

Nurturli Privacy Policy

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Introduction

Welcome to Nurturli. We understand that privacy is especially important when it comes to information about your family and children. This Privacy Policy explains how we collect, use, share, and protect your personal information when you use the Nurturli application and services (the "Service"). Nurturli is operated by Sleeping Eight Technologies (OPC) Private Limited, a company registered in India.

Our Commitment: We are committed to protecting your privacy and being transparent about our data practices. We do not sell your personal information, and we use your data solely to provide and improve our parenting support service.

Data Location: Nurturli's servers and databases are located in the United States. Your information is primarily processed and stored in the US under US data protection laws.

By using Nurturli, you agree to the collection and use of information as described in this Privacy Policy. If you do not agree with our practices, please do not use the Service.

1. Information We Collect

We collect several types of information to provide and improve our Service:

1.1 Account Information

When you create an account, we collect:

- **Email address** (used for login and communication)
- **Password** (stored securely using Firebase Authentication - we never see your actual password)
- **Name** (optional, for personalization)
- **Guardian type** (e.g., mother, father, grandparent, aunt, uncle, legal guardian)
- **Contact preferences** (email, SMS, or phone)

1.2 Guardian and Family Information

- **Guardian profiles:** Each person using Nurturli has a Guardian profile with their email, name, and relationship to children
- **Family unit information:** Name of your family unit, household structure, timezone

- **Family invitations:** When you invite other guardians (co-parents, caregivers), we store invitation codes and relationships
- **Family roles:** Whether you're a family admin or have specific access permissions

1.3 Children's Information

We collect limited information about your children to provide age-appropriate guidance:

- **Name** (first name only, no last names required)
- **Birth month and year** (not exact birth date - used to calculate approximate age)
- **Gender** (optional)
- **Interests** (optional, for personalized recommendations)

Important: We do not collect children's full birth dates, social security numbers, photos, or other sensitive identifiers. We collect only the minimum information necessary to provide age-appropriate parenting guidance.

1.4 Conversation Data

When you chat with our AI assistant, we collect:

- **Your messages:** Questions, concerns, and descriptions of parenting situations
- **AI responses:** The guidance and suggestions provided by our AI
- **Conversation metadata:** Timestamps, conversation titles, favorite status
- **Conversation context:** Links to which children the conversation is about
- **Conversation memory:** Summaries and key information to maintain context across sessions

1.5 Actions and Task Data

When you use the Action Center, we collect:

- **Action details:** Titles, descriptions, categories (sleep, feeding, development, etc.)
- **Schedule information:** Due dates, recurrence patterns, time slots (morning, afternoon, evening, night)
- **Progress tracking:** Completion status, step-by-step progress, completion notes
- **Action series:** Multi-step parenting goals and their components
- **Which children** each action relates to

1.6 Journal Entries

When you use the Journal feature, we collect:

- **Entry content:** Your observations, milestones, and reflections
- **Entry metadata:** Date, category (milestone, daily, health, behavior, learning, activity), mood
- **Associated children:** Which child(ren) the entry is about
- **Media references:** If you mention photos or documents (note: we don't currently store actual photos)

1.7 Reference Guides

When you save reference guides, we collect:

- **Guide content:** Strategies and tactics saved from conversations
- **Situation tags:** Categories like "bedtime," "tantrums," "resistance"
- **Usage data:** When you access guides and how often
- **Personal notes:** Your customizations to saved strategies

1.8 Device and Technical Information

We automatically collect certain technical information:

- **Device tokens:** For push notifications (iOS and Android)
- **Device type and platform:** iOS or Android
- **App version:** To provide appropriate features and support
- **IP address:** For security and fraud prevention
- **Usage analytics:** How you use the app (features accessed, session duration)
- **Error logs:** To diagnose and fix technical issues

1.9 Notification Preferences

- **Timezone:** Your family's timezone for proper notification timing
- **Notification settings:** Which time slots you want notifications (morning, afternoon, evening, night)
- **Quiet hours:** Times when you don't want to be disturbed
- **Active days:** Which days of the week you want notifications
- **Sound preferences:** Whether you want notification sounds

2. How We Use Your Information

We use the information we collect for the following purposes:

