

Privacy Policy

How we collect, use, and protect your information.

Effective Date: 24 April 2026

Last Updated: 24 April 2026

Joyna AI Inc. | Delaware C-Corporation, United States
hello@joyna.community | joyna.ai | joyna.ai/privacy-policy

Joyna AI Inc. ("Joyna", "we", "us", or "our") is a Delaware C-Corporation that operates an AI-powered community discovery concierge delivered exclusively through WhatsApp. This Privacy Policy explains what personal information we collect from users and hosts, how we use it, with whom we share it, how long we keep it, and what rights you have over your data.

By messaging Joyna on WhatsApp or registering as a host through our portal, you agree to the practices described in this policy. If you do not agree, please do not use the service. This policy is available at joyna.ai/privacy-policy.

1. Who We Are and How to Contact Us

Joyna AI Inc. is incorporated in the State of Delaware, United States. Although we are a US company, we offer our service to users in the United Kingdom and therefore comply with the UK General Data Protection Regulation (UK GDPR) and the Data Protection Act 2018.

Our primary contact for all privacy matters is:

- Email: hello@joyna.community
- Website: joyna.ai/privacy-policy

UK GDPR Article 27 Representative

As a non-UK entity processing personal data of UK residents, Joyna AI Inc. has appointed a UK representative in accordance with Article 27 of the UK GDPR. UK individuals and the Information Commissioner's Office (ICO) may contact our representative directly on any matter relating to this policy or the processing of personal data:

- Name: Christopher Cowdrey
- Email: chris@chriscowdrey.co.uk

Our UK representative will escalate all enquiries to Joyna AI Inc. promptly. Appointment of a UK representative does not transfer legal liability for data protection compliance, which remains with Joyna AI Inc.

2. Scope of This Policy

This policy covers two categories of people whose personal data we process:

- **Users (guests):** individuals who message Joyna on WhatsApp to discover and join communities.
- **Hosts:** individuals and businesses who register through our host portal to list their communities, events, or experiences on the Joyna platform.

This policy covers only data collected from 24 April 2026 onwards through the current Joyna product. No data from any prior version of the service is carried forward or subject to this policy.

3. Information We Collect

3.1 User (Guest) Data

When you message Joyna on WhatsApp, we collect and store the following:

- Your WhatsApp phone number, shared automatically when you initiate a conversation.
- Your first name, if you choose to share it during the conversation.
- Your age, which you enter as a free-text number. We use this for matching purposes only. If you indicate you are under 18, we will not provide the service and will not retain any data from that interaction.
- Your gender, which is entirely optional. If provided, it is used solely for matching purposes and never for marketing profiling.
- Your area within London, as described by you in your own words (for example, "West London" or "Hackney"). We do not collect your precise GPS location or full address.
- Your stated preferences and interests as expressed during the qualifying conversation, such as the type of community you are seeking, your social preferences, and availability.
- The full content of your WhatsApp conversation with Joyna, including all messages exchanged during the qualifying and matching process.
- Your match outcomes: which communities were recommended to you and whether you indicated you attended or planned to attend.
- Ratings and feedback you provide following a community visit, if you choose to respond to our follow-up message.

What we do not collect from users:

- We do not access your WhatsApp contacts, messages with other people, photos, or any content outside your direct conversation with Joyna.
- We do not conduct phone or video calls.
- We do not collect precise GPS or device location data.
- We do not collect payment card or financial information.

3.2 Host Data

When you register through our host portal, we collect:

- Your full name if registering as an individual, or your name as a representative of a business entity.
- Your email address.
- Details about your community or events, including event name, description, location, timing, and format.

- Your gender, which is entirely optional and not required to complete registration.

Hosts may be sole traders, independent organisers, or representatives of a registered business. Where a host registers as an individual, their data is treated as personal data under UK GDPR. Where a host registers on behalf of a registered business, contact information is treated as business contact data. We apply the same care and security standards in all cases.

4. How We Use Your Information

4.1 User Data

- **To provide the matching service.** We use your conversation, stated preferences, area, age, and optional gender to identify and recommend suitable communities through WhatsApp.
- **To send proactive follow-up messages.** After a match, Joyna may send you a WhatsApp message to ask whether you attended the community or event and to invite you to leave a rating. You are never obligated to respond.
- **To improve match quality.** Conversation data, match outcomes, and ratings are used to train and refine our AI matching system. This benefits all users over time.
- **To enforce our age restriction.** If you indicate you are under 18, we use that information solely to decline the service. No data from that interaction is retained.
- **For safety and fraud prevention.** We may use data to detect abuse, spam, or misuse of the platform.

4.2 Host Data

- **To operate the host portal.** We use your name and email to manage your account, send platform communications, and verify your identity.
- **To power the matching engine.** Your event and community details are used to surface your listing to relevant users.
- **To share referral performance.** We provide hosts with data about how many Joyna users were referred to their community and aggregate satisfaction ratings. See Section 6 for the precise details of what user information hosts receive.
- **To send host communications.** We may contact you by email about your listing, platform updates, and subscription matters.

