

## PRIVACY POLICY

*Last updated: April 23, 2025*

This Privacy Policy explains how SoSo Labs L.L.C-FZ ("SoSo Labs," "we," "us," or "our") collects, uses, discloses, and protects your personal information in connection with Babella—an AI-powered baby sleep application. This Policy applies to the Babella mobile application, our website, and any associated services (collectively, the "Products").

By using the Products, you agree to this Privacy Policy. If you do not agree, please do not use the Products.

## 1. DEFINITIONS

- **Personal Information:** Information that identifies or can be used to identify you, such as name, email, child's profile, and activity logs.
- **Anonymous Information:** Information that cannot be linked to an identified individual.

## 2. INFORMATION WE COLLECT

We collect the following information directly from you when you create an account or use the Products:

- Your name and email address
- Your baby's name, birthdate, gender, timezone, and sleep-related data
- Any content or feedback you voluntarily provide (e.g. messages to support)

We may also collect the following automatically:

- IP address, device identifiers, app interactions, and general location data
- Sleep pattern interactions and usage history (e.g. lullaby plays, routine tracking)

If you use Apple to subscribe, billing and payment data is processed directly by Apple.

## 3. HOW WE USE YOUR INFORMATION

We use your information to:

- Operate and personalize the Products
- Provide predictive sleep insights and personalized routines
- Communicate with you, including support messages and updates
- Improve our models, features, and user experience

We may also use anonymized and aggregated data for analytics and research.

## 4. DATA SHARING

We do **not** sell your Personal Information. We may share it only:

- With third-party service providers (e.g. analytics, hosting, AI model providers like OpenAI)
- With payment processors (e.g. Apple)
- As required by law, regulation, or legal process
- In connection with a business transaction (e.g. merger or acquisition)

All vendors are contractually obligated to protect your data.

## 5. INTERNATIONAL DATA TRANSFERS

Babella is operated from the United Arab Emirates, and your data may be stored or processed in countries that do not have the same data protection laws. We ensure that any such transfers comply with applicable legal standards.

## 6. YOUR RIGHTS

Depending on your jurisdiction, you may have rights to:

- Access, correct, or delete your Personal Information
- Object to or restrict certain uses of your data
- Withdraw consent where processing is based on consent

You can request changes or deletions by contacting us at **info@soso-labs.com**. We may retain some data to meet legal or operational requirements.

## 7. DATA RETENTION

We retain Personal Information as long as your account is active or as needed to:

- Fulfill the purpose for which it was collected
- Comply with our legal obligations
- Resolve disputes and enforce agreements

Upon account deletion, identifiable Personal Information is removed, while anonymized usage data may be retained for analytics.

## 8. SECURITY

We implement appropriate technical and organizational safeguards to protect your information. However, no system is fully secure. You use the Products at your own risk.

## 9. CHILDREN'S PRIVACY

We do not knowingly collect information directly from children under 13. All data relating to children is provided by a consenting parent or guardian and used solely to deliver Babella's functionality.

If we discover a child has provided us personal information without parental consent, we will delete it.

## 10. DO NOT TRACK

Our app does not respond to browser-based "Do Not Track" signals. We may use analytics and advertising tools that track user behavior across services.

## 11. THIRD-PARTY LINKS AND SERVICES

The Products may contain links to third-party websites or integrations with third-party platforms. This Privacy Policy does not apply to those services. We are not responsible for their content or data handling practices.

## 12. CHANGES TO THIS PRIVACY POLICY

We may revise this Privacy Policy from time to time. Material changes will be notified via the Products or by email at least 5 days in advance. Continued use after the update constitutes your agreement to the revised terms.

## 13. CONTACT INFORMATION

If you have questions about this Privacy Policy or wish to exercise your rights, contact us:

**SoSo Labs L.L.C-FZ**  
Meydan Grandstand, 6th Floor  
Meydan Road, Nad Al Sheba  
Dubai, United Arab Emirates  
**Email:** [info@soso-labs.com](mailto:info@soso-labs.com)