

PRIVACY POLICY

Last Updated: December 5, 2025

1. INTRODUCTION

Welcome to Veeeet («we,» «our,» «us,» or the «App»). We are committed to protecting your privacy and the personal data of your pets. This Privacy Policy explains how we collect, use, store, and protect your information when you use our mobile application.

Our Contact Information:

- Company Name: GUSAKOV VADIM
- Tax ID (NIF): Z1386004Y
- Registered Address: Calle Camiño Fonte da Rua, 9, 36760 O Rosal, Pontevedra, Spain
- Email: info@veeeet.org
- Website: www.veeeet.org
- Data Protection Officer (EU): info@veeeet.org

Important: This App is designed for pet owners aged 18 and over. We do not knowingly collect information from children under 18 (or under 16 in the EU, or under 13 in the US).

2. DATA CONTROLLER

For the purposes of the EU General Data Protection Regulation (GDPR), UK GDPR, and other applicable data protection laws:

Data Controller:

- GUSAKOV VADIM
- NIF: Z1386004Y
- Registered Address: Calle Camiño Fonte da Rua, 9, 36760 O Rosal, Pontevedra, Spain

For users in the Russian Federation, we act as the operator of personal data in accordance with Federal Law No. 152-FZ «On Personal Data.»

3. LEGAL BASIS FOR PROCESSING (EU/UK USERS)

We process your personal data based on the following legal grounds:

- **Consent:** You have given explicit consent for specific processing activities (e.g., AI recommendations, marketing communications)
- **Contract Performance:** Processing is necessary to provide you with our services
- **Legal Obligation:** Processing is required to comply with applicable laws
- **Legitimate Interests:** Processing is necessary for our legitimate business interests (e.g., improving our services, security)

4. WHAT INFORMATION WE COLLECT

4.1. Information You Provide Directly

Account Information:

- Email address (required for account creation and communication)
- Password (encrypted and securely stored)
- Optional: Name, profile picture

Pet Information:

- Pet name
- Species (dog, cat, etc.) and breed
- Date of birth or age
- Gender
- Weight and height measurements
- Health records and notes you choose to add
- Photos of your pet (optional)

User-Generated Content:

- Notes and observations about your pet
- Questions submitted to the AI Assistant
- Feedback and support requests

4.2. Information Collected Automatically

Device Information:

- Device type and model
- Operating system version
- App version

Usage Data:

- Features you use and how often
- Time spent in the app
- Crash reports and error logs
- General analytics data

Important: We do NOT collect:

- Precise geolocation data
- Access to your contacts
- Access to other apps on your device
- Biometric data

5. USE OF ARTIFICIAL INTELLIGENCE

5.1. AI-Powered Recommendations

Our App uses artificial intelligence technology to analyze your pet's data and provide personalized care recommendations. This feature is **optional** and requires your explicit consent.

What AI Does:

- Analyzes pet data (species, breed, age, weight, height)
- Provides recommendations on nutrition, exercise, grooming, and general care
- Identifies trends in your pet's health data (e.g., weight changes)

What AI Does NOT Do:

- Provide veterinary medical diagnosis
- Replace professional veterinary consultation
- Make treatment recommendations
- Access your personal identifying information (name, email)

5.2. Data Shared with AI Providers

When you enable AI recommendations, we share the following **anonymized** pet data with our AI service providers (OpenAI and Google):

- Pet species and breed
- Age
- Weight and height
- General health observations you've entered
- Images uploaded by you for text recognition (OCR) or analysis.
- Your questions to the AI Assistant

We DO NOT share:

- Your email address
- Your name or personal information
- Any personally identifiable information

5.3. AI Service Providers

We use the following AI service providers:

OpenAI:

- Services: GPT models for text generation and analysis
- Data processing locations: United States and European Union (depending on service configuration)
- Privacy policy available at: www.openai.com

Google (Google Cloud AI):

- Services: Machine learning and AI analysis

- Data processing locations: Multiple regions globally including United States and European Union
- Privacy policy available at: www.google.com

For EU users: Data transfers to these AI providers are protected by Standard Contractual Clauses (SCCs) approved by the European Commission and other adequate safeguards in accordance with GDPR Article 46.

