

Moments Privacy Policy

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Introduction

Moments (“we,” “us,” “our”) is a private, invite-only photo sharing app for small events. This Privacy Policy explains what we collect, how we use it, how we share it, how long we keep it, how we protect it, and the rights available to you under applicable laws in the EU/EEA/UK, Canada, and the U.S.

If you have questions, contact our Privacy Officer: ramiljiwani@gmail.com For Quebec Law 25, our Privacy Officer’s title and contact details are published here as required. ([Légis Québec](#))

Summary of Key Points (TL;DR)

- **We collect:** account details (e.g., email, username), event content (photos, captions), usage logs, device/app info, IP, mobile ad identifiers, and diagnostics/analytics.
 - **We use data to:** run Moments (auth, feeds, likes), keep it safe, and measure performance.
 - **Sharing:** with cloud/analytics service providers (e.g., Firebase), with event members (content you post), and when legally required. Firebase/Google secure data with encryption at rest and in transit. ([Firebase](#), [Google Cloud](#))
 - **Your rights:** vary by region. EU/EEA/UK (GDPR) rights include access, deletion, portability, objection, etc. California/Colorado and other U.S. states add rights to opt-out of sale/sharing/targeted ads; we honor required browser signals like Global Privacy Control where applicable. Canada (PIPEDA) includes access/correction and breach notice rules. ([GDPR](#), [California DOJ Attorney General](#), [Colorado Attorney General](#), [Privacy Commissioner Canada](#))
 - **Security & breaches:** we apply technical/organizational measures; GDPR requires 72-hour regulator notice after becoming aware of a qualifying breach; PIPEDA requires reporting “as soon as feasible” and keeping breach records for 24 months. ([Legislation.gov.uk](#), [Justice Laws](#), [www.gazette.gc.ca](#))
 - **Children:** Moments isn’t for children under 13 and we don’t knowingly collect their data (COPPA). ([Federal Trade Commission](#))
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What Information We Collect

Personal information you provide

- **Account details:** email, username, display name, profile photo.
- **Event content & social activity:** photos you upload (including metadata embedded by your device), captions, likes/reactions, event memberships.
- **Support & communications:** messages you send to support or feedback forms.
- **Consent choices:** ad consent (EEA/UK/CH), privacy preferences.

Information collected automatically

- **Device & app data:** device model/OS, app version, language, crash logs/diagnostics (e.g., Firebase Crashlytics). ([Firebase](#))
 - **Usage & logs:** IP address, timestamps, pages/screens, features used (e.g., camera, upload).
 - **Identifiers:** mobile advertising ID (e.g., IDFA/AAID) used by AdMob; we request your consent for personalized ads in the EEA/UK/CH via a certified CMP when required. ([Google Help](#))
 - **Analytics & ads:** SDKs (e.g., Firebase, AdMob) may receive data to provide analytics, crash reporting, fraud prevention, and ad delivery/measurement. ([Firebase](#))
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How We Process Your Information

We use your information to:

- **Provide the app:** authenticate, let you create/join events with codes, upload/manage photos, show new posts since last visit, and enable likes.
 - **EU legal bases:** performance of a contract (provide the service) and, for some improvements/prevention of abuse, our legitimate interests, balanced with your rights. ([Legislation.gov.uk](https://legislation.gov.uk))
- **Safety & moderation:** detect, investigate, and prevent spam, fraud, or violations of community rules; handle reports.
 - **EU legal bases:** legitimate interests; where required, legal obligation. ([Legislation.gov.uk](https://legislation.gov.uk))
- **Analytics & product improvement:** understand feature usage, fix crashes, and improve performance (e.g., Firebase Analytics/Crashlytics). ([Firebase](https://firebase.google.com))
- **Legal compliance:** meet legal, regulatory, and tax obligations; respond to lawful requests.

Where we rely on **legitimate interests**, you can object (see Rights). (gdpr-text.com)

When and With Whom We Share Your Personal Information

- **Within an event:** content you post (photos, captions, likes, username) is visible to members of that event.
- **Service providers (processors):**
 - **Firebase / Google Cloud** for hosting, databases, analytics, and crash reporting (data encrypted in transit and at rest). ([Firebase](https://firebase.google.com), [Google Cloud](https://cloud.google.com))
- **Compliance & safety:** to comply with law, enforce terms, or protect rights, safety, and property.

We do not exchange your personal information for money; however, “**sharing**” for **cross-context behavioral advertising** (e.g., with AdMob) may occur unless you opt out where state laws treat such activity as “sharing.” See U.S. rights for opt-out controls and required signals (e.g., GPC). ([California DOJ Attorney General](https://oag.ca.gov/privacy/ccpa))

How Long Do We Keep Your Information

We keep personal information **only as long as necessary** for the purposes described here or as required by law, consistent with GDPR's storage-limitation principle and PIPEDA's retention rules. ([Legislation.gov.uk](#), [Justice Laws](#))

Typical retention (configurable as your practices finalize):

- **Account data:** while your account is active, then delete or anonymize within 1-7 days of deletion request (subject to legal holds/backups).
- **Event photos & captions:** until you delete them or an event owner deletes/archives the event; residual backups are purged on a rolling schedule.
- **Logs/analytics:** short-lived operational logs (~30–90 days) unless needed for security/investigations.
- **Report/abuse records:** retained as needed to enforce rules and comply with legal duties.
- **Breach records (Canada):** at least 24 months for all “breaches of security safeguards” under PIPEDA. ([www.gazette.gc.ca](#))

