

# Privacy Policy – MINSAS (My Insurance Assistance)

## Controller

UAB Minsas, Vilnius, Lithuania  
Email: legal@minsas.com

## Age restriction

MINSAS is intended for users **16 years or older**.

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## 1 · What data we process

Only information necessary to run the app and handle insurance-related actions:

Category	Description	When collected
<b>Account data</b>	Email address, name, phone number	When you create or update your profile
<b>Claim content</b>	Photos, videos, PDF or image documents, text fields, sketches, finger-drawn signatures	When you create a claim
<b>Location</b>	Precise GPS coordinates only when you tap <b>Save Location</b> or sign on the map	By your action
<b>Device info</b>	Phone model and OS version (collected during signature step)	Automatically at that moment
<b>Injury toggle</b>	“Was anyone injured?” (Yes/No) — used only to suggest calling 112 (emergency). No medical details are stored.	When you answer
<b>Logs / security</b>	Basic Supabase backend logs for reliability and fraud prevention	Automatically
<b>Analytics (performance)</b>	Anonymized usage patterns for app performance monitoring only — screen views, session duration, device type, app version, and <b>approximate country-level location</b> . <b>Not linked</b> to your identity or claim content; no names/emails/phone numbers/photos/precise GPS.	When you use the app

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## 2 · Why we use the data and our legal basis

Purpose	Legal basis (GDPR Art.)
Provide and operate the app — create claims, generate PDFs, send to insurers	6(1)(b) Contract performance
Location and map signing	6(1)(a) Consent (you choose to save location or sign)
Logs and security monitoring	6(1)(f) Legitimate interests (service integrity)
Legal and tax records (e.g. subscriptions)	6(1)(c) Legal obligation
App performance monitoring, bug detection, and user experience improvement (analytics)	6(1)(f) Legitimate interests

We **do not** intentionally store special-category (“health”) data or link such data to an identified person. Analytics is not based on consent and is part of our legitimate interest in operating a stable, secure, and performant app. You retain the **right to object** (see Section 5).

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## 3 · Processors and data storage

We use a limited set of processors acting under contract:

- Supabase (hosting, database, storage)
- Google Gemini (OCR for document text extraction)
- Google Maps (geocoding)
- Resend (email)
- PDFShift (PDF generation)
- Stripe (payments)
- Branch.io (deep links)
- Google Analytics (Google LLC, USA) — performance analytics under EU Standard Contractual Clauses (SCCs).

Some providers are in the U.S.; data transfers use **EU Standard Contractual Clauses**.

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## 4 · Retention and deletion

Personal data are kept only as long as needed to operate the service and meet legal obligations.

When you delete your account:

- Access is immediately blocked.
- A 30-day finalization removes shares and invites, anonymizes your profile, deletes avatar files, and cancels subscriptions at period end.
- Full details: [minsas.app/minsas\\_data\\_deletion.html](https://minsas.app/minsas_data_deletion.html)

Analytics events are **not linked** to your identity or claims and are retained only for **technical performance** needs.

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## 5 · Your rights

You may request **access, correction, erasure, restriction, or portability**, and **object** to processing. Contact [legal@minsas.com](mailto:legal@minsas.com) for any request. You can also delete your account in the app under **Profile** → **Settings** → **Delete Account**.

You have the right to complain to the Lithuanian State Data Protection Inspectorate or your local EU authority.

**Right to object to analytics (Art. 21 GDPR).** You may object to analytics processing at any time by contacting [legal@minsas.com](mailto:legal@minsas.com). If you object, we will stop sending further analytics events from your app instance as soon as reasonably possible. This does not affect the core claim functionality.

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## 6 · Electronic signatures

Finger-drawn signatures captured in MINSAS are **simple electronic signatures** under Regulation (EU) 910/2014 (eIDAS).

They are valid for evidence but **not qualified electronic signatures (QES)**.

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## 7 · Changes

We may update this policy and will notify users through the app before changes take effect.

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## 8 · Cookies and tracking technologies

### What we use

MINSAS uses **Google Analytics** which relies on cookies or similar technologies (e.g., app instance identifiers) to measure **technical performance** (screen views, session duration, device type, app version, country-level location).

### What we don't do

We do **not** use analytics to collect names, emails, phone numbers, claim content, photos, precise GPS coordinates, or other personal identifiers. Analytics events are **kept separate** from claims data and **not linked** to your identity.

**Control.** Analytics runs under **Legitimate Interest (GDPR Art. 6(1)(f))** to keep the app reliable and improve performance. If you do not want analytics, email **legal@minsas.com** and we will stop sending analytics events from your app instance going forward. This does not affect your ability to use core features.

### Legal basis

Analytics runs under **Legitimate Interest (GDPR Art. 6(1)(f))** to keep the app reliable, monitor performance, and fix bugs.

### International transfers

Google Analytics is provided by **Google LLC (USA)** under **EU Standard Contractual Clauses**.

**Last updated:** October 2025