

1. Who We Are and How to Contact Us

Legacy is operated by:

Legacy Vault Technologies Ltd

Company number: **16711135**

Registered office: **167-169 Great Portland Street, London, England, W1W 5PF**

Email: arthur@searchyourlife.com

For the purposes of UK GDPR and other applicable data protection laws, **Legacy Vault Technologies Ltd is the “data controller”** of your personal data.

If you have questions about this Policy or how we handle your data, you can contact us at arthur@searchyourlife.com.

You also have the right to lodge a complaint with your local data protection authority. In the UK, this is the **Information Commissioner’s Office (ICO)**.

2. What This Policy Covers

This Policy applies when you:

- use the Legacy mobile app;
- visit our website or web app;
- contact us by email or in-app support;
- participate in any beta tests, surveys or research we run about Legacy.

It does **not** apply to third-party services you connect to Legacy (for example, cloud storage providers or email clients). Those services have their own privacy policies.

3. The Information We Collect

The information we collect depends on how you use Legacy. We group it into the following categories:

3.1 Account and Profile Information

- Name, display name or username
- Email address
- Password or authentication credentials
- Country or time zone (where provided)
- Subscription status and billing-related identifiers (if you subscribe through app stores or other payment providers)

3.2 Memory Content (“Content”)

This is the heart of Legacy:

- Photos and videos you upload
- Audio recordings and voice notes
- Written entries and journal notes
- Transcripts and summaries generated by our AI tools
- Tags, titles, descriptions and other metadata you add
- Collections, Legacies and Time Capsules you create

Because memories are personal, Content may **incidentally include sensitive information** (e.g. about health, relationships, beliefs). You choose what to upload.

3.3 Usage Data

- Features you use (e.g. Time Capsules, shared Legacies)
- Actions you take (create, view, edit, share, react)
- Dates and times of use
- In-app settings and preferences

3.4 Device and Technical Data

- Device type, operating system and app version
- Device identifiers (e.g. IDFA/AAID where applicable)
- IP address and basic location inferred from IP
- Log information (crash logs, performance data)
- Language settings

3.5 Payment & Transaction Data (if applicable)

- Subscription tier and renewal status
- Basic transaction details and timestamps
- We do **not** store your full payment card details. These are handled by secure third-party payment processors or app stores.

3.6 Communications with Us

- Emails or messages you send to our support
- Feedback, bug reports or survey responses
- Any attachments or screenshots you provide

3.7 Contacts & People You Connect With (Optional)

If you choose to:

- invite others to a shared Legacy or Time Capsule;
- tag people in memories using contact details you provide;

we may process names, email addresses or phone numbers you supply, to send invitations or manage sharing.

We do **not** access your phone contacts unless you explicitly grant permission and use a feature that requires it.

4. How We Collect Your Information

We collect information in three main ways:

1. **Directly from you** – when you create an account, upload memories, edit settings, contact support, or respond to surveys.
2. **Automatically** – when you use the app or website (usage, device and log data).
3. **From third parties** – for example:
 - app stores or payment partners (to confirm subscriptions);
 - analytics or crash reporting tools, providing aggregated usage or performance metrics.

We do **not** buy third-party data to profile you, and we do **not** ingest data brokers' lists.

5. How We Use Your Information (Purposes & Legal Bases)

Under data protection law, we must have a legal basis for each use of your personal data. For users in the UK and EEA, we rely mainly on **contract**, **legitimate interests** and **consent**, and in some cases **legal obligations**.

5.1 To Provide and Maintain the Service

Examples:

- Creating and managing your account
- Saving and syncing your memories
- Operating Legacies, shared collections and Time Capsules
- Providing search, timelines and browsing features
- Handling subscriptions and billing

Legal basis:

- Performance of a contract (to provide the Service you sign up for)
- Legitimate interests (to run a secure and effective service, where contract does not strictly apply)

5.2 To Power AI-Assisted Features

Examples:

- Transcribing audio and video
- Generating summaries and highlights
- Suggesting tags, themes or emotional categories
- Improving search and organisation of your memories

Legal basis:

- Performance of a contract (where needed to provide core features you choose to use)
- Legitimate interests (to improve quality and relevance of AI tools)
- Consent (for particularly sensitive Content where local law requires explicit consent)

We will **not** use your Content to train general-purpose AI models that are sold or licensed as stand-alone products to third parties.

