

MyDestiny

U.S. ENGLISH | PUBLICATION VERSION

Privacy Notice

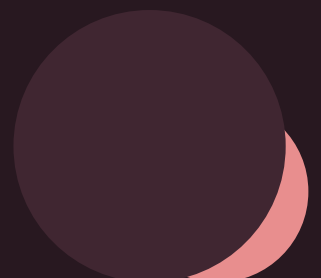
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Prepared for publication and rewritten for the current MyDestiny PWA.

Controller: ABACULUS USA, INC. | P16000086381

Privacy and support contact: support@mydestiny.love

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1. Purpose and scope

This Privacy Notice explains how ABACULUS USA, INC. processes personal data in connection with the MyDestiny website, installable web application and related services. It applies to mydestinydating.com, mydestiny.love and every MyDestiny interface that links to this Notice.

MyDestiny is an adults-only dating service that may provide a visual-choice test, personalized written assessments, match recommendations, mutual matches, member profiles, messaging, notifications, and free and paid features.

At a glance

We process data needed to provide the Service under the contract. Newsletters, sensitive data and identifiable scientific research each rely on a separate, optional consent. Members can change these choices independently.

2. Controller and contact details

Item	Details
Controller	ABACULUS USA, INC.
Address	677 North Washington Blvd., Suite 57, Sarasota, Florida 34236, United States
Florida document number	P16000086381
Support and privacy requests	support@mydestiny.love
EEA privacy contact and representative	Zoltán Jónás, Hungary - support@mydestiny.love

We have not appointed a Data Protection Officer. Privacy questions, rights requests and complaints may be sent to the contact above.

3. Personal data we process

Category	Examples and purpose-limited content
Account and authentication	Email address, username or display name, secure password hash, email verification, login and security events.
Profile and search settings	Date of birth or age, gender, who you are looking for, city or broad area, height, education, occupation category, relationship status, biography and search ranges.
Lifestyle and optional characteristics	Smoking, alcohol use, religious or political self-description, relationship and family preferences, only when entered by the member.
Photos	The number of profile photos allowed in the app, primary photo selection and technical metadata. The current Service does not use profile photos for biometric identification.
MyDestiny test	Visual choices, response order, timestamps, answers from the member's and assumed partner's perspectives, calculated components, assessments, compatibility indicators and match suggestions.
Connections and communications	Likes, invitations, mutual matches, messages, images sent in chat, blocks, reports, notification and read status.
Subscription and payment	Plan, price, currency, billing country, transaction reference, payment and renewal status, cancellation and billing information. Full card data is handled by the payment provider.
Technical data	IP address, device and browser type, operating system, session and cookie identifiers, PWA or push token, logs, errors and approximate location inferred from IP.
Support and legal	Requests, complaints, evidence, privacy requests, moderation and safety records.

4. Sources of personal data

- Directly from the member during registration, profile completion, testing, subscription, messaging and support.
- From the member's device and use of the Service through security, technical and operational logs.
- From other MyDestiny members through likes, mutual matches, messages, blocks or reports.
- From contracted providers, such as payment status, email delivery and fraud-prevention signals.
- From a legacy MyDestiny account when data is lawfully migrated and the member receives advance notice.

5. Purposes and legal bases

Purpose	EEA/UK legal basis	Main data
Account, email verification and login	Steps to enter into and performance of a contract	Account and authentication
Profile, test, assessment, matches and messaging	Performance of a contract; explicit consent for sensitive data	Profile, test, communications
Subscription, automatic renewal and billing	Performance of a contract and legal obligation	Plan, transaction, billing
Account and community safety, fraud and abuse prevention	Legitimate interests; legal obligation; vital interests in an emergency	Logs, reports, relevant message content
Service email and push notifications	Performance of a contract and legitimate interests	Email, push token, event
Newsletter, offers and re-engagement marketing	Separate consent	Email, language, campaign and opt-out records
Essential analytics, troubleshooting and security	Legitimate interests; consent where required	Technical and usage data
Scientific development	Separate optional consent; anonymized data where possible	Data identified in the research notice
Legal claims, authorities and accounting	Legal obligation and legitimate interests	Data necessary for the matter

6. Sensitive data and separate consents

A dating profile and partner preference may directly or indirectly reveal sexual orientation. Members may optionally disclose religious or political beliefs, and the test may create inferences about personal preferences and relationship patterns. We protect this information as sensitive data.

