

MOBILE APP PRIVACY POLICY

(Last modified: January 28, 2025)

Introduction

Microgram, owned and operated by Lurra, LLC ("**Company**", "**We**" or "**Us**") respects your privacy and is committed to protecting it through our compliance with this policy. This policy describes:

- The types of information we may collect or that you may provide when you download, install, register with, access, or use the Microgram application (the "**App**").
- Our practices for collecting, using, maintaining, protecting, and disclosing that information.

This policy applies only to information we collect in this App, and in email, text, and other electronic communications sent in connection with this App.

This policy DOES NOT apply to information that:

- We collect offline or on any other Company apps or websites, including websites you may access through this App.
- You provide to or is collected by any third party (*see* [Third-Party Information Collection](#)).
- Information involving third-party apps or services.

Our websites and apps, and these other third parties may have their own privacy policies, which we encourage you to read before providing information on or through them.

Please read this policy carefully to understand our policies and practices regarding your information and how we will treat it. If you do not agree with our policies and practices, do not download, register with, or use this App. By downloading, registering with, or using this App, you agree to this privacy policy. This policy may change from time to time (*see* [Changes to Our Privacy Policy](#)). Your continued use of this App after we revise this policy means you accept those changes, so please check the policy periodically for updates.

Individuals Under the Age of 18

The App is not intended for children under 18 years of age, and we do not knowingly collect personal information from children under 18. If we learn we have collected or received personal information from a child under 18 without verification of parental consent, we will delete that information. If you believe we might have any information from or about a child under 18, please contact us at team@microgramapp.com

California residents under 16 years of age may have additional rights regarding the collection and sale of their personal information. Please *see* [Your State Privacy Rights](#) for more information.

Information We Collect and How We Collect It

We collect information from and about users of our App:

- Directly from you when you provide it to us.
- Automatically when you use the App.

Information You Provide to Us

When you download, register with, or use this App, we may ask you provide information -- either now or in the future, as other functionality and features of the App emerge:

- By which you may be personally identified, such as name, email address, phone number, or any other identifier by which you may be contacted ("**personal information**").
- That is about you but individually does not identify you.

This information includes:

- Information that you provide by filling in forms in the App. This includes information provided at the time of registering to use the App, posting material, and requesting further services. We may also ask you for information when you enter a contest or promotion sponsored by us, and when you report a problem with the App.
- Content and contacts that you supply through any features of the App. Content that may be submitted to or collected by the App currently includes, but is not limited to:
 - Birthday;
 - Height;
 - Weight;
 - Body fat (as a percentage);
 - Biological sex;
 - Reproductive status;
 - Activity level;
 - Lifestyle goals;
 - Body goals;
 - Diet preferences;
 - Daily nutrient targets;
 - Voice recordings from you;
 - Photos taken by you;
 - Daily calorie targets; and
 - Daily step count or active energy burned (if a user grants permission for us to access their data from Apple Health App).
- Records and copies of your correspondence (including email addresses and phone numbers), if you contact us.
- Details of transactions you carry out through (or related) the App and of the fulfillment of your orders. You may be required to provide financial information before placing an order through the App.
- Your search queries on the App.

You may also provide information for publication or display ("**Posted**") on public areas of the app or websites you access through the App (collectively, "**User Contributions**"). Your User Contributions are Posted and transmitted to others at your own risk. Additionally, we cannot control the actions of third parties with whom you may choose to share your User Contributions. Therefore, we cannot and do not guarantee that your User Contributions will not be viewed by unauthorized persons.

Automatic Information Collection

When you download, access, and use the App, it may use technology to automatically collect:

- **Usage Details.** When you access and use the App, we may automatically collect certain details of your access to and use of the App, including traffic data, logs, and other communication data and the resources that you access and use on or through the App.
- **Device Information.** We may collect information about your mobile device and internet connection, including the device's unique device identifier, IP address, operating system, browser type, and mobile network information.

If you do not want us to collect this information do not download the App or delete it from your device.

Third-Party Information Collection

When you use the App or its content, certain third parties may use automatic information collection technologies, or other public sources to collect information about you or your device. These third parties may include:

- Advertisers, ad networks, and ad servers.
- Analytics companies.
- Artificial intelligence services and APIs.