5.3 To Keep Legacy Safe and Secure

Examples:

- Detecting and preventing fraud, abuse and security incidents
- Enforcing our Terms of Use (e.g. illegal content, harassment, misuse)
- Protecting other users and our systems

Legal basis:

- Legitimate interests (security and integrity of the Service and users)

- Legal obligations (where we must act in response to lawful requests)

5.4 To Communicate with You

Examples:

- Sending service emails (account changes, security alerts, outages)
- Responding to your questions or support requests
- Informing you about important changes to our Terms or this Policy

Legal basis:

- Performance of a contract
- Legitimate interests (keeping users informed about their accounts and security)

5.5 To Send Optional Product Updates & Marketing

Examples:

- Emails or in-app messages about new features or offers
- Product tips, onboarding guidance, and invitations to beta tests

Legal basis:

- Consent (where required; you can unsubscribe at any time)
- Legitimate interests (for existing users, within the bounds of applicable marketing laws)

You can opt out of marketing communications at any time via the email unsubscribe link or your account settings. We'll still send necessary service and security messages.

5.6 To Improve the Service and Conduct Research

Examples:

- Analysing feature usage to understand what works and what doesn't

- Troubleshooting bugs and performance issues
- Running anonymised or aggregated analytics to guide product decisions

Where possible, we use **de-identified or aggregated data** that does not directly identify you.

Legal basis:

- Legitimate interests (developing and improving the Service)

5.7 To Comply with Legal Obligations

Examples:

- Record-keeping and accounting
- Responding to lawful requests from regulators or law enforcement
- Complying with applicable data protection, consumer and tax laws

Legal basis:

- Legal obligations
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6. How We Use and Protect Sensitive Information

Your memories may contain **special categories of personal data** (e.g. health, beliefs, family situations). We do not ask you to categorise them this way, but we treat all Content as sensitive by design.

- We process this Content **only to provide the Service you've chosen**, e.g. storage, organisation, AI transcription and search.
- We do **not** use such data for advertising or sell it.
- Where required by law, we rely on your **explicit consent**, which you give by voluntarily uploading such Content and using the relevant features.

You can delete Content at any time (see Section 10).

7. How We Share Your Information

We do **not** sell your personal data and we do **not** share it with advertisers.

We share your information only in the following limited situations:

7.1 With Other Users You Choose

- When you invite people to a shared Legacy, Time Capsule or other collaborative space, your chosen Content in that space becomes visible to those participants.
- If you tag or mention people within a shared Legacy, participants may see that information.

You control what you share and with whom.

7.2 With Service Providers (Processors)

We use trusted third-party providers to help us run Legacy, for example:

- Cloud hosting and storage
- Database and backup services
- Analytics and crash reporting tools
- Email and notification services
- Payment processors / app stores
- Customer support tools

These providers act as **data processors** and are only allowed to use your personal data to provide services to us, under written contracts that include data protection obligations.

7.3 Legal and Safety Reasons

We may access, preserve and share your information if we reasonably believe it is necessary to:

- comply with a law, regulation, legal process or enforceable governmental request;

- enforce our Terms of Use or protect the rights, property or safety of Legacy, our users or others;
- detect, prevent or address fraud, security or technical issues;
- respond to emergencies where we believe there is a risk of serious harm.

Any such sharing will be limited to what is strictly necessary for the relevant purpose.

7.4 Business Transfers

If Legacy Vault Technologies Ltd is involved in a merger, acquisition, reorganisation or sale of assets, your information may be transferred as part of that transaction. We will ensure the receiving party continues to respect this Policy, and we will notify you where required by law.

8. International Data Transfers

We are based in the **United Kingdom**, but some of our service providers may be located in other countries.

When we transfer personal data outside the UK or EEA, we will ensure that appropriate safeguards are in place, such as:

- UK or EU standard contractual clauses approved by regulators;
- Adequacy regulations (where a country is recognised as providing an adequate level of protection);
- Other safeguards permitted under data protection laws.

You can contact us for more information about these safeguards.

