

Cookie Policy

Last Updated: 16 March 2026 · Version 1.2



Welcome

This Cookie Policy explains what cookies and similar technologies LifeThreads uses, why we use them, and how you can manage your preferences. We use as few cookies as possible — only what is genuinely needed.

1. What are cookies?

Cookies are small files saved on your device when you use an app or website.

They are used for things like keeping you logged in, remembering your preferences, and understanding how the app is being used. Not all cookies are the same — some are essential (the app will not work without them) and some are optional.

2. Our approach

Our cookie commitment

We only use cookies that are genuinely necessary or that you have given us permission to use. We do not use advertising cookies, behavioural tracking cookies, or any technology that tracks you across other apps or websites. You will always be asked before we set any optional cookie.

3. Cookies we use

3.1 Essential cookies — always active

These are required for the app to work. They cannot be turned off. Without them you would not be able to log in or use the app securely.

Name	What it does	How long	Opt out?
Session token	Keeps you logged in while you use the app	Until you log out	No
Security token	Protects your account against certain types of attacks	Per session	No
App settings	Remembers your display and accessibility preferences	1 year	No
Encryption ref	Needed to decrypt and display your data and Threadballs	Session (cleared on logout)	No

Cookie Policy

Last Updated: 16 March 2026 · Version 1.2



3.2 Optional cookies — your choice

These improve your experience or help us improve the app. We will ask for your permission before setting any of these, and you can change your mind at any time.

Name	What it does	How long	Opt out?
Accessibility	Stores settings such as larger text or high contrast mode	1 year	Yes - Settings > Privacy > Cookie Preferences
Analytics	Tells us which features are used most; this data is anonymised and cannot identify you	13 months	Yes - Settings > Privacy > Cookie Preferences
Navigation memory	Remembers where you were in the app so you can pick up where you left off	30 days	Yes - Settings > Privacy > Cookie Preferences

What we do not use

We do not use advertising cookies, social media tracking pixels, or any cross-app or cross-website tracking technology.

4. Managing your cookie preferences

You are in control of your cookie settings at all times:

- In the app: Settings > Privacy > Cookie Preferences — update your choices at any time
- On first launch: a consent screen appears before any optional cookies are set
- On your device: clear all app data at any time through your device's settings

You can update your cookie preferences at any time - including enabling cookies you previously declined. Each category of optional cookie can be accepted or declined individually. Changes take effect immediately.

5. Threadballs and third-party data

Because LifeThreads stores data about people who are not the account holder, we want to be transparent about how that works.

Our role with Threadball data

When a user creates a Threadball for another person, LifeThreads stores that data on the creating user's behalf. The creating user is the data controller for that person's data and is responsible for having a lawful basis to hold and share it. LifeThreads acts as the data processor — we store and protect the data but do not use it for any other purpose. LifeThreads cannot verify consent in advance but will investigate and act on any complaint from a person who believes their data has been stored without consent. This includes restricting or deleting data where no lawful basis can be confirmed.

Cookie Policy

Last Updated: 16 March 2026 · Version 1.2



6. Security

All data stored in LifeThreads — including Threadball, Thread and Strand content — is encrypted in storage and in transit. We use industry-standard security throughout. Full details are in our [Privacy Policy](#).

Good security practice

Enable two-factor authentication on your account for the strongest protection. We recommend using an authenticator app (such as Google Authenticator or Authy) rather than email-based verification. Set this up in Settings > Security > Two-Factor Authentication.

7. GDPR and legal compliance

This Cookie Policy is governed by the same legal framework as our Privacy Policy. LifeThreads operates primarily under the **UK General Data Protection Regulation (UK GDPR)** and the **Data Protection Act 2018**, as a company registered in England and Wales. The **Privacy and Electronic Communications Regulations 2003 (PECR)** govern specifically our use of cookies and electronic communications.

Where we refer to GDPR Article numbers in this policy, these are references to the UK GDPR. If you are based in the European Union, the EU General Data Protection Regulation (EU GDPR) 2016/679 also applies to the processing of your personal data. Your rights and our practices are the same under both instruments. Full details of the applicable legal framework are set out in our [Privacy Policy](#).

Data Protection Impact Assessments (DPIAs) have been completed for the Threadball feature and for the app's core data storage and sharing architecture. These cover the processing of special category data including health, identity and financial records. Summaries are available on request at privacy@lifethreads.co.uk.

7.1 Lawful basis for processing

Data protection law requires us to have a valid legal basis for every type of processing we carry out. The bases we rely on in connection with the processing described in this Cookie Policy are:

Essential cookies and app functionality (Arts. 6(1)(b) and 6(1)(f)) - processing carried out through essential cookies is necessary to perform the contract with you (delivering the app you signed up for) and to pursue our legitimate interests in keeping the app secure and operational. Essential cookies cannot be turned off because the app cannot function without them.