They may use this information to provide you with interest-based (behavioral) advertising or other targeted content.

We do not control these third parties' tracking technologies or how they may be used. If you have any questions about an advertisement or other targeted content, you should contact the responsible provider directly.

Sensitive Data Disclosure

We understand that certain information you provide to us through the App may be considered sensitive personal data under applicable laws (e.g., GDPR). This can include:

- Health metrics such as weight, body fat percentage, or other indicators of health.
- Potential biometric data if you upload images or voice recordings (e.g., photos of your meals, audio descriptions of your food intake).

We collect and process this data exclusively for the purposes described in this Privacy Policy, such as providing personalized nutritional analyses, meal insights, and related functionalities within the App.

Explicit Consent for Sensitive Data

- By uploading or inputting any sensitive data (including photos, audio recordings, or detailed health metrics) within the App, you explicitly consent to our collection and processing of such data as outlined in this Privacy Policy and, where applicable, under Article 9(2)(a) of the GDPR. You may withdraw this consent at any time by contacting us at team@microgramapp.com. Please note, however, that withdrawing consent may limit or prevent your ability to use certain features of the App.

Data Minimization

- We are committed to the principle of data minimization. This means we only collect the minimal amount of sensitive data necessary to fulfill the specific purpose of providing accurate nutritional information and personalized recommendations. We do not use your sensitive data for any unrelated or secondary purposes without your explicit permission, and we will not retain it for longer than is necessary to achieve the purposes outlined in this Privacy Policy.

Legal Bases for Processing (EEA/UK Users)

If you are located in the European Economic Area (EEA) or the United Kingdom (UK), we rely on the following lawful bases under applicable data protection laws (e.g., GDPR) to process your personal data:

Contractual Necessity

- We collect certain personal data (such as your email address, subscription details, and basic account information) to perform our agreement with you—i.e., to create and maintain your account, handle billing, and deliver the services you request.

Explicit Consent for Sensitive Data

- We rely on your explicit consent when you provide sensitive or health-related information (e.g., height, weight, body fat, photos, or voice recordings) so that we can offer personalized nutritional analyses. You can withdraw this consent at any time by contacting us at team@microgramapp.com, although doing so may limit certain features of the App.

Legal Obligation

- In some cases, we may need to keep records or process certain data to comply with legal requirements, such as tax or accounting rules.

Legitimate Interests

- We may process certain non-sensitive data (like usage analytics, logs) to improve our services, enhance security, prevent fraud, or understand how users interact with the App. We ensure these interests do not override your fundamental rights and freedoms.

How We Use Your Information

We use information that we collect about you or that you provide to us, including any personal information, to:

- Provide you with the App and its contents, and any other information, products or services that you request from us.

- Analyze and process photos or voice recordings that you upload or record through the App—potentially using AI or machine-learning technologies—to generate personalized meal analyses, nutritional breakdowns, and related insights.
- Fulfill any other purpose for which you provide it.
- Give you notices about your account and/or subscription, including expiration and renewal notices.
- Carry out our obligations and enforce our rights arising from any contracts entered into between you and us, including for billing and collection.
- Notify you when App updates are available, and of changes to any products or services we offer or provide through it.

The usage information we collect helps us to improve our App and to deliver a better and more personalized experience by enabling us to:

- Estimate our audience size and usage patterns.
- Store information about your preferences, allowing us to customize our App according to your individual interests.
- Speed up your searches.
- Recognize you when you use the App.

We may use the information we collect to display advertisements to our advertisers' target audiences. Even though we do not disclose your personal information for these purposes without your consent, if you click on or otherwise interact with an advertisement, the advertiser may assume that you meet its target criteria.

How We Store Your Information

We store your data on Firebase servers, which are protected by advanced encryption and security measures. Firebase employs various security techniques including encryption of data at rest and in transit to protect your personal information.

We will keep your personal data as long as you use the App. After you cease using the App or request deletion of your data, we will retain your information for an additional period necessary to comply with our legal obligations, resolve disputes, and enforce our agreements. Once this period has expired, we will delete your data by removing it from our servers and any backups in a manner designed to ensure that it cannot be reconstructed or read.