5.4. Your Control Over AI Features

You can:

- Enable or disable AI recommendations at any time in Settings
- Delete your AI interaction history
- Opt out of AI features while continuing to use other app features

6. HOW WE USE YOUR INFORMATION

We use your information for the following purposes:

6.1. Service Provision

- Create and manage your account
- Store and display your pet's information
- Provide AI-powered recommendations (if enabled)
- Send service-related notifications (e.g., reminders you set up)
- Provide customer support

6.2. Service Improvement

- Analyze app usage to improve features
- Debug and fix technical issues
- Develop new features
- Improve AI recommendation accuracy

6.3. Communication

- Respond to your inquiries
- Send important updates about our services
- Send marketing communications (only with your consent, and you can opt out anytime)

6.4. Legal Compliance and Safety

- Comply with applicable laws and regulations
- Protect against fraud and abuse
- Enforce our Terms of Service

7. DATA SHARING AND DISCLOSURE

7.1. We DO NOT Sell Your Data

We do not sell, rent, or trade your personal information to third parties for marketing purposes.

7.2. Service Providers

We may share limited data with trusted service providers who assist us in operating the App:

Cloud Hosting Providers:

- **Adalo (www.adalo.com)** — provides no-code app platform and hosting services for app infrastructure
- **Timeweb (www.timeweb.ru)** — provides hosting services and data storage, including for Russian users

AI Service Providers:

- **OpenAI** — processes AI recommendations (anonymized pet data only)
- **Google Cloud AI** — processes AI recommendations (anonymized pet data only)

All service providers are contractually bound to protect your data and use it only for specified purposes.

7.3. Legal Requirements

We may disclose your information if required by law, court order, or governmental authority, or to:

- Protect our legal rights
- Prevent fraud or security threats
- Protect the safety of users

7.4. Business Transfers

If we are involved in a merger, acquisition, or sale of assets, your information may be transferred. We will notify you before your data is transferred and becomes subject to a different privacy policy.

8. DATA RETENTION

8.1. Active Accounts

We retain your personal data as long as your account is active and as necessary to provide you with services.

8.2. Inactive Accounts

If you do not log in for 24 months, we may delete or anonymize your data after notifying you via email.

8.3. Deletion Requests

When you request account deletion, we will:

- Delete your email and account credentials immediately
- Delete or anonymize pet data within 30 days

- Retain certain data for legal compliance purposes (e.g., financial records, if applicable) as required by law

8.4. Backup Retention

Deleted data may persist in backup systems for up to 90 days before permanent deletion.

9. DATA SECURITY

We implement industry-standard security measures to protect your data:

9.1. Technical Measures

- Encryption in transit (TLS/SSL)
- Encryption at rest for sensitive data
- Secure password hashing
- Regular security audits
- Access controls and authentication

9.2. Organizational Measures

- Access to data is restricted on a need-to-know basis
- Confidentiality agreements with all personnel
- Regular security training

9.3. Your Responsibility

- Keep your password secure and confidential
- Log out from shared devices
- Report any unauthorized access immediately

Important: While we strive to protect your data, no method of transmission or storage is 100% secure. We cannot guarantee absolute security.

10. YOUR RIGHTS

10.1. Rights for EU/UK Users (GDPR)

You have the right to:

1. **Access:** Request a copy of your personal data
2. **Rectification:** Correct inaccurate or incomplete data
3. **Erasure («Right to be Forgotten»):** Request deletion of your data
4. **Restriction:** Limit how we process your data
5. **Data Portability:** Receive your data in a machine-readable format
6. **Object:** Object to processing based on legitimate interests
7. **Withdraw Consent:** Withdraw consent at any time (doesn't affect prior processing)
8. **Lodge a Complaint:** File a complaint with your local data protection authority

Spanish Data Protection Authority (AEPD):

- Website: www.aepd.es
- Address: C/ Jorge Juan, 6, 28001 Madrid, Spain

EU Supervisory Authorities: You can find your local authority at: https://edpb.europa.eu/about-edpb/board/members_en

To exercise these rights, contact us at: info@veeeet.org

We will respond within 30 days (or 45 days for complex requests).

