

# OGMY Privacy Policy

Updated on November 2nd, 2024

This Privacy Policy applies to all Services and/or Contents and/or Products and/or Websites owned and operated by OGMY, including but not limited to [www.ogmy.life](http://www.ogmy.life), [www.ogmy.org](http://www.ogmy.org), [www.ogmy.ai](http://www.ogmy.ai), [www.ogmy.live](http://www.ogmy.live), [www.ogmy.co](http://www.ogmy.co), [www.insights-ogmy.life](http://www.insights-ogmy.life), and any other websites, pages or features owned or operated by us, as well as any associated Services.

This Privacy Policy applies in conjunction with our Terms of Use (TOU). Before using our Services, creating a user account and/or profile and submitting personal information, you must carefully read and agree to this Privacy Policy in its entirety.

We use the same terms here as in our Terms of Use for more simplicity. We will notify you about this Privacy Policy if we have a new or different definition of a term already defined in our Terms of Use.

By accessing or using the Services, you acknowledge and declare that you have read, understood and agreed to this Privacy Policy in its entirety. Unless otherwise specified herein, the Privacy Policy applies to all uses of the Services and/or Products and/or Contents and/or Websites. You may consent to this Privacy Policy by clicking to accept or agree, where this option is made available to you by OGMY for any Services, by creating an OGMY user account or by actually using the Services, including but not limited to providing any profile or self-reported personal information. In this case, you acknowledge and agree that OGMY considers your use of the Services as acceptance from that point on.

You may access the PDF version of this Privacy Policy at <https://ogmy.life/privacy-policy> and download or print it for your permanent storage.

## What information is collected by OGMY?

We try not to use legalese, but we do use some useful definitions to describe the data we collect while providing the Services to you.

When we refer to "**Personal Information**" and/or "**Personal Data**", we use these general terms to refer to the different categories of data we describe in this section that personally identify or relate to you. Your Personal Information all information about a single person, such as phone number, name, personality, traits or characteristics.

Here are the types of personal information we collect:

"**Registration Information**" is the information you provide about yourself when creating and securing your user account and/or purchasing our Services (for example, email address, phone number, user password, payment information and/or billing address).

"**Profile Information**" is the information you provide about yourself when you create your user profile in order to access the Services for processing personal data and

providing personalized analytics (including but not limited to gender, age, nationality, education, work experience, industry, personality traits and personal values).

**"Self-Reported Information"** is information you provide to us through the Services when you fill out and/or submit information in response to our Forms. This information includes, but is not limited to, your preferences, lifestyle, personal characteristics and/or locations and any other information you enter into our Forms when you are logged into your OGMY user account.

**"Alignment Information"** is information about the analysis of your situation (e.g. "General Alignment Score", "Mental Alignment Score", "Physical Alignment Score", "Social Alignment Score", "Financial Alignment Score"). Alignment Information includes all analyses and/or **"Observations"** (also known as **"Insights"** and/or **"Scores"**) presented within the Personalized Analyses to users as part of our Services. These are generated and provided by OGMY as part of our Services and/or Products and/or Content and/or Websites.

**"Web Behavior Information"** is information about how you use our Website and its subdomains (including but not limited to the type of browser and/or device used, pages and/or domains viewed) collected through log files, cookies and web beacon technology.

**"Other User Generated Content"** or **"Other User Generated Contents"** and/or **"Non-OGMY Content"** or **"Non-OGMY Contents"** means all information, data, text, including messages or emails, software, music, sound, photographs, graphics, video, messages or other materials - other than registration information, profile information, self-reported information and web behavior information - generated by users of the Services and transmitted, publicly or privately, to or through OGMY, including but not limited to email exchanges, text messages, calls and forms made available for recruitment.

