

2. PRIVACY POLICY + GDPR

Privacy Policy — ONA

Last updated: [22nd of May 2026]

ONA respects your privacy and is committed to protecting your personal data.

This Privacy Policy explains how we collect, use, process, and protect your information.

1. Data Controller

The data controller is:

[LEGAL ENTITY NAME] [ADDRESS] Netherlands

privacy@onacycle.com

2. Personal Data We Collect

Depending on how you use ONA, we may collect:

Account Information

- name;
- email address;
- login credentials;
- subscription information.

Wellness & Lifestyle Data

- cycle information;
- symptom tracking;
- sleep data;
- nutrition preferences;
- workout activity;
- wellness goals;

- mood tracking;
- wearable data.

Technical Data

- IP address;
 - device type;
 - operating system;
 - app usage;
 - cookies and analytics.
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3. Sensitive Health Data

Certain information processed by ONA may qualify as special category personal data under GDPR, including health-related information.

We only process such data:

- with your explicit consent;
- where necessary to provide the Services;
- in accordance with GDPR requirements.

You may withdraw consent at any time.

4. How We Use Your Data

We use personal data to:

- provide and improve the Services;
- personalize insights and recommendations;
- manage subscriptions;
- communicate with users;
- ensure platform security;
- analyze platform performance;
- comply with legal obligations.

We do not sell your personal data.

5. Legal Bases for Processing

Under GDPR, we process personal data based on:

- consent;
 - performance of a contract;
 - legitimate interests;
 - legal obligations.
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6. Data Sharing

We may share personal data with:

- cloud hosting providers;
- analytics providers;
- payment processors;
- customer support providers;
- professional advisors.

We require third parties to implement appropriate security measures.

We do not share personal data for third-party advertising purposes without consent.

7. International Transfers

If personal data is transferred outside the European Economic Area (EEA), we ensure appropriate safeguards are in place, such as:

- Standard Contractual Clauses;
 - adequacy decisions;
 - equivalent lawful transfer mechanisms.
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8. Data Retention

We retain personal data only as long as necessary for:

- providing the Services;
- legal compliance;

- resolving disputes;
- enforcing agreements.

You may request deletion of your account and associated data.

9. Your GDPR Rights

Under GDPR, you may have the right to:

- access your personal data;
- correct inaccurate data;
- erase data (“right to be forgotten”);
- restrict processing;
- object to processing;
- withdraw consent;
- data portability;
- lodge a complaint with the Dutch Data Protection Authority (Autoriteit Persoonsgegevens).

Requests may be sent to: privacy@onacycle.com

10. Security

We implement reasonable technical and organizational measures to protect personal data.

However, no system can guarantee absolute security.

11. Cookies & Analytics

ONA may use cookies and similar technologies for:

- analytics;
- authentication;
- performance optimization;
- user experience improvements.

Where legally required, we will request consent before placing non-essential cookies.

12. Children

ONA is not intended for individuals under 18 years old.

We do not knowingly collect data from minors.

13. Changes to This Policy

We may update this Privacy Policy from time to time.

Material changes will be communicated through the app or website.
