

# THEOVIA PRIVACY POLICY

**Effective Date:** 8/25/2026 **Last Updated:** 8/25/2026

Theovia is operated by **Blackmane Industries LLC** (“Theovia”, “we”, “us”, “our”), a limited liability company organized in Arizona, United States, with its principal place of business in Tempe, Arizona.

This Privacy Policy explains what information we collect through the Theovia website at theoviaos.com, the Theovia mobile applications for iOS and Android, and all related features and services (together, the “Service”), how we use that information, and the choices you have.

**Please read this policy carefully.** By creating an account or using the Service, you agree to the practices described here. If you do not agree, please do not use the Service.

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## 1. A note about faith, and about what we cannot read

Two things about Theovia are unusual enough that we want to state them before anything else.

**We record your faith tradition.** When you join, you tell us your faith and, if you wish, your denomination. We use this to determine which calendar, which observances, which scripture and which guidance you are shown. Many privacy laws treat this as especially sensitive — California calls it “sensitive personal information”, and India and Mexico apply similar protections. We treat it as such. **We collect it only because the Service cannot function without it**, we do not sell it, we do not use it for advertising, and you may change or remove it at any time by editing your profile or deleting your account.

**Your private messages are encrypted so that we cannot read them.** Direct messages, ministry vault messages and confessions you send within your sanctuary are encrypted on your device before they reach us. This does not cover what you write to Theios, which is described in Section 6. We store only the encrypted result. **We do not hold a key that would let us read them, and neither does your church.** This means we cannot recover your message history if you lose your keys and your recovery phrase, and we cannot produce readable message content in response to a request from anyone, including law enforcement.

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## 2. Two kinds of account, and why it matters

Theovia can be used in two different ways, and **what we collect depends on which one you are using.**

**A personal workspace** is yours alone. There is no church, no leadership, and no other member. You have the calendar, scripture, meditation, your own journal and the Theios study companion. Nobody else can see anything in it. We collect your account details and what you choose to write; there is no congregation to share it with.

**An institution workspace** belongs to a church, temple, mosque or other religious institution that you have joined or been invited to. Here you also have messaging, ministry vaults, prayer walls, announcements, events, service scheduling and — where the sanctuary offers it — children’s ministry check-in. **In an institution workspace, some information is necessarily visible to that sanctuary’s leadership**, as described in Section 7.

You may hold both. They are kept separate, and moving between them does not carry your content across.

⚠ Where a section below applies only to one kind of account, it says so.

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## 3. Information we collect

### 3.1 Information you give us

**When you create an account:** your first and last name, email address, a username, your password (stored only as a cryptographic hash — we never store the password itself), your faith tradition and denomination, and if it applies, whether you wish to include the Apocrypha in your scripture.

**Encryption keys.** When you create an account, your device generates an RSA key pair. The public key is stored in plain form so others can send you encrypted messages. The private key is stored **twice, both times encrypted**: once with a key derived from your password, and once with a key derived from a recovery code shown to you a single time at sign-up. We hold both encrypted copies and neither of the secrets that open them. **If you lose your password and your recovery code, your encrypted history cannot be recovered by us, by your sanctuary, or by anyone.**

**When you join a sanctuary** (*institution workspace only*): your membership, your role, and a record of your request to join and its outcome, including if it was declined.

**Content you create in a personal workspace:** your journal, your saved scripture and reflections, and anything you write to Theios. **This is visible to you alone.**

**Content you create in an institution workspace** (*institution workspace only*): prayer requests, direct messages, ministry vault messages, confessions, replies to announcements, event registrations, and service scheduling responses.

**Files you upload:** profile pictures, and — if you are a church leader — sermons, documents, images, reels and video, and material for events and newsletters.

**If you subscribe:** your subscription tier and billing period. **We do not receive or store your card details.** Payments are handled by Stripe on the web and by Apple or Google in the mobile applications.

### 3.2 Information collected automatically

Server logs recording IP address, request path, response status, and timestamp. Device and session information for the security features that let you see and revoke your signed-in devices. A push notification token, if you allow notifications. Records of your interaction with the Service, such as when you last read announcements.

### 3.3 Information we deliberately do not collect

**We do not store your location.** Prayer times, sunrise and sunset, and the Sky AR feature use your device's location on the device itself. Your coordinates are not transmitted to us or stored on our servers. A sanctuary's own address and coordinates are stored, because a church is a public place, not a person.

