

Privacy Policy

1. Introduction

Echo4Ever Limited ("we", "our", "us") is committed to protecting your privacy and preserving your personal and family history in a safe, respectful, and secure environment. We provide a platform where individuals can upload, store, and share personal content — such as photos, videos, documents, and written stories — with people they choose.

We operate from New Zealand, but our users may reside in countries around the world. This Privacy Policy is designed to comply with the strongest applicable privacy laws, including:

- New Zealand Privacy Act 2020
- European Union GDPR
- United Kingdom GDPR
- South Africa POPIA
- Australia Privacy Principles (APPs)
- Canada PIPEDA
- United States privacy laws, including CCPA/CPRA, CPA, VCDPA, CTDPA, UCPA

We apply one high global privacy standard to all users, regardless of location.

By using our platform, you agree to this Privacy Policy.

2. Information We Collect

We only collect information necessary to operate the service and preserve your content.

2.1 Account Information

- Full name
- Email address
- Password (securely hashed — we never store your password in plain text)
- Country of residence (used for billing currency)

Privacy Policy

2.2 Payment Information

- We use Stripe to process payments. We do not store your credit card details directly.
- We store a Stripe customer identifier and subscription identifier to manage your billing.
- Stripe's own privacy policy governs how they handle your payment details.

2.3 User-Generated Content

Any content you choose to upload, including:

- Photos, videos, and audio recordings
- Documents and written materials
- Stories, life events, and timeline entries
- Metadata you voluntarily include (dates, names, descriptions, locations)

You always retain ownership of your content.

2.4 Family and Relationship Information

When you use our family sharing, family tree, or Heritage Custodian features, we may store:

- Names, email addresses, and relationship details of people you invite to share your vault
- Family tree data you create, which may include names, birth dates, death dates, and medical conditions of relatives — including individuals who are not platform users
- Heritage Custodian designations and their contact details

You are responsible for ensuring you have appropriate permission before entering personal information about other individuals, particularly living persons.

2.5 Technical and Security Information

- IP address (logged for security events such as login, password changes, and support requests)
- Device and browser type
- Dates and times of access
- Security audit logs (account actions such as login, password change, email change, and support contact)

Privacy Policy

2.6 Communication Information

- Support requests, enquiries, or messages you send to us via the in-app Help & Support feature or by email.

We do not collect:

- Biometric identifiers
- Advertising identifiers
- Behavioural tracking data
- Sensitive data unless voluntarily uploaded by you

3. How We Use Your Information

We use personal information to:

- Provide and maintain your account
- Store and display the content you upload
- Make your content available only to people you approve
- Process payments and manage subscriptions
- Deliver scheduled content (time capsules) on the dates you choose
- Facilitate family sharing and Heritage Custodian designations
- Preserve archives in memorial mode when requested by a Heritage Custodian
- Ensure platform security and integrity
- Send transactional emails (verification, password reset, invitations, notifications)
- Communicate with you (support, notices, updates)
- Comply with legal requirements

We never sell your personal information.

Privacy Policy



4. Legal Bases for Processing

Where required (EU/UK GDPR), we rely on:

- Consent — when you create an account or upload content
- Contract — to deliver the platform and its features
- Legitimate Interests — security, reliability, fraud prevention, audit logging
- Legal Obligation — complying with laws and regulatory requests

5. International Compliance

5.1 New Zealand Privacy Act 2020

We comply with all Information Privacy Principles (IPPs), including transparency, security, and cross-border protection.

5.2 EU & UK GDPR

We provide full GDPR rights, including access, deletion, portability, and objection rights.

5.3 South Africa POPIA

We follow POPIA requirements for lawful processing, minimality, and cross-border transfer protections.

5.4 Australia Privacy Act (APPs)

We adhere to APP principles for collection, use, security, and individual rights.

5.5 Canada PIPEDA

We ensure meaningful consent, security safeguards, and user access rights.

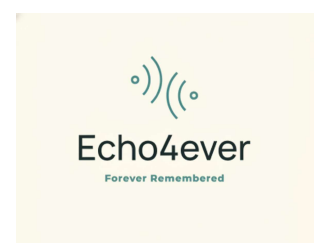
5.6 United States (CCPA/CPRA and state laws)

All U.S. users receive:

- Right to know
- Right to delete
- Right to correct
- Right to opt out of data sharing
- No discrimination

We do not sell data.

Privacy Policy



6. Service Providers

We share your information only with the following essential service providers necessary to operate the platform:

- Cloudflare, Inc. — Cloud hosting, content delivery network (CDN), database infrastructure (D1), file storage (R2), session management (KV), and bot protection (Turnstile). Cloudflare processes data on its global edge network. <https://www.cloudflare.com/privacypolicy/>
- Stripe, Inc. — Payment processing and subscription management. Stripe processes your payment details directly; we do not store credit card numbers. <https://stripe.com/privacy>
- Resend — Transactional email delivery (verification emails, password resets, invitations, notifications). <https://resend.com/legal/privacy-policy>

Each provider must:

- Follow strict privacy and security standards
- Use your data only to perform contracted services
- Comply with applicable privacy laws

We never share user information with advertisers or unrelated third parties.

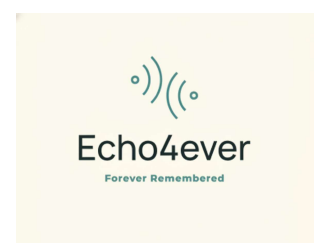
7. International Data Transfers

Your information is stored and processed on Cloudflare's global infrastructure, which operates across multiple countries. Payment data is processed by Stripe's infrastructure. Email delivery is handled by Resend.