Separate choices at registration

(1) accepting the Terms and acknowledging this Notice is required for an account; (2) we request explicit consent for sensitive data; (3) newsletters have a separate, unticked and optional box; and (4) scientific development has a separate optional consent. Declining newsletter or research consent does not prevent use of the Free or Premium Service.

Consent can be withdrawn at any time in profile settings or by emailing support@mydestiny.love. Withdrawal does not affect earlier lawful processing. Deleting sensitive information required for a feature may limit that feature.

7. The test, written assessment and matching

MyDestiny uses predetermined rules to organize and compare visual choices, profile settings and, where a feature requires it, tests completed from two perspectives. Outputs may include personalized written assessments, component-level feedback, a compatibility or Matrix score, and ranked profile suggestions.

- The Service performs profiling by using automated calculations to evaluate personal preferences and relationship characteristics.
- Key ranking factors include stated search criteria, mutual eligibility and interest, and comparison of test results. Exact weights may be proprietary, but we provide meaningful information about the main logic.

- MyDestiny does not make a decision that produces legal or similarly significant effects. Members decide whether to contact or continue a relationship with another member.
- A member may request an explanation, report an error and request human review where an output materially affects access to a feature.

8. Information visible to other members

Other members can see only profile fields marked for display, profile photos, information associated with a mutual match and messages sent to them. Email address, password, payment details, internal security logs and complete raw test sequences are not public. The interface indicates what will be shared with another member.

A recipient may save or forward content received in a message. Members should share only information and images they are prepared for the recipient to know. The Terms restrict misuse, but we cannot fully control another person's device.

9. Recipients, service providers and international transfers

The production MyDestiny PWA uses Cloudflare, Inc. for core infrastructure, including application delivery and security, the D1 database and R2 image storage.

We may disclose the minimum necessary personal data to:

- cloud infrastructure, database, object storage, content delivery and security providers;
- email, push notification, authentication, customer support, analytics and error-monitoring providers;
- payment and billing providers;
- legal, accounting, audit and security advisers under confidentiality obligations;
- authorities or other recipients when required by law, court order or protection of a person's safety;
- a successor or buyer in a corporate transaction, with appropriate safeguards and notice.

The Controller operates in the United States, so EEA data may be transferred to the United States or another country. We use an adequacy decision, the European Commission's Standard Contractual Clauses, supplementary technical measures or another lawful safeguard as appropriate. We provide information about current provider categories and the relevant safeguard on request.

We do not sell personal data

MyDestiny does not sell personal data or disclose profile photos, test results or messages for a third party's own advertising. If the business model changes, we will provide advance notice and any opt-in or opt-out required by law.

10. Retention

Data	Main retention rule
Active account, profile, test and matches	For the life of the account and while needed to provide the feature.
Deleted account in active systems	Deleted or irreversibly anonymized as a rule within 30 days.
Backups	Up to 90 days after ordinary deletion, isolated from new use.
Messages and safety reports	During the account; up to 180 days after deletion where needed for abuse, disputes or safety.
Technical and security logs	Normally up to 12 months; longer for an active incident or claim.
Transaction, billing and accounting	The applicable tax and accounting period, typically 5-8 years.
Complaints and legal claims	Applicable limitation period; five years for certain Hungarian consumer complaint records.
Marketing consent and suppression list	Until withdrawal; evidence of consent and opt-out through the applicable claims period.
Research data	As stated in the separate research notice; irreversibly anonymized data is no longer personal data.

