hypnoora

LEGAL

# Privacy Policy

| LAST UPDATED | MB IT PIRKLIAI | EMAIL |
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| June 1, 2026 | Company code 304957766 | help@hypnoora.com |

This Privacy Policy forms part of the Terms and Conditions of **MB IT pirkliai**, company code 304957766, with our registered office at Žirmūnų g. 30E-2, Vilnius, the Republic of Lithuania (hereinafter referred to as the "Company"). All capitalised terms used in this Privacy Policy have the same meaning as in the Terms and Conditions unless otherwise indicated in Clause 1 below.

This Privacy Policy explains the way We collect and store Your information. By providing Personal Information, You consent to Our collection, use, and disclosure of Your Personal Information in accordance with this Privacy Policy and any other arrangements that apply between Us. We may change our Privacy Policy from time to time by publishing changes to it on the website or application. We encourage You to check our website or application periodically to ensure that You are aware of Our current Privacy Policy. The date of the last update of this Privacy Policy is shown at the top of this document.

01

## Definitions

In this Privacy Policy, the following capitalised terms have the following meanings:

- **Automatic Data** has the meaning given to it in Clause 2.
- **Non-Personal Information** means information which does not relate to a person and/or cannot be used to identify a person.
- **Personal Information** means any information which can be used to identify an individual, and is described in detail in Clause 2.
- **Payment Information** means information which is necessary to purchase our Product/Services, and is described in detail in Clause 2.

02

## What personal information do We collect?

We may collect Personal Information about You when You use the Product or interact with Us in any way.

We collect all information which You voluntarily provide to Us through using Our Product or interacting with Us. This includes information provided during registration; during support correspondence, questions, services, and surveys; when making payments; and when You register to receive any of Our newsletters.

The Personal Information We may collect includes without limitation: basic information such as Your first and last name; contact information including email address and phone number; demographic information such as postal code, age, and gender; other relevant information; Your contact details.

The Payment Information We may collect includes date of purchase, credit card owner's full name, and payment ID.

We also automatically collect certain technical data that is sent to Us from the device and/or browser through which You access the Product (hereinafter referred to as "Automatic Data"). Automatic Data includes without limitation a unique identifier associated with Your access device and/or browser, including, for example, Your internet protocol (IP) address, characteristics about Your access device and/or browser, statistics on Your activities on the Product, details of the services We have provided to You or that You have questions about, including any additional information necessary to deliver those services and respond to Your questions. However, to the extent that IP addresses or similar identifiers are considered Personal Information by local law, We also treat these identifiers as Personal Information. We collect Automatic Data based on Your consent which was granted to Us by You when You registered Your account on the Product and accepted this Privacy Policy. If You do not want Us to collect this information, delete Your account on the Product or refrain from using the Product.

Children under the age of 18 are not permitted to create their own Product account unless their parent or guardian has provided verifiable consent, in which case the parent or guardian must review the Terms and this Privacy Policy before they can begin the account creation process for the child. If We learn that We have collected or received Personal Information from a child under the age of 18 without verification of parental consent, We will delete that information. If You believe We might have any information from or about a child under the age of 18, please contact us immediately as described in Clause 13.

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## Why do We collect, use, and disclose Personal Information?

We may collect, hold, use, and disclose Your Personal Information for the following purposes:

- to enable You to access and use Our Product;
- to operate, protect, improve, and optimise Our Product, business and Our users' experience, such as to perform analytics, conduct user-experience research and for advertising and marketing;
- to send You service, support and administrative messages, reminders, technical notices, updates, security alerts, and information requested by You;
- to carry out Our obligations and enforce Our rights arising from the agreement entered into between You and Us, including for billing and collection;
- to send You promotional messages regarding new features and subscription deals and other information that may be of interest to You;
- to comply with Our legal obligations, resolve any disputes We may have with any of Our users, enforce our agreements with third parties, and for anti-fraud purposes.

From time to time, We may use Your Personal Information to send You important notices, including but not limited to notices about purchases You have made and changes to the Terms. Due to the importance of this type of information, You may not opt out of receiving these notices.