**"Sensitive Information"** are defined by the French CNIL (Commission Nationale Informations et Libertés) as user data revealing the alleged racial or ethnic origin, political opinions, religious or philosophical beliefs or trade union membership, as well as the processing of genetic data, biometric data for the purpose of uniquely identifying a natural person, data concerning health or data concerning the sexual life or sexual orientation of a natural person. The collection of such data is subject to an additional request for express consent from the user before accessing Forms that may collect it.

**"De-identified Information"** means all information collected about users but stripped of registration information (including, but not limited to, your email and/or phone number and/or first name and/or last name) so that you cannot reasonably be identified as an individual. It is no longer personally identifiable information or personal information when processed.

**"Aggregate Information"** is different from Personal Information. It is not personal information because it does not contain information about a specific individual and cannot be reasonably linked to that individual. It provides information about a group of people by describing the group as a whole, such that no specific individual can be reasonably identified. For example, the number of OGMY users with a specific personality trait or value is aggregated information.

## How do we collect information?

 You are free to provide only the personal information you want.

**You :** We collect the information you provide to us when you use and/or purchase our Services and/or Products and/or Content, create your user account, respond to our Forms or participate in any other activity on our Websites and/or Services, call our customer service hotline or otherwise interact with us using one or more devices. You may provide information in a variety of ways, including by typing or using voice commands.

**Service Providers:** We may collect information through service providers that use a variety of technologies and tools, such as cookies, analytics tools, software development kits, application program interfaces, web beacons, pixels and tags when you visit, use or interact with our Services. For more details on how we collect and use information about web behavior, please see the Cookies section of this Privacy Policy.

**OGMY:** We may infer new information from other data we collect, including by using automated means to generate information about your likely preferences or other characteristics. For example, we use your alignment information to infer certain preferences, or we may infer your location (city and/or country) from registration information and/or web behavior information.

## How do we use your personal information?

 **We do not use your personal information in ways that you would not be aware of.**

We use your information to:

- To provide our Services, including developing, operating, improving, maintaining and safeguarding our Services, including the development of new Content and/or Services and/or Products and/or tools and/or features;
- To analyze and measure trends and usage of the Services;
- To communicate with you, including through email, or to share information about our Services or other offers or information that we believe may be relevant to you;
- To personalize, contextualize and market our Services to you;
- Enhance the safety, integrity and security of our Services, including preventing fraud and other unauthorized or illegal activities on our Services;
- Enforce, investigate and report conduct that violates our Terms of Use or other policies;
- Conduct surveys or polls, and obtain testimonials or stories about you;
- To comply with our legal, regulatory and licensing obligations.

By submitting your email address on our Website, you agree to receive emails from us. We do not send unsolicited commercial emails, because we hate spam as much as you do. If at any time you wish to unsubscribe from receiving future emails, we include detailed unsubscribe instructions at the bottom of each email. Email addresses submitted solely through the order processing page will be used for the sole purpose of sending you information and updates regarding your order. If, however, you have provided us with the same email address by another method, we may use it for any of the purposes set forth in this policy.

## Do we share personal information?

 **We do not sell our users' personal information to third parties.**

We share information with our service providers and contractors only when necessary to provide our Services and/or Products and/or Content and/or Websites.

**Service Providers:** Our service providers help us provide our Services and act on our behalf to make things happen. We implement procedures and maintain contractual terms with each service provider to protect the privacy and security of your personal information. We use service providers and contractors to assist us in certain areas, including but not limited to:

- processing and analysis of your data ;
- hosting and maintenance of our servers and Websites ;
- storage, management and security of your data, including in the Cloud ;
- credit card processing and payment services ;
- customer support ;
- analysis of the use of our Websites.

Our third party service providers include:

- [cloud.google.com](https://cloud.google.com)
- [aws.amazon.com](https://aws.amazon.com)
- [wix.com](https://wix.com)
- [stripe.com](https://stripe.com)
- [netlify.com](https://netlify.com)
- [openphone.com](https://openphone.com)

If you share your personal information with a third party, they may use your personal information differently than we do under this Privacy Policy. Please make these choices carefully and consult the privacy policies of any other applicable third parties. We recommend that you hide any personally identifiable information if you choose to share our Services and/or Products and/or Content and/or Websites on social networks or with any other third party.