11. Security and administrative access

MyDestiny uses risk-appropriate technical and organizational measures, including encrypted transmission, one-way password hashing, role separation, logging, backups, patching, abuse and intrusion protection, and data-processing agreements.

Authorized administrators may access profiles, test results, subscription status, messages or reports only as needed for support, safety, moderation, troubleshooting, a rights request or legal compliance. Administrators are subject to confidentiality and access controls.

No online service can promise zero risk. We investigate security incidents, take appropriate remedial action, and notify authorities and affected individuals when required by law.

12. Email, push notifications, newsletters and cookies

Service communications

We may send communications necessary to operate the account without newsletter consent, including email verification, password reset, security alerts, invoices, renewal and cancellation confirmations, notice of a new message or like, test deadline reminders, and material contractual or privacy changes.

Newsletter and re-engagement marketing

We send newsletters, offers, Premium promotions and inactivity-based re-engagement marketing only with separate prior consent. The box is not pre-ticked and registration does not depend on consent. Every marketing email includes an easy unsubscribe method. Unsubscribing does not stop necessary service communications.

Cookies and local storage

Strictly necessary cookies and local storage support login, security, language and session settings. Non-essential analytics or marketing technologies activate only after the consent required in the member's location. The cookie control provides details and choices.

13. Scientific development and analytics

MyDestiny may analyze operation of the Service for scientific and product development. Aggregated statistics needed for reliability and basic improvement may rely on legitimate interests. Identifiable test, profile or sensitive data is used for research only under a separate, detailed and voluntary consent.

- Research consent can be enabled and withdrawn separately.
- Dating and Premium access are not conditional on research participation.
- Research data is coded, separated and anonymized where possible.
- Photos, message content or direct identifiers are used for research only when expressly listed in the separate notice and consented to.
- Irreversibly anonymized results may be retained for scientific or statistical use.

14. Your privacy rights

- Request information and access to your personal data.
- Correct inaccurate data and complete incomplete data.
- Request deletion or restriction when the legal conditions are met.
- Receive data you provided in a commonly used, machine-readable format where portability applies.
- Object to processing based on legitimate interests; object to direct marketing at any time and without reasons.
- Withdraw consent at any time.
- Request meaningful information about profiling and, where applicable, human intervention or review.
- Complain to the supervisory authority in your country. In Hungary: National Authority for Data Protection and Freedom of Information, naih.hu.

Send a request to support@mydestiny.love. We may reasonably verify identity. We respond within the applicable period, normally one month under GDPR. Rights may be limited to protect another person's rights, safety, legal obligations or an active claim.

15. United States privacy rights

Where an applicable U.S. state privacy law grants rights, an eligible resident may request access, correction, deletion and portability; opt out of sale, targeted-advertising sharing or profiling with significant effects; and, in some states, appeal a denied request. MyDestiny currently does not sell personal data or share it for another business's cross-context behavioral advertising.

Submit requests and appeals to support@mydestiny.love. We may verify identity and require valid authority from an agent. We do not unlawfully discriminate against a person for exercising privacy rights.

16. Adults only

MyDestiny is available only to people aged 18 or older. We do not allow a minor to use the Service even with parental consent. If we learn that we process data of a person under 18, we suspend the account and delete the data subject to safety, legal and evidentiary needs.

17. Legacy MyDestiny accounts and one-time service notices

Data from a legacy MyDestiny system may be migrated only when a lawful basis exists, the data is necessary, and the member receives advance, understandable notice of the migration, new processing and deletion options.

A genuinely necessary one-time account, security or service-migration notice to a legacy member must not be disguised advertising. A message promoting a new service, discount or return requires documented marketing consent. Prior registration alone is not newsletter consent.

18. Changes and contact

We update this Notice when the Service, technology or law changes. We provide prominent in-app or email notice before a material change when its nature requires it. Earlier versions are archived by version number.

Contact

Privacy questions, rights requests and complaints: support@mydestiny.love. We acknowledge every inquiry within 24 hours and provide the substantive response within the applicable legal deadline.