2.1 To Provide the Service

- **Authentication:** Verify your identity and manage your account

- **Personalized AI responses:** Generate guidance tailored to your children's ages and your specific situations
- **Conversation memory:** Remember context from previous conversations to provide continuity
- **Action tracking:** Help you organize and complete parenting tasks
- **Push notifications:** Remind you about scheduled actions (when enabled)
- **Family collaboration:** Enable multiple guardians to share information and coordinate care

2.2 To Improve the Service

- **Analytics:** Understand how users interact with features to improve the app
- **AI model improvement:** Use anonymized, aggregated data to enhance our AI responses
- **Feature development:** Identify which features are most valuable to parents
- **Bug fixes:** Diagnose and resolve technical issues

2.3 To Communicate with You

- **Service updates:** Notify you about new features, changes, or maintenance
- **Account information:** Send important updates about your account
- **Support:** Respond to your questions and support requests
- **Marketing** (with consent): Share parenting tips and updates about Nurtureli

2.4 To Ensure Security and Compliance

- **Fraud prevention:** Detect and prevent unauthorized access or misuse
- **Legal compliance:** Comply with applicable laws and regulations
- **Terms enforcement:** Ensure users comply with our Terms of Service

3. How We Share Your Information

We do not sell your personal information.

We share your information only in the following limited circumstances:

3.1 Within Your Family

Shared access: All guardians within your Family unit can view:

- Children's profiles and information
- Actions created by any family member
- Journal entries (unless you implement privacy controls in the future)

- Reference guides saved by any family member

You control access: As a family admin, you control who joins your family through invitations

3.2 With Service Providers

We share data with trusted third-party service providers who help us operate the Service:

Authentication and Security (Firebase/Google)

- **What we share:** Email, authentication tokens, device tokens for push notifications
- **Why:** To provide secure login and push notification delivery
- **Their commitment:** Firebase is bound by Google's privacy policies and security standards

AI Processing (OpenAI)

- **What we share:** Your conversation messages, child age/developmental context, conversation history
- **Why:** To generate personalized AI responses
- **Important protections:**
 - OpenAI does not use data submitted via their API to train their models
 - Conversations are processed in real-time and not stored by OpenAI beyond processing
 - We have a Business Associate Agreement with OpenAI for data protection

Cloud Infrastructure Providers

- **What we share:** All data stored in our databases (encrypted)
- **Why:** To host and maintain the Service securely
- **Their commitment:** Industry-standard security practices and compliance certifications

Analytics Services

- **What we share:** Anonymized usage data, feature interactions
- **Why:** To understand how users interact with the app and improve it
- **Protection:** Data is anonymized and aggregated before sharing

3.3 For Legal Reasons

We may disclose your information if required to:

- **Comply with law:** Respond to subpoenas, court orders, or legal processes

- **Protect rights and safety:** Prevent fraud, abuse, or harm to users or others
- **Enforce our Terms:** Investigate violations of our Terms of Service
- **Emergency situations:** When we believe disclosure is necessary to prevent physical harm

3.4 Business Transfers

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

3.5 With Your Consent

We may share your information for other purposes with your explicit consent.

4. Data Security

We take the security of your information seriously and implement appropriate technical and organizational measures:

4.1 Security Measures

- **Encryption in transit:** All data transmitted between your device and our servers is encrypted using TLS/SSL
- **Encryption at rest:** Sensitive data is encrypted in our databases
- **Secure authentication:** We use Firebase Authentication with industry-standard security
- **Access controls:** Limited employee and contractor access to personal data
- **Regular security updates:** We keep our systems updated with security patches
- **Secure infrastructure:** We use reputable cloud providers with strong security practices

4.2 Your Role in Security

You play an important role in keeping your account secure:

- **Strong passwords:** Use a unique, strong password for your account
- **Keep credentials private:** Don't share your login information
- **Secure devices:** Keep your devices updated and protected
- **Report issues:** Notify us immediately if you suspect unauthorized access

4.3 Security Limitations

While we implement strong security measures, no system is 100% secure. We cannot guarantee absolute security of your data. You use the Service at your

own risk.

5. Data Retention

5.1 How Long We Keep Your Data

- **Active accounts:** We retain your data for as long as your account is active
- **After account deletion:** Most personal data is deleted within 90 days
- **Anonymized data:** We may retain anonymized, aggregated data indefinitely for analytics and improvement
- **Legal obligations:** We may retain certain data longer if required by law

5.2 Conversation Data

- **Recent conversations:** Stored to provide conversation memory and context
- **Older conversations:** May be archived or summarized for memory efficiency
- **Deleted conversations:** Permanently deleted within 30 days of your deletion request

5.3 Backup Retention

Data in backups may be retained for up to 90 days after deletion from production systems for disaster recovery purposes.