We use recognised safeguards such as:

- Standard Contractual Clauses (SCCs)
- NZ Privacy Act IPP 12 & 13 protections
- POPIA cross-border compliance
- PIPEDA equivalency
- Appropriate contractual and technical safeguards

Privacy Policy



8. Security of Your Information

We use industry-standard safeguards, including:

- Encrypted data transmission (TLS/HTTPS)
- Secure password hashing (bcrypt)
- JWT-based authentication with short-lived access tokens
- Bot protection via Cloudflare Turnstile
- Access controls ensuring content is only visible to authorised users
- Security audit logging of account activity with IP addresses
- Regular backups managed by our infrastructure provider

Despite our efforts, no system is 100% secure. We will notify affected users and relevant authorities if a significant data breach occurs.

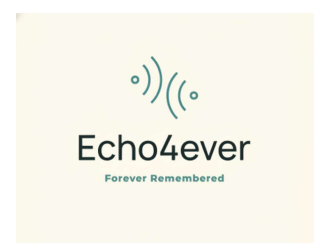
9. Your Rights

You may exercise any of the following rights:

- Access your personal information
- Correct inaccurate information
- Delete your account and content
- Withdraw consent
- Object to certain processing
- Lodge a complaint with your local privacy authority

To exercise any of these rights, contact us at contact@echo4ever.com.

We treat all users equally and provide GDPR-level rights globally.



10. Heritage Custodian and Memorial Mode

10.1 Heritage Custodian

You may designate a Heritage Custodian — a trusted person who can request that your archive be placed into memorial mode after your death. When you nominate a Heritage Custodian:

- Their name and email address are stored.
- They are invited to create an account and accept the role.
- Once accepted, they gain the ability to request memorial mode in the future.

10.2 Memorial Mode

When a Heritage Custodian requests memorial mode, the request is reviewed by an Echo4Ever administrator. If approved:

- The vault owner's account is permanently transitioned to memorial status.
- The vault owner can no longer log in.
- All legacy content and time capsules become accessible to family members.
- The Heritage Custodian is granted curator access (can share the archive and add tributes).
- The subscription is cancelled automatically — no further payments are charged.
- The archive is preserved indefinitely at no cost to the family.

10.3 Data About Deceased Persons

Memorial archives are preserved as a permanent tribute. Family members with access can continue to view the content. If all authorised family members request deletion, we will honour that request.

Privacy Policy

11. Family Sharing and Third-Party Data

11.1 Family Sharing

When you invite family members to view your vault, we store their email address at the point of invitation, even before they accept. Once they accept and create an account, they can access the content you have shared.

11.2 Family Tree

The family tree feature allows you to record information about family members, including people who are not platform users and people who are deceased. This may include names, birth and death dates, relationships, and medical conditions.

You are responsible for ensuring you have appropriate consent or legitimate reason before entering personal information about living individuals who are not platform users. If any individual wishes to have their information removed from a family tree, they may contact us at contact@echo4ever.com and we will assist.

12. Time Capsules

You may create time capsules — content that is locked until a date you specify or until memorial mode is activated. Time capsule content is stored securely and delivered to your specified recipients on the scheduled date. This means your content may be retained and processed after the original upload date, in accordance with your instructions.

13. Data Retention and Long-Term Preservation

Because our mission is to help individuals preserve their personal and family history, we provide extended retention options.

13.1 Active Accounts

Your content is retained for as long as your account is active and your subscription is current.

13.2 Memorial Archives

Memorial archives are preserved indefinitely at no cost. See Section 10.

Privacy Policy

13.3 Subscription Non-Payment

If you fail to pay your subscription:

- Your account will be immediately suspended and your vault locked.
- You can restore access at any time by updating your payment method.
- After 6 months of continuous non-payment, your account may be terminated.
- Following termination, your content will be safely archived and preserved. The purpose of Echo4Ever is to preserve your legacy for future generations, and we honour that intent by keeping your content safe even after your account is no longer active.
- You may request a return of your data at any time by contacting us at contact@echo4ever.com.
- Your content will not be deleted unless you explicitly request deletion.

13.4 Voluntary Account Deletion

If you close your account:

- Your content will be safely archived and preserved. The purpose of Echo4Ever is to preserve your legacy for future generations, and we honour that intent by keeping your content safe even after your account is closed.
- You may request a return of your data at any time.
- Your content will not be deleted unless you explicitly request deletion.

13.5 Permanent Deletion

You may request permanent deletion at any time by contacting us at contact@echo4ever.com. Deletion only occurs when explicitly requested by you. Upon request, all associated content will be removed from active systems and scheduled for secure erasure from backups within 30 days.

14. Children's Privacy

This platform is not intended for children under 16 years old, or higher where local law applies. We will delete accounts created by children below the lawful age upon discovery or notification.

Privacy Policy

15. Cookies and Local Storage

We use:

- Essential cookies — Cloudflare Turnstile (bot protection) may set cookies for security verification.
- Local storage — We use your browser's local storage to maintain your login session (authentication tokens). This is not a cookie but functions similarly to keep you logged in.

We do not use:

- Advertising or tracking cookies
- Analytics cookies
- Third-party marketing cookies

You may clear local storage and cookies in your browser settings, but this will log you out and some features may stop working.

16. Contact Us

For privacy questions, rights requests, or concerns:

Privacy Officer

Jeff Groenewald

contact@echo4ever.com

Echo4Ever Limited

Auckland, New Zealand

17. Changes to This Policy

We may update this policy when needed. Significant updates will be communicated via email or platform notification. The effective date at the top of this policy will be updated accordingly.