We may also disclose Your Personal Information to a trusted third party who also holds other information about You. This third party may combine that information in order to enable it and Us to develop anonymised consumer insights so that We can better understand Your preferences and requirements, personalise Your experience, and enhance the services that You receive from Us.

The information We collect is not distributed, sold, or leased to third parties for commercial purposes, except to provide services You have requested on the Product or for other purposes when We have Your permission to do so or when We are required to do so by law.

You are not obligated to provide the Personal Information that We have requested. However, if You choose not to provide it, We may not be able to provide You with our services or respond to any queries You may have.

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## Do We use Your Personal Information for direct marketing?

We may send You direct marketing notices and information about Our services, including but not limited to emails. By registering for Our Product and accepting this Privacy Policy, You hereby grant Your consent to receiving such notices from Us, unless You opt out as provided hereunder.

You may opt out of receiving marketing materials from Us as described in Clause 13 or by using the opt-out facilities provided in the aforementioned notices (e.g., an unsubscribe link).

We do not control third parties' collection or use of Your information to serve interest-based advertising. However, these third parties may provide You with ways to choose not to have Your information collected or used in this way.

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## To whom do We disclose Your Personal Information?

Depending on the payment method chosen by You, Your Personal Information may be disclosed to and processed by payment service providers, insofar as reasonably necessary for the purposes of collecting, processing, and administrating payments for the services.

We may disclose Your Personal Information if We believe such disclosure is necessary or appropriate for protecting the rights, property, or safety of Our Product, our customers, or other persons. This includes exchanging information with other companies and organisations for the purposes of fraud protection and credit risk reduction.

In certain circumstances, We may have to disclose certain Personal Information to third parties in order to enable You to acquire new products or to administer or provide the services that You are requesting.

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## Using our website and cookies

We may collect Personal Information about You when You use and access our website. While We do not use browsing information to identify You personally, We may record certain information about Your use of our website, such as which pages You visit, the time and date of Your visit, and the IP address assigned to Your device.

We may also use "cookies" or other similar tracking technologies on Our website that help Us track Your website usage and remember Your preferences. Cookies are small files that store information on Your device. They enable the entity that puts the cookie on Your device to recognise You across different websites, services, devices, and/or browsing sessions. You can disable cookies through Your internet browser; however, if You do so, our website may not work as intended for You.

We may also use cookies to enable Us to collect data that may include Personal Information. We will handle any Personal Information collected by cookies in the same way that We handle all other Personal Information as described in this Privacy Policy.

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## Data security

We may hold Your Personal Information in either electronic or hard copy form. We take commercially reasonable steps to protect Your Personal Information from misuse, interference, and loss, as well as unauthorised access, modification, or disclosure, and We use a number of physical, administrative, personnel, and technical measures to protect Your Personal Information. However, We cannot guarantee the absolute safety and security of Your Personal Information.

The safety and security of Your Personal Information also depends on You. Where We have given You account access credentials, You are responsible for keeping them confidential and not sharing them with anyone. We are not responsible for circumvention of any privacy settings or security measures We provide.

We protect Your personal information by using encryption and other data security measures. The data We collect is stored in encrypted form, even when We utilise third-party storage. However, no method of transmission over the internet or method of electronic storage is 100% safe and secure. While We strive to use commercially acceptable means of protecting Your Personal Information, We cannot guarantee its absolute safety and security.

You are responsible for the Personal Information You choose to share or submit to others online or offline. We will not take responsibility for Your decision to make any Personal Information publicly available.

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## Retention

Your personal data that We process for any purpose shall not be kept for longer than is necessary for that purpose. In any case it shall be kept for no longer than:

a. account data will be retained for no longer than 5 (five) years following your last update on the account;
b. service data will be retained for no longer than 5 (five) years following the end of provision of services;
c. messaging data will be retained for no longer than 2 (two) years following the provision of consent, or, in the case where messaging data is sent to present clients to maintain and improve customer relations, for no longer than 2 (two) years following the end of provision of the respective services, unless You withdraw Your consent earlier or object to such processing.

In some cases, it is not possible for Us to specify in advance the periods for which Your personal data will be retained (e.g. device data will be retained for as long as is necessary for the relevant processing purposes).

After the end of the applicable retention period, or upon Your request, personal data is destroyed using overwriting or physical destruction methods (where applicable).