**We do not use advertising trackers,** advertising identifiers, or third-party advertising cookies. We do not sell or share personal information for cross-context behavioral advertising.

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## 4. Children and Kids Ministry

**Theovia accounts are for adults.** You must be at least 18 years old to create an account, and older where your local law requires it. We do not knowingly collect personal information directly from a child under 18, and a minor cannot hold an account, sign in, or send or receive messages. The only information we hold about a child is a Kids Ministry record created by their own parent or guardian, as described below.

### Kids Ministry check-in (*institution workspace only*)

Where a sanctuary offers children's programming, **a parent or guardian may create a record for their child** so the church can check them in and out safely. The account remains the adult's. The child has none.

● **This record contains health information about a child,** which we treat as among the most sensitive information on the Service. A record may include:

- Full legal name, preferred name, date of birth and age group
- Guardian and second guardian names, parent phone number and email
- Emergency contact name and phone number
- Names of people authorised to collect the child
- **Allergies, medical conditions and medications, and special needs**
- Whether the parent consents to photographs or media of the child
- Notes recorded by the guardian/ministry team about the child's care

**Why we collect it.** A church cannot look after a child safely without knowing who may collect them, who to call in an emergency, and what could harm them. Each field exists for that reason and no other.

**Who can see it.** The parent or guardian who created it, and the leadership and children's ministry team of that one sanctuary. Nobody else. It is never shared with other sanctuaries, never used for marketing, and never sold.

**Photo and media consent** is recorded as an explicit yes or no and is set by the parent. Where consent is not given, the sanctuary is expected to honour that.

**⚠ Parents are in control.** You may view, correct or delete your child's record at any time through the app, by asking your sanctuary's leadership, or by contacting us at the address in Section 13. Deleting your own account deletes the children's records you created.

**We do not use children's information for any purpose other than the check-in and safety functions described above.** We do not build profiles of children, we do not send them communications, and we do not process their information to train any model.

## 5. How we use information

- To provide the Service: your account, your sanctuary, your messages, your calendar
- To determine what you see, based on your faith tradition
- To send you transactional email — verification, password reset, announcements you have not read, and notices about your account
- To send push notifications you have enabled
- To operate the study companion, Theios
- To protect the Service: rate limiting, abuse prevention, and the audit log that lets a sanctuary's leadership see what administrative actions were taken
- To take payment and manage subscriptions
- To meet our legal obligations

**We do not train any AI models on your information.** Our own model is frozen, our providers are barred from it, and if that ever changes we will update this policy first.

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## 6. Theios, and what happens to what you write to it

Theios is a study companion. When you write to it, your message is checked by our own model, then sent to a third-party artificial intelligence provider for a self-harm check and a reply.

Every message you write is screened first by a model we built ourselves. The model is ours, but it runs on GPU infrastructure rented from a third party — which means your message reaches that infrastructure exactly as you wrote it, before any screening has happened. The screening runs on every message. What it changes depends on what it finds.

**An ordinary message is sent as you wrote it.** If you mention a name during an everyday talk or while asking about a sermon or a passage, that name goes with it. Everyday conversation is not altered.

**A message the screening judges to be confessional or otherwise sensitive has personal names replaced before it is sent** - writing something confessional to Theios is not the same as the sanctuary confessions feature in Section 1, which we cannot read at all. The provider receives a placeholder such as [Name 1] in place of a real name, so the substance of your question reaches it without the people in it being identified. **You still see the real names.** The map from placeholder back to name is encrypted with your own key and held on your device, not by us, and it travels between your devices in that encrypted form. We cannot reverse the placeholders ourselves.

**A message containing sexually explicit language is first rewritten by our screening into neutral language, and then has names replaced in the same way. The screening does not alter violent or graphic content — that is passed through unchanged, so that the safety check described below can see it.**

**When a message has been treated this way, the app tells you so** — a notice appears above the conversation reading "sensitive words detected, names veiled for your protection", so you are never left guessing whether it happened.

**⚠ This screening is automated and deliberately protective.** It will sometimes veil a name ([NAME]), or place ([LOCATION]) in an ordinary conversation that did not need veiling; less often it misses one, and the message goes as written. The identifier removal is careful, but it is not a guarantee. Please do not write anything to Theios that you would not want processed by a third party.

