

# Privacy Policy

Last updated: Dec 21, 2025

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# Introduction

**Monroy Industries, LLC** ("we," "us," or "our") having its principal place of business at 522 W Riverside Ave Ste 6698 Spokane, WA, 99201-0580, United States ("Company", "We", "Our", or "Us") is committed to protecting Your privacy as a data subject ("You" or "Your") and ensuring the secure processing of Your personal data. We strive to limit the processing of personal data as far as possible and do not collect personal data beyond what is necessary.

All processing of personal data, including the collection, registration, storing, and general handling is governed by applicable privacy legislation. While we are based in the United States, we adhere to multiple privacy frameworks to provide comprehensive protection for all our users:

1. **General Data Protection Regulation (GDPR):** Although we are US-based, we voluntarily apply GDPR standards to all users globally as a best practice for data protection.
2. **California Consumer Privacy Act (CCPA):** For California residents, we comply with all CCPA requirements. Under the CCPA, the terms in this privacy policy should be understood as follows: "personal data" includes "personal information"; "data subject" includes "consumer"; "controller" includes "business"; and "processor" includes "service provider", all as defined under the CCPA.
3. **Children's Online Privacy Protection Act (COPPA):** Our app is rated 17+ and is not intended for users under 13 years of age. We do not knowingly collect personal information from children under 13.

We strive to ensure that all processing of personal data is conducted in accordance with these regulations and applicable local laws. This privacy policy explains how we collect, use, disclose, and safeguard your information when you use our mobile application **Affirmations** ("Application").

Please read this privacy policy carefully. If you disagree with the terms of this privacy policy, please do not access or use the Application.

## When does this privacy policy apply?

This Privacy Policy applies to all users of our Application, regardless of location. It covers all personal data collected and processed through your use of our Application, including any information you provide when you:

- Use our services
- Make in-app purchases or subscribe to premium features
- Use our roast and comeback generation features
- Submit feedback or contact our support team
- Interact with any part of our Application

This privacy policy describes how We collect and use Your personal data when You are using Our services, playing Our apps or interacting with Us. It applies to all visitors, end users (including paying and non-paying users, adults and children), and those who interact with Our social media channels. Note that Our social media accounts are intended for anyone over the age of 13 (or any other age applicable in your country).

## Your Rights as a Data Subject

Depending on your location, you may have certain rights regarding your personal data. We respect these rights and aim to accommodate all valid requests, regardless of your location. If you would like to access, correct, erase, or limit the use or disclosure of any of Your personal data that has been collected and is stored by Us or exercise any other right under applicable data protection legislation, please notify Us at [privacy@monroyindustries.xyz](mailto:privacy@monroyindustries.xyz) so that We may consider and respond to Your request in accordance with applicable law.

### For All Users

You have the right to:

- **Information:** Request information about the personal data we hold about you, how we use it, and who else might receive your personal data.
- **Access:** Obtain confirmation as to whether we are processing your personal data and, if so, access that personal data.

- **Rectification:** Request that we correct or update inaccurate or incomplete information about you.
- **Erasure ("Right to be Forgotten"):** Request deletion of your personal data under certain circumstances, such as when the data is no longer necessary for the original purpose, if you withdraw consent, or if the data has been unlawfully processed. This right may be limited if we have legal obligations to retain your data or if our interests in keeping the data outweigh your interests in having it deleted.
- **Restriction of Processing:** Request that we restrict the processing of your data in certain circumstances, such as if you contest the accuracy of your data or if the processing is unlawful but you oppose erasure.
- **Data Portability:** Request a copy of your personal data in a structured, commonly used, and machine-readable format, and to transmit that data to another controller where technically feasible.
- **Objection:** Object to the processing of your personal data in certain circumstances, including when we process your data based on our legitimate interests.
- **Not be Subject to Automated Decision-Making:** Not be subject to a decision based solely on automated processing, including profiling, which produces legal or similarly significant effects concerning you.

### **For European Union and UK Residents (GDPR)**

In addition to the rights listed above, you have the right to:

- Lodge a complaint with your local data protection authority.
- Withdraw consent at any time (where processing is based on consent).
- Not be subject to automated decision-making, including profiling, that produces legal or similarly significant effects.
- Request a Data Subject Access Request.

### **For California Residents (CCPA)**

California residents have the right to:

- Know what personal information is being collected about them.
- Know whether their personal information is sold or disclosed and to whom.
- Say no to the sale of their personal information.
- Access their personal information.

- Request deletion of their personal information.
- Not be discriminated against for exercising their privacy rights.

