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1 General information

Paindrainer AB ("Paindrainer," "we," "our," "us") is committed to protecting your privacy. This Privacy Policy describes how we collect, use, and share your personal information through our website (www.relivra.ai), social media, and the Relivra application ("App"), collectively referred to as the "Service".

The Service is provided by **Paindrainer AB**, a Swedish company located at Medicon Village, SE-223 81 Lund, Sweden (Organization No. 559156-5196).

By clicking "Accept," installing the App, creating an account, or using the Service, you confirm that you have read, understood, and agree to this Policy.

1.1 Regulatory positioning

Paindrainer operates under the **EU General Data Protection Regulation (GDPR)** as its primary privacy framework. This Privacy Policy extends those principles to users in the United States.

Paindrainer AB may operate other services that are subject to the U.S. Health Insurance Portability and Accountability Act (HIPAA). However, **the Relivra Service is not offered as a HIPAA-covered service**, and Paindrainer does not act as a HIPAA covered entity or business associate in connection with Relivra.

While Relivra processes health-related information, it does so in a **consumer wellbeing context**, and not as part of clinical care, medical treatment, or healthcare provider services.

We may amend this policy from time to time. If significant changes occur, we will notify you via the App, email, or our Website. The current version is always available online.

2 How we process your information

2.1 How we collect your information

We collect personal information:

- when you enter data into the App
- when you use our Website or Services
- when you contact support or interact with us

Cookies and similar technologies

Cookies are primarily used on our Website. The App does not use any cookies.

Cookies help us understand how users interact with our web-based Services, improve functionality, and optimize performance. You may manage cookies through your browser settings; however, disabling cookies may affect functionality.

2.2 How we share your information

We do not sell or share your personal information for advertising or commercial data brokerage purposes. We may share information in the following cases:

- **Service Providers:** Third-party vendors (e.g., hosting, analytics, support tools) who process data on our behalf under contractual safeguards.
- **Business Transfers:** In connection with a merger, acquisition, or sale of assets.
- **Legal Requirements:** When required by law, regulation, or legal process.

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2.3 How we protect your information

We implement appropriate technical and organizational security measures designed to protect your information, including:

- encryption of data in transit and at rest
- access controls and authentication mechanisms
- logging and monitoring of system activity
- secure development and operational practices aligned with industry standards (including SOC 2 principles)

Despite these measures, no system can be guaranteed to be completely secure.

You are responsible for maintaining the confidentiality of your account credentials.

2.4 How long we retain your information

We retain your personal data:

- for as long as your account is active
- for up to **24 months** after account termination to enable account restoration and continuity
- longer where required by law or regulatory obligations

You may request deletion of your data at any time by contacting support@relivra.ai

3 Where we process your personal information

Your data is primarily processed in the **United States**.

As an EU-based company, Paindrainer applies GDPR safeguards to international data transfers, including:

- use of service providers in jurisdictions with adequate protection
- contractual safeguards (e.g., Standard Contractual Clauses where applicable).

4 Why we process your personal information

4.1 To provide and operate the Service

We collect data such as your name, email, birthdate, usage data and health -related inputs to:

- verify your identity
- provide core functionality
- generate insights and summaries
- store user inputs (e.g., activity data, reflections, scores)

Legal basis: performance of contract and explicit consent (for health-related data).

4.2 To provide support

We use your information to respond to inquiries and resolve issues.

Legal basis: legitimate interest.

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4.3 To improve services

We use aggregated and de-identified data to analyze usage patterns and improve functionality.

Legal basis: legitimate interest.

4.4 To send service communications

We may send essential updates related to your account or the Service.

Legal basis: performance of contract.

4.5 For research

With your **explicit consent**, we may use your data for research purposes.

This may include transforming your data into de-identified or anonymized form, after which it can no longer be linked to you. Once anonymized, the data may be used for:

- research and statistical analysis
- product improvement
- scientific publications

You may withdraw your consent at any time.

4.6 To prevent misuse

We process data to detect and prevent fraud, abuse, or violations of our Terms.

Legal basis: legitimate interest.

4.7 To comply with legal obligations

We may process data to comply with laws, such as tax or regulatory reporting.

Legal basis: legal obligation

4.8 Automated processing and AI

The Service uses artificial intelligence and automated processing to generate insights, suggestions, and summaries. This may involve analysis of:

- user inputs
- behavioral patterns
- usage data

These processes are designed to support wellbeing and **do not provide medical or clinical decisions**.

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5 Your rights

You may exercise your rights by contacting support@relivra.ai

Depending on your location, you may have the right to:

- access your personal data
- correct inaccurate data
- request deletion of your data
- restrict or object to processing
- withdraw consent
- receive a copy of your data (data portability)

We will respond in accordance with applicable law.

6 U.S. Privacy rights

Residents of certain U.S. states (including California, Colorado, Virginia, Connecticut, Utah, Texas, and Oregon) may have additional rights.

These may include the right to:

- access personal information we hold about you
- request deletion of your personal information
- correct inaccuracies
- opt out of certain data processing activities
- receive a portable copy of your data

We do not sell or share personal information for cross-context behavioral advertising.

Requests may be submitted to support@relivra.ai

7 Children's privacy

The Service is not intended for individuals under the age of 18. We do not knowingly collect personal information from children under 13. If such data is identified, it will be deleted.

8 Contact information

Paindrainer AB

Medicon Village
SE-223 81 Lund
Sweden

Email: support@relivra.ai

9 Effective date

Mars 19, 2026