**● In an institution workspace, a message that indicates you may be at risk of harming yourself is reported to that institution's leadership.** The church administrator is notified, and depending on the institution's settings other leaders such as deacons may be notified as well.

**We do this because we would rather a person who is in danger be reached by someone who can help than have their words stay private.** You should know it before you write, not after. It is stated in the app before you begin a conversation with Theios, and it is stated here.

**⚠ Your conversation itself stays private. Your leadership cannot read it.** What they receive is a short alert naming you and saying that thoughts of self-harm were expressed, so that someone can reach out to you. They are not shown what you wrote.

**Nothing else in a conversation with Theios triggers a notification.** Confessional content does not. Sensitive content does not. Only an indication that you may be at risk of harming yourself does. **In a personal workspace there is no leadership and no such alert.**

**⚠ Theios is not a counsellor, a doctor, or an emergency service.** If you are in immediate danger, contact your local emergency number or a crisis line in your country.

Conversations with Theios are stored in your account so that you can return to them, and you may delete any of them at any time.

## 7. Who we share information with

**We do not sell your personal information.** We have not sold or shared personal information in the preceding twelve months, and we do not intend to.

We share information with the following categories of service providers, each only to the extent needed to run the Service:

| Purpose                                | What they receive                                                                                                            |
|----------------------------------------|------------------------------------------------------------------------------------------------------------------------------|
| Hosting and application infrastructure | All Service data, as our hosting provider                                                                                    |
| Database and file storage              | Account records, encrypted messages, uploaded files                                                                          |
| Artificial intelligence processing     | Your message to Theios — as written, or with personal names replaced where the screening judged it sensitive — and its reply |
| Transactional email delivery           | Your email address and the message being sent                                                                                |
| Push notification delivery             | Your device push token and the notification                                                                                  |
| Payment processing                     | Your payment details, collected directly by them                                                                             |
| App distribution                       | Whatever Apple or Google collect under their own policies                                                                    |

### The providers we use are:

| Provider      | Role                                                                                                                           |
|---------------|--------------------------------------------------------------------------------------------------------------------------------|
| Railway       | Application hosting                                                                                                            |
| Supabase      | Database, and the vector store used for scripture and sermon search                                                            |
| Cloudflare R2 | Storage of uploaded files: profile pictures, sermons, documents, images, reels, video, and material for events and newsletters |
| OpenAI        | Processing Theios' replies, and the automated safety check that detects expressions of self-harm described in Section 6        |
| Runpod        | Running our own screening model, which classifies messages and veils names before they are sent onward                         |
| Resend        | Sending transactional email                                                                                                    |
| Expo          | Delivering push notifications                                                                                                  |
| Stripe        | Payments made on the web                                                                                                       |
| Apple, Google | App distribution, and payments made in the mobile applications                                                                 |

**Within your sanctuary.** Your name, username, profile picture, role and join date are visible to the leadership of any sanctuary you belong to, and — depending on that

sanctuary's settings — to its other members. Your messages are not, because we cannot read them.

**Legal disclosure.** We may disclose information where we believe in good faith that we are required to do so by law, or where it is necessary to protect the safety of a person. **We cannot disclose the content of end-to-end encrypted messages, because we cannot read them.**

**Business transfer.** If Blackmane Industries LLC is involved in a merger, acquisition or sale of assets, information may be transferred as part of that transaction. We will give notice before your information becomes subject to a different privacy policy.

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## 8. Security

Passwords are stored using a slow, salted hashing algorithm designed to resist brute force. Private messages are encrypted on your device and stored only as ciphertext. All traffic between your device and our servers is encrypted in transit. Sessions can be reviewed and revoked from your account, and a device limit applies to each account.

 **No system is perfectly secure.** We cannot guarantee that information transmitted over the internet is completely safe, and you use the Service at your own risk. If we become aware of a breach affecting your personal information, we will notify you as required by law.

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## 9. How long we keep information

We keep your account information for as long as your account exists. When you delete your account, we delete your personal information within 1 day from the live system, except where we are required to keep it longer for legal, tax or accounting reasons.

**Some things survive deletion in a form that no longer identifies you:** audit log entries recording that an administrative action occurred, aggregate counts, and a record that a required consent was given — reduced to the type of consent, the version of this policy then in force, and the date, with your name, IP address and device information removed. Messages you sent to others remain in their copy of the conversation, as they would in any messaging service.