## Regarding Children Under 13 (COPPA)

We do not knowingly collect personal information from children under 13 years of age. If we learn that we have inadvertently collected personal information from a child under 13, please contact us at [privacy@monroyindustries.xyz](mailto:privacy@monroyindustries.xyz), and we will promptly:

- Delete any personal information we may have collected from your child
- Take reasonable measures to prevent future collection

## Information we collect

We strive to collect only information that is necessary to provide and improve our services. Here's what we collect:

### Information You Provide to Us

- **Subscription and Payment Information:** When you purchase a subscription, we collect information necessary to process your payment and manage your subscription, including payment history and purchasing tendencies.
- **Application Usage Data:** We automatically collect information about how you use our app to improve our services and understand user behavior. This includes:
  - **App Interactions:** Actions you take within the app, such as focus session start and completion, taking screenshots, and subscription-related interactions
  - **Technical Information:** Your device model, operating system version, app version, language settings, and general device performance data
  - **Usage Patterns:** Session duration, feature usage frequency, and app navigation patterns
  - **Location Information:** Approximate location (city and region) derived from your IP address, not GPS or precise location data
  - **Error and Performance Data:** Information about app crashes, errors, and performance metrics to help us improve the app

- **Analytics Identifiers:** We use Firebase Analytics with privacy-focused settings that do not collect advertising identifiers (IDFA) or enable cross-app tracking
- **Social Media Information:** Information about You and Your Interactions with Affirmations fan pages on social media - such as name and/or user name, posts You like and comment.
- **Customer Support Information:** Information you provide when you contact us for support, share feedback, or report issues, including the details of your inquiry. When you report inappropriate content, we may collect the prompt that generated the reported content for content moderation and safety purposes only.

The usage data is collected through Firebase Analytics and is used solely to understand how our app is used, improve functionality, and provide better user experiences. We do not associate this analytical data with your personal identity or link it to the content you create.

The usage data helps us understand which features are most popular, identify areas for improvement, and ensure the app performs well across different devices and usage patterns.

## Information Collected Automatically

- **Unique Identifiers:** We collect non-personal identifiers to provide our services, including:
  - Firebase Instance ID (a unique identifier for app installations, not linked to personal identity)
  - IP address (stored separately from user accounts for operational purposes only)
  - Anonymous subscription and account identifiers through RevenueCat for subscription management
- **Device Information:** We automatically collect technical information about your device to ensure our app works properly across different devices, including:
  - Device model and manufacturer
  - Operating system and version
  - App version and platform
  - Screen resolution and display characteristics

- Device language and regional settings
- Available storage and memory information
- **Location Information:** We derive approximate location (city and region) from your IP address through Firebase Analytics and RevenueCat services. We do not collect precise GPS location data or track your physical movements.
- **Performance and Error Data:** Our systems automatically collect technical information to maintain and improve app performance, including:
  - App crashes and error reports
  - Performance metrics (load times, response times)
  - Network connectivity information
  - App stability and functionality data
- **Session Information:** We automatically track basic session data including:
  - When you open and close the app
  - How long you use the app during each session
  - General navigation patterns within the app
  - Time and date of app usage

This information is collected automatically when you use our app and helps us provide, maintain, and improve our services. None of this automatically collected information is used to identify you personally or track you across other apps or websites.

## **Information We Do Not Collect from Children Under 13**

Our application is not intended for users under 13. We do not knowingly collect any personal information from children under 13. If we learn that we have inadvertently collected personal information from a child under 13, we will promptly delete that information.

## **How we use the information we collect, and legal bases for use**

### **How We Use Information**

We use the information we collect for the following purposes:

- **To Provide and Maintain Our Service:** Including processing your requests, creating and maintaining your account, storing your preferences, providing customer support, and processing payments and subscriptions.
- **To Improve Our Service:** Analyzing usage patterns and device information helps us understand how users interact with our app, allowing us to diagnose technical issues, improve existing features, and develop new ones.
- **To Personalize User Experience:** Tailoring your experience based on your preferences, usage history, and demographic information to make our app more relevant to you.
- **To Manage User Accounts:** Setting up, verifying, and maintaining your registration, subscription, and credit system.
- **To Communicate With You:** Responding to your inquiries, providing notifications about your account, and sharing important updates about our services.
- **To Ensure Security and Prevent Fraud:** Monitoring and preventing potentially fraudulent activity and protecting our services and community.
- **For Research and Development:** Conducting research to improve our app and develop future products.
- **To Comply With Legal Obligations:** Meeting requirements imposed by applicable laws and regulations.

## **Legal Bases for Processing (GDPR)**

For users in the European Economic Area (EEA) and the UK, we process your personal data based on the following legal grounds:

### **Performance of a Contract**

Processing necessary to deliver our services and fulfill our commitments to you.

