

Privacy Policy Last updated: [14.07.25]

Otti Group LTD ("we", "us", or "our") respects your privacy. This Privacy Policy explains how we collect, use, and protect your personal data when you use our app and website. We are a limited company registered in the UK, and our contact email for data queries is: hello@otti.app.

1. **What Data We Collect** We may collect the following data from you:
 - Parent/guardian name and/or child's first name
 - Age or date of birth of the child
 - Responses to sleep-related surveys and logs
 - Email address and account login details
 - Device information, including IP address and operating system
 - General usage data (e.g., app activity, features used)
 - Special category data related to child health, neurodivergence, or birth history (only with consent)
2. **How We Use Your Data** We use your data to:
 - Provide and personalise support, coaching, and sleep-related recommendations
 - Improve our AI model and service
 - Monitor app performance and usage trends (via tools like Google Analytics)
 - Contact you about important account or safety issues
 - (Future use) Send optional newsletters or marketing with your consent
3. **Legal Basis for Using Your Data** We rely on one or more of the following legal grounds:
 - Your consent (especially for any sensitive data)
 - Our legitimate interests (e.g., improving the app, understanding user needs)
 - Contractual necessity (to provide the service)
 - Legal obligation (if required to disclose data by law)
4. **Where Your Data Is Stored** Your data is stored securely within the EU. We take appropriate steps to protect it against unauthorised access or misuse. Some technical processing may involve third-party tools (e.g., cloud services or analytics providers). These services are required to comply with EU/UK data protection standards.
5. **How Long We Keep Your Data** We only keep your data for as long as necessary to provide our service and meet legal or operational requirements. Typically, we retain user data for up to 2 years after last activity, unless you ask us to delete it sooner.
6. **Your Rights** Under UK data protection law, you have the right to:
 - Access the personal data we hold about you
 - Request correction of inaccurate or outdated information
 - Ask us to delete your data ("right to be forgotten")
 - Object to or restrict how we process your data
 - Request a copy of your data (data portability)

To exercise these rights, email us at hello@otti.app.

7. **Consent and Withdrawal** We will request clear, separate consent before collecting or processing any special category data (e.g., child health or neurodivergence info). You can withdraw your consent at any time by contacting hello@otti.app.
8. **Cookies and Tracking** We use cookies and trackers for analytics and functionality on our website. These help us understand usage patterns and improve your experience. You can control cookies through your browser settings.

8.1 Types of Cookies We Use

We use the following types of cookies:

- **Essential cookies** – necessary for app or website functionality
- **Analytics cookies** – help us understand how users interact with our app and improve it (e.g. via Google Analytics)
- **Functionality cookies** – remember preferences or settings to personalise your experience

We do not use advertising or tracking cookies for third-party marketing.

8.2 Managing Cookies

You can control or disable cookies through your browser settings. Most browsers allow you to block or delete cookies. Please note, some parts of the app or website may not work properly without essential cookies.

For more details, visit www.allaboutcookies.org.

9. **Children's Data** This app is designed to support parents and guardians. We do not knowingly collect personal data directly from children. Any child-related data is provided by the parent or guardian and handled with additional care.
10. **Changes to This Policy** We may update this policy from time to time. If significant changes are made, we will notify you within the app or by email.
11. **Contact Us** If you have questions about this Privacy Policy or wish to make a data request, please email: hello@otti.app

You also have the right to complain to the Information Commissioner's Office (ICO) at www.ico.org.uk.