

Reflex App - Privacy Policy

Last Updated: April 20, 2025

This Privacy Policy (the “Privacy Policy” or “Policy”) describes the types of information Reflex and its affiliates (“Reflex,” “we,” “our,” or “us”) collect and process from and about you.

Except as described in this Privacy Policy, the Policy applies to any and all websites, mobile applications, and any other electronic and/or digital products and/or other services that are made available by Reflex and that link to this Policy, and our offline services (collectively, the “Services”).

By using the Services, you are agreeing to the practices described in this Policy. If you do not agree to the practices described in this Policy, please do not access or use the Services.

Undefined capitalized terms used herein shall have the meaning set forth in the Reflex Terms of Service.

1. Information We Collect

When you access or otherwise use our Services, we may collect information from you. The types of information we collect depend on how you use our Services. Please note that we need certain types of information to provide the Services to you. If you do not provide us with such information, or if you ask us to delete that information, you may no longer be able to access or use certain Services. The information we collect may include data you directly provide to us, data we obtain automatically from your interactions with our Services, and data we obtain from other sources.

Information you provide directly to us. We may collect information directly from you. For example, you may provide us with information when you use the Services, communicate with us, register for an account, subscribe to newsletters, or participate in a promotion. Information you provide directly to us may concern you and others and may include, but is not limited to:

Email address;

User name;

Your User Content (as defined in the Terms of Service), such as chat communications, posted images, and shared Characters; and Contents of communications with us.

You are not required to provide us with such information, but certain features of the Services may not be accessible or available absent the provision of the requested information.

Information we collect automatically. We and our third-party vendors, which include ad networks and analytics companies such as Google Analytics, may use cookies, web beacons, and other tracking technologies to collect information about the computers or devices (including mobile devices) you use to access the Services. As described further below, we may collect and analyze information including but not limited to (a) browser type; (b) ISP or operating system; (c) domain name; (d) access time; (e) referring or exit pages; (f) page views; (g) IP address; (h) unique device identifiers (e.g. IDFA or Android ID); (i) version of our Services you're using; and (j) the type of device that you use. We may also track when and how frequently you access or use the Services, including how you engage with or navigate our site or mobile application. We may use this information (including the information collected by our third-party vendors) for analytics (including to determine which portions of the Services are used most frequently and what our users like/do not like), to evaluate the success of any advertising campaigns, and as otherwise described in this Policy.

We and our third-party vendors may use cookies, clear GIFs, pixel tags, and other technologies that help us better understand user behavior, personalize preferences, perform research and analytics, and improve the Services. These technologies, for example, may allow us to tailor the Services to your needs, save your password in password-protected areas, track the pages you visit, help us manage content, and compile statistics about usage of our Services. We or our third-party vendors also may use certain of these technologies in emails to our customers to help us track email response rates, identify when our emails are viewed, and track whether our emails are forwarded.

Most web browsers automatically accept cookies, but your browser may allow you to modify your browser settings to decline cookies if you prefer. If you disable cookies, you may be prevented from taking full advantage of the Services, because the Services may not function properly. As we adopt additional technologies, we may also gather additional information through other methods. For more information, see <https://www.allaboutcookies.org/>.

When you use the Services, we may collect general location information (such as general location inferred from an IP address).

Information we collect from other sources. We may also collect information about you from other parties, such as when you are referred to us by another user. We may also receive information about you from third party social platforms, such as Facebook or Instagram, when you interact with our social media profiles.

We may also collect information when you connect to your account using an account maintained by a third party, such as a social media account ("Third-Party Account"). The Services may collect information about you from your Third-Party Accounts in accordance with your permissions. When you connect to us through a Third-Party Account like Facebook or Google, we receive information from that third party identifying your account. We collect and store this information and use it to help you connect to the Services. Connecting your account to a Third-Party Account is completely optional, and you will have the opportunity to grant permission when you attempt to connect. You can revoke permission by logging into the Third-Party Account and disconnecting Reflex from there, and through the native

applications on your smartphone. We may retain the information we collected previously from you.

2. How We Use the Information We Collect

We may use your information for any of the following purposes:

Provide and administer the Services;

Personalize the Services;

Communicate with you, including to information you about features or aspects of the Services we believe might be of interest to you, or to communicate with you about changes to our terms, conditions, or policies;

Engage in other communications with you, such as to respond to your inquiries, comments, feedback, or questions;

Analyze, maintain, improve, modify, customize, and measure the Services, including to train our artificial intelligence/machine learning models;

Develop new programs and services;

Detect and prevent fraud, criminal activity, or misuses of our Service, and to ensure the security of our IT systems, architecture, and networks;

Comply with legal obligations and legal process and to protect our rights, privacy, safety, or property, and/or that of our affiliates, you, or other parties, including to enforce our Terms of Service and any other agreements; and

Carry out any other purpose for which the information was collected.

