The Focus Path

Privacy Policy & Data Protection

Effective Date: August 29, 2026
Governing Law: Ottawa, Ontario, Canada
Company: SimpliLyfe Inc.

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1. Introduction

This Privacy Policy describes how SimpliLyfe Inc. (operating as "The Focus Path") collects, uses, stores, and protects personal data when you use The Focus Path platform, mobile application, and related services (collectively, the "Service"). By using the Service you agree to the practices described in this policy.

2. Information We Collect

We collect the following categories of information:

2.1 Account & Profile Information

- **Name** — provided at registration to personalise your experience.
- **Email address** — used for authentication, account recovery, and essential communications.
- **Password** — stored as a one-way cryptographic hash; we never store or view plaintext passwords.
- **Date of birth** — collected solely for age-verification purposes to comply with the Children's Online Privacy Protection Act (COPPA) and equivalent regulations. Not used for marketing or shared with third parties.
- **User ID** — a system-generated unique identifier used to associate your data with your account across the Service.

2.2 Academic Content

- Classes, semesters, assignments, tasks, subtasks, and study materials you create within the Service.
- Personal events and calendar data.
- Notes and flashcard content.

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2.3 Device & Technical Information

- **Device identifier** — the vendor-assigned device ID (e.g., iOS *identifierForVendor*) used to route push notifications to your device.
- **Device name and model** — used to identify your device in multi-device management.
- **Operating system and version** — used for compatibility and debugging.
- **Application version** — used for support and diagnostics.
- **Push notification token** — a Firebase Cloud Messaging (FCM) token used exclusively for delivering push notifications you have opted into.
- **Usage activity** — the days you use the Service and the approximate time the app is open each day, measured in five-minute periods from the requests the app makes to our servers. Used to operate and improve the Service. It contains no location data.

2.4 Diagnostics

- **Crash data** — when the application encounters an error, a crash report (including stack trace, device state, and your User ID) is sent to our error-monitoring provider (Sentry) so we can identify and fix bugs.
- **Performance data** — a sample of application performance traces (response times, rendering metrics) is collected via Sentry to monitor and improve Service reliability.

> **Note on diagnostics:**
>
> Crash and performance data are linked to your User ID and email so our engineering team can reproduce and resolve issues that affect your account. Sentry is contractually prohibited from using this data for any purpose other than providing the error-monitoring service to us. We do not enable Sentry's default personally identifiable information (PII) collection (`sendDefaultPii` is disabled).

2.5 Schedule Images You Choose to Scan

- **Schedule image** — if you use the Click and Configure feature, the single photo or screenshot you select (typically a syllabus, timetable, or class schedule) is transmitted to our servers and passed to an AI provider so that the classes, exams, and tasks it contains can be extracted.
- We do *not* browse, index, or read your photo library. Only the one image you explicitly choose is transmitted.
- The image is processed transiently to extract text and is **not stored** after extraction completes. Only the resulting schedule items are saved to your account.

2.6 Information We Do *Not* Collect

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- We do not collect advertising identifiers (IDFA/GAID).
- We do not collect precise or coarse location data.
- We do not collect contacts, and we do not access your photo library beyond the single image you explicitly select for scanning (see 2.5).
- We do not use cookies or third-party trackers for advertising.
- Firebase Analytics is disabled in our mobile application.

3. Data Collection Summary

The following table summarises the data we collect, its purpose, and whether it is linked to your identity:

Data Type	Purpose	Linked to Identity	Used for Tracking
Email Address	Authentication, account recovery	Yes	No
Name	Profile personalisation	Yes	No
Date of Birth	COPPA age verification	Yes	No
User ID	Account association, diagnostics	Yes	No
Device ID	Push notification delivery	Yes	No
Crash Data	Bug identification and resolution	Yes	No
Performance Data	Service reliability monitoring	Yes	No
Schedule Image (Click and Configure)	AI extraction of classes, exams, and tasks; not retained	Yes	No
Usage Activity	Operating and improving the Service	Yes	No

4. Legal Basis for Processing

The Focus Path processes personal data in compliance with the following frameworks where applicable:

- **PIPEDA** (Personal Information Protection and Electronic Documents Act) — Canada
- **GDPR** (General Data Protection Regulation) — EU/UK

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- **COPPA** (Children's Online Privacy Protection Act) — United States
- **FERPA** (Family Educational Rights and Privacy Act) — United States

4.1 COPPA & Age Verification

The Focus Path collects date of birth from all users during registration (including those who sign in via Apple or Google) to verify that the user is at least 13 years of age. Users under 13 are not permitted to create an account. We are working toward a verified parental consent process to serve younger students in the future.