**Commonly Owned Entities, Affiliates and Change of Ownership:** If we become involved in a bankruptcy, merger, acquisition, reorganization or sale of assets, your personal information may be accessed, sold or transferred as part of that transaction and this Privacy Policy will apply to your personal information as transferred to the new entity. We may also disclose personal information about you to our affiliates to help them operate our Services and those of our affiliates.

**Third Parties Related to Law, Prejudice, and the Public Interest:** OGMY will not provide information to law enforcement unless required by law to comply with a valid court order, subpoena or search warrant. We require that all law enforcement requests follow valid legal process, such as a court order or search warrant. If we are required to disclose your personal information to law enforcement, we will make every effort to notify you in advance, unless prohibited by law.

OGMY will retain and disclose all information if required to do so by law or in the good faith belief that such retention or disclosure is reasonably necessary to:

- compliance with legal or regulatory process (such as a judicial proceeding, court order or government investigation) or obligations that OGMY may owe under ethical and other professional rules, laws and regulations;
- Enforce OGMY's Terms of Use and other policies;
- Respond to claims that any content violates the rights of third parties;

-protect the rights, property or personal safety of OGMY, its employees, officers, directors, contractors or other personnel, its users and the public.

Nothing in this Privacy Policy is intended to limit the legal defenses or objections you may have to a request by a third party, including a government, to disclose your Personal Information.

We may also analyze, design, share, produce, publish, promote and market statistics from aggregate information about and/or resulting from users' use of our Services to third parties and/or in collaboration with third parties. Data processing for statistical studies is carried out exclusively on the basis of aggregated and de-identified data, stripped of your Registration information (e.g., your email and/or phone number) and other identifying data so that you cannot reasonably be identified as an individual.

## How can you manage your personal information?

✔ You can delete your user account at any time.

**Access and download:** You can access and download the personal information you have shared with OGMY. Please note that if you lose access to your OGMY user account, we will ask you to provide additional information to verify your identity before we give you access or release information. This process may take up to seventy-two (72) hours after a request is submitted.

**Modify and correct information:** You may correct your Registration Information by accessing your Member area. You may change your Profile Information by submitting a new Form available on the "Update my profile" page inside your Member Area. You may change Self-reported information entered into Forms by submitting an identical Form again. The latest version of any submitted Form is used to generate your Personalized Analysis.

**Delete your user account and information:** You can delete your OGMY user account at any time in your user account settings or by sending an email to [privacy@ogmy.life](mailto:privacy@ogmy.life). Upon deletion of the user account, we will automatically exclude you from our Services and delete your personal information from our database. This process may take up to seventy-two (72) hours after a request is submitted.

## How do we store your personal information?


✔ We separate and encrypt your Personal Information within our databases to ensure its privacy.

We retain Personal Information for an indicative period of five (5) years from the time it is registered on or through our Services and/or Products and/or Websites. However, we may retain Personal Information for as long as necessary to provide the Services and carry out the transactions you request from us, to comply with our legal obligations, to resolve disputes, to enforce our agreements and for other legitimate and lawful business purposes.

Because these needs may vary for different types of data in the context of different Services, actual retention periods may vary significantly depending on criteria such as user expectations or consent, the sensitivity of the data, the availability of automated controls allowing users to delete data, and our legal or contractual obligations.

In the event that you wish to delete your OGMY user account, we will retain limited information related to your account and data deletion request, including but not limited to your email address, account deletion request identifier, communications related to inquiries or complaints, and legal agreements, for a limited period of time as required by law, contractual obligations, and/or as necessary for the establishment, exercise, or defense of legal claims and for audit and compliance purposes.