We may combine information that we collect from you through the Services with information that we obtain from other sources. We may also aggregate and/or de-identify information collected through the Services. We may use and disclose de-identified or aggregated data for any purpose, including without limitation for research and marketing purposes.

3. When We Disclose the Information We Collect

We may disclose your information in any of the following circumstances:

Affiliates: We may disclose information to our affiliates, meaning an entity that controls, is controlled by, or is under common control with Reflex. Our affiliates may use the information we disclose in a manner consistent with this Policy.

Vendors: We may disclose your information to employees, consultants, and other vendors who need access to such information to carry out work or perform services on our behalf, such as those who provide data storage, payment, technology support and services, customer service, analytics, fraud prevention, legal services, and marketing services.

Safety and Protection of Reflex and Others: We may disclose certain information if we believe in good faith that doing so is necessary or appropriate to (i) protect or defend the Reflex or other parties, including to defend or enforce this Policy, our Terms of Service, or any other contractual arrangement; and/or (ii) protect the rights, property or personal safety of Reflex, our agents and affiliates, our employees, users and/or the public.

Advertising and Analytics: Though we do not engage in advertising as of the date of this Policy, we may in the future disclose or make available some of your information with advertising and analytics partners to serve advertisements on our behalf across the internet and to provide analytics services. These entities may use cookies and tracking technologies to allow us to, among other things, track and analyze data, determine the popularity of certain content, deliver advertising and content targeted to your interests and better understand your online activity. For more information about how to manage having your web browsing information used for advertising purposes, please see the Online Analytics and Tailored Advertising section below.

Legal Requirements. We may disclose certain information if we believe in good faith that doing so is necessary or appropriate to comply with any law enforcement, legal, or regulatory process, such as to respond to a warrant, subpoena, court order, or other applicable laws and regulations.

Business Transfers. We may disclose certain information, in connection with or during negotiations or closing of any merger, sale of company assets, financing, or acquisition of all or a portion of our business to another company.

Your User Content. Certain actions you take may be visible to other users of the Services or result in content that is made available to other users of the Services. For example, if you create User Content, such as creating shared Characters, we may also make that available on the Services. If you communicate using a Group Chat, you are directing us to make your chats available to other members of that Group Chat, which may include Characters on the Services and other users.

Other Disclosures with Consent or at Your Direction. We may disclose your information to nonaffiliated third parties based on your consent to do so. For example, you may direct us to disclose information about you when you refer us or our Services to your friends or other acquaintances.

4. Online Analytics and Tailored Advertising

Analytics. We may use third-party web analytics services on the Services, such as those of Google Analytics. These vendors use the sort of technology described in the “Information We Collect Automatically” section above to help us analyze how users use the Services, including by noting the third-party website from which you arrive. The information collected by such technology will be disclosed to or collected directly by these vendors, who use the information to evaluate your use of the Services. We also may use Google Analytics for certain purposes related to advertising, as described in the following section. To prevent Google Analytics from using your information for web analytics, you may install the Google Analytics Opt-Out Browser Add-on.

Tailored Advertising. Though we do not engage in advertising as of the date of this Policy, we may in the future allow third-party advertising networks to place cookies or other tracking technologies on your computer, mobile phone, or other device to collect information about your use of the Services in order to (a) inform, optimize, and serve marketing content based on past visits to our website and other online services and (b) report how our marketing

content impressions and interactions with these marketing impressions are related to visits to our online services. We may also allow other unaffiliated parties (e.g., ad networks and ad servers such as Google Analytics) to serve tailored marketing to you and to access their own cookies or other tracking technologies on your computer, mobile phone, or other device you use to access the Services. Those parties that use these technologies may offer you a way to opt out of targeted advertising as described below. You may receive tailored advertising on your computer through a web browser. Cookies may be associated with de-identified data linked to or derived from data you voluntarily have submitted to us (e.g., your email address) that we may disclose to a vendor in hashed, non-human-readable form.

If you are interested in more information about tailored advertising and how you can generally control cookies from being put on your computer to deliver tailored marketing, you may visit the Network Advertising Initiative's ("NAI") Consumer Opt-Out Link, the Digital Advertising Alliance's ("DAA") Consumer Opt-Out Link, and/or the European Interactive Digital Advertising Alliance to opt-out of receiving tailored advertising from companies that participate in those programs. To exercise choices about how Google personalizes Display Advertising or to customize Google Display Network ads, you can visit the Google Ads Settings page. Please note that to the extent advertising technology is integrated into the Services, you may still receive advertising content even if you opt out of tailored advertising. In that case, the advertising content may not be tailored to your interests. Also, we do not control any of the above opt-out links and are not responsible for any choices you make using these mechanisms or the continued availability or accuracy of these mechanisms. If your browsers are configured to reject cookies when you visit these opt-out pages, or you subsequently erase your cookies, or use a different computer or change web browsers, your opt-out may no longer be effective.