> **Parental Consent:**
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> SimpliLyfe Inc. requires verified parental or legal guardian consent for any user who is considered a minor under applicable laws, including COPPA (U.S.), GDPR (EU/UK), and PIPEDA (Canada). Parents or guardians must complete The Focus Path Parental Consent Form and verify their identity through our email verification process before the minor's account may be activated. A minor is not permitted to access or use The Focus Path until the full parental consent process is complete.

5. How We Use Your Data

We use collected information for the following purposes:

- **Platform functionality** — powering core features such as task management, scheduling, and study tools.
- **Authentication and security** — verifying your identity, managing sessions, and preventing unauthorised access.
- **Push notifications** — delivering class reminders, assignment due-date alerts, and other notifications you have opted into.
- **Diagnostics and improvement** — using crash and performance data to identify bugs, improve reliability, and optimise the user experience.
- **Regulatory compliance** — using date of birth for age verification under COPPA and similar regulations.
- **Communications** — sending essential account-related emails (password resets, verification, security alerts).

6. Data Sharing & Third-Party Processors

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We do not sell personal data to third parties. We share data only with approved service processors who are contractually bound to protect your information and to use it solely for providing their service to us:

Processor	Purpose	Data Shared
Neon (PostgreSQL)	Primary database hosting	All account and academic data
Vercel	Web application hosting	Request data, server-side rendering
Sentry	Error monitoring and performance	Crash reports, performance traces, User ID, email
Firebase Cloud Messaging	Push notification delivery	FCM token, device identifier
Apple (Sign in with Apple)	Authentication	Authentication tokens (Apple provides limited data to us)

7. Data Retention

- **Active accounts:** Data is retained for as long as your account is active.
- **Account deletion:** When you request account deletion, your account enters a 30-day grace period during which you may cancel the request. After 30 days, all personal data is permanently deleted from our primary database and backups within 90 days.
- **Diagnostic data:** Crash and performance data in Sentry is retained for 90 days, then automatically purged.
- **Push notification tokens:** Device tokens are deleted when you log out or unregister your device.

8. Your Rights

Depending on your jurisdiction, you have the right to:

- **Access** — request a copy of all personal data we hold about you.
- **Correction** — request correction of inaccurate data.
- **Deletion** — request deletion of your account and all associated data.
- **Export** — download your data in a portable JSON format.
- **Withdraw consent** — opt out of non-essential communications at any time.

You may exercise these rights through the in-app Settings page (Account > Data & Privacy) or by contacting us at the address below.

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9. Data Security

- **Encryption at rest:** AES-256 encryption for stored data.
- **Encryption in transit:** TLS 1.3 for all network communications.
- **Credential storage:** Passwords are hashed with bcrypt (cost factor 12). Authentication tokens are stored in platform-native secure storage (iOS Keychain / Android Keystore).
- **Access controls:** Role-based access, regular security audits, and automated vulnerability scanning.

10. Children's Privacy

The Focus Path does not knowingly collect personal information from children under 13 without verified parental consent. All users must provide their date of birth during registration. If we learn that we have collected data from a child under 13 without proper consent, we will promptly delete the account and all associated data.

If you believe a child under 13 has created an account without parental consent, please contact us immediately at **privacy@simpli-lyfe.com**.

11. Changes to This Policy

We may update this Privacy Policy from time to time. We will notify you of material changes via email or an in-app notification at least 14 days before the changes take effect. The "Effective Date" at the top of this document reflects the date of the most recent revision.

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12. Contact Us

For privacy questions, data requests, or to exercise any of your rights under this policy:

Email: privacy@simpli-lyfe.com
Company: SimpliLyfe Inc.
Location: Ottawa, Ontario, Canada

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