

PRIVACY POLICY

MUNAI Service

Effective Date: June 27, 2026

1. GENERAL PROVISIONS

1.1. This Privacy Policy (hereinafter referred to as the "Policy") describes the collection, use, storage, and protection of personal data of MUNAI service users.

1.2. The personal data operator is Individual Entrepreneur Babchenko Anastasia Anatolievna, TIN (HVHH) 20316045, state registration number 286.1588595, address: Khorenatsi St. 105/6 S, Yerevan 0010, Republic of Armenia, email: info@munaye.com (hereinafter referred to as the "Operator", "we").

1.3. By using the Service, you give your informed and voluntary consent to the processing of personal data in accordance with this Policy and the Law of the Republic of Armenia "On Protection of Personal Data".

2. WHAT DATA WE COLLECT

2.1. Authentication data (depending on the sign-in method):

- When signing in via Telegram: user ID, first name (if specified in profile), username, language settings
- When registering in the web version: email address, password (stored in encrypted form), language settings

2.2. Data you provide during registration and use:

- Birth date and gender — used for the AI personality analysis ("Who Am I") feature and transmitted to the third-party AI provider (details in section 4)
- Country of residence
- Text dream descriptions — processed by the AI provider for generating interpretations (details in section 4)
- Messages in AI chats (belief work, "Who Am I" chat) — processed by the AI provider (details in section 4)
- Journal entries and notes — stored on Service servers, NOT transmitted to the AI provider
- Created tasks and reminders
- Settings and preferences in the Service

2.2.1. Health data (voluntary opt-in):

- Menstruation start date and cycle length
- Menstruation day markings
- This data is a special category of personal data (health data). Collection is performed only with your explicit consent upon feature activation. Menstrual cycle data is NOT transmitted to the AI provider or any other third parties and is used exclusively for cycle calendar display in the Service interface

2.2.2. Geolocation data (voluntarily provided):

- Coordinates (latitude and longitude) — requested through the standard operating system permission mechanism
- Used exclusively for calculating precise lunar phases for your location
- NOT transmitted to the AI provider or any other third parties
- Stored on Service servers until account deletion or consent withdrawal
- Providing geolocation is voluntary. If declined, the lunar calendar is calculated with reduced accuracy

- On Android devices, coordinates are updated no more than once every 3 days to minimize system permission requests

2.3. Technical data:

- Date and time of Service use
- Platform type (iOS, Android) and device information
- Time zone
- Interface interaction data (for analytics)

2.4. Payment data:

- Payment information is processed by the Tribute and Paddle payment systems. Tribute and Paddle are independent payment data operators
- We DO NOT store bank card data, CVV codes, or other payment details
- We receive from the payment systems only payment confirmation, subscription type, and transaction ID

3. DATA PROCESSING PURPOSES

3.1. We process your data for:

- Providing Service features: lunar calendar calculation based on geolocation, dream interpretation via AI, personality analysis based on birth date and gender via AI, belief work via AI
- User identification by Telegram ID (for the mini-app) or by email and password (for the web version) and account access
- Saving dream history, journal, chats, and personal settings
- Menstrual cycle tracking (with voluntary feature activation)
- Processing payments via Tribute and Paddle payment systems and providing paid features
- Sending Service notifications (with your consent): task reminders, lunar events, cycle notifications
- Improving Service quality and user experience based on anonymized analytics
- Compliance with legal requirements of the Republic of Armenia

4. DATA PROCESSING USING ARTIFICIAL INTELLIGENCE

4.1. The Service uses a third-party AI provider — Fireworks AI, Inc. (USA) — for processing the following features: dream interpretation, personality analysis ("Who Am I"), belief work (CBT), and chat based on analysis results. Processing is carried out via the Fireworks AI API under their standard terms of service.

4.2. List of data transmitted to the AI provider for each feature:

- Dream interpretation: dream description text, moon phase at the time of recording. Personal data (name, Telegram ID) is NOT transmitted
- Personality analysis ("Who Am I"): birth date and gender. This data is required for generating personalized analysis. Name and Telegram ID are NOT transmitted
- "Who Am I" chat: user message text and previous personality analysis (last 10 messages). User gender for correct addressing. Name and Telegram ID are NOT transmitted
- Belief work (CBT): user answers to self-observation questions (7 questions) and user gender. Name and Telegram ID are NOT transmitted
- Belief chat: user message text and previous AI analysis (last 10 messages). User gender. Name and Telegram ID are NOT transmitted
- Menstrual cycle data, geolocation, tasks, journal entries, and reminders are NOT transmitted to the AI provider under any circumstances

4.3. Data is transmitted to Fireworks AI, Inc. servers located in the USA. This constitutes cross-border data

transfer carried out in accordance with the Law of the Republic of Armenia "On Protection of Personal Data". By using AI-related features (dream interpretation, personality analysis, belief work), you give explicit consent to such transfer. Transmitted data is anonymized — the AI provider does not receive information that could identify you personally.