5. Your Choices

We offer you certain choices regarding the collection, use, and disclosure of information about you.

Profile information. You may deactivate your account through your account profile page. You may also verify, correct, update, or delete certain of your information through your account profile page.

Marketing communications. You can unsubscribe from marketing emails by following the directions in those emails. Please note that if you unsubscribe from marketing emails, we may still send you administrative emails regarding the Services, including, for example, notices of updates to our Terms of Service or this Policy.

Cookies and analytics. You can opt out of certain cookie-related and analytics processing by following the instructions in this Policy.

Rights to information about you. Your local law may provide you certain rights with respect to your information. Depending on your jurisdiction, you may request that we:

- Provide you with information about the categories of personal information we collect or disclose about you; the categories of sources of such information; the business or commercial purpose for collecting such information; and the categories of unaffiliated parties to whom we disclose such personal information. Such information is also set forth in this Policy;
- Provide access to and/or a copy of certain information we hold about you;
- Prevent the processing of your information for direct-marketing purposes (including any direct marketing processing based on profiling);
- Update information which is out of date or incorrect;
- Delete certain information that we are holding about you;
- Restrict the way that we process and disclose certain information about you;
- Transfer your information to a third-party provider of services;
- Opt you out of the processing of your personal information for purposes of profiling in furtherance of decisions that produce legal or similarly significant effects, if applicable; and
- Revoke your consent for the processing of your information.

You may be able to designate an authorized agent to make requests on your behalf. In order for an authorized agent to be verified, you must provide the authorized agent with signed, written permission to make such requests or a power of attorney. We may also follow up with you to verify your identity before processing the authorized agent's request as permitted by applicable law.

Please note that certain information may be exempt from such requests under applicable law. For example, we may retain certain information for legal compliance and to secure our Services. We may need certain information in order to provide the Services to you; if you ask us to delete it, you may no longer be able to use the Services.

You also have the right to not be discriminated against (as provided for in applicable law) for exercising your rights.

You may also have the right to opt out of sales of your personal information, or the processing of your personal information for targeted advertising. To opt out of any future targeted advertising we may offer, please use the tools described in the section above on Tailored Advertising.

If you would like information regarding your rights under applicable law or would like to exercise any of them, contact us at <https://support.Reflex/hc/en-us/requests/new>. To protect your privacy and security, we take reasonable steps to verify your identity and requests before granting such requests. If we are unable to verify your identity, we may be unable to respond to your requests.

Depending on applicable law, you may have the right to appeal our decision to deny your request, if applicable. We will provide information about how to exercise that right in our response denying the request.

Regional privacy disclosures and rights. Additional disclosures for residents of the European Economic Area, United Kingdom, California, and Nevada are set forth below in Regional Privacy Disclosures.

6. Regional Privacy Disclosures

Residents of the European Economic Area and United Kingdom. Reflex is considered the “data controller” of the “personal data” (as defined under the General Data Protection Regulation) we handle under this Policy. In other words, Reflex is responsible for deciding how to collect, use, and disclose personal data, subject to applicable law. The laws of the European Economic Area and the United Kingdom require data controllers to tell you about the legal ground that they rely on for using, sharing, or disclosing your personal data. To the extent those laws apply, our legal grounds are as follows:

- **Contractual Commitments:** We may use, share, or disclose personal data to honor our contractual commitments to you. For example, we will process your personal data to comply with our agreements with you, and to honor our commitments in any contracts that we have with you.
- **With Your Consent:** Where required by law, and in some other cases, we use, share, or disclose personal data on the basis of your consent.
- **Legitimate Interests:** In many cases, we use, share, or disclose personal data on the ground that it furthers our legitimate business interests in ways that are not overridden by the interests or fundamental rights and freedoms of the affected individuals, such as customer service, certain promotional activities, analyzing and improving our business, providing security for the Services, preventing fraud, and managing legal issues.
- **Legal Compliance:** We need to use and disclose personal data in certain ways to comply with our legal obligations.

In addition to those rights described herein, you have the right to lodge a complaint with the relevant supervisory authority. However, we encourage you to contact us first, and we will do our very best to resolve your concern.

Residents of Nevada. If you are a resident of Nevada, you have the right to opt-out of the sale of certain personal information to unaffiliated parties. You can exercise this right by contacting us as described in the “Contact Us” section below with the subject line “Nevada Do Not Sell Request” and providing us with your name and the email address. We do not currently sell your personal information as sales are defined in Nevada Revised Statutes Chapter 603A.

