

Privacy Policy

Last updated: 21/11 2025

In this Privacy Policy, we will explain what information we collect about you, how we use it, when we share it, and the controls we provide you to manage the information you share with us. Please also remember that Snugl is not meant to be used if you are under 18.

1. Information we process about you

Snugl (the 'App') collects information that you provide directly to us, through your use of our App and your visit to our website or shared by third-parties.

1.1 Data that you provide to us

Account Creation Data: when you create an account on our App, we will ask you information such as name, age, gender and gender preference.

Content Data: when you use the App, you can decide to share data including but not limited to texts, data, sounds, tags, or any other materials ("Content"). For instance, but not exclusively, Content may be shared through Your profile (e.g., Your biography, Your photos, etc), or through the chat.

Chat Data: when you use the chat function, we can collect information such as the messages, sounds and voices, photos and videos you share with other users within the chat.

Communications with Snugl: When you report a concern with our App, respond to a survey, request assistance, we collect the following data:

- Your email address,
- Content of communication with us,
- Photos, voices or videos you may decide to share with us,
- Copies of government issued identification (only when strictly required to identify you with certainty),
- Identifiers (e.g., phone numbers or email address),
- Any other information you may decide to share with us.

1.2 Data we collect when you use our App or visit our website

Like all internet based services, as you use our App or visit our website, we automatically receive information about you from your device and your usage of our App and your visit of our website. Most information is collected through trackers:

a. Through the use of our website:

Connection and Technical Data such as IP address, device type, operating system version, browser, language preference, and browsing data.

b. Through your use of the App:

Connection and Technical Data such as:

- IP address, account creation date, last login, terminal equipment and port, operating system, system configuration data, device type, operating system version, browser, language preference, and applications.
- user_id (unique identifier generated at account creation), device_id (unique identifier generated when connecting on new device) and other partners ID.

Mobile advertising IDs and device identifiers:

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We collect technical identifiers developed by mobile operating systems for advertising purposes which remain under your control and can be reset or erased at any time in through your device settings:

- Mobile advertising IDs (e.g., Apple IDFA if you use iOS or Google AAID if you use Android).
- Device identifiers (e.g., IDFV for iOS devices and Android ID for Android devices).

Interaction Data:

- with other users (number of interactions, users invitations, the users with whom you interact the most).

Inferred information: We will analyse Account Creation Data and the Content Data to infer information about you such as:

- Your time zone.
- Your interests.

Usage Data: actions performed on the App or our website, number of Snugl conversations, Content viewed, Content interactions, the fact that you deleted Content, or that you blocked users, when you take a screenshot in our App, application crashes, pages visited and event logs.

Geolocation Data: when you use our app, we infer your country, city, region based on your IP address.

Address Book Data: You can decide to allow Snugl to access your address book to identify the friends in your Address Book who may already be on Snugl or to recommend you new friends. We do not access your Address Book without your permission. Bear in mind that even if you don't agree to share your Address Book with us, we can still make personalized friends' suggestions to you based on your contact details that we received from your friends who use our app (see below). You can revoke your permission to access your Address Book Data at any time through your device settings. Once access is revoked, we will no longer collect or update contact information from your address book, and previously uploaded contact data will be deleted within a reasonable time.

Integrations with partners: When you decide to connect a partner application to use a specific integration on Snugl, we receive information that allows us to bring that feature to you. This will include all necessary device data, and other optional data that you may choose to share as part of the integration.

1.3 Information about you provided by third parties

We may receive information about you from other users of our app. For instance, if other users know you and choose to use contact importing, they may share your Address Book Data details such as your phone number with us, just as you may share theirs. Where friends of yours use contact importing, we may suggest you as a friend to them, and them as a friend to you or they can find you via our search tool.

When you use certain social features of Snugl—such as inviting a contact or sharing a post—we may send an SMS message to that person on your behalf using the phone number you've provided (e.g., from your synced contacts). These messages may include a link to the content or an invitation to join Snugl. Recipients can opt out of future messages by following the instructions included in the SMS.

We will also receive the information about where you came from to download the App (for example, if you clicked on an ad on another social media) from our partners.