6. Your Privacy Rights

Depending on your location, you may have certain rights regarding your personal information:

6.1 Access and Portability

- **Right to access:** Request a copy of the personal information we hold about you
- **Data portability:** Receive your data in a machine-readable format

6.2 Correction and Deletion

- **Right to correct:** Update inaccurate or incomplete information through your account settings
- **Right to delete:** Request deletion of your account and personal data

6.3 Control Over Data Processing

- **Opt-out of marketing:** Unsubscribe from promotional emails (we'll still send essential account emails)

- **Notification preferences:** Control which notifications you receive
- **Object to processing:** In some cases, object to how we process your data

6.4 How to Exercise Your Rights

To exercise any of these rights:

1. **Through the app:** Many rights can be exercised directly in your account settings
2. **Contact us:** Email support@nurturli.app with your request
3. **Verification:** We'll verify your identity before processing requests
4. **Response time:** We'll respond within 30 days (may be extended to 60 days for complex requests)

6.5 Rights for US Residents

If you're a California resident, you have additional rights under the California Consumer Privacy Act (CCPA):

- Right to know what personal information is collected, used, and shared
- Right to delete personal information (with exceptions)
- Right to opt-out of sale of personal information (note: we don't sell your information)
- Right to non-discrimination for exercising your rights

Other US states may provide similar rights. Contact us to learn about your specific rights.

6.6 Rights for EU/UK Residents

If you're in the European Union or United Kingdom, you have rights under GDPR:

- Right to access, rectification, and erasure
- Right to restrict processing
- Right to data portability
- Right to object to processing
- Right to lodge a complaint with your supervisory authority
- Right to withdraw consent (where processing is based on consent)

7. Children's Privacy and COPPA Compliance

7.1 Age Requirements and Service Design

Nurturli is intended for use by adults (18+ years old). We do not knowingly collect personal information directly from children under 13.

Important Clarification: Nurturli is a parent-facing tool where parents and guardians input information about their children for their own use in man-

aging parenting activities. Children do not use, access, or interact with the Service. All information about children is provided by and controlled by parents/guardians.

7.2 Information About Children

While parents provide information about their children (names, ages, developmental information), this information:

- Is provided by the parent/guardian, not the child
- Is entered into a parent's account that the child does not access
- Is limited to what's necessary for age-appropriate parenting guidance
- Is controlled by the parent/guardian who can delete it at any time
- Is protected with the same security measures as all personal data
- Cannot be accessed or modified by the children themselves

7.3 COPPA Compliance

We comply with the Children's Online Privacy Protection Act (COPPA):

- We do not collect personal information directly from children
- Children do not interact with or use the Service
- Parents control all information about their children
- We do not require more information about children than is necessary for providing parenting guidance
- Parents can review, delete, or refuse further collection of their children's information at any time
- We do not share children's information with third parties for marketing purposes
- We do not enable children to make their personal information publicly available

7.4 Parental Rights

As a parent or guardian using Nurturli, you have the right to:

- Review all information stored about your children
- Request deletion of your children's information at any time
- Refuse to permit further collection of your children's information
- Access and export all data related to your children

7.5 If We Learn of Unauthorized Child Data

If we discover that we have inadvertently collected personal information directly from a child under 13 (i.e., a child using the Service themselves), we will delete it immediately.

8. International Data Transfers

8.1 Where We Store Data

- **Primary storage:** Our servers and databases are located in the United States
- **Service providers:** Our third-party providers (Firebase, OpenAI) also primarily operate in the United States, though they may use global infrastructure
- **Data processing:** Your information is primarily processed and stored in the United States

8.2 For US Users

If you are located in the United States, your data remains within the US and is subject to US federal and state data protection laws, including:

- California Consumer Privacy Act (CCPA)
- Other applicable state privacy laws
- Federal laws including COPPA for children's privacy

8.3 For International Users

If you use Nurturli from outside the United States:

- Your information will be transferred to and processed in the United States
- The US may have different data protection laws than your country
- We ensure appropriate safeguards for international data transfers:
 - **Standard contractual clauses:** We use EU-approved standard contractual clauses where applicable
 - **Adequacy decisions:** We rely on adequacy decisions for certain jurisdictions
 - **Service provider commitments:** Our providers commit to appropriate data protection standards

8.4 Your Consent to Data Transfer

By using Nurturli from outside the United States, you explicitly consent to the transfer of your information to the United States and its processing under US law.