Residents of California. Throughout this Policy, we discuss in detail the specific pieces of personal information and sensitive personal information we collect, the sources of that information, and how we disclose it. Under the California Consumer Privacy Act (“CCPA”), we also have to provide you with the “categories” of personal information and sensitive personal information we collect and disclose for business or commercial purposes (as “categories” are defined by the CCPA).

In the twelve months leading up to the effective date of this Policy, we have collected and disclosed the categories of personal information described in Section 1 for business or commercial purposes. The categories of personal information are: identifiers, financial information (such as payment information), commercial or transactional information, internet or other electronic network activity information, general geolocation data, audio or video information (such as pictures and videos you submit), other information about you that you may provide to us voluntarily, such as through User Content, other information that may identify you, and inferences drawn from the information we collect.

We also collect the following categories of “sensitive personal information,” as defined under the CCPA: (i) account log-in and password or other credentials that allow access to your account; and (ii) other sensitive personal information you may voluntarily provide to us in your capacity as an individual user of the Services (e.g. if you voluntarily post User Content revealing your race, religion, or sexual orientation).

We process the categories of personal information identified above for the purposes as described in more detail in Section 2 above.

We collect the categories of personal information identified above from the following sources: (1) directly from you; (2) through your use of the Services; and (3) other parties such as other users and through unaffiliated parties.

We describe our information disclosure practices in more detail in Section 3, above.

“Sale” and “sharing” of personal information

The CCPA sets forth certain obligations for businesses that “sell” or “share” personal information. Where we refer to “sell” or “share” (or their variants) in quotes, we are referring to those terms as uniquely defined in the CCPA.

We may use third-party analytics services and online advertising services that may result in the “sharing” of online identifiers (e.g., cookie data, IP addresses, device identifiers, general location information, and usage information) with advertising partners to advertise the Services on other websites. If you or your authorized agent would like to opt out of our “sharing” of your information for such purposes, you may do so by using the tools described in the section above on Tailored Advertising, which are also available [here](#).

We do not knowingly “sell” or “share” the personal information of children under 16.

Do-Not-Track disclosure

We do not respond to browser-initiated Do Not Track signals, as the Internet industry is currently still working on Do Not Track standards, implementations, and solutions.

Retention of your personal information

Please see the Data Retention section below.

CCPA rights

California residents can make requests about their personal information as described as set forth in Rights to Information About You above. The CCPA also allows you to limit the use or disclosure of your “sensitive personal information” if your sensitive personal information is used for certain purposes. Please note that we do not use or disclose sensitive personal information other than for purposes for which you cannot opt out under the CCPA.

7. Security

Reflex implements technical, administrative, and physical safeguards to protect the information we collect from loss, misuse, and unauthorized access, disclosure, alteration, or destruction. However, no Internet or email transmission is ever fully secure or error free. Therefore, we do not promise and cannot guarantee the security of your information or communications.

8. Data Retention

In General. We keep your information for the time necessary for the purposes for which it is processed. The length of time for which we retain information depends on the purposes for which we collected and use it and your choices, after which time we may delete and/or aggregate it. We may also retain and use this information as necessary to comply with our legal obligations, resolve disputes, and enforce our agreements.

Popular Characters. If a Character you create and set to “Public” reaches a certain threshold of popularity, we reserve the right to preserve that Character’s characteristics and to keep that Character active on the Services, even if you otherwise delete your data and your account. We do this to avoid impacting the experience of other users, given that a highly popular Character by definition is having active conversations with many thousands of users. To ensure that we do not retain information about you when this occurs, please avoid submitting any such information as part of the Character creation flow if you are creating a “Public” Character.

9. Consent to Transfer

Our services are global and your information may be stored and processed in the United States and other countries outside the United States that may have data protection laws that differ from the laws in your country, and data may be accessible to law enforcement and national security authorities under certain circumstances. By using the Services, or providing us with any information, you consent to the collection, processing, maintenance, and transfer of such information in and to the United States and other applicable countries in which the privacy laws may not be as comprehensive as, or equivalent to, those in the country where you reside and/or are a citizen.

10. Links to Third Party Websites

The Services may contain links to third-party websites or services. We are not responsible for the content or practices of those websites or services. The collection, use, and disclosure

of your information by third parties will be subject to the privacy policies of the third-party websites or services, and not this Policy. We urge you to read the privacy and security policies of these third parties before providing information to them.

11. Changes to this Policy

We may change this Policy to reflect changes in the law, our information practices or the features of the Services. We will indicate the date of the most recent update in this Policy. If we make a material change to the Policy, you will be provided with appropriate notice in accordance with legal requirements. By continuing to use the Services, you are confirming that you have read and understood the latest version of this Policy.

12. Contact Us

If you have any questions about our Privacy Policy or information practices, please contact us at dev.aurastudios@gmail.com