2. How we use information about you

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Why we Process your Data	What Personal Data is Processed	Legal Ground for the Processing
So you can create and keep your account and so we can identify you when you log in	Account Creation Data	Performance of the contract between You and Snugl
So you can publish, see and react to Content on the Snugl App and use Snugl's chat	Content Data, Chat Data, Communications with Snugl, Usage Data, Device and Equipment Data	Performance of the contract between You and Snugl
So we can determine your time Zone	Connection and Technical Data	Our legitimate interests to provide you with our App
So we can process your or other users' requests, complaints and reports	Content Data, Communications with Snugl	Our legitimate interests to provide answers to users regarding our App
So we can moderate Content in accordance with the law and our Terms of Use	Content Data, Chat Data, Communications with Snugl	Our legitimate interest to provide a safe and secure environment
So we can suspend accounts or keep certain users from using the app after violation	Account Creation Data, Interaction Data	Our legitimate interest to provide a safe and secure environment
So we can connect you with other users	Account Creation Data, Address Book Data, Interaction Data	Consent, Our legitimate interest
So we can communicate with you within the App	Account Creation Data, Content Data	Our legitimate interest to communicate with you
To make sure the app or the website is running smoothly for you	Navigation data, Interaction Data	Our legitimate interest to provide a working App
So we and our partners can infer preferences and interest	Account Creation Data, Content Data, Connection and Technical Data, Mobile advertising IDs	Consent
So we and our partners can serve advertising tailored to preferences	Connection and Technical Data, Inferred Data, Mobile advertising IDs	Consent, where required by applicable laws
So we can answer to requests from national authorities	All categories of data as applicable	Our legal obligations

3. When we share information about you

3.1 We share information about you with our employees and service providers, who will process it under our control.

Snugl Employees: To allow you to use the App to you or provide you support, authorized Snugl employees may need to get access to your information. We strictly limit who can access your data.

Service Providers: To bring you our App we work with partners who provide us services. This includes partners who help with moderation, technical and hosting support, sending notifications, publishing, and sharing content, user analytics and satisfaction surveys, management of security incidents or fraudulent activity, display personalized ads, etc.

Counsels: For compliance with our statutory obligations, in particular in terms of accounting, auditing and internal control, we might share your information with our counsels (legal, financial, audit).

3.2 We also share information about you to third parties, who will process it under their own control.

The Voodoo Group: Snugl is part of the Voodoo Group ("Voodoo"), and we share your information with Voodoo, who can use it for its own purposes, as described in its Privacy

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Policy. Voodoo might combine the data shared by us with data they hold about you from other apps. This sharing only occurs if you have consented to.

Ad Partners: To allow us to monetize the ad inventory of our app and provide users with free products and services, we can share your information with our partners. Those partners usually collect data via their own tools (Software development Kits or "SDK" and cookies) but we can also provide them with supplemental information relating to you that we hold. You will find https://snugl.app/sdk_policy a list of our partners and the privacy policies of their services.

Commercial partners: From time to time, we may share some Content data to promote our services to our commercial partners.

Partner Integrations: Where we partner to bring you a feature we may need to share your information with the partner to integrate the feature into our App.

Legal and Statutory Purposes: From time to time we may receive legal requests for information related to our users, be required to proactively share data with authorities when we learn of certain Content on our App (e.g., Child Sexual Abuse Material or terrorism), address fraud or security concerns, or protect people on our App or elsewhere from harm.

Change in Ownership: In the event of a merger, acquisition, reorganization or sale of assets, or bankruptcy, Snugl may share, sell or transfer information about you. This Privacy Policy would apply to all transferred information.

4. Children's data

Snugl never knowingly or willingly collects any personal data concerning children. If you are under 18, please do not use Snugl.

5. International transfers

Some of the partners and service providers referred to in this policy are located outside of the European Union. In such case, we ensure that:

- The personal data is transferred to countries recognized as offering an equivalent level of protection or,
- One of the mechanisms offering appropriate guarantees is implemented (for example, the adoption of the standard contractual clauses of the European Commission).

6. How long we keep information about you

We keep your information only for as long as it's needed to provide our services to you, in line with legal requirements and data protection authorities guidelines.

Your information such as Content Data, Chat Data and Account Creation Data are retained for as long as your account remains active. If your account remains unused for a continuous period of **three (3) years**, it will be considered inactive in accordance with our data retention policy. In such cases, your account will be inactivated, and all associated data will be permanently deleted. You will receive advance notice before any such action is taken, giving you the opportunity to log in and reactivate your account to preserve your data.

We may keep Content Data, Chat Data and Account Creation Data after your Account is considered inactive for legal purposes.

7. What controls you have over your information in the App

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At Snugl we have implemented features to ensure that you remain in control of your personal data.

Notification: In the settings of the applications you can choose and control which notifications you receive about our App.

Block or Hide Users: To make sure you have a great experience when using our App, you can block or hide users who you do not want to receive Content from or who you do want to see your Content. If you block or hide a user, at any time you can go into the settings of the App and view who you have blocked or hidden. You can also unblock or unhide them at any time.

Who sees your Content: Note that when you share Content through our App, that Content is available to other users.

Time Zone: When you create an account we determine your time zone for the purpose of providing you our App. In the settings of the applications you can change your time zone at any time.

Integrations: From time to time we may offer integrations with partners to provide you certain features. If those partners require you to log into your account on their services to avail of the feature, you will be able to control those integrations in the settings of the applications at any time.