## Security Measures

 **We implement physical, technical and administrative measures to prevent unauthorized access to or disclosure of your personal information.**

Our team regularly reviews and improves our security practices to ensure the integrity of our systems and your personal information.

Here are some of the measures we implement:

-We use fully monitored and compliant secure servers (maintained by our ISO 27701 and ISO 27001 certified service providers).

-All personal information provided via our Website is transmitted via Secure Socket Layer (SSL) technology to encrypt the transmission to our databases (maintained by our ISO 27701 and ISO 27001 certified service providers).

-We also encrypt our internal network infrastructure and regularly update our anti-virus, anti-phishing software and mask our login information.

-Your registration information is of a special personal nature (known as "Personally Identifiable Information"), so we store it with an extra level of encryption in separate databases from your other personal information.

-We have separated our databases so that we do not store your responses to our Forms in the same place as information collected during the creation of your user account, including your registration information and/or profile information.

-Your Personalized Analyses are only temporarily available and accessible on our servers to limit any risk of disclosure to third parties. They are destroyed after a specific period of time (see exact time period in our TOU).

-We use anonymized unique user identifiers (UUIDs) to organize our databases without displaying your Registration information. The information collected during Form submission is therefore not linked to any personally identifiable information.

-We have implemented a strict internal access policy to the data we collect, called a "Chinese wall". Staff members are prohibited from accessing your personally identifiable information and



Profile information and/or Self-reported information and/or Alignment information at the same time (unless authorized in exceptional circumstances).

-We use advanced encryption techniques to protect your passwords and financial data. We do not store or retain this data. If you have forgotten your password, we invite you to use the password reset service available to you.

-We use encrypted and secure payment solutions.

-We archive collected data on separate and isolated servers to ensure its integrity in the event of a security breach or other incident.

However, neither people nor security systems are infallible, including encryption systems. In addition, people can commit intentional crimes, make mistakes, or fail to follow policies. While we make reasonable efforts to protect your personal information, we cannot guarantee its absolute security. You agree that intentional misconduct is the standard by which we measure our compliance with the protection of your personal information.

Given the irreducible risks of transmitting information over the Internet, however, we cannot ensure or warrant the complete security of any information you transmit to OGMY or guarantee that your personal information on the Service cannot be accessed, disclosed, altered or destroyed by a breach of any of our physical, technical or managerial safeguards.

Please be aware that protecting your personal information is also your responsibility. Please protect your password and other authentication information from third parties, and notify OGMY immediately of any unauthorized use of your Registration information. The password you used to create your user account on our Website is not visible to OGMY personnel. We encourage you not to share it with OGMY or any third parties, nor to reuse it. OGMY cannot secure personal information that you voluntarily provide or request us to provide.

## **Third Party Content and Integrations**

Our Services and/or Products and/or Websites may contain third party content, integrations or links to third party websites operated by organizations not affiliated with OGMY. Through these integrations, you may provide information to third parties as well as to OGMY. Because we can only control our own Services and/or Products and/or Content and/or Websites, we are not responsible for how these third parties collect or use your information. Therefore, please be sure to review the privacy policies of each third party service you visit or use, including third parties with whom you interact through our Services and/or Products and/or Websites.

## **Provisions applicable to residents of the European Economic Area and the United Kingdom**

This subsection applies to residents of the European Economic Area ("EEA"), including the European Union ("EU") and the United Kingdom ("UK"). It explains how OGMY complies with certain privacy rights specifically available to individuals located in these geographic areas, including, but not limited to, those under the General Data Protection Regulation ("GDPR").

## 1. Our relationship with you

We are the "**Controller**" of your Personal Information as we determine the means and purposes of processing your information when you use our Services.

## 2. Legal basis for processing personal information

The laws of your country require us to rely on certain conditions to process your information. When we process your information, we rely on the following conditions or "legal bases":

- Your consent;
- Legal obligations;
- Execution of contracts we have with you or to take steps at your request before entering into a contract with you;
- Legitimate interests to protect our property, our rights or the safety of OGMY, our customers or others.

