

Privacy Policy

We believe that transparency is the key to any healthy relationship. We appreciate that you trust us with information about you, and we want to be transparent about how we use it.

You own your personal data, and you are always in control. Therefore, we offer you several ways to control the privacy of your personal information and we are constantly striving to improve the functions and features needed for you to be in control.

Sleep Cycle AB (“we”, “us”, “our”) is the data controller for any personal data that you or the Sleep Cycle Kids app (“app”) forward to us and we will process your personal data only in accordance with applicable legislation, such as the GDPR. We are not the data controller for personal data that is processed locally on your device.

This notice describes how we process your personal data. You will learn about the data we collect, how we use it, your rights, and the measures we take to keep it safe. We always make sure that your data is protected in accordance with applicable legislation.

If you have any questions, or feel you need any part of this notice explained, please contact our support (support@sleepcycle.com) or our data protection officer (privacy@sleepcycle.com)

General information about the Sleep Cycle Kids app

When using the Sleep Cycle Kids app, you are not required to create an account. All information and all personal data that you enter in the App are only stored and processed locally on your mobile phone. We do not have access or authorization to access your personal data and information that you enter in the App and which is stored locally.

If you choose to upload a photo of your child in the App, Sleep Cycle kids will not process that personal data. Such photos are solely for your own private use, and we do not have access or authorization to your photo.

If you wish to share your child’s profile with another caregiver, Sleep Cycle Kids offers a sharing function based on Apples CloudKit sharing

functionalities. We are not considered data controller if you choose to share your link with parties outside the Sleep Cycle Kids app.

How we use your data

Managing our relationship with you

We are delighted that you have chosen our app to get better insights into how your child sleeps and thereby gain insights in his/hers sleeping patterns. To manage our relationship and provide the app and thereto related services in a satisfactory and error free manner, we need to process some of your personal data. For example, we process your data if you contact our customer support team, for maintenance of the app, and analytics purposes. Please find more detailed information on how we process your data when we manage our relationship, below.

Why we process this data	Description	The personal data we process	Where we got it from	Legal basis for doing so	How long will we keep your data?
<i>Manage payments and returns</i>	Payments and returns are processed by iTunes. This data will also be kept for bookkeeping purposes.	Active subscription and returns.	iTunes	Our agreement with you (GDPR art 6.1(b)). It is also necessary to comply with the Swedish Bookkeeping Act (GDPR art 6.1(c)).	One (1) plus seven (7) years, in accordance with the Swedish Bookkeeping Act.
<i>Provide customer support</i>	If you have any questions or problems with the app, you can contact our customer support team who will help you with any questions or problems you may have.	Primarily, we will only process technical data (e.g. IP addresses, timestamps, log files, device type and operating system).	You/the Sleep Cycle app.	Technical data is processed based on our agreement with you (GDPR, art 6.1(b)). In most cases, we need to process this data to be able to help you with your request.	We will delete or anonymise the data as soon as the support ticket is resolved.
<i>Improve and personalize the services and to develop new ones</i>	We may use your data to troubleshoot and protect against errors; perform data	Technical data (e.g. IP addresses, timestamps, log	You/the Sleep Cycle Kids app.	We will only do this if we find that this use is compatible with the purpose for	Three (3) years from collection.

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	analysis and testing; conduct research and surveys; develop new features and services; personalize your experience	files, device type and operating system).		which the data was originally collected. If so, we will rely on the original legal basis, our agreement with you.	

<i>Respond to legal requests/requirements</i>	We may preserve or disclose information about you to comply with a law, regulation, legal process, or governmental request; to assert legal rights or defend against legal claims; or to prevent, detect, or investigate illegal activity, fraud, abuse, violations of our terms, or threats to the security of the Sleep Cycle Kids app or the physical safety of any person.	All data in the Sleep Cycle Kids app.	You/the Sleep Cycle Kids app	GDPR 6.1(c) processing is necessary for compliance with a legal obligation to which the controller is subject.	As long as we have to to establish, exercise or defend the claim in question.
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How we share your personal data and who we share it with

We also use other service providers that may process your data on our behalf. We use Purchasely to display paywall, perform purchases and process transactions. Since the app does not require you to sign-in/create a user account, we don't have access to, or the ability to identify individual users.

As you may understand, this means that your data may be processed both within the EU/EEA, as well as in other locations outside the EU/EEA, including in the U.S. To ensure that your data enjoys the same level of protection as if it had remained within the EU/EEA, we have entered contractual clauses with all our service providers who process personal data outside of the EU/EEA.