We publish our retention schedule and time-limits so they're predictable and proportionate. ([Legislation.gov.uk](#))

How Do We Keep Your Information Safe

We implement technical and organizational measures appropriate to risk, including **encryption in transit and at rest**, access controls, least-privilege design, monitoring, and vulnerability management. Firebase/Google Cloud encrypts customer data by default at rest and in transit. ([Google Cloud](#))

Breach response:

- Under **GDPR**, we notify the relevant supervisory authority **within 72 hours** of becoming aware of a qualifying personal data breach and, where required, affected users without undue delay. ([Legislation.gov.uk](#))
 - Under **PIPEDA**, we notify the Office of the Privacy Commissioner of Canada (OPC) and affected individuals **as soon as feasible** when a breach creates a real risk of significant harm, and we keep records for **24 months**. ([Justice Laws](#), [www.gazette.gc.ca](#))
 - Under **Quebec Law 25**, we quickly notify the CAI and affected persons if an “incident de confidentialité” presents a risk of serious injury. ([Cai Québec](#))
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What Are Your Privacy Rights

EU/EEA/UK (GDPR) rights

You have rights to **access, rectify, erase, restrict, port, and object** to certain processing; you may **withdraw consent** at any time (this won't affect past lawful processing). We respond **within one month** (GDPR Art. 12(3)). You may also lodge a complaint with your supervisory authority. ([GDPR](#), [Legislation.gov.uk](#))

Legal bases we rely on include **contract, consent, legitimate interests, legal obligation**, as described above (GDPR Art. 6). ([Legislation.gov.uk](#))

Canada (PIPEDA + Quebec Law 25) rights

- **Access and correction:** You can request access to and correction of your personal information held by us. (PIPEDA principles). ([Privacy Commissioner Canada](#))
- **Breach notifications & records:** If a breach poses a real risk of significant harm, we notify you and the OPC “as soon as feasible,” and keep breach records for 24 months. ([Justice Laws](#), [www.gazette.gc.ca](#))
- **Quebec Law 25:** We designate a **person in charge of the protection of personal information** and publish their title/contact details; we conduct **privacy impact assessments** for projects that involve personal information where required. ([Légis Québec](#))

United States (CCPA/CPRA + state laws) rights

If you're a resident of California (and similarly Colorado, Virginia, etc.), you may have rights to:

- **Know/access, delete, correct, portability, opt-out of sale/sharing/targeted advertising, and non-discrimination.** California requires acknowledgment in **10 business days** and a substantive response within **45 days** (extendable to 90). ([California Privacy Protection Agency](#), [California DOJ Attorney General](#))
- **Opt-out mechanisms:** Where required, we honor **Global Privacy Control (GPC)** and other recognized **Universal Opt-Out Mechanisms** (e.g., under Colorado law). ([California DOJ Attorney General](#), [Colorado Attorney General](#))

You can exercise rights in-app (Settings → Privacy) or by emailing **ramiljiwani@gmail.com**. We'll verify your request consistent with applicable law.

International Transfers

If we transfer your data outside your region (e.g., from the EEA/UK to the U.S.), we rely on **appropriate safeguards** such as the **European Commission's Standard Contractual Clauses** (SCCs) or UK-approved transfer tools, as applicable. ([European Commission](#), [GDPR](#))

Children's Privacy

Moments is **not directed to children under 13**. We do not knowingly collect personal information from children under 13. If we learn we've collected it, we'll delete it. (COPPA) ([Federal Trade Commission](#))

How to Contact Us

- **Privacy Officer (incl. Quebec Law 25 contact):** ramiljiwani@gmail.com (title and contact posted as required). ([Légis Québec](#))
 - **EU/EEA/UK:** You may contact your local supervisory authority (see EU list) or our Privacy Officer. ([EUR-Lex](#))
 - **Canada:** You may contact the OPC or the Commission d'accès à l'information du Québec (CAI) about concerns. ([Privacy Commissioner Canada](#), [Cai Québec](#))
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SDK-Specific Disclosures (Firebase)

Firebase (Analytics/Crashlytics): Used for app performance, crash diagnostics, and feature analytics; Google provides **encryption at rest and in transit** and other safeguards for customer data. ([Firebase](#), [Google Cloud](#))

Region-Specific Addenda (Short Form)

- **GDPR Articles referenced:** lawful bases (Art. 6), principles incl. storage limitation (Art. 5), security of processing (Art. 32), breach notification (Art. 33), data subject rights and complaint (Arts. 12, 15–22, 77). ([Legislation.gov.uk](https://legislation.gov.uk), [GDPR](#))
 - **PIPEDA:** 10 Fair Information Principles; breach notification “as soon as feasible”; breach record retention 24 months. ([Privacy Commissioner Canada](#), [Justice Laws](#), www.gazette.gc.ca)
 - **Quebec Law 25:** publish privacy officer contact; assess privacy impacts for qualifying projects; notify CAI and individuals of confidentiality incidents with risk of serious injury. ([Légis Québec](#), [Cai Québec](#))
 - **California (CCPA/CPRA):** rights to know/delete/correct/opt-out; 10-day acknowledgment & 45-day response; honor GPC. ([California Privacy Protection Agency](#), [California DOJ Attorney General](#))
 - **Colorado (CPA):** recognize state-approved **Universal Opt-Out Mechanisms** for targeted advertising/sales. ([Colorado Attorney General](#))
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