

AMBYS PRIVACY POLICY

Version 1.0

Last updated 24 April 2025

Welcome to Ambys! Ambys is a place for your emotions.

We're committed to protecting your privacy and making sure you feel informed and in control of your personal data. This policy explains what information we collect, how we use it, and the choices you have.

TL;DR (Too Long; Didn't Read):

1. We collect some personal data when you use Ambys, and this policy explains what and why.
2. Some of your data might be shared with trusted partners and service providers so we can run Ambys smoothly.
3. You have rights over your data, including access, deletion, and correction.
4. Got questions? Reach out—we're happy to help.

1. WHO WE ARE

AltoPass Inc. (Ambys app) is the company responsible for your data. You can contact us <http://ambys.pro/> if you have questions about this policy or your information.

2. WHO THIS APPLIES TO

This policy applies if you use our platform. To create a Ambys account, you need to share some information with us. **If you're under 18, you're not allowed to use Ambys—please don't create an account.**

3. WHAT DATA WE COLLECT

We collect information such as:

- **Identity Info:** Name, username, profile photo, date of birth, etc.
- **Contact Info:** Email, phone number.
- **Location Data:** If enabled on your device.
- **Friends Data:** Contacts from your phone.

- **Usage Data:** Messages, photos, videos, how you use the app.
- **Device Data:** IP address, device info.

You can choose not to provide some info, but that may affect your access to parts of the app.

How We Use Your Personal Information

3.1 Legal Basis for Processing

Under applicable privacy laws, we can only use your personal information when there is a valid reason to do so—this is called a "lawful basis." The legal bases we rely on include:

- **Contractual Necessity** – When we need to process your information to deliver our service or to take steps you’ve requested.
- **Legitimate Interest** – When we use your data in a way that is necessary for our business interests, as long as your rights don’t override those interests.
- **Compliance with Law** – When we need to meet legal or regulatory obligations.
- **Consent** – When you’ve given us permission to use your information for a specific purpose.

3.2 Purpose of Use and Legal Basis

Purpose	Data Types	Explanation	Legal Basis
Account setup & access	Identity, Contact, Location, Platform	To create and manage your account.	Contractual Necessity
Contact sync	Friends	To help you find and connect with friends.	Contractual Necessity
Purchases	Transaction	To manage subscriptions and in-app purchases.	Contractual Necessity
Security & fraud prevention	Identity, Contact, Device	To maintain platform security and prevent fraud.	Legitimate Interest
Troubleshooting	Device, Usage	To detect and fix platform issues.	Legitimate Interest
Analytics	Device, Usage	To understand and improve our service.	Legitimate Interest
Legal compliance	Identity, Device	To meet our legal obligations.	Compliance with Law
Marketing	Identity, Contact	To send promotional messages (with your consent).	Consent

4. How Long We Keep Your Data

We only keep your personal information as long as needed to fulfill the purposes listed above. In some cases, we may retain it longer if required by law.

On Ambys, you decide who sees your content—whether that’s only your group, everyone on Ambys, or even the Ambys team for potential features. It’s entirely your choice.

5. Who We Share Your Data With

We may share your personal data with the following:

- **Affiliates** – Other companies in our corporate group.
- **Service Providers** – Vendors that support our platform (e.g., hosting, analytics).
- **Professional Advisers** – Lawyers, auditors, and similar experts.
- **Public Authorities** – When required by law.
- **Purchasers** – In the event of a business sale or merger.

We always ensure recipients have proper data protection safeguards in place.

We will **never sell your personal data** to third parties. We do **not** share text messaging opt-in data with any third parties for marketing purposes.

Your data may be stored or processed in other countries. When this happens, we apply appropriate legal protections to keep your data secure.

6. Data Security

We implement robust measures to protect your personal information from loss, misuse, or unauthorized access. Only authorized personnel have access, and they are bound by confidentiality obligations.

We also have procedures in place to manage any data breaches, including notifying regulators or users where required.

7. Your Rights

Depending on where you live, you may have the right to:

- **Access** the personal data we hold about you.
- **Correct** inaccurate or incomplete data.
- **Delete** your data (when we no longer need it).
- **Object** to certain types of data processing.
- **Restrict** how your data is used temporarily.
- **Transfer** your data to another provider.
- **Withdraw consent** for any processing based on consent.

To exercise any of these rights, please contact us. We may need to verify your identity before responding.

We aim to respond within a month but will let you know if it might take longer.

8. Cookies

We use cookies to enhance your experience on Ambys.

Type	Purpose
Essential Cookies	Needed for core platform functionality.
Functionality Cookies	Remember your preferences (e.g., language or login).

You can manage cookie settings through your browser or device settings.

9. Do We Update This Notice?

Short answer: Yes.

We may update this Privacy Notice from time to time to stay in line with legal requirements or changes in how we handle personal information. When we make changes, we'll update the "Revised" date at the top of this page. If the changes are significant, we may also let you know through a notice on our site or by contacting you directly.

We recommend checking this page regularly so you're always informed about how we protect your data.

10. How to Contact Us

If you have any questions, concerns, or feedback about this Privacy Notice, feel free to get in touch:

Email: support@altopass.io

Mailing Address:

AltoPass Inc.
405 El Camino Real, Suite 629
Menlo Park, CA 94025
United States

11. How to Access, Update, or Delete Your Data

Depending on the laws in your country, you may have the right to:

- Access the personal data we've collected about you
- Update or correct that information
- Ask us to delete it

To make any of these requests, please fill out and submit a **Data Subject Access Request**. We'll respond as quickly as we can and in accordance with applicable privacy laws.