Your rights

If you want to exercise your rights you are always welcome to contact us directly and we will help you with your request.

Right to information and access

You have the right to know if we process personal data about you. If we do, you also have the right to receive information about the personal data we process and why we do it. You also have the right to receive a copy of all personal data we have about you.

If you are interested in specific information, please indicate it in your request. For example, you can specify if you are interested in a certain type of information (e.g. what contact and identification information we have about you) or if you want information from a certain time period.

Right to have erroneous data corrected

If the data we hold about you are incorrect, you have the right to have it corrected. You also have the right to supplement incomplete information with additional information that may be needed for the information to be correct.

Once we have corrected your data, or it has been supplemented, we will inform those we have shared your data with about the update, provided that it is not impossible or too cumbersome. If you ask us, we will also tell you who we have shared your data with.

If you request to have data corrected, you also have the right to request that we limit our processing during the time we investigate the matter.

Right to have data deleted

In some cases, you have the right to have your data deleted. You have the right to have your data deleted if:

1. The data is no longer needed for the purposes for which we collected it,
2. You withdraw your consent, if applicable,
3. The data is used for direct marketing and you unsubscribe from it,

4. You oppose use that is based on our legitimate interest and we cannot show compelling grounds that outweigh your interests,
5. The personal data has been used illegally, or
6. Deletion is required to fulfill a legal obligation.

You can delete specific data points, for example sleep sessions or comments posted by yourself, directly in the app. If you uninstall the Sleep Cycle Kids app in order to remove any stored data your data will be deleted. We may preserve data for legal reasons or to prevent harm.

If we delete data following your request, we will also inform those we have shared your data with, provided that it is not impossible or too cumbersome. If you ask us, we will also tell you who we have shared your data with.

Objecting to data use

You have the right to object to processing that is based on our legitimate interest. If you object to the use, we will, based on your particular situation, evaluate if our interests in using the data outweigh your interests in the data not being used for that purpose. If we are unable to provide compelling legitimate grounds that outweigh yours, we will stop using the data you object to – provided we do not have to use the data to establish, exercise or defend legal claims. If you object to the use, you also have the right to request that we restrict our use during the time we investigate the matter.

You always have the right to object to, and thus unsubscribe from, direct marketing.

Right to withdraw consent

You have the right to withdraw your consent for a specific processing at any time. You can withdraw your consent in the privacy settings in the app or by contacting us.

Your withdrawal will not affect processing that has already been carried out.

Right to request restriction

Restriction means that the data is marked so that it may only be used for certain limited purposes. The right to restriction applies:

1. When you believe the data are incorrect and you have requested correction. If so, you can also request that we limit our use while we investigate if the data are correct or not.
2. If the use is illegal but you do not want the data to be deleted.
3. When we no longer need the data for the purposes for which we collected it, but you need it to be able to establish, assert or defend legal claims.
4. If you object to the use. If so, you can request that we limit our use while we investigate if our interest in processing your data outweighs your interests.

Our policies for children

We appreciate the importance of taking additional measures to protect children's privacy. All personal data that you enter in the App are only stored and processed locally on your mobile phone. We do not have access or authorization to access your personal data and information that you enter in the App and which is stored locally.

The Application is not for use by children, and you undertake not to let any person under the age of 17 to use the Application.

Changes to privacy notice

We reserve the right to change this Privacy Notice from time to time. If we make any material changes to our notice, we will push a notification through the Sleep Cycle Kids app. We encourage you to contact us if you have any questions about the notice or about how we process your personal data.

You may also submit complaints to a supervisory authority. In Sweden, the supervisory authority is the Swedish Supervisory Authority for Privacy Protection. (www.imy.se/en/)

Contact information

Data controller

Name:	Sleep Cycle AB
Registration number:	556614-7368
Postal address:	Gårdatorget 1 412 50 Gothenburg SWEDEN
E-mail address:	support@sleepcycle.com

Data Protection Officer

Postal address:	Sleep Cycle AB Att. Data Protection Officer Gårdatorget 1 412 50 Gothenburg SWEDEN
E-mail address:	privacy@sleepcycle.com

Versions in other languages than English

The original version of this Privacy Notice is written in English. To the extent a translated version of the Privacy Notice is in conflict with the English version, the English version shall prevail.