Below is a summary of the personal data collected, its purpose, legal basis and retention period:

<b>Purpose of the data processing</b>	<b>Collected personal data</b>	<b>Legal basis</b>	<b>Retention period</b>
Create and secure your user account	Registration information	Execution of contracts	Duration of the use of the services + legal prescription (5 years)
Create your user profile	Profile information	Consent (to the TOU and Privacy Policy)	5 years
Provide Personalized analyses	Self-reported information	Consent (to the TOU and Privacy Policy)	5 years
Provide Personalized analyses	Alignment information	Consent (to the TOU and Privacy Policy)	5 years
Provide and Improve Personalized analyses	Sensitive information	Consent (to the TOU, Privacy Policy and specific notices related to the processing of sensitive data)	5 years
Purchase of products or services	Transaction Data (Names, Billing Addresses, Debit/Credit Card Numbers)	Execution of contracts	Duration necessary for the execution of the transaction plus the legal retention period for accounting purposes
Operate the Website	Web behavior information	Consent (to the TOU and Privacy Policy)	5 years



Administrative management of the website and User complaints	Other User Generated Content	Legitimate interests	Duration of the use of the services + legal prescription (5 years)
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We also keep a detailed register of all data processings, built on the model provided by the CNIL and updated regularly.

### 3. Privacy Rights

EEA and UK residents have the right to access, delete, correct, withdraw consent and benefit from the portability of their information. We believe that all of our customers should have strict privacy controls, so our Privacy Policy outlines how you can access, download and delete your personal information. In addition, you have the right to object to or restrict the processing of your personal information. To exercise these rights, please contact us at [privacy@ogmy.life](mailto:privacy@ogmy.life). We will process your request in accordance with applicable law and, in some cases, your ability to access or control your Personal Information will be limited as required or permitted by applicable law. Any process to fully upload or delete your Personal Information may take up to seventy-two (72) hours after a request is submitted.

### 4. International Transfers

We are a globally oriented company and use international service providers, which means that your personal information may be transferred to, stored and processed in France and/or other countries outside your place of residence. When we make such transfers, we rely on various legal bases to lawfully transfer personal information worldwide, including compliance with our agreements with you, your prior consent, adequacy determinations for the relevant countries, or other transfer mechanisms that may be available under applicable law, such as standard contractual clauses approved by the European Union Commission.

In cases where personal information may be transferred to or processed in locations outside the EEA and the United Kingdom that have not been determined by the European Commission or the UK ICO to have an adequate level of data protection, OGMY takes steps designed to provide the level of data protection required in the EU or the United Kingdom, including ensuring that transfers are governed by the requirements of the Standard Contractual Clauses adopted by the European Commission or other adequate transfer mechanism. OGMY has entered into transfer agreements based on the Standard Contractual Clauses that allow for the processing and transfer of personal data.

Through the services provided by our service providers located outside of the EEA and the United Kingdom, we continue to participate in the EU-U.S. Privacy Shield frameworks, as set forth by the U.S. Department of Commerce, regarding the collection, use, and retention of personal information transferred from the EU and EEA to the United States, respectively. OGMY is committed to applying the applicable principles of the Privacy Shield Framework to personal information received from the EU and EEA. In the event of a conflict between the terms of this Privacy Policy and the applicable Privacy Shield Principles, the Privacy Shield Principles will prevail. As of July 16, 2020, we no longer rely on the EU-U.S. Privacy Shield to transfer data from the EEA or the United Kingdom to the United States.

OGMY is responsible for the processing of Personal Information that it receives or subsequently transfers to a third party acting as an agent on its behalf. OGMY complies with applicable data protection legislation, including the Privacy Shield Principles for all onward transfers of Personal Information from the EEA and the UK to other countries, including the onward transfer liability provisions in the Privacy Shield Principles.