9. Cookies and Similar Technologies

If you use our website or web app, we may use cookies and similar technologies to:

- keep you signed in;

- remember your preferences;
- measure site performance and usage;
- improve our content and UX.

Where required by law, we will ask for your consent to non-essential cookies via a banner or settings panel. You can manage your cookie preferences through your browser or device settings and (where available) our own cookie controls.

The mobile app may also use SDKs that serve similar purposes (analytics, crash reporting). These do not include advertising SDKs.

10. How Long We Keep Your Information

We keep personal data only for as long as we reasonably need it for the purposes described in this Policy, including:

- to provide the Service to you;
- to maintain business and legal records;
- to resolve disputes and enforce our agreements;
- to comply with legal obligations.

Broadly:

- **Account & profile data** – kept while your account is active and for a limited period after closure, where required for legitimate business or legal reasons.
- **Content (memories)** – kept while your account is active, unless you delete specific items. When you delete Content or your account, we begin the deletion process from our active systems, typically within **30 days**.
- **Backups & logs** – may persist for up to **90 days** or a limited period beyond that where required for security, legal or fraud-prevention reasons.
- **Communications** – kept as long as required to manage your request and maintain a record of our interactions, then deleted or archived.

If Content forms part of a shared Legacy or Time Capsule, copies may remain available to other participants until they also delete it, as explained in the Terms of Use.

11. Your Rights

If you are in the UK, EEA or in another region with similar laws, you have certain rights over your personal data. Subject to conditions and applicable law, these may include:

1. **Right of access** – to obtain a copy of your personal data and information about how we process it.
2. **Right to rectification** – to correct inaccurate or incomplete data.
3. **Right to erasure (“right to be forgotten”)** – to request deletion of your personal data in certain circumstances.
4. **Right to restriction** – to ask us to limit processing in certain circumstances.
5. **Right to data portability** – to receive your personal data in a structured, commonly used, machine-readable format and transmit it to another controller where technically feasible.
6. **Right to object** – to object to certain processing, including processing based on legitimate interests or direct marketing.
7. **Right to withdraw consent** – where we rely on consent, you can withdraw it at any time. This will not affect the lawfulness of processing before withdrawal.

You can exercise many of these rights directly in the app (e.g. by editing or deleting Content, exporting data if we provide a download tool, or deleting your account).

For other requests, please contact us at [\[privacy@legacy.app\]](mailto:privacy@legacy.app). We may need to verify your identity before fulfilling your request. We will respond within the time required by law.

You also have the right to lodge a complaint with your local data protection authority. In the UK, this is the **ICO**.

12. Children and Young People

Legacy is **not intended for children under 13**. If we become aware that we have collected personal data from a child under 13 without appropriate consent, we will take steps to delete it.

If you are a parent or guardian and believe your child is using Legacy without permission, please contact us.

For young users above the minimum age, we encourage using Legacy with awareness of what you share and with whom.

13. Security

We use a combination of technical and organisational measures to protect your information, including:

- Encryption in transit (e.g. HTTPS)
- Access controls and authentication
- Regular security monitoring and logging
- Data minimisation and limited retention

However, no online service is 100% secure. You are responsible for:

- choosing a strong, unique password;
 - keeping your login details confidential;
 - promptly notifying us if you suspect unauthorised access.
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14. Automated Decision-Making

Legacy uses automated processing (including AI) to:

- transcribe, tag and summarise your Content;
- organise and suggest memories within your account;

- help keep the Service secure and detect abuse.

These processes **do not** produce legal or similarly significant effects on you as an individual. We do not use automated decision-making to deny you access to essential services without human oversight.

15. Changes to This Policy

We may update this Privacy Policy from time to time, for example when we introduce new features, technologies or legal requirements.

- We will always post the latest version in the app or on our website with an updated “Last updated” date.
- Where changes are material, we will take reasonable steps to notify you (e.g. by email or in-app notice) and, where required, seek your consent.

If you continue to use the Service after the updated Policy takes effect, you agree to its terms. If you do not agree, you should stop using Legacy and delete your account.

16. How to Contact Us

If you have any questions, concerns or requests about this Privacy Policy or how we handle your data, please contact us:

Legacy Vault Technologies Ltd

Email: arthur@searchyourlife.com

Address: **167-169 Great Portland Street, London, England, W1W 5PF**