This includes:

- Setting up and maintaining your account
- Processing your payments and subscriptions
- Providing the core functionality of our app
- Responding to your customer service requests

### **Legitimate Interests**

Processing for our legitimate business interests, provided these interests are not overridden by your rights. This includes:



- Improving and developing our services
- Protecting the security of our app and preventing fraud
- Understanding how you use our service to create a better experience
- Diagnosing technical problems and administering our app
- Handling legal matters and disputes

You can contact us to understand a specific legitimate interest and obtain information on how we balance our interests with your privacy rights.

### **Compliance with Legal Obligations**

Processing necessary to comply with applicable laws, including:

- Verifying your identity when required by law
- Retaining records as required by law
- Responding to valid legal requests from authorities

### **Consent**

Processing based on your specific consent, which you can withdraw at any time.

This may include:

- Marketing communications (unless you opt out)
- Certain types of personalization and targeted content
- The use of certain cookies or similar technologies

## **How and when we share your information**

We may share Your information, including Your personal data which includes but is not limited to billing information or user names, with Our agents, contractors, or service providers who are hired to perform services on Our behalf.

We share your information with third parties only when necessary to provide our services or as required by law. We do not sell your personal information.

### **Service Providers**

We share information with third-party service providers who help us operate our app:

- **Firebase Analytics (Google):** We use Firebase Analytics to understand how our app is used and to improve our services. Our implementation is privacy-focused and configured to:
  - Collect usage analytics and app performance data
  - Derive approximate location (city/region) from IP addresses
  - Track device information and user behavior within our app
  - NOT collect advertising identifiers (IDFA) or enable cross-app tracking
  - NOT register with ad networks or share data for advertising purposesFirestore processes this data according to Google's privacy policies and data processing agreements.
- **RevenueCat:** We use RevenueCat to manage subscriptions and in-app purchases. RevenueCat collects and processes:
  - Device information and unique app installation identifiers
  - Purchase history and subscription status
  - Country/locale and language settings
  - Platform information (iOS/Android)
  - App usage data related to subscription features. For subscribers, payment processing through app stores (Apple App Store, Google Play Store) serves as a form of verifiable consent for data processing.
- **Customer Support Tools:** When you contact our support team, we may use customer support platforms to:
  - Collect and store your contact information
  - Record details about your support requests and technical issues
  - Maintain conversation history to provide better assistance
  - Track resolution status and follow-up communications. This information is used solely to provide support services and improve our customer service.

All service providers are contractually required to protect your information and use it only for the specific services they provide to us. We do not sell, rent, or otherwise share your personal information with third parties for their own marketing purposes.

## Content Sharing

- **User-Initiated Sharing:** You may share content you create using our app through your device's sharing options. When you choose to share content, you control who receives it.

## **Legal Requirements**

We may disclose your information if required to do so by law or in response to valid requests by public authorities (e.g., a court or government agency). This includes:

- Responding to legal process (such as a court order or subpoena)
- Protecting our rights and property
- Preventing fraud or abuse
- Supporting auditing and compliance functions

## **Business Transfers**

If we are involved in a merger, acquisition, or sale of all or a portion of our assets, your information may be transferred as part of that transaction. We will notify you via email and/or a prominent notice on our Application of any change in ownership or uses of your personal information.

## **With Your Consent**

We may share your information with third parties when you have given us your consent to do so.

## **Data Minimization Approach**

Our application follows a data minimization approach for all users. We only collect information necessary for basic functionality and maintain separation between user identifiers and generated content.

For all users (who must be 13 or older):

- We only share the minimum information necessary for the operation of our service with our service providers
- We do not collect or store prompts entered for generating coloring pages (except as noted below)

For safety and content moderation purposes, we collect prompts for reported content only. This information is used solely to investigate the report and improve our filtering systems.

# **Your options**

## **Account Information**

You can access, review, and update your personal information by contacting us at [privacy@monroyindustries.xyz](mailto:privacy@monroyindustries.xyz).

## **Subscription Management**

You can manage your subscription through the App Store settings on your iOS device.

## **Communications Preferences**

You can opt out of receiving marketing emails by using the "unsubscribe" link or other means specified in marketing emails you receive from us. However, you cannot opt out of receiving all emails from us, such as service announcements and emails about the status of your account.

## **Data Subject Rights**

Our Application provides you the option to access, correct, or delete the personal information we have collected about you. As described in the "Your Rights as a Data Subject" section, depending on your location, you may have additional rights regarding your personal information.