10.2. Rights for California Users (CCPA/CPRA)

California residents have the right to:

1. **Know:** What personal information we collect and how we use it
2. **Access:** Request a copy of your personal information
3. **Delete:** Request deletion of your personal information
4. **Opt-Out:** Opt out of the «sale» of personal information (we don't sell data)
5. **Non-Discrimination:** Not be discriminated against for exercising your rights

To exercise these rights, contact us at: info@veeeet.org

Verification: We will verify your identity before processing requests.

10.3. Rights for Russian Federation Users

In accordance with Federal Law No. 152-FZ, you have the right to:

1. Receive confirmation of personal data processing
2. Access your personal data
3. Clarify, block, or delete inaccurate or outdated data
4. Withdraw consent to data processing
5. Protect your rights in court

To exercise these rights, contact us at: info@veeeet.org

10.4. How to Exercise Your Rights

In-App:

- Options to delete, or modify your data

By Email:

- Send a request to info@veeeet.org
- Include your registered email address for verification

11. DATA STORAGE LOCATIONS

11.1. EU Users

Your data is primarily stored on servers operated by our hosting providers:

- Adalo (www.adalo.com) — infrastructure locations vary globally
- For users in the European Union, data is processed in accordance with GDPR requirements

Data transfers outside the EU are protected by:

- Standard Contractual Clauses (SCCs) approved by the European Commission
- Adequate safeguards in accordance with GDPR Article 46

11.2. Russian Federation Users

Important: In compliance with Federal Law No. 242-FZ, personal data of Russian citizens is recorded, systematized, accumulated, stored, clarified, and updated using databases located on the territory of the Russian Federation.

Our Russian data is stored at: **Timeweb** (www.timeweb.ru) — data centers located in the Russian Federation.

11.3. US Users

Your data is stored on servers operated by our hosting providers, including locations in the United States.

12. INTERNATIONAL DATA TRANSFERS

For users outside the country where our servers are located, your data may be transferred internationally. We ensure such transfers comply with applicable laws through:

- **EU Standard Contractual Clauses (SCCs)**
- **UK International Data Transfer Agreement (IDTA)**
- **Adequacy decisions** (where applicable)
- **Your explicit consent** (where required)

13. COOKIES AND TRACKING TECHNOLOGIES

13.1. Mobile App

Our mobile app does **not** use cookies. We collect limited analytics data as described in Section 4.2.

13.2. Website (if applicable)

Our website may use:

- **Essential cookies:** Required for the website to function
- **Analytics cookies:** Help us understand website usage (with consent where required)

You can manage cookies in your browser settings.

14. THIRD-PARTY LINKS

Our App may contain links to third-party websites or services. We are not responsible for the privacy practices of these third parties. We encourage you to read their privacy policies.

15. MARKETING COMMUNICATIONS

15.1. Email Marketing

With your consent, we may send you:

- Product updates and new features
- Tips for pet care
- Special offers and promotions

15.2. Opt-Out

You can opt out of marketing emails at any time by:

- Clicking «Unsubscribe» in any marketing email
- Adjusting your preferences in Settings → Notifications
- Contacting us at info@veeeet.org

Note: You cannot opt out of essential service communications (e.g., security alerts, account notifications).

16. DISCLAIMER: AI RECOMMENDATIONS

IMPORTANT NOTICE:

The AI-powered recommendations provided by this App are for **informational and educational purposes only**. They are NOT:

- Veterinary medical advice
- Diagnosis of any condition
- Treatment recommendations
- A substitute for professional veterinary consultation

You should always:

- Consult a licensed veterinarian for health concerns
- Seek immediate veterinary attention for emergencies
- Use AI recommendations as supplementary information only

We are not responsible for:

- Any actions taken based on AI recommendations
- Any harm or injury resulting from reliance on AI-generated content
- Accuracy or completeness of AI recommendations

AI Limitations:

- AI may make errors or provide incomplete information
- AI is based on general knowledge, not your specific pet's medical history
- AI cannot examine your pet or run diagnostic tests

By using AI features, you acknowledge and accept these limitations.

17. CHANGES TO THIS PRIVACY POLICY

We may update this Privacy Policy from time to time to reflect:

- Changes in our practices
- Legal or regulatory requirements
- New features or services

17.1. Notification of Changes

We will notify you of material changes by:

- In-app notification
- Email to your registered address
- Updating the «Last Updated» date at the top of this policy

17.2. Your Consent

Continued use of the App after changes constitutes acceptance of the updated Privacy Policy. If you do not agree, please discontinue use and contact us to delete your account.

