

Privacy Policy for ActionSmartAI

ActionSmartAI Ltd (Company Number: 16429509)

Effective Date: 28 May 2025

Website: <https://actionsmartai.com>

Contact: support@actionsmartai.com

1 Introduction

ActionSmartAI Ltd ("we", "us", or "our"), a company registered in England and Wales with company number 16429509, is committed to protecting your privacy. This Privacy Policy explains how we collect, use, store, and protect your personal data when you use the ActionSmartAI iOS application ("the App"). The App is designed to help you manage goals, habits, routines, and reflections through a user-centric, AI-powered platform. We prioritise your privacy and ensure that no human will access your personal data, nor will it be sold or shared with third parties. Our robust security measures are designed to prevent any data breaches.

This policy complies with the UK General Data Protection Regulation (UK GDPR), the Data Protection Act 2018, and other applicable laws. By using the App, you agree to the practices described in this policy. If you have any questions, please contact us at support@actionsmartai.com.

2 Data We Collect

We collect only the data necessary to provide and improve the Apps functionality. The types of data collected include:

- **Personal Data:** Information you voluntarily provide, such as:
 - Name and email address (if provided for account creation or support purposes).
 - Subscription-related data (e.g., payment status for premium features, processed via StoreKit).
- **App Usage Data:** Information generated through your use of the App, including:
 - Macro Goals, Micro Goals, Habits, Routines, and Journal/Reflection entries (e.g., titles, descriptions, categories, dates, notes, mood ratings, and tags).
 - Achievement data (e.g., progress, streaks, and unlocked achievements).
 - Notification and reminder settings.
- **Technical Data:** Automatically collected data to ensure the App functions correctly, including:
 - Device information (e.g., device type, operating system version).
 - Usage analytics (e.g., app interactions, feature usage, and performance metrics).

- Crash reports and diagnostic data to improve stability.

We do not collect sensitive personal data (e.g., health, financial, or biometric data) unless explicitly provided by you in goal or journal entries, which remain under your control and are not accessed by any human.

3 How We Use Your Data

Your data is used solely to provide, maintain, and enhance the Apps functionality. Specific uses include:

- **Service Delivery:**
 - Managing and displaying your Macro Goals, Micro Goals, Habits, Routines, and Journal entries.
 - Generating AI-powered insights and suggestions (e.g., Micro Goal generation, habit suggestions, and journal feedback) using AWS Bedrock (Claude 3 Sonnet model).
 - Scheduling and delivering notifications and reminders via the iOS UserNotifications framework.
 - Tracking achievements and progress metrics to support gamification.
- **App Improvement:**
 - Analysing usage patterns and technical data to optimise performance and user experience.
 - Identifying and fixing bugs through crash reports and diagnostics.
- **Subscription Management:**
 - Processing subscription status and enabling premium features via StoreKit.

No human at ActionSmartAI Ltd or any third party will access your personal data. AI processing is automated, and data is handled securely without manual intervention.

4 Data Storage and Security

We take robust measures to protect your data:

- **Storage:**
 - Data is stored locally on your device using UserDefaults for persistence.
 - Cloud-based data (e.g., for backup or sync via CloudKit) is encrypted both in transit and at rest.
- **Security:**
 - End-to-end encryption ensures data remains inaccessible to unauthorised parties.
 - Highly secure algorithms and protocols prevent data breaches.

- AWS services (Lambda, API Gateway, Bedrock, CloudKit) are secured with AWS IAM and comply with industry-standard security practices.
- Client-side caching reduces unnecessary API calls, minimising exposure.
- **Retention:**
 - Data is retained only for as long as necessary to provide the Apps services or as required by law.
 - You can delete your data at any time via the Apps settings, after which it is permanently removed from our systems.

5 Data Sharing and Third Parties

We do not sell, share, or disclose your personal data to third parties, except in the following limited circumstances:

- **Service Providers:** We use AWS (Amazon Web Services) for backend infrastructure (Lambda, API Gateway, Bedrock, CloudKit). These services process data in accordance with our instructions and strict security standards, without human access.
- **Legal Obligations:** We may disclose data if required by law, such as to comply with a court order or regulatory requirement, but only to the extent necessary.

No third-party advertising or tracking services are used in the App.

6 Your Rights

Under the UK GDPR, you have the following rights regarding your personal data:

- **Access:** Request a copy of the data we hold about you.
- **Rectification:** Correct inaccurate or incomplete data.
- **Erase:** Request deletion of your data.
- **Restriction:** Restrict how we process your data.
- **Portability:** Obtain your data in a structured, machine-readable format.
- **Objection:** Object to processing for specific purposes.
- **Withdraw Consent:** Withdraw consent for data processing (where applicable).

To exercise these rights, contact us at support@actionsmartai.com. We will respond within one month, as required by law.

7 Childrens Privacy

The App is not intended for use by individuals under 16 years of age. We do not knowingly collect personal data from children. If you believe a child under 16 has provided data, please contact us to have it removed.

8 Cookies and Tracking

The App does not use cookies or third-party tracking technologies. Analytics are collected in an anonymised form to improve functionality, without identifying individual users.

9 International Data Transfers

As ActionSmartAI Ltd is based in the UK, data is primarily processed within the UK or the European Economic Area (EEA). Where data is processed by AWS in regions outside the UK/EEA, we ensure compliance with UK GDPR through appropriate safeguards, such as Standard Contractual Clauses.

10 Changes to This Policy

We may update this Privacy Policy to reflect changes in our practices or legal requirements. We will notify you of significant changes via the App or by email (if provided). The latest version is always available at <https://actionsmartai.com/privacy>.

11 Contact Us

If you have questions, concerns, or wish to exercise your data rights, please contact:

ActionSmartAI Ltd

Email: support@actionsmartai.com

Website: <https://actionsmartai.com>

Twitter: <https://twitter.com/ActionSmartAI>