

Privacy Policy

Last updated: November 19, 2024

Welcome

Welcome to Slow, a journaling app provided by Slow Technologies Inc. ("Slow", "we," "us," "our"). By accessing or using the Slow app ("the App"), you agree to comply with and be bound by the following Privacy Policy. If you do not agree to this Privacy Policy, please do not use the App.

Thank you for taking the time to read our Privacy Policy, which is meant to help you understand how we handle your data. We have taken great care to make this policy as clear as possible, however, if you have any questions or concerns, please contact us at support@theslowapp.com.

For any specific concerns regarding European Union or United Kingdom data protection law that are not addressed in this policy, please contact us at support@theslowapp.com.

Our commitment

Our app works best when you write honestly and openly, which is why we try our best to provide a secure environment for your thoughts and feelings. We believe that protecting your data goes hand-in-hand with delivering a great journaling experience, which is why we are committed to transparently communicating how and why we use your data, along with what measures we take to secure it.

As we continue to improve our in-app experience over time, we will remain steady in our dedication to handle your data safely.

1. Personal Data we collect

We collect personal data relating to you ("Personal Data") if you create an account to use the App or communicate with us as follows:

- **Account Information:** When you create an account with us, we will collect information associated with your account, including your name, contact information, subscription status, and transaction ID, (collectively, "Account Information").
- **User Content:** We collect input that you provide to the App, namely your journal entries and any "Dear Diary" questions that you ask.
- **Communication Information:** If you communicate with us, such as via email or via social media, we may collect Personal Data like your name, contact information, and the contents of the messages you send ("Communication Information").

We do not store location data or device information.

2. How we use Personal Data

We may use Personal Data for the following purposes:

- To provide and maintain the App, for example to respond to “Dear Diary” questions or provide automatic insights;
- To communicate with you, including to send you information about the App, for example about changes or improvements to the App;
- To prevent fraud, illegal activity, or misuses of the App, and to protect the security of our systems and the App;
- To comply with legal obligations and to protect the rights, privacy, safety, or property of our users, Slow, or third parties.

As of now, we do not use entry Personal Data (including input given to the App in the form of journal entries or “Dear Diary” questions) to conduct research or to train/fine-tune the LLMs that generate the App’s advice.

3. Disclosure of Personal Data

We may disclose your Personal Data in the following circumstances:

- Government Authorities or Other Third Parties: We may share your Personal Data with government authorities, industry peers, or other third parties in compliance with the law (i) if required to do so to comply with a legal obligation, or in the good faith belief that such action is necessary to comply with a legal obligation, (ii) to protect and defend our rights or property, (iii) if we determine, in our sole discretion, that there is a violation of our terms, policies, or the law; (iv) to detect or prevent fraud or other illegal activity; (v) to protect the safety, security, and integrity of our products, employees, users, or the public, or (vi) to protect against legal liability.
- Vendors and Service Providers: To assist us in providing and maintaining certain features of the App, we may disclose Personal Data to third-party service providers. Below is a summary of the third-party services we currently use.

Third Party Services

MongoDB Atlas: we trust AWS cloud storage through MongoDB Atlas to safely secure Personal Data at rest, including User Content. You can find Mongo DB’s privacy policy at <https://www.mongodb.com/legal/privacy/privacy-policy>.

Groq: We use Groq to run the Large Language Models (LLMs) we use for various features. This includes answering “Dear Diary” questions and generating automatic insights by processing User Content. Groq does not retain any User Content inputted through Slow.

Firebase: all authentication of accounts is completed through Firebase, which we use to store Account Information. This backend solution is trusted for account authentication across industries. You can find Firebase’s privacy policy at <https://firebase.google.com/support/privacy>.

4. Retention of Personal Data

We will retain your Personal Data for only as long as we need to provide the App's features to you, or for other legitimate business purposes such as resolving disputes, safety and security reasons, or complying with our legal obligations.

When such business purposes are not applicable, our deletion protocol is as follows:

When an entry is deleted in the App, it is deleted both on the user's device and from our MongoDB Atlas database. When an account is deleted, all corresponding User Content is deleted from the MongoDB Atlas database and corresponding Account Information is deleted from Firebase.