9. Cookies and Tracking Technologies

9.1 What We Use

- **Essential cookies:** Required for authentication and security
- **Analytics:** To understand how users interact with the Service
- **Preferences:** To remember your settings and preferences

9.2 Mobile App Tracking

Our mobile app may use:

- **Device identifiers:** To provide push notifications and track app installations
- **Analytics SDKs:** To measure app performance and usage
- **Crash reporting:** To identify and fix bugs

9.3 Your Choices

- **Mobile settings:** Control tracking through your device settings (iOS: Limit Ad Tracking, Android: Opt out of Ads Personalization)
- **App permissions:** Control what data the app can access through your device settings

10. Third-Party Links and Services

10.1 External Links

The Service 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.

10.2 Third-Party Services We Use

Our key third-party services and their privacy policies:

- **Firebase/Google:** <https://firebase.google.com/support/privacy>
- **OpenAI:** <https://openai.com/privacy>

11. Changes to This Privacy Policy

11.1 Updates

We may update this Privacy Policy from time to time. When we do:

- We'll update the "Last Updated" date at the top
- For material changes, we'll notify you via email or through the app
- Your continued use after changes constitutes acceptance

11.2 Material Changes

For significant changes that affect how we use your data:

- We'll provide at least 30 days' notice
- You can delete your account if you don't agree with the changes
- We'll seek consent where required by law

11.3 Review Previous Versions

We maintain a history of our Privacy Policy. You can request previous versions by contacting us.

12. Contact Us

If you have questions, concerns, or requests regarding this Privacy Policy or our privacy practices, please contact us:

Company: Sleeping Eight Technologies (OPC) Private Limited

Email: support@nurturli.app

Website: <https://nurturli.app>

Response Time

We will respond to privacy inquiries within:

- 7 business days: Initial acknowledgment
- 30 days: Full response (may extend to 60 days for complex requests)

13. Specific Disclosures by Jurisdiction

13.1 For California Residents (CCPA)

Categories of Personal Information Collected: See Section 1 above

Business Purpose for Collection: See Section 2 above

Categories of Third Parties We Share With: See Section 3 above

Sale of Personal Information: We do NOT sell your personal information

Your CCPA Rights:

- Right to know what personal information we collect and how we use it
- Right to delete your personal information
- Right to opt-out of sale (not applicable - we don't sell data)
- Right to non-discrimination

How to Exercise Rights: Contact support@nurturli.app or use in-app settings

Authorized Agents: You may designate an authorized agent to make requests on your behalf

13.2 For Nevada Residents

We do not sell personal information as defined by Nevada law. If you are a Nevada resident, you may opt-out of future sales by contacting support@nurturli.app.

13.3 For EU/UK Residents (GDPR)

Legal Basis for Processing:

- **Contract:** To provide the Service you've requested
- **Legitimate interests:** To improve the Service and ensure security
- **Consent:** For marketing communications and certain data processing activities

Data Protection Officer: support@nurturli.app

Right to Lodge Complaint: You have the right to lodge a complaint with your local supervisory authority

Data Retention: See Section 5 above

International Transfers: See Section 8 above

14. Additional Information

14.1 Do Not Track

Some browsers have "Do Not Track" features. Currently, there is no industry standard for responding to Do Not Track signals, so we do not respond to them at this time.

14.2 Automated Decision Making

We use AI to generate parenting suggestions, but:

- These are recommendations, not automated decisions that significantly affect you
- You maintain full control over all parenting decisions
- You can always contact support to discuss AI recommendations

14.3 Data Security Incidents

In the unlikely event of a data breach that affects your personal information:

- We will notify you as required by applicable law
- We will notify relevant authorities as required
- We will take immediate steps to mitigate harm and prevent future incidents

Your Trust Matters

At Nurturli, we understand that you're trusting us with information about your family and children. We take that responsibility seriously. This Privacy Policy reflects our commitment to transparency, security, and putting your family's privacy first.

Remember: You are in control. You can access, update, or delete your information at any time. If you have any questions or concerns, we're here to help.

Parents Know Best - including when it comes to your family's privacy.

Thank you for trusting Nurturli to support your parenting journey.