Privacy Policy of the Teorido app

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This translation is for information purposes only. In the event of any discrepancy, the Polish version of the document is binding.

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1. Data controller

1. The controller of your personal data is **Łukasz Filbrandt**, conducting unregistered business activity, ul. Generała Mariusza Zaruskiego 10a/24, 81-577 Gdynia (hereinafter: the **Controller** or **we**).
2. For matters concerning personal data, write to **prywatnosc@teorido.pl** or send a letter to the address above.
3. We have not appointed a data protection officer, because we are not required to do so.
4. Capitalised terms (e.g. App, Account, Anonymous Account) have the meaning given to them in the Terms.

2. Where we get your data from

- **from you**: when you use the App, create an Account, provide your first name and username, invite friends or contact us,
- **from Google**: when you log in with Google (only your email address and Google account identifier),
- **automatically**: from your device while you use the App (technical data, learning and gameplay data).

3. What data we process, for what purpose and on what legal basis

Purpose	Data	Legal basis (GDPR)
Providing the services: Anonymous Account, learning, saving and synchronising progress, gameplay	account identifier, date of creation and of last activity, answers to questions (including response time), progress in lessons and exams, statistics, flagged questions, Virtual Items, selected driving licence category, settings (including the selected App language)	Article 6(1)(b) (performance of a contract)
Creating an Account and logging in	email address; when logging in with Google: email address and Google account identifier (we do not retrieve the first name, surname or photo from the Google account); one-time login code	Article 6(1)(b)
Profile	first name (it cannot be changed later) and username	Article 6(1)(b)
Social features: friends, invitations, challenges between friends	first name, username, friend connections, invitations, progress in challenges, data shown to friends (section 4)	Article 6(1)(b)

Purpose	Data	Legal basis (GDPR)
Protection against bots and abuse: captcha, limits on sending codes and invitations, detection of irregular in-game settlements	hash of the email address, account identifier, timestamp, Cloudflare verification token, record of rejected settlements; on Cloudflare's side: IP address and browser data	Article 6(1)(f) (legitimate interest: security of the App and fairness of gameplay)
Security of logging in and of the infrastructure: login system and server logs, backups	IP address, browser data, login events; copies of the entire database	Article 6(1)(f)
Service-related messages: login code, warning before deletion of an inactive Account, notice of a change to the Terms	email address, selected App language (so that the message reaches you in your language)	Article 6(1)(b) and (c)
Contact, complaints, content reports, appeals against moderation decisions	data provided in the message	Article 6(1)(b), (c) (obligations under the Act on consumer rights [ustawa o prawach konsumenta] and the Digital Services Act) and (f)
Moderation of first names and usernames	first name, username, history of decisions	Article 6(1)(c) and (f)
Consent register	type and content of the consent, its grant or withdrawal, date	Article 6(1)(c) and (f) (accountability)
Establishment, exercise and defence of claims	data necessary for the matter	Article 6(1)(f)

Providing data is voluntary. Without an email address or a Google account, you cannot create an Account, but you can use the Anonymous Account.

What we do not collect: date of birth, home address, location, payment data. We do not store your IP address in our tables (it is processed only by the providers listed in section 5, as part of their services).

4. What other users can see

Who	What they see
Any logged-in user who types in your exact username (when inviting or choosing a username)	only the fact that such a username exists, without your first name or any other data
A person you invite to be friends (while the invitation is pending)	your first name and username

Who	What they see
Your friends (only for as long as you are friends)	first name and username; month and year the account was created; current streak; number of bolts; current category and progress in categories (completed lessons); learning statistics (longest streak, average and record number of lessons per day, number of learning days, the topic with the most mistakes and the number of those mistakes); number of new lessons on each day of the current week; progress and results in challenges between you

Friends **do not see** your email address, account identifier, individual answers or exact dates. Only people who have an Account can be friends. When a friendship is removed, access to this data ends immediately for both sides. We do not run public rankings.

5. Recipients of data

We entrust your data only to providers who help us run the App, on the basis of data processing agreements. Some of them act, to a certain extent, as independent controllers.

Recipient	Scope	Role
Supabase Pte. Ltd.	database, login, App servers (servers in Frankfurt, Germany); query logs with IP address	processor
Plus Five Five, Inc. (Resend)	sending email messages: recipient address and message content (including the login code)	processor
Cloudflare, Inc.	bot protection (Turnstile); storing and delivering photos and videos for the questions; storing encrypted database backups (in the European Union); handling the teorido.pl domain and incoming mail	processor; for the purpose of improving Turnstile: independent controller
GitHub, Inc.	infrastructure on which a backup of the database is created every night (before it is encrypted)	processor
Google (Google Ireland Ltd / Google LLC)	logging in with Google, under the terms of your agreement with Google	independent controller
Apple, Google (app stores)	download and updates of the mobile App, under the terms of your agreement with the store	independent controllers
Legal and tax advisers, public authorities	where necessary or required by law	independent controllers

We will inform you of any change or addition of a provider (e.g. hosting for the teorido.pl website) by updating this list.

6. Transfers of data outside the European Economic Area

Supabase (Singapore), Plus Five Five (USA), Cloudflare (USA), GitHub (USA) and Google (USA) have their registered offices or staff outside the EEA. Data may therefore be transferred to third countries on the basis of:

- a decision of the European Commission finding an adequate level of protection (EU-US Data Privacy Framework), in the case of entities certified under this programme,
- standard contractual clauses approved by the European Commission, in the case of the others (including Supabase).

You can obtain a copy of the safeguards applied by writing to prywatnosc@teorido.pl.

7. How long we keep data

Data	Period
Anonymous Account and its data	until you delete it or **90 days after the last activity**
Account and its data	until you delete it or **2 years after the Account was last used** (7 days beforehand we will send a warning to the Account's email address)
Login code	valid for 10 minutes; it becomes invalid once used or expired
Friendships, invitations, challenges between friends	until they are deleted or the Account is deleted
Consent register	until the Account is deleted
Protection data (sending and invitation limits, captcha tokens)	up to 7 days
Record of rejected in-game settlements	until the Account is deleted; after that without the account identifier (it is then no longer personal data)
Login system logs (including IP address)	up to 30 days
Supabase server logs	up to 7 days
Log of sent messages in Resend	30 days
Backups (encrypted)	**30 days**; data deleted from the App disappears from the backups after this period at the latest
Complaints, reports, appeals	until the claims become time-barred
Data in your device's storage	until you log out, delete the Account or clear the browser / app data

8. Your rights

You have the right to:

- access your data and