5. Legal Basis for Processing (UK GDPR)

We process personal data on the following legal grounds under the UK GDPR:

- **Contract performance (Article 6(1)(b)):** Processing user conversation data and host registration data is necessary to deliver the service requested.
- **Legitimate interests (Article 6(1)(f)):** We use conversation data, match outcomes, and ratings to improve our AI matching system. This is in the legitimate interest of all users and hosts and does not override your individual rights.
- **Legal obligation (Article 6(1)(c)):** We may retain or disclose data where required by applicable law or regulatory authority.

Where we collect optional data such as gender, we rely on your freely given consent, which you may withdraw at any time by contacting us at hello@joyna.community. Withdrawal of consent does not affect the

lawfulness of any processing carried out before withdrawal.

6. How We Share Your Information

We do not sell your personal information to any third party. We share data only in the following circumstances:

6.1 What hosts receive about users

When Joyna refers a user to a host's community or event, the host receives only the user's first name. This may appear in the host's event dashboard and may be included in email notifications sent to the host. We never share a user's WhatsApp number, email address, full name, age, gender, or any other personal details with hosts.

6.2 Service providers

We use trusted third-party providers who process data on our behalf under strict contractual obligations, including:

- Amazon Web Services (AWS), eu-west-1 region (Dublin, Ireland), for cloud infrastructure and database hosting.
- Meta Platforms Ireland Ltd., as the operator of the WhatsApp Business API through which Joyna communicates with users. Meta's own Privacy Policy applies to your use of the WhatsApp platform itself. We are the data controller for all data we collect and store in our own systems.
- Anthropic and OpenAI, as AI processing providers used to power the Joyna conversation and matching engine. See Section 7 for full details.

6.3 Legal requirements

We may disclose information if required by law, court order, or regulatory authority, or where we believe disclosure is necessary to protect the safety of any person or to prevent fraud.

6.4 Business transfers

If Joyna AI Inc. is acquired, merged, or undergoes a similar corporate transaction, your data may be transferred as part of that process. We will notify you in advance where required by law.

7. WhatsApp, Meta, and Third-Party AI Providers

7.1 WhatsApp and Meta

Joyna operates exclusively through the WhatsApp Business API. When you message Joyna, your messages are transmitted through WhatsApp's infrastructure operated by Meta Platforms Ireland Ltd. Meta's Privacy Policy and Terms of Service govern your use of the WhatsApp platform itself and are available at [whatsapp.com/legal/privacy-policy](https://www.whatsapp.com/legal/privacy-policy).

Joyna AI Inc. is the data controller for all data we collect and store within our own systems. Meta acts as a data processor in transmitting messages between you and Joyna.

7.2 Third-Party AI Providers

To deliver the Joyna matching service, your conversations and interactions with Joyna may be processed by third-party AI providers, currently including Anthropic and OpenAI. Information processed by these providers

may include the content of your conversation with Joyna and the preferences you share during the qualifying process.

These providers are bound by data processing agreements with Joyna AI Inc. and operate under their own privacy policies and security standards. We select providers based on their security practices and compliance with applicable data protection law.

8. Automated Decision-Making

Joyna uses automated AI processing to generate community match recommendations based on the preferences you share during your conversation. This automated processing produces recommendations but does not make legally significant decisions about you. You are always free to accept, ignore, or query any recommendation Joyna makes.

If you have a question about a match recommendation or wish to request that a recommendation be reviewed, please contact us at hello@joyna.community. We will respond within one calendar month.

9. Cookies and Tracking Technologies

Joyna AI Inc. may use cookies, advertising pixels, conversion tracking tools, and similar technologies on its website at joyna.ai. These tools help us understand how users discover the Service and measure the effectiveness of our marketing.

Where specific tracking tools are deployed, details will be set out in an updated version of this Privacy Policy before those tools go live. You may be able to manage or opt out of certain tracking through your browser settings or the settings of the relevant platforms.

The Joyna WhatsApp service itself does not use cookies.

10. Data Storage and International Transfers

All personal data collected by Joyna is stored on Amazon Web Services infrastructure in the eu-west-1 region, located in Dublin, Ireland. This region is within the European Economic Area (EEA), which the UK recognises as providing an adequate level of data protection.

As Joyna AI Inc. is a US-incorporated company, our access to and processing of your data from the United States constitutes an international transfer under UK GDPR. To ensure your data receives the same level of protection as it would under UK law, we rely on UK-approved International Data Transfer Agreements (IDTAs), which incorporate Standard Contractual Clauses (SCCs) approved by the UK Information Commissioner's Office. These are binding contractual obligations that require us to protect your data in accordance with UK GDPR standards regardless of where it is accessed from.

Where any other service providers process data outside the UK or EEA, we ensure appropriate safeguards are in place before any transfer occurs.

11. Data Retention

We retain your personal data only for as long as necessary and in accordance with the following schedule:

- **Active users:** we retain all data, including full conversation history, for as long as you are actively using the Joyna service.