Notwithstanding the other provisions of this Section, We may retain Your personal data where such retention is necessary for compliance with a legal obligation to which We are subject, or in order to protect Your vital interests or the vital interests of another natural person.

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## Third-party links

Our Product may contain links to websites operated by third parties. Those links are provided for convenience and may not remain current or be maintained. We are not responsible for the privacy practices of, or any content on, those linked websites, and have no control over or rights in those linked websites. The privacy policies and terms of use that apply to those other websites may differ substantially from Our Privacy Policy and terms, so We encourage individuals to read them before using those websites.

This Privacy Policy does not apply to any Personal Information that You provide to anyone other than Us, through the Product or any other means.

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## Accessing or correcting Your Personal Information

You can access the Personal Information We have about You by contacting Us as described in Clause 13. We may not be able to provide You with access to all of Your Personal Information, in which case We will inform You of the reason. We may also need to verify Your identity when You request Your Personal Information.

If You think that any Personal Information We have about You is inaccurate, please inform Us as described in Clause 13 and We will take reasonable steps to ensure that it is corrected. We will consider and respond to all requests in accordance with all applicable laws.

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## AI tools

We may use AI-based chatbots and other customer support solutions powered by third-party AI tools when You contact Us through in-app chat, our customer support email, or other communication channels.

a. The AI-based tools utilised by Us are powered by third-party service providers whose technologies enhance the functionality of Our application.

b. In the course of using AI-based tools, certain data may be collected or used, including profile information, user queries, interactions, and any information voluntarily shared during the conversation or necessary for query resolution. This data may be processed to provide tailored responses to user inquiries.

c. The scope of information processed by AI-based tools will depend on the nature of Your request or inquiry, as well as any information You provide in the request itself, so both personal and non-personal data may be processed.

d. By using Our in-app chat or by contacting Our customer support channels, You acknowledge and consent to the processing of any Personal Data contained in Your inquiry through the use of AI-based tools. Such processing is solely for the purpose of enhancing the functionality of Our application, improving user experience, and providing efficient customer support.

e. Data collected by AI-based tools may be shared with the third-party providers powering such functionality. We ensure that these third-party providers adhere to data protection laws and maintain the confidentiality and security of the shared information.

f. AI-based tools do not handle subscription management requests or data subject rights requests described in this Privacy Policy. For these matters, please contact Our customer support directly.

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## Your rights under EU/EEA law (GDPR)

As a company registered in the Republic of Lithuania and operating within the European Union, We are subject to the General Data Protection Regulation (GDPR). Under the GDPR, You have the following rights regarding Your personal data:

- **Right of access** – You have the right to obtain confirmation as to whether We process personal data concerning You, and to receive a copy of that data.
- **Right to rectification** – You have the right to have inaccurate personal data corrected and incomplete data completed.
- **Right to erasure** – You have the right to request the deletion of Your personal data where there is no longer a legitimate purpose for Us to retain it.
- **Right to restriction of processing** – You have the right to request that We restrict the processing of Your personal data in certain circumstances.
- **Right to data portability** – You have the right to receive Your personal data in a structured, commonly used, machine-readable format and to transmit it to another controller.
- **Right to object** – You have the right to object to processing of Your personal data carried out on the basis of our legitimate interests or for direct marketing purposes.
- **Right to withdraw consent** – Where processing is based on Your consent, You have the right to withdraw that consent at any time, without affecting the lawfulness of processing based on consent before its withdrawal.
- **Right to lodge a complaint** – You have the right to lodge a complaint with a supervisory authority, in particular in the EU Member State of Your habitual residence, place of work or place of the alleged infringement. In Lithuania, the supervisory authority is the State Data Protection Inspectorate (*Valstybinė duomenų apsaugos inspekcija*), **vdai.lrv.lt**.

To exercise any of the above rights, please contact Us as described in Clause 13.

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## Contact us

For further information about Our Privacy Policy or practices, to access or correct Your Personal Information, or to exercise any of Your rights, please contact Us:

**MB IT pirkliai**
Company code: 304957766
Žirmūnų g. 30E-2, Vilnius, Lithuania
Email: **help@hypnoora.com**