Optional cookies (Art. 6(1)(a)) - processing carried out through optional cookies is based on your consent. You can withdraw consent at any time via Settings > Privacy > Cookie Preferences. Withdrawal does not affect any processing that took place before you withdrew consent.

Special category data in Threadballs (Arts. 6(1)(a) and 9(2)(a)) - where Threadball content includes health, identity or financial records relating to the account holder, processing is based on explicit consent.

Special category data in Threadballs - children and incapacitated adults (Arts. 6(1)(d) and 9(2)(c)) - where a Threadball contains special category data about a child under 16, or about an adult who lacks mental capacity, processing is carried out on the basis of vital interests. A parent storing a child's medical records or identity documents, or a person acting under a Lasting Power of Attorney storing health and care records for an adult who cannot consent, is acting to protect the vital interests of that person.

Joint Owner notification records (Art. 6(1)(f)) - metadata retained for security audit purposes is processed on the basis of our legitimate interests in maintaining the security and integrity of Threadball access. This retention is limited

Cookie Policy

Last Updated: 16 March 2026 · Version 1.2



to metadata only - no Strand, Thread or Threadball content is retained under this basis. See our Privacy Policy §8 for full retention details.

Legal obligations (Art. 6(1)(c)) - where the law requires us to retain certain records, for example billing records for up to 7 years, we process that data to comply with our legal obligations.

Full details of our lawful bases for all processing are set out in our [Privacy Policy](https://lifethreads.app/privacy) at lifethreads.app/privacy.

8. Apple App Store disclosures

In accordance with Apple App Store requirements, we disclose the following:

- **Data linked to your identity** - your name, email address, account activity, device identifiers and data in your own profile
- **Threadball data** - stored on behalf of the creating user; treated with the highest level of protection as it relates to identifiable individuals, including special category data such as health, identity and financial records processed under UK GDPR Articles 6 and 9
- **Data not linked to you** - anonymised, aggregated crash reports only; no Strand, Thread or Threadball content is included
- **Automated decision-making** - LifeThreads does not carry out any solely automated decision-making or profiling that produces legal or similarly significant effects on users. If this changes, we will update this policy and notify you before it takes effect
- **Tracking** - we do not track users across apps or websites owned by other companies
- **Age rating** - 17+ in the Apple App Store, reflecting the sensitive personal data and third-party profiles the app handles. The minimum age to create a LifeThreads account is 16 in accordance with UK GDPR Article 8. Parents and legal guardians may create Threadballs for children under 16 as described in our Privacy Policy

9. Third-party services

We work with a small number of trusted providers, all bound by Data Processing Agreements (DPAs) in accordance with UK GDPR Article 28. They are prohibited from using your data for their own purposes. The providers we currently use are:

- **Application hosting** - Replit (runtime environment and application infrastructure). Replit's involvement is limited to the runtime environment; application data is stored on EEA-based AWS servers
- **Database and data storage** - AWS (Amazon Web Services), EEA-based servers. Your personal data is not transferred outside the EEA in the ordinary course of providing the service
- **Email delivery** (notifications, OTPs, support responses) - Resend
- **Address lookup** - Ideal Postcodes

If we add or change any provider, we will update this section. You can request details of the DPAs we have in place by contacting privacy@lifethreads.co.uk.

What we do not use

No advertising networks. No data brokers. No social media tracking services. No third party whose business model involves monetising personal data.

Cookie Policy

Last Updated: 16 March 2026 · Version 1.2



10. Children

LifeThreads does not allow children under 16 to create their own accounts, in accordance with UK GDPR Article 8.

Parents and legal guardians may create Threadballs for children under 16. Where a Threadball contains health, identity or other special category data about a child, this is processed on the basis of vital interests (UK GDPR Article 9(2)(c)) - reflecting that a parent storing a child's medical records or identity documents is acting to protect that child's interests. Parents are responsible for ensuring this is done lawfully and in the child's best interests, and for sharing the child's Threadball only with people who have a clear and appropriate reason to access it.

When a child turns 16, they may contact us at privacy@lifethreads.co.uk to request access to, correction of, or deletion of any Threadball data held about them. We will action such requests within 30 days.

11. Changes to this policy

If we make meaningful changes to how we use cookies, we will notify you by email and in the app at least 30 days before the change takes effect. For changes that require your fresh consent - for example, introducing a new category of optional cookie - we will ask for your consent explicitly rather than relying on continued use of the app.

12. Contact us

- **General enquiries** - info@lifethreads.co.uk
- **Privacy and data rights requests** - privacy@lifethreads.co.uk
- **General support** - support@lifethreads.co.uk
- **In the app** - Settings > Privacy

We will respond to all privacy and data rights requests within 30 days, free of charge.

If you are not satisfied with our response, you have the right to complain to the UK Information Commissioner's Office (ICO) at ico.org.uk, or to your national data protection authority if you are based in the EU.

Life&Others Limited · Company Registration Number: 7097772 · ICO Registration: ZC107933