any time.
- **Restriction and Objection:** You have the right to object to or request restrictions on the processing of your data under applicable conditions.
- **Withdrawal of Consent:** Where processing is based on consent, you may withdraw your consent at any time without affecting the lawfulness of earlier processing.
- **Managing Connected Apps:** You can review and revoke permissions for any authorized application at any time in the Linked Apps section of your account dashboard.

To exercise any of these rights, use the tools in your account dashboard or contact us at support@suloro.com.

11. Account and Data Deletion Process

You can permanently delete your Suloro Account and personal data at any time through our self-service flow:

1. Sign in to your Suloro Account dashboard.
2. Go to the **Data & Privacy** section.

3. Locate the **Delete Account** option at the bottom of the page.
4. Review the deletion notice and confirm by entering your password.
5. Submit your request.

Upon submitting the request:

- All active sessions on all your devices are immediately revoked.
- Your account is scheduled for permanent deletion and enters a mandatory 30-day grace period. A confirmation alert is sent to your registered email address.
- If you sign in during the 30-day grace period, you will have the opportunity to cancel the deletion request and restore your account.
- After the 30-day grace period concludes, your account profile, personal data, and application connections are permanently purged from active servers by automated cleanup systems.

12. Minimum Age and Children

Protecting children is a fundamental commitment at Suloro. Our services are subject to strict age requirements.

Minimum Legal Age Requirement: 13 Years Old: Suloro apps, websites and services are not intended for children under 13 years of age. Where local law sets a higher minimum age for digital consent (such as 14, 16, or the age of digital majority in your jurisdiction), that higher age requirement applies.

- **Mandatory True Date of Birth:** Users must provide their true and accurate date of birth during account registration. Setting your accurate date of birth allows us to apply age-appropriate safety protections.
- **Permanent Suspension for Underage or False DOB:** If a user is below the minimum legal age, or has entered a false, fabricated, or fake date of birth to bypass our age verification checks, Suloro may suspend or permanently terminate that account without prior notice, and may permanently delete all associated personal data as permitted or required by law.
- **No Knowingly Collected Child Data:** We do not knowingly collect personal information from individuals under the minimum legal age. If we become aware that personal information of an underage child has been collected without verifiable parental consent, we take immediate steps to delete that information.
- **Parental Requests:** Parents or legal guardians who believe their child has registered an account or provided personal information without consent may contact us at support@suloro.com to request immediate account termination and data erasure.

13. International Data Transfers

Suloro serves users worldwide. Your information may be processed and stored on secure servers located outside of your country of residence. Regardless of where your data is processed, we apply the high standards of protection outlined in this policy and implement recognized contractual and technical safeguards to ensure your personal data remains protected.

14. Comprehensive Privacy Rights

We provide privacy protections designed to satisfy standards established under privacy frameworks worldwide, ensuring all users can exercise meaningful control over their personal data:

A. Access, Rectification and Portability

You have the right to access the personal information we maintain about you, verify how it is processed, and request corrections or updates if any details are incomplete or inaccurate. Where technically feasible, you may obtain a structured copy of your digital data.

B. Erasure, Restriction and Objection

You have the right to request the erasure of your personal data when it is no longer required for the purposes for which it was collected, or to object to specific processing activities. Where processing is based on your consent, you may withdraw your consent at any time without affecting prior lawful processing.

C. Transparent Processing & Non-Discrimination

We believe privacy is a fundamental right. Suloro never sells personal data to data brokers or advertising exchanges, and we will never discriminate against you, alter service pricing, or degrade your service quality for exercising your statutory privacy rights.

D. Grievance Redressal and Regulatory Inquiries

You have the right to seek prompt resolution of any privacy concerns or file inquiries through our designated support channel at support@suloro.com, as well as the right to lodge a complaint with your competent supervisory authority or data protection regulator in your jurisdiction.

15. Third-Party Links and Services

Our applications and websites may contain links to external websites, services, or developer integrations that are not operated by Suloro. If you follow a link to a third-party site, their privacy practices and policies will govern your interaction. We encourage you to review the privacy policies of any third-party service you visit.

When you use your Suloro Account to sign in to third-party applications, those applications are bound by developer agreements to uphold user privacy and maintain accessible privacy policies. You can audit and disconnect these applications at any time in your account dashboard.

16. Changes to This Policy and Grievance Handling

We may update this Privacy Policy from time to time to reflect changes in our services, technology, or legal requirements. When updates are published, the revised date will be displayed at the top of this page as "Effective November 5, 2026". For significant changes, we will provide noticeable alerts on our website or through your account dashboard.

Support & Grievance Redressal: If you have questions, concerns, complaints, or grievance requests regarding your personal data or this Privacy Policy, please reach out to our dedicated support team at support@suloro.com or manage your settings directly at https://accounts.suloro.com.