Backups are retained for 7 days and are overwritten in the ordinary course. A copy of deleted data may therefore remain in a backup for up to 7 days after it is removed from the live system, after which it is gone.

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## 10. Your rights

Depending on where you live, you may have the right to:

- **Access** the personal information we hold about you
- **Correct** information that is inaccurate or incomplete
- **Delete** your personal information
- **Port** your information to another service
- **Object to** or **restrict** certain processing
- **Withdraw consent** where we rely on it — including your consent to record your faith tradition
- **Complain** to your data protection authority

To exercise any of these, email us at [privacy@theoviaos.com](mailto:privacy@theoviaos.com). We will respond within 30 days, and will tell you if we need longer.

 **We will not discriminate against you for exercising these rights.** We will not deny you the Service, charge you a different price, or give you a lesser experience.

**Deleting your account** is available in the app under Account, and does not require you to contact us.

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## 11. International transfers

We are based in the United States and our servers are located in the United States. If you use the Service from outside the United States, your information will be transferred to and processed in the United States, which may not offer the same level of data protection as your own country. By using the Service you consent to this transfer.

The Service is not offered in the European Economic Area, the United Kingdom, or mainland China, and we do not knowingly accept registrations from those regions.

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## 12. Changes to this policy

We may update this Privacy Policy. If we make a material change, we will notify you in the Service or by email before it takes effect. The date at the top shows when it was last revised.

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## 13. Contact us

**Blackmane Industries LLC**, Tempe, Arizona, United States

Email: [privacy@theoviaos.com](mailto:privacy@theoviaos.com)

Privacy Officer, Data Protection Officer and grievance contact: Eshan K Kaushal, [privacy@theoviaos.com](mailto:privacy@theoviaos.com). You may contact this address to raise a complaint or exercise any

right described in this policy.

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## 14. Notice for California residents

Under the California Consumer Privacy Act, as amended, California residents have the rights described in Section 10, and the following additional disclosures apply.

### Categories of personal information collected in the last twelve months:

| CCPA category                         | What we collect                                                                                                                                                                                                                                                                                                        |
|---------------------------------------|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| Identifiers                           | Name, username, email address, IP address, account ID                                                                                                                                                                                                                                                                  |
| Customer records                      | Name, email address                                                                                                                                                                                                                                                                                                    |
| Commercial information                | Subscription tier and billing period                                                                                                                                                                                                                                                                                   |
| Internet activity                     | Server logs, interaction with the Service                                                                                                                                                                                                                                                                              |
| <b>Sensitive personal information</b> | <b>Religious or philosophical beliefs</b> (your faith tradition and denomination); <b>the contents of messages not directed to us</b> (stored encrypted and unreadable by us); <b>health information</b> (allergies, medical conditions, medications and special needs recorded by a parent in a Kids Ministry record) |

**Disclosure to your institution.** As described in Section 6, in an institution workspace we disclose to that institution's leadership an indication that a member may be at risk of harming themselves. This is a disclosure for safety, not a sale or a share for advertising.

**We do not sell or share personal information** as those terms are defined by the CCPA, and we have not done so in the preceding twelve months. We do not sell or share the personal information of any consumer we know to be under 16.

**Use of sensitive personal information.** We use your faith tradition solely to provide the Service you asked for. We do not use it to infer characteristics about you. Because our use falls within the purposes permitted by the CCPA without a right to limit, we do not offer a "Limit the Use of My Sensitive Personal Information" link — but you may change or remove your faith tradition at any time in your profile.

**Requests.** Submit a request by emailing [privacy@theoviaos.com](mailto:privacy@theoviaos.com). We will verify your identity before responding, usually by confirming control of the email address on the account.

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## 15. Notice for residents of other U.S. states

If you live in a state with a comprehensive privacy law — including Virginia, Colorado, Connecticut, Utah, Texas, Oregon, Montana or others as they take effect — you may have

rights similar to those in Section 10, and the right to appeal a decision we make about your request.

**We do not process personal information for targeted advertising, sale, or profiling that produces legal or similarly significant effects.**

To exercise a right or appeal a decision, email: **[privacy@theoviaos.com](mailto:privacy@theoviaos.com)**.

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*By using Theovia, you acknowledge that you have read and understood this Privacy Policy.*