To exercise any of these rights, including deleting your data, please check the App's Settings tab first as most options are available there or contact us at [privacy@monroyindustries.xyz](mailto:privacy@monroyindustries.xyz).

For more specific information about your privacy rights based on your location, please review the "European Union and UK Privacy Rights" and "US State Privacy Rights" sections of this policy.

# Retention and Deletion

We retain your personal information only for as long as necessary to fulfill the purposes for which we collected it, including for the purposes of satisfying any legal, regulatory, tax, accounting, or reporting requirements.

## Data Retention Periods

- **Device Identifiers:** After account deletion, we may retain device identifiers and records of free credits awarded (de-identified from personal information) to maintain the integrity of our free credit system and prevent abuse.
- **Basic Usage Data:** Information about preferences (roast degrees, style, and region) and usage may be anonymized after account deletion so that no direct or indirect identifiers remain, after which we may store the aggregated information for analytical purposes.
- **Customer Support Communications:** We retain information related to customer support inquiries for one year before deletion.

In case of legal matters or disputes, the storage period for data is governed by the relevant limitation period, so that we can sufficiently defend ourselves against claims, or by the relevant legal obligations to retain documents.

## Data Deletion

You can request deletion of your account and associated personal data through the App or by contacting us at [privacy@monroyindustries.xyz](mailto:privacy@monroyindustries.xyz). We will process your request within 30 days, subject to any legal obligations that may require us to retain certain information.

## Security

We value your trust in providing us your personal information, and we are committed to protecting it. We implement appropriate technical and organizational security measures designed to protect the security of any personal information we process, including:

- Pseudonymization of data where appropriate
- Encryption of sensitive information

- User-based access controls and permission levels
- Regular security assessments

However, please remember that no method of transmission over the Internet or method of electronic storage is 100% secure and reliable. While we strive to use commercially acceptable means to protect your personal information, we cannot guarantee its absolute security and do not accept liability for unintentional disclosure. We regularly review our security procedures to consider appropriate new technology and methods, but even with our best efforts, no security measure is perfect or impenetrable.

## **Our policy on children's information**

Obliterated is designed for users who are 13 years of age or older.

### **Age Restrictions**

- The app is intended for users 13 years of age or older
- By downloading and using the app, you confirm that you meet this age requirement
- Users under 13 years of age are strictly prohibited from using the app
- We do not knowingly collect personal information from children under 13 years of age

### **Parental Guidance**

Parents or guardians of users between the ages of 13-17 should:

- Be aware of the nature of our app
- Review the app's content and features before allowing use
- Supervise their teen's use of the app

If a parent or guardian believes we have inadvertently collected personal information from their child under 13, they can contact us at [privacy@monroyindustries.xyz](mailto:privacy@monroyindustries.xyz) to request deletion of this information.

## **International transfer**

Your information, including personal data, may be transferred to and maintained on computers located outside of your state, province, country, or other governmental jurisdiction where data protection laws may differ from those of your jurisdiction.

We operate worldwide and may move, process, and store your data in the United States and any other country where we operate or maintain facilities, which may be outside the country where you live. Not all countries provide the same level of data protection. Some countries where we transfer personal data may allow government authorities greater access than your home country does.

### **Data Transfers from the EU and UK**

For users in the European Union (EU) and United Kingdom (UK), we implement appropriate safeguards for international data transfers:

- **Adequacy Decisions:** When available, we transfer personal data to countries that have been recognized by the European Commission as providing adequate protection for personal data.
- **Standard Contractual Clauses (SCCs):** For transfers to countries without an adequacy decision, we implement the Standard Contractual Clauses approved by the European Commission, which require the recipient to protect your data and provide you with EU-level rights and protections.
- **EU-US Data Privacy Framework:** For transfers to the United States, we may rely on the EU-US Data Privacy Framework when applicable.
- **Additional Protections:** We also implement additional technical protection measures as needed for each data transfer, such as encryption and pseudonymization.

Your consent to this Privacy Policy followed by your submission of personal information represents your agreement to these transfers.

## European Union and UK Privacy Rights

If you reside in the European Union or United Kingdom, you have certain rights under applicable data protection legislation. You can ask us to:

- Confirm we process your personal data and provide access to what personal data we have about you.
- Change, update, or correct your personal data.
- Delete your personal data.
- Restrict or stop using some or all of your data if we have no legal right to keep using it.
- Give you a copy of personal data you provided to us in a machine-readable format.

To exercise any of these rights, including to delete your data, you may do so from the App or contact us at [privacy@monroyindustries.xyz](mailto:privacy@monroyindustries.xyz). You are not required to pay any charge for exercising your rights. If you make a request, we have one month to respond to you. If you think we haven't complied with applicable data protection laws, you have the right to file a complaint with your local data protection authority.