Delete Your Account: You can choose to delete your account at any time. If you choose to delete your account, your account will be scheduled for deletion. This process takes approximately 30 days. Note, information will not be deleted where Snugl has received a valid legal request requiring us to preserve your information.

Consent: When we rely on your consent, you can withdraw your consent at any time from the "settings" page in our application.

If your account is permanently suspended by us and you choose to delete your account, we will keep Account Creation Data related to your account to prevent permanently suspended users from creating new accounts.

8. What rights do you have over your information

Privacy is a fundamental human right. That means every person that uses our App, irrespective of where they reside, can expect the same things from us. Whether you are in Europe, one of the 50 U.S. States, Latin America, the Middle East, Africa, Japan, Asia Pacific, or anywhere in between, you can:

- **Right to access and obtain a copy of your data:** you may request access to your personal data.
- **Right of rectification:** You may also ask us to rectify any personal data concerning you that is inaccurate and to complete any incomplete information.
- **Right to erasure/deletion:** Under certain circumstances, you may request the erasure of your personal data.
- **Right to restrict processing:** In certain circumstances, you may request the limitation of the processing of your personal data.
- **Right to withdraw your consent:** Where the processing of your personal data is based on your consent, you may, at any time, withdraw any consent you have previously provided to us.
- **Right to object:** You may also object at any time to the processing of your Personal Data when it is used for commercial prospecting purposes.
- **Right to portability:** In certain cases, you may also obtain a copy of your personal data, in a commonly used and machine-readable format.

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- **Right to set instructions for how your data is processed post-mortem:** If you are a French user, you also have the right to set directives concerning the management of your personal data after your death.
- If you are in the European Union, EFTA States or the United Kingdom, and wish to raise a concern about our data processing practices, you have the right to do so with your local supervisory authority or Snugl's lead supervisory authority, the Commission Nationale de l'Informatique et des Libertés (CNIL).

Some of these rights (rectification, deletion and consent withdrawal) can be exercised directly from the App, in the setting section. You can also exercise these rights and all other rights by addressing your request to our support at (snuglapp@gmail.com) or our Office of Data Protection at dpo@voodoo.io.

9. U.S. Privacy Rights

This U.S. Privacy Rights section supplements the information contained in our Privacy Policy and applies to all users, visitors and others who reside in the United States. We adopt this notice to comply with various federal and state privacy regulations, including but not limited to the California Consumer Privacy Act (CCPA), the California Privacy Rights Act (CPRA), the Colorado Privacy Act (CPA), the Connecticut Data Privacy Act (CTDPA), and other applicable laws.

Please note that we do not sell personal information as traditionally understood. However, under certain state laws, some data-sharing activities, particularly those involving cookies and similar technologies, may be considered a "sale" or "share" of personal information.

Your Rights and Choices

As a U.S. resident, you have specific rights regarding your personal information under federal and state laws. These rights include:

9.1 Right to Know: You have the right to request that we disclose certain information to you about our collection and use of your personal information over the past twelve (12) months.

9.2 Right to Delete: You have the right to request that we delete any of your personal information that we collected from you and retained, subject to certain exceptions.

9.3 Right to Opt-Out of the Sale and share of Personal Information: You have the right to opt-out of the sale and share of your personal information. You may also use a Global Privacy Control (GPC) signal.

9.4 Right to Non-Discrimination: You have the right not to receive discriminatory treatment for exercising your CCPA rights.

9.5 Exercising Your Rights: To exercise the rights described above, please submit a verifiable consumer request to us by contacting our Data protection office at dpo@voodoo.io or at (snuglapp@gmail.com).

9.6 Response Format and Delivery: We will deliver our written response by mail or electronically, at your option. We will respond to your request within 45 days of its receipt.

9.7 Contact Information: If you have any questions or comments about this notice, please contact our Data protection office (dpo@voodoo.io) or at (snuglapp@gmail.com)

9.8 Children: Our website and our App are not intended for use by users under the age of 18, and we do not knowingly collect personal information from children under this age.

9.10 Do Not Track (DNT): Some browsers offer a "Do Not Track" (DNT) setting. However, there is no universally accepted standard for how DNT signals should be interpreted. As a result, our website does not currently respond to DNT signals. Instead, we focus on compliance with recognized privacy preferences, such as the Global Privacy Control (GPC).

10. Contact

The data controller for our App is VOODOO SAS, a French société par actions simplifiée, whose registered office is at 17 rue Henry Monnier, 75009 Paris, France registered at the Companies Registry of Paris under number 792 483 307.

You can contact our Data Protection Officer at dpo@voodoo.io or by mail: Voodoo, 17 rue Henry Monnier, 75009 Paris, France.

11. Update of our Privacy Policy

We can update our Privacy Policy if this is necessary or if the law requires it.