International Data Transfers

We are based in the United States and use Firebase, a platform provided by Google, to store and process the data we collect through the App. Firebase operates globally and may store data in data centers located in the United States and other countries outside of the European Economic Area (EEA). These countries may not offer the same level of data protection as those within the EEA.

To ensure that your personal data receives an adequate level of protection, we have ensured that Google incorporates Standard Contractual Clauses into our agreement. These clauses provide specific guarantees around the security and processing of data transferred outside the EEA.

By using the App, you acknowledge and consent to the transfer, processing, and storage of your information in and to the United States and other countries. We remain committed to protecting your data and upholding your privacy rights.

Disclosure of Your Information

We may disclose aggregated information about our users, and information that does not identify any individual, without restriction.

In addition, we may disclose personal information that we collect or you provide:

- To our subsidiaries and affiliates.
- To contractors, service providers, and other third parties we use to support our business.
- To a buyer or other successor in the event of a merger, divestiture, restructuring, reorganization, dissolution, or other sale or transfer of some or all of the Company's assets, whether as a going concern or as part of bankruptcy, liquidation, or similar proceeding, in which personal information held by the Company about our App users is among the assets transferred.
- To fulfill the purpose for which you provide it.
- For any other purpose disclosed by us when you provide the information.
- With your consent.
- To comply with any court order, law, or legal process, including to respond to any government or regulatory request.
- To enforce our rights arising from any contracts entered into between you and us, and for billing and collection.
- If we believe disclosure is necessary or appropriate to protect the rights, property, or safety of the Company, our customers or others.

Your State Privacy Rights

State consumer privacy laws may provide their residents with additional rights regarding our use of their personal information. To learn more about California residents' general privacy rights, visit <https://oag.ca.gov/privacy/ccpa>.

Your Data Protection Rights

We would like to make sure you are fully aware of all of your data protection rights. Every user is entitled to the following:

- The right to access - You have the right to request us for copies of your personal data. We may charge you a small fee for this service.
- The right to rectification - You have the right to request that we correct any information you believe is inaccurate. You also have the right to request us to complete information you believe is incomplete.
- The right to erasure - You have the right to request that we erase your personal data, under certain conditions.

- The right to restrict processing - You have the right to request that we restrict the processing of your personal data, under certain conditions.
- The right to object to processing - You have the right to object to our processing of your personal data, under certain conditions.
- The right to data portability - You have the right to request that we transfer the data that we have collected to another organization, or directly to you, under certain conditions.
- If you make a request, we have one month to respond to you. If you would like to exercise any of these rights, please contact us at our email: team@microgramapp.com

Data Security

We have implemented measures that aim to secure your personal information from accidental loss and from unauthorized access, use, alteration, and disclosure.

The safety and security of your information also depends on you. Where we have given you (or where you have chosen) an encryption key, password, or other verification code for access to certain parts of our App, you are responsible for keeping this confidential. We ask you not to share your password with anyone. We urge you to be careful about giving out information in public areas of the App like message boards. The information you share in public areas may be viewed by any user of the App.

Unfortunately, the transmission of information via the internet and mobile platforms is not completely secure. Although we do our best to protect your personal information, we cannot guarantee the security of your personal information transmitted through our App. Any transmission of personal information is at your own risk. We are not responsible for circumvention of any privacy settings or security measures we provide.

Changes to Our Mobile Privacy Policy

We may update our privacy policy from time to time. If we make material changes to how we treat our users' personal information, we will post the new privacy policy on this page with a notice that the privacy policy has been updated or an in-App alert the first time you use the App after we make the change.

The date the privacy policy was last revised is identified at the top of the page. You are responsible for ensuring we have up-to-date active contact information for you and for periodically visiting this privacy policy to check for any changes.

Contact Information

To ask questions or comment about this privacy policy and our privacy practices, contact us at:

Microgram
Email: team@microgramapp.com

How To Contact The Appropriate Authority

Should you wish to report a complaint or if you feel that we have not addressed your concern in a satisfactory manner, you may contact the Information Commissioner's Office or the relevant state data privacy authority.