5. Your rights

Depending on where you live, you may have certain statutory rights in relation to your Personal Data. If you live within the European Economic Area, United Kingdom, or Switzerland or in certain other areas, you have the right to:

- Access your Personal Data and information relating to how it is processed.
- Delete your Personal Data from our records.
- Rectify or update your Personal Data.
- Transfer your Personal Data to a third party (right to data portability).
- Restrict how we process your Personal Data.
- Withdraw your consent, where we rely on consent as the legal basis for processing, at any time.
- Lodge a complaint with your local data protection authority.

You also have the following rights to object:

- Object to our processing of your Personal Data for direct marketing at any time.
- Object to how we process your Personal Data when our processing is based on legitimate interests.

You can exercise some of these rights through your Slow account. If you are unable to exercise any of your rights through your account, please submit your request to support@theslowapp.com.

A note about accuracy: Slow uses LLMs to provide automatic insights and responses to "Dear Diary" questions by reading a collection of past user entries, the current entry, and the question if one is asked, and, in response, predicting the words most likely to appear next. In some cases, the words most likely to appear next may not be completely factually accurate. For this reason, you should not rely on the factual accuracy of output from the App's features. If you notice that output generated by Slow contains factually inaccurate information about you and you would like to request a correction or removal of the information, you can submit these requests to support@theslowapp.com, and we will consider your request based on applicable law and the technical capabilities of the LLMs we use.

6. Children

Our Services are not intended for or aimed at children under the age of 13, and we do not knowingly gather Personal Data from children under 13. If you suspect that a child under 13 has shared Personal Data with Slow via the App, please contact us at support@theslowapp.com. We will review the situation and, if necessary, remove the

Personal Data from our records. Additionally, users under 18 must have consent from a parent or guardian to access and use our Services.

7. Security

We and our service providers implement industry-standard encryption protocols for your data in transit and at rest, including encryption of User Content (journal entries, “Dear Diary” questions, etc.) at rest by MongoDB Atlas (refer to ‘Third Party Services’). Access to Personal Data is limited to authorized personnel, and only for the purposes outlined in section 2: ‘How we use Personal Data’.

While we take great effort to ensure data security, there still exists the unlikely possibility of a data breach. In the event of such a breach, we have a robust incident response plan in place to identify, contain, and mitigate the impact. If a breach involves your Personal Data, we will notify you via email and, if necessary, the appropriate supervisory authorities as well.

Going forward, we will continue to prioritize security of Personal Data, reviewing and assessing our security protocols in a proactive manner.

8. EU and UK requirements: Legal bases for processing

Purpose of processing	Type of Personal Data processed, depending on the processing activity	Legal basis, depending on the process activity
To provide and maintain the App	<ul style="list-style-type: none"> ● Account Information ● User Content ● Communication Information 	Where necessary to perform a contract with you, such as processing a user’s prompts to provide a response.
To communicate with you, including to send you information about the App and events	<ul style="list-style-type: none"> ● Account Information ● Communication Information 	<p>Where necessary to perform a contract with you, such as processing your contact information to send you a technical announcement about the App.</p> <p>Your consent when we ask for it to process your Personal Data for a specific purpose that we communicate to you, such as processing your contact information to send you certain forms of marketing communications.</p>
To prevent fraud, illegal activity, or misuses of our Services, and to protect the	<ul style="list-style-type: none"> ● Account Information ● User Content ● Communication 	Where necessary to comply with a legal obligation.

security of our systems and the App	Information	Where we are not under a specific legal obligation, where necessary for our legitimate interests and those of third parties, including in protecting the App from abuse, fraud, or security risks.
To comply with legal obligations and to protect the rights, privacy, safety, or property of our users, Slow, or third parties	<ul style="list-style-type: none"> ● Account Information ● User Content ● Communication Information 	<p>Where necessary to comply with a legal obligation, such as retaining transaction information to comply with record-keeping obligations.</p> <p>Where we are not under a specific legal obligation, where necessary for our legitimate interests and those of third parties and broader society, including in protecting our or our affiliates', users', or third parties' rights, safety, and property.</p>

9. Changes to this privacy policy

We reserve the right to amend this Privacy Policy at any time. When we do, we will publish an updated version and effective date on our website (theslowapp.com), and may communicate the change via email, unless another type of notice is required by applicable law.

10. Contact us

If you have any questions or doubts regarding this Privacy Policy, please contact us at support@theslowapp.com.