4.4. We do not control and are not responsible for data processing by Fireworks AI, Inc. Processing is carried out under their standard terms of service. We recommend not including personal data of third parties, passwords, financial information, or other confidential information in dream descriptions, chat messages, or questionnaire answers.

5. DATA TRANSFER TO THIRD PARTIES

5.1. We may transfer data to the following categories of recipients:

- Fireworks AI, Inc. (USA) — anonymized text data for AI processing (dream descriptions, birth date, gender, chat messages). Detailed list of transmitted data is specified in section 4.2
- Tribute and Paddle — payment systems for subscription payment processing. The payment systems receive only data necessary for payment processing
- Timeweb — hosting provider on whose servers the Service database and backups are stored
- Government agencies of the Republic of Armenia — exclusively when legally required (court order, authorized agency request)

5.2. We DO NOT sell or transfer your personal data to third parties for advertising or marketing purposes.

5.3. Cross-border data transfer is carried out only to Fireworks AI, Inc. (USA) and only in anonymized form (without name, Telegram ID, or other identifying data). Transfer is carried out in accordance with the Law of the Republic of Armenia "On Protection of Personal Data". By using the Service's AI features, you give explicit consent to such transfer.

6. DATA STORAGE AND PROTECTION

6.1. Personal data is stored on servers of the hosting provider Timeweb with the following security measures:

- Data encryption in transit between client and server (SSL/TLS)
- Restricted server access (SSH keys, no password access)
- Regular automatic database backups to Timeweb S3 object storage
- Passwords and API keys stored in protected environment variables

6.2. Data retention periods:

- Account data (name, birth date, gender, country, Telegram ID) — during Service use and 3 years after account deletion
- Dream history, interpretations, journal entries — until deleted by user or account deletion
- AI chat history (beliefs, "Who Am I") — until deleted by user or account deletion
- Geolocation data — until consent withdrawal by user or account deletion
- Menstrual cycle data — until feature is disabled by user or account deletion
- Technical logs — 12 months
- Payment data — 5 years (tax law requirement of the Republic of Armenia)

6.3. Database backups are created automatically and stored in Timeweb S3 object storage. Backups contain all user data and are protected by the hosting provider's security measures.

6.4. Despite security measures taken, we cannot guarantee absolute data protection from unauthorized access. The User is informed of risks associated with data transmission over the Internet.

7. YOUR RIGHTS

7.1. In accordance with the Law of the Republic of Armenia "On Protection of Personal Data", you have the right to:

- Obtain information about processed personal data
- Request correction of inaccurate data
- Withdraw consent to personal data processing
- Request deletion of personal data
- Request cessation of personal data processing
- File a complaint with the Personal Data Protection Agency of the Ministry of Justice of the Republic of Armenia

7.2. To exercise your rights, send a request to email: info@munaye.com. We will respond within 30 calendar days.

7.3. Withdrawal of consent to personal data processing makes further Service use impossible. Data will be deleted as specified in section 6.2.

8. COOKIES AND LOCAL STORAGE

8.1. The Service uses browser local storage (localStorage) for:

- Saving user language settings
- Storing geolocation consent status
- Caching temporary interface settings

8.2. LocalStorage data is stored only on the user's device and is not transmitted to Service servers or third parties. You can clear localStorage through browser or Telegram app settings.

9. PERSONAL DATA OF MINORS

9.1. The Service is not intended for persons under 18 years old without consent of legal representatives.

9.2. We do not knowingly collect data from minors. If we become aware of such collection, the data will be promptly deleted.

10. POLICY CHANGES

10.1. We reserve the right to change this Policy at any time. The current version is published in the Service.

10.2. We will notify users of significant changes through the Service.

10.3. Continued use of the Service after Policy changes means acceptance of the new version.

11. CONTACTS

For personal data processing inquiries, contact:

Email: info@munaye.com

Telegram: [@anastasican_b](https://t.me/anastasican_b)

Address: Khorenatsi St. 105/6 S, Yerevan 0010, Republic of Armenia

By using the MUNAI service, you confirm that you have read this Privacy Policy and consent to the processing of personal data under the specified conditions, including cross-border transfer of anonymized data to Fireworks AI, Inc. (USA) for AI processing purposes.