To verify your identity when you make a request, you must provide us with your email address and respond to an email verification request. We will match that information to the information we have in our systems.

Because we operate worldwide, we may transfer the personal data of EU residents to countries outside of the EU and UK. When we do, we use EU's standard contractual clauses or other appropriate safeguards to ensure the protection of your data.

## US State Privacy Rights

If you are a resident of California, Colorado, Connecticut, Oregon, Texas, Utah, or Virginia, you may have the following rights under the applicable privacy laws in your state:



- The right to know what personal information we have collected about you, including sources, purpose of collection, and third parties we have shared it with.
- The right to delete your personal information.
- The right to correct inaccurate personal information.
- The right to opt out of the sale or sharing of your personal information.

To exercise any of these rights, please contact us at [privacy@monroyindustries.xyz](mailto:privacy@monroyindustries.xyz). For requests to know, delete, or correct, we must verify your identity; you must provide us with your email address and respond to an email verification request. We will match that information to the information we have in our systems.

You must use "Request to Know Information", "Right to Know Categories," "Right to Delete," or "Right to Opt out of Sale/Sharing" or "Right to Correct Information" in the subject line of your email, as appropriate. For requests to know, delete and correct, you must provide us with your device id (found in the App's setting page) and email address you used when you created your account, if applicable. Each request must be sent separately.

To designate an authorized agent to act on your behalf, you must send a signed, written authorization containing your name, email address, and phone number to:  
Monroy Industries, LLC  
Attn: Privacy Requests  
522 W Riverside Ave Ste 6698  
Spokane, WA, 99201-0580, United States

We will process your request in an efficient manner, but we may not be able to delete all your personal information in certain circumstances, such as:

- To complete ongoing transactions with you
- To detect or address security incidents
- To protect against fraudulent or illegal activity
- To comply with legal requirements
- Or for other legitimate internal purposes permitted by law

If we delete your personal information, many of our services will not work the same for you. For example, your account will be deleted, any saved content will be deleted, and saved preferences will no longer be available.

## **Do Not Sell or Share My Personal Information**

We do not sell or share your personal information for targeted advertising.

## **Right to Appeal**

If you are a Colorado, Connecticut, or Virginia resident and we were unable to fulfill your request, you may appeal by emailing us at [privacy@monroyindustries.xyz](mailto:privacy@monroyindustries.xyz) within fourteen days of our decision, providing a detailed reason for your appeal and your state of residence.

## **Sensitive Personal Information**

We do not collect or process Sensitive Personal Information for inferring characteristics or use or disclose Sensitive Personal Information for purposes other than those permitted by law. In addition, we do not "sell" or "share" Sensitive Personal Information.

## **California-Specific Rights**

Under California Civil Code sections 1798.83, "Shine the Light Act", California residents are entitled to ask Us for a notice describing what categories of personal data We share with third parties or corporate affiliates for those third parties or corporate affiliates' direct marketing purposes. Please note that We do not share Your personal data with any third parties or affiliates for their direct marketing purposes.

CCPA provides consumers who are California residents with specific rights regarding their personal data:

- **Right to Access:** If You are a California resident, You have the right to request, up to two times each year, access to categories and specific pieces of Your personal data that We collect, use and/or disclose.
- **Right to Delete:** If You are a California resident, You have the right to request that We delete Your personal data that We collect, subject to applicable legal exceptions.

- **Right to Opt Out of Sale of Personal Information:** Our App does not sell any personal data.

To make a request regarding Your rights under CCPA as described above, please send an email to [privacy@monroyindustries.xyz](mailto:privacy@monroyindustries.xyz) or write to us, using the address above.

## How we make changes to this policy

We may update this Privacy Policy from time to time. We will notify you of any changes by posting the new Privacy Policy on this page and updating the "Last Updated" date at the top of this Privacy Policy.

For material changes that significantly affect your rights or how we use your data, we will provide a more prominent notice (such as an in-app notification or email to the last email address you provided us). Where required by applicable law, we will obtain your consent before implementing such changes.

You are advised to review this Privacy Policy periodically for any changes. Changes to this Privacy Policy are effective when they are posted on this page, unless stated otherwise.

## Contact us

If you have any questions, concerns, or requests regarding this Privacy Policy, please contact us by email: [privacy@monroyindustries.xyz](mailto:privacy@monroyindustries.xyz).

Other contact information for inquiries:

Main operator: Francisco Monroy

Monroy Industries, LLC

Phone: 509-259-8529

Address: 522 W Riverside Ave Ste 6698 Spokane, WA, 99201-0580, United States