- **Inactive users:** if you have not interacted with Joyna for 12 consecutive months, your conversation data and personal details will be deleted or fully anonymised. Anonymised data cannot be used to identify you and may be retained indefinitely for the purpose of improving our matching models.
- **Hosts:** we retain host account data for the duration of your active listing and for 12 months following deactivation of your host account, after which it is deleted or anonymised.
- **Under 18 interactions:** if a user indicates they are under 18, no data from that interaction is retained. It is discarded immediately.
- **Erasure requests:** if you request that we delete your data, we will action this within 30 days. See Section 12 for how to make this request.

When we delete data, we remove it from our active systems and ensure it is purged from backups within a reasonable timeframe consistent with our backup cycles.

12. Your Rights Under UK GDPR

As a UK resident, you have the following rights in relation to your personal data:

- **Right of access.** You may request a copy of the personal data we hold about you.
- **Right to rectification.** You may ask us to correct inaccurate or incomplete information.
- **Right to erasure.** You may ask us to delete all personal data we hold about you. This is sometimes called the right to be forgotten. To make an erasure request, whether you are a user or a host, please email us at hello@joyna.community. We will action all erasure requests within 30 days.
- **Right to restrict processing.** You may ask us to limit how we use your data in certain circumstances, for example while a dispute is being resolved.
- **Right to data portability.** You may request a copy of your personal data in a structured, commonly used, machine-readable format.
- **Right to object.** You may object to us processing your data on the basis of our legitimate interests. We will stop unless we can demonstrate compelling legitimate grounds that override your interests.
- **Right to withdraw consent.** Where processing is based on your consent, such as optional gender data, you may withdraw that consent at any time by contacting hello@joyna.community. Withdrawal does not affect the lawfulness of processing carried out before withdrawal.
- **Rights in relation to automated decision-making.** You have the right to query any automated match recommendation Joyna makes. See Section 8 for details.

To exercise any of these rights, contact us at hello@joyna.community or contact our UK representative at chris@chriscowdrey.co.uk. We will respond within one calendar month. We may ask you to verify your identity before actioning a request.

If you are not satisfied with how we handle your request, you have the right to lodge a complaint with the Information Commissioner's Office (ICO) at ico.org.uk or by calling 0303 123 1113.

13. Data Security

We implement appropriate technical and organisational measures to protect your personal data against unauthorised access, loss, alteration, or disclosure. These include:

- Encryption of data in transit and at rest within our AWS infrastructure.
- Access controls limiting who within our team can access personal data.

- Regular review of our security practices and cloud infrastructure.

No system is completely secure. If you believe your information has been compromised, please contact us immediately at hello@joyna.community.

14. Data Breach Notification

In the event of a personal data breach, Joyna AI Inc. will comply with its notification obligations under UK GDPR. Specifically:

- Where a breach is likely to result in a risk to your rights and freedoms, we will notify the Information Commissioner's Office (ICO) within 72 hours of becoming aware of the breach.
- Where a breach is likely to result in a high risk to your rights and freedoms, we will also notify affected individuals directly without undue delay, providing details of the nature of the breach, the likely consequences, and the measures we have taken or propose to take to address it.
- Where the risk is low, we may not be required to notify individuals, but we will maintain an internal record of all breaches regardless of severity.

If you believe your personal data held by Joyna has been compromised, please contact us immediately at hello@joyna.community.

15. Age Restriction

The Joyna service is intended exclusively for users aged 18 and over. We ask all users to provide their age at the start of a conversation. If a user indicates they are under 18, Joyna will inform them that the service is only available to those aged 18 and over, decline to provide the service, and discard all data from that interaction immediately.

We do not knowingly collect or retain personal data from individuals under 18. If you believe a minor has accessed our service and their data has been stored, please contact us at hello@joyna.community and we will delete the relevant data promptly.

16. Governing Law

This Privacy Policy is governed by and construed in accordance with the UK General Data Protection Regulation (UK GDPR) and the Data Protection Act 2018, as they apply to the processing of personal data of UK residents.

The supervisory authority for data protection matters relating to UK users is the Information Commissioner's Office (ICO), contactable at ico.org.uk or 0303 123 1113. You have the right to lodge a complaint with the ICO at any time.

17. Changes to This Policy

We may update this Privacy Policy from time to time to reflect changes in our practices or legal obligations. If we make material changes, we will notify users via WhatsApp message and notify hosts by email before the changes take effect. The current version of this policy is always available at joyna.ai/privacy-policy.

Your continued use of the Joyna service after notification of material changes constitutes your acceptance of the updated policy.

18. Contact Us

For any questions, concerns, or data rights requests relating to this Privacy Policy or your personal data, please contact us:

- Email: hello@joyna.community
- Website: joyna.ai/privacy-policy

UK GDPR Article 27 Representative

UK individuals and the ICO may also contact our appointed UK representative directly:

- Christopher Cowdrey
- Email: chris@chriscowdrey.co.uk