

MMOTW (Magic Mirror On The Wall) - Privacy Policy

Last updated

July 1, 2025

Overview

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This Privacy Policy explains how EBOX3 ("EBOX3", "we", "us") collects, uses, and shares information about you when you use MMOTW (Magic Mirror On The Wall) (the "App") and our website (the "Site"). We are established in Andorra and comply with applicable Andorran data protection law and, where we offer services to individuals in the EEA/UK, the EU/UK GDPR.

Quick summary

1. Who we are

Controller: EBOX3

Registered office: Apartat de correus 1033, AD500 Andorra la Vella, Andorra

Contact: privacy@ebox3.com

2. What we collect

Account & Identity: Email address (and/or login ID), display name, password hash, country/region and language preferences.

App Content You Provide: Journaling entries, mood logs, goals for tomorrow, mirror affirmations. Selfies you upload for the Magic Mirror appearance insights, and images you choose to publish anonymously to the community for feedback. Ratings/feedback you give or receive.

Well-being Signals (optional): "Back to Calm" usage (e.g., session start time, duration) and your inputs to calming exercises.

Referral Program: Referral links/codes, invite activity, payout details necessary to administer rewards (e.g., payout account identifier, tax/KYC info if required by law).

Technical Data: Device type, OS/browser, app version, locale, IP address (approximate location), crash logs, and strictly necessary cookies or similar technologies for session management and security.

Payments: Processed by our payment provider; we receive tokenized references and summary records (e.g., plan purchased, last 4 digits, card brand, billing country) but not full card numbers.

3. GDPR compliance & lawful bases

We comply with the GDPR when we offer services to individuals in the EEA/UK. Our key GDPR principles are data minimization, purpose limitation, storage limitation, integrity/confidentiality, and accountability.

Lawful bases: Contract (to create and operate your account, deliver App features, and provide support). Consent (for processing special-category data such as mood logs, selfies/appearance insights, anxiety helper; for optional communications). Legitimate interests (to secure and improve our services, prevent abuse, and understand feature usage-balanced against your rights and expectations). Legal obligations (to comply with tax, accounting, and legal requests where applicable).

Your GDPR rights: access, rectification, erasure (right to be forgotten), restriction, objection, and data portability. Where processing is based on consent, you may withdraw consent at any time. You also have the right to lodge a complaint with your local supervisory authority or with the Andorran Data Protection Agency (APDA).

4. How we use your information

Provide and personalize App features (journaling, mood, goals, affirmations, appearance insights, community feedback).

AI assistance: Our AI provides suggestions, reframes community comments positively, and offers motivational tips. AI outputs are generated based on your inputs and are assistive only; not clinical or diagnostic.

Run the Back to Calm feature (breathing guidance and calming messages).

Operate the referral program and pay eligible rewards.

Communicate with you (service messages, updates, security alerts). Marketing only with consent.

Monitor for fraud, spam, harassment, and policy violations; improve the service including via aggregated, de-identified analytics.

5. Sharing of information

Processors: cloud hosting, CDN, error logging, email/push providers, payment processors-under DPAs; we do not permit them to use your data for their own purposes.

Community: Content you choose to post anonymously (images and text) will be visible to other users; your account identity is not shown. We may remove or refuse content that violates guidelines.

Legal: where required by law or to protect rights, safety, and security.

Business transfers: in a merger, acquisition, or asset sale, with appropriate safeguards.

We do not sell personal data and do not share personal data with third parties for their independent marketing.

6. International transfers

We may transfer data outside Andorra/EEA/UK. Andorra benefits from an EU adequacy decision. Where we transfer data to other countries, we use lawful transfer tools (e.g., Standard Contractual Clauses) and apply additional safeguards (encryption at rest/in transit, access controls, and audits).

7. Data retention

Journal/mood/goals/affirmations: retained for the life of your account (until you delete it).

Selfies uploaded for Magic Mirror appearance insights: retained until you delete it and stored encrypted; you can delete any image at any time. We do not use selfies to identify you (no facial recognition for identity) and we do not build biometric templates.

Community posts: retained while published; if you delete, we remove or anonymize within a reasonable period, but cached/archived copies may persist temporarily.

Referral/transaction records: retained as required by tax/accounting laws (typically 6-10 years).

8. Your rights

To exercise your rights, contact us at privacy@ebox3.com. We will respond consistent with applicable law.

9. Children & minors

MMOTW is intended for adults 18+. We do not knowingly allow minors to use the App. If you believe a minor has provided data, contact us and we will take appropriate steps.

10. Security

We implement technical and organizational measures appropriate to the risk, including encryption in transit (TLS) and encryption at rest, access controls, least-privilege policies, and audit logging; backups, vulnerability management, and incident response. Note: unless otherwise stated, we do not claim end-to-end encryption where only you hold the keys; server-side encryption is applied to protect data at rest.

11. Cookies & similar technologies

We use only functional (strictly necessary) cookies required to operate the Site and App (e.g., session management, security, load balancing, payment checkout). We do not use analytics, advertising, or other non-essential cookies. Because only essential cookies are used, consent is not required under applicable ePrivacy rules; we still provide clear notice in the footer and in this Policy. If we ever introduce analytics or marketing cookies in the future, we will first obtain your consent and update this Policy.

12. Third-party links

The App and Site may link to third-party sites. Their privacy practices are governed by their own policies.

13. AI features & automated processing

Our AI features generate motivational suggestions, rephrase community feedback to remove abusive language, and analyze selfies for appearance insights. These are assistive and for well-being and entertainment, not clinical or diagnostic. We do not use your personal content to train general-purpose AI models without your consent. We do not make legal or similarly significant decisions solely by automated means.

14. Changes to this policy

We may update this policy; we will post the new version with a new 'Last updated' date and, where required, notify you.

- We process your data to provide motivational coaching features like journaling, mood logging, mirror affirmations, goals, and community feedback.
- Some features (e.g., mood logging, anxiety helper, appearance insights) may involve special categories of data. We process these only with your explicit consent, which you can withdraw at any time in-app.
- Privacy first: We do not sell your data and we do not share personal data with third parties for their own marketing.
- Encryption: Data is encrypted in transit (TLS) and encrypted at rest on our servers. Access is strictly limited and logged.
- We use third-party processors (e.g., cloud, analytics if any, payments) under GDPR-compliant Data Processing Agreements (DPAs).
- You can export and delete your data from the App at any time or email us.