

Privacy Policy – *Mini Navigator*

Effective Date: 23/06/2025

Your privacy is important to us. This Privacy Policy explains how *Mini Navigator* ("we", "our", or "us") collects, uses, and protects your information, including the personal data of children, in accordance with the UK General Data Protection Regulation (UK GDPR) and EU GDPR where applicable.

1. Who We Are

We are the provider of *Mini Navigator*, an app designed to help parents and carers monitor and analyse a child's behaviour. We are based in the United Kingdom and act as the **Data Controller** for the personal data you provide.

2. What Personal Data We Collect

From the Parent or Carer:

- Full name
- Email address
- Username and password

This data is stored securely in **Amazon Cognito**, located in the **EU (Ireland)** region.

About the Child (Provided by Parent/Carer):

- First name
- Gender
- Age
- Verbal status (Yes/No)
- Subscription information (tier, status, dates, revenueCat ID)

This data is stored in **Amazon DynamoDB** (EU West 1 - EU Ireland).

We do **not** collect any sensitive personal information such as medical records, school data, or home address.

3. How We Use Your Data

We use your data to:

- Allow you to create and manage an account
- Store your child's behaviour entries
- Analyse anonymised behaviour data using AI (ChatGPT via OpenAI) **without personal identifiers**
- Provide subscription services

4. AI and Anonymised Analysis

To improve insight and support, we use **OpenAI's ChatGPT** to analyse behaviour entries. Before analysis:

- We **remove your child's name**
- We convert any identifiable terms to anonymised gender pronouns

No personal data is shared with OpenAI or stored by them under your name.

5. Legal Basis for Processing

We process your data under the following legal bases:

- **Consent** – You give consent when creating an account and entering your child's data.
- **Contract** – To provide the services you have subscribed to.
- **Legitimate interest** – To improve the app and its insights (with anonymised data).

6. Parental Consent

If you enter data about a child, you confirm that:

- You are the child's parent or legal guardian, or
- You have authority to provide this data

Children under 13 must not use the app directly. All data must be entered by an adult.

7. Data Storage and Retention

- All data is stored in **AWS EU-West-1 (Ireland)**.
- We retain user and child data for as long as your account is active.
- After inactivity of [e.g. 12 months], your data may be anonymised or deleted.

8. Your Rights

Under GDPR, you have the right to:

- Access your data
- Correct inaccurate data
- Request data deletion
- Withdraw consent
- Object to processing
- File a complaint with the **ICO (UK)**

To exercise these rights, contact us at **gdpr@mininavigator.co.uk**.

9. Data Security

- All data is encrypted at rest and in transit
- Access is restricted using secure AWS IAM roles and policies

10. Contact Us

If you have any questions about this policy or your data rights, please contact:

Email: gdpr@mininavigator.co.uk.