

## **Privacy Policy**

**Effective Date:** April 21, 2026

This Privacy Policy outlines how **Heston Plus LTD** (“we,” “our,” “us”) collects, uses, and protects the personal information of individuals (“you,” “user”) who interact with the **ImFocused** application and related services (“App” or “Services”). By accessing or using the App, you agree to the terms outlined in this document.

By accessing or using the App, you consent to the terms of this Privacy Policy. If you disagree, you must stop using the App immediately.

### **1. Information We Collect**

We collect information from you in various ways to ensure the functionality of the App and improve its performance and user experience.

#### **1.1. Automatically Collected Information**

When you interact with our App, we automatically collect specific details, including but not limited to:

- **Device Information:** IP address, device type, operating system, and language settings.
- **Usage Data:** Pages visited, features used, time spent in the app, and interaction timestamps.
- **Diagnostics Data:** Crash logs, performance metrics, and error reports to identify technical issues.

**Example:** If the app crashes, we may log information about your device and app version to identify and resolve the problem promptly.

#### **1.2. Information You Provide Voluntarily**

You may choose to share additional personal information, such as:

- Full name

- Email address
- Profile details when creating an account
- Responses to surveys or contests

We request only necessary information and avoid collecting sensitive data, such as financial or health-related information.

### **1.3. Data from Third-party Sources**

We may receive supplementary information from sources like app stores or marketing partners. For example, when you download our App, we may access anonymized device identifiers to ensure compatibility with your device.

### **1.4. Photos, Images, and Face Data (AI Video Generation Feature)**

When you use the AI video generation feature, you may upload or select photos/images (including pictures generated by you or obtained from other sources). These images may contain a person's face. We process this content to generate the requested AI video output and provide the feature's functionality. We do not use Face ID and we do not use facial recognition to verify your identity. We do not create or store biometric identifiers (such as face templates or face embeddings) for the purpose of uniquely identifying you.

## **2. How We Use Your Information**

We process your data to provide, optimize, and protect the App and its features. The purposes for data use include:

### **2.1. Account Management and Support**

- To create, verify, or delete user accounts.
- To provide support for technical issues or address feedback submitted via the App.

### **2.2. Service Improvement**

- Personalize the app experience by suggesting relevant features.

- Analyze trends and patterns to identify popular functionalities.

### **2.3. Legal and Compliance**

- To fulfill obligations under applicable laws or respond to lawful requests, such as court orders or subpoenas.
- Enforce our Terms of Service and investigate potential breaches.

### **2.4. Marketing and Promotions**

With your consent, we may send newsletters or promotional messages. You can opt out of these at any time.

### **2.5. How We Use Photos/Images (including Face Data)**

We use uploaded photos/images (which may include a face) solely to:

- Generate the AI video you request and deliver the output to you.
- Maintain, troubleshoot, and improve the reliability and security of the feature (for example, to diagnose failed generations or technical errors).

We do not use your photos/images to identify you as a person, and we do not use them for advertising purposes.

## **3. Sharing Your Information**

We respect your privacy and limit sharing your data only when absolutely necessary:

### **3.1. With Service Providers**

Third-party vendors help us operate our App, such as cloud hosting providers, analytics platforms, and marketing partners. These parties are contractually required to protect your data. Some of our service providers may process the photos/images you upload and the generated video output on our behalf solely to provide the AI video generation feature (AI processing providers). These parties are contractually required to protect your data and are not permitted to use it for their own purposes.

### **3.2. For Legal Obligations**

We may share information when required by law or to protect rights, safety, or prevent fraud.

**Example:** If requested by law enforcement due to suspected illegal activity, we may disclose specific user data after verifying the legality of the request.

## **4. Data Retention Policy**

### **4.1. Retention Duration**

We retain your information only as long as necessary to fulfill its intended purpose or comply with legal obligations. Specific retention times include:

- **Account Details:** Deleted upon account deactivation.
- **Usage Logs:** Retained for 24 months to monitor trends.

### **4.2. Data Removal Requests**

You may request the deletion of your data by contacting us. However, certain legal obligations may require us to retain minimal information for dispute resolution or fraud prevention. This also applies to content you upload for AI video generation (photos/images) and generated outputs (videos), subject to the retention terms described above.

### **4.3. Retention of Uploaded Photos/Images and Generated Videos (AI Video Feature)**

We retain uploaded photos/images/videos for up to 30 days to process your request and deliver the generated result, after which they are deleted or anonymized, unless a longer retention period is required to comply with legal obligations or resolve disputes.

## **5. Your Privacy Rights**

Depending on your location, you may be entitled to specific data privacy rights under the General Data Protection Regulation (GDPR) or California Consumer Privacy Act (CCPA):

## 5.1. GDPR Rights

If you are in the EEA (European Economic Area), you have the right to:

1. Access the data we store about you.
2. Request corrections or updates to your data.
3. Restrict processing or request the erasure of your data.
4. Transfer data to another service provider (data portability).

## 5.2. California Privacy Rights

California residents may request annual reports detailing personal information shared with third parties for marketing purposes.

## 6. Data Protection and Security

We prioritize safeguarding your information through:

- **Encryption:** All sensitive data transfers use advanced encryption protocols.
- **Access Controls:** Only authorized personnel can access stored data.

Although we use industry-standard practices, no method of transmission over the Internet or electronic storage is 100% secure.

## 7. Cookies and Tracking Technologies

Our App employs cookies and similar tracking tools to enhance the user experience.

- **Necessary Cookies:** Ensure core functionality.
- **Performance Cookies:** Track app usage patterns.
- **Targeting Cookies:** Used for personalized ads.

You can control cookies through your device or browser settings.

## 8. Privacy for Minors

We do not knowingly collect information from anyone under the age of 16. If you suspect a child has provided data, please contact us immediately.

## **9. International Data Transfers**

Your information may be stored and processed in countries other than your own. In such cases, we implement measures to comply with local laws and ensure secure data handling.

## **10. Changes to This Privacy Policy**

We may occasionally update this Privacy Policy. Changes will be effective once published. Material updates will be communicated via in-app notifications or email.

## **11. Contact Us**

For further questions, concerns, or requests regarding this Privacy Policy, you can reach us via:

**Email:** [support@imfocusedapp.com](mailto:support@imfocusedapp.com)