18. CHILDREN'S PRIVACY

Our App is not intended for children under:

- 18 years old (globally)
- 16 years old (in the EU)
- 13 years old (in the US, per COPPA)

We do not knowingly collect personal data from children. If we discover that a child's data has been collected, we will delete it immediately.

Parents/Guardians: If you believe your child has provided us with personal data, please contact us at info@veeeet.org.

19. CONTACT US

If you have questions, concerns, or requests regarding this Privacy Policy or your personal data:

Email: info@veeeet.org

Data Protection Officer (EU): info@veeeet.org

Postal Address: GUSAKOV VADIM Calle Camiño Fonte da Rua, 9 36760 O Rosal, Pontevedra Spain

Response Time: We aim to respond to all inquiries within 30 days.

20. SUPERVISORY AUTHORITIES

20.1. Spain and European Union

If you are in Spain or the EU and believe we have not addressed your concerns, you have the right to lodge a complaint with:

Spanish Data Protection Authority (Agencia Española de Protección de Datos — AEPD):

- Website: www.aepd.es
- Address: C/ Jorge Juan, 6, 28001 Madrid, Spain
- Phone: +34 901 100 099

Other EU Member States:

- List of EU authorities: https://edpb.europa.eu/about-edpb/board/members_en

20.2. United Kingdom

UK users can contact:

- Information Commissioner's Office (ICO): <https://ico.org.uk>

20.3. Russian Federation

Russian users can contact:

- Roskomnadzor (Federal Service for Supervision of Communications, Information Technology and Mass Media)
- Website: <https://rkn.gov.ru>

20.4. United States

US users can contact:

- Federal Trade Commission (FTC): <https://www.ftc.gov>
- State Attorney General (for state-specific privacy laws)

21. GOVERNING LAW

This Privacy Policy is governed by:

- For EU/Spain users: GDPR and Spanish data protection laws (Ley Orgánica 3/2018, de Protección de Datos Personales y garantía de los derechos digitales)
- For UK users: UK GDPR and UK Data Protection Act 2018
- For Russian users: Federal Law No. 152-FZ and laws of the Russian Federation

- For US users: Federal and applicable State laws
- For other users: Spanish law and international data protection standards

22. ADDITIONAL INFORMATION FOR SPECIFIC JURISDICTIONS

22.1. California Residents (CCPA/CPRA)

Categories of Personal Information Collected:

- Identifiers (email address)
- Commercial information (app usage)
- Internet/network activity (device information)
- Inferences (pet care preferences)

Business Purpose for Collection:

- Providing and improving services
- Customer support
- Legal compliance

Categories of Third Parties with Whom We Share Data:

- Service providers (cloud hosting, AI services)
- Professional advisors (legal, accounting, if applicable)

We do NOT sell personal information.

Shine the Light Law: California residents can request information about disclosure of personal information to third parties for direct marketing purposes. We do not disclose information for such purposes.

22.2. Russian Federation Residents

Data Localization: Personal data of Russian citizens is stored and processed on servers located in the Russian Federation, operated by Timeweb (www.timeweb.ru).

Cross-Border Transfer: Data may be transferred to AI service providers (OpenAI and Google) located outside Russia for processing anonymized pet data. Your personal identifying information (email, name) stored in Russia.

Roskomnadzor Notification: We maintain compliance with notification requirements under Federal Law No. 152-FZ.

Rights Protection: You may protect your rights through Roskomnadzor or through judicial proceedings.

22.3. Virginia, Colorado, Connecticut, Utah Residents

Under state privacy laws, you have rights similar to CCPA including:

- Right to access and delete your data

- Right to opt out of targeted advertising (we don't engage in this)
- Right to correct inaccuracies

Contact us at info@veeeet.org to exercise these rights.

23. ENTIRE AGREEMENT

This Privacy Policy, together with our Terms of Service, constitutes the entire agreement between you and GUSAKOV VADIM (trading as Veeeet) regarding the use of your personal data.

By using Veeeet, you acknowledge that you have read, understood, and agree to this Privacy Policy.

GUSAKOV VADIM

NIF: Z1386004Y

Last Updated: December 5, 2025