

Record of Processing Activities (ROPA) — Momtivation App (LeadClosers d.o.o.)

Last updated: [insert date]

This Record of Processing Activities (ROPA) is maintained in accordance with Article 30 of the General Data Protection Regulation (GDPR).

Data Controller: LeadClosers d.o.o., Gradiška 21, 10000 Zagreb, Croatia

Email: vladimir@leadclosers.eu

1. Processing Activity: User Account Management

Purpose: Account creation and authentication

Categories of Data: Name, email, phone number, password (encrypted)

Legal Basis: Contract performance

Retention: Until account deletion

Recipients: Hetzner (EU), DigitalOcean (EU)

2. Processing Activity: Health and Fitness Data Processing

Purpose: Personalized training and nutrition

Categories of Data: Weight, height, health issues, goals, questionnaire data

Legal Basis: Explicit consent (GDPR Art. 9)

Retention: Until account deletion

Recipients: Hetzner, DigitalOcean

3. Processing Activity: Apple Health / Recording API Sync

Purpose: Displaying user progress metrics

Categories of Data: Steps, distance, calories (read-only)

Legal Basis: Explicit consent

Retention: Until permission withdrawal

Recipients: None (stored internally)

4. Processing Activity: Analytics

Purpose: Improving user experience and app performance

Categories of Data: Device info, interactions, usage behavior

Legal Basis: User consent

Retention: 12–24 months

Recipients: Google Analytics, Amplitude, Microsoft Clarity (SCC)

5. Processing Activity: Marketing Communication

Purpose: Sending emails, WhatsApp reminders, and notifications

Categories of Data: Email, phone number

Legal Basis: Consent

Retention: Until withdrawal

Recipients: HighLevel (USA, SCC)

6. Processing Activity: Community Feed

Purpose: Displaying user-generated content

Categories of Data: Posts, comments, photos

Legal Basis: Legitimate interest + voluntary submission

Retention: Until user deletion

Recipients: Other Momtivation users (display only)

7. Processing Activity: System Security & Logging

Purpose: Detecting fraud and ensuring system integrity

Categories of Data: IP address, device info, system events

Legal Basis: Legitimate interest

Retention: 30–90 days

Recipients: Internal only

8. Processing Activity: Affiliate Links

Purpose: Redirecting users to partner offers

Categories of Data: Click events (non-personal)

Legal Basis: Legitimate interest

Retention: Not stored

Recipients: eSky, Coursera (no personal data shared)

9. International Transfers

Data may be transferred to the United States through:

- HighLevel
- Google
- Amplitude
- Microsoft

Transfers rely on Standard Contractual Clauses (SCC).

10. Technical and Organizational Measures

- Encryption in transit and at rest
- Access control and authentication
- Regular security monitoring

- Data minimization
- Encrypted backups
- Staff confidentiality and training

11. Contact for Data Protection

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