In certain situations, OGMY may be required to disclose Personal Information in response to lawful requests from public authorities, including to meet national security or law enforcement requirements.

## 5. Questions

We encourage you to contact us so that we may attempt to address your concerns or dispute informally by email at [privacy@ogmy.life](mailto:privacy@ogmy.life) or by mail (see last section Contact Information). You may also consult the CNIL website (<https://www.cnil.fr/fr>) for additional information about your rights.

## Cookies

The generic term "**Cookie**" or "**Cookies**" refers to cookies, web beacons, flash cookies, tags, pixels and other tracking technologies. Cookies are text files, containing small amounts of information, that are downloaded to your device when you browse the web or use a web application. We use cookies to provide, secure and understand the use of our Services and advertisements.

There are two types of cookies: on the one hand, "**session cookie**" lasts as long as your browser is open and is automatically deleted when you close your browser, on the other hand, "**persistent cookie**" lasts until you or your browser deletes the cookies, or they expire.

Cookies set by OGMY are called "**first party cookies**", while cookies set by parties other than OGMY are called "**third party cookies**". Parties that set third-party cookies may recognize your device, both when you use our Services and when you use other websites or mobile applications. To understand how other companies use cookies, please review their own privacy policies.

Like most online services, OGMY uses cookies to keep your data secure, help us improve our Services, understand how you engage with the web content and emails we send, and provide you with relevant advertisements.

Below is a summary table of the cookies we use:

Categories of cookies	Why do we use these cookies?
Essential	These cookies provide essential functionality such as security, identity verification and network management. These cookies cannot be disabled.
Functional	These cookies collect data to remember users' choices to improve and provide a more personalized experience.

Analytics	These cookies help us understand how users and/or visitors interact with our website, discover errors and provide better overall analysis.
Marketing	These cookies are used to track the effectiveness of our ads in order to provide a more relevant service and deliver more relevant ads.

We are committed to providing you with meaningful privacy choices. If you choose to disable or decline certain cookies, you may experience a loss of functionality or availability throughout our service. You have a number of options to control or limit how we and third parties use cookies:

**Via our cookie management tool:** If you are located in certain jurisdictions where our cookie management tool is available, you can access the Cookie Choice page. You can make certain choices regarding cookies that are not "strictly necessary" cookies.

**Third Party Opt-Out:** As described in this policy, OGMY uses cookies from third party analytics, advertising and marketing service providers to collect information about its Services, the effectiveness of its marketing campaigns and other operations. For example, we use Google Analytics User-ID to combine behavioral information across devices and sessions (including authenticated and unauthenticated sessions) on our Services. These third parties, including Google Analytics, provide users with the ability to disable their cookies.

Our third-party service providers include:

- [analytics.google.com](https://analytics.google.com)
- [tagmanager.google.com](https://tagmanager.google.com)
- [facebook.com/adsmanager](https://facebook.com/adsmanager)

If you choose to use social plugins, you may share information with the company that manages the social plugins ("third party social media") during your interactions. Please refer to the social media third party's privacy policies to learn more about their data practices.

If you have any questions about OGMY's cookie policy, please contact us at [privacy@ogmy.life](mailto:privacy@ogmy.life)

## Changes to this Privacy Policy

We may make changes to this Privacy Policy from time to time. We will notify you of such changes here or by contacting you via email or any other contact method, including but not limited to, on another page or feature of the Website.

## Translations

This Privacy Policy was originally written in French (FR).

We reserve the right to translate Privacy Policy into other languages.

In the event of a conflict between a translated version of this Privacy policy and the French version, the French version shall prevail.

You can view the original French version of these TOU at <https://ogmy.life/privacy-policy>

## Contact Information

If you have any questions about this Privacy Policy, or for any other inquiries or complaints, please email us at [privacy@ogmy.life](mailto:privacy@ogmy.life) or send a letter to

Privacy Officer  
OGMY SASU  
10 rue de la Paix  
75002 Paris, France