

OMINIMA — Privacy Policy

Last updated: October 2026

1. Data controller

The controller of the personal data collected through the ominima.com website, the ominima.app web application and the OMINIMA mobile application (the “Application”) is **OMINIMA, S.L.U.**, Carrer Pere d’Urg, 10-12, Edifici Ag-Monducal, 5th floor, AD500 Andorra la Vella (Principality of Andorra), NRT L-721155-A. Contact for any question relating to data: support@ominima.com, with “Personal data” in the subject line.

2. Legal framework

Processing is carried out in accordance with Andorran Law 29/2021 of 28 October 2021 on the protection of personal data and, for persons located in the European Union, Regulation (EU) 2016/679 (the “GDPR”).

3. Data collected

Depending on the services used, OMINIMA may collect:

- identification and contact data (first name, last name, email address, country);
- account and login data;
- data relating to health and physical condition (body measurements, medical record, goals, workouts, diet, activity and sleep);
- content sent by the User (photos, videos, messages);
- purchase and payment data (offer, amount, invoicing; card details remain with the payment service provider);
- technical data (device, usage and error logs).

Some data is necessary to provide the services; without it, OMINIMA may be unable to provide them.

4. Purposes and legal bases

OMINIMA processes data on one of the following bases: performance of the contract concluded with the User, the User’s consent, OMINIMA’s legitimate interest (in particular the security of the services, the prevention of fraud and abuse, and the improvement of the services) or compliance with legal obligations.

Data is used to: provide the services and Coaching; personalise programmes; manage orders, payments, subscriptions and the customer relationship; send service-related communications and, with the User’s consent, marketing communications; ensure the security and proper functioning of the Application; prevent fraud and abuse; improve the services; handle complaints and disputes; comply with legal obligations.

Health data. Health data is processed only with the User’s explicit consent, collected in the Application, in order to personalise their programmes, enable follow-up by their coach and, if the User agrees, operate the artificial intelligence features. The User may withdraw each consent at any time in the Settings; withdrawal does not affect prior processing but may prevent access to certain services.

5. Recipients and transfers

Data may be disclosed, to the extent necessary:

- to OMINIMA's authorised staff and to the User's coach, within the limits of the sharing permissions granted;
- to service providers acting on OMINIMA's behalf and on its instructions, in particular for hosting, payment, sending emails and notifications, technical monitoring, video delivery and the provision of artificial intelligence services; they are bound by confidentiality and may not use the data for any other purpose;
- to partner platforms through which the User purchased an offer;
- to the authorities, where required by law, and to OMINIMA's advisers for the defence of its rights;
- in the event of a transfer of all or part of OMINIMA's business, to the acquirer.

Some service providers are located outside the European Union and Andorra. Where the destination country does not ensure a level of protection recognised as adequate, transfers are subject to appropriate safeguards, in particular the European Commission's standard contractual clauses, a copy of which may be obtained on request.

6. Retention periods

Data is retained for as long as necessary for the purposes for which it was collected, to comply with legal obligations and for the establishment, exercise or defence of legal claims. In particular:

- customers: for the duration of the relationship, then 3 years after the end of the last access or last login;
- prospects: 3 years from the last contact;
- billing data: for the statutory retention period for accounting records.

When an account is deleted, the data is erased, except for data that OMINIMA must or may retain for the reasons above.

7. User rights

In accordance with applicable regulations, the User may request access to, rectification, erasure and portability of their data, restrict or object to its processing, and withdraw their consents at any time. The User may exercise these rights from the Application's Settings or by writing to support@ominima.com. OMINIMA may ask the User to prove their identity.

The User may lodge a complaint with the Andorran Data Protection Agency (Agència Andorrana de Protecció de Dades) or with the data protection authority of their country of residence.

8. Security

OMINIMA implements appropriate technical and organisational measures to protect data against unauthorised access, loss or use, and limits access to those who need it. As no transmission over the Internet is completely secure, OMINIMA cannot, however, guarantee absolute security.

9. Minors

The services are reserved for persons aged 18 or over. OMINIMA does not knowingly collect data relating to minors.

10. Cookies

The website and the Application use cookies and similar technologies that are necessary for their operation. Any non-essential cookie is placed only with the User's consent, which may

be withdrawn at any time.

11. Changes

This policy may be amended at any time. The date of the latest update appears at the top of the document. In the event of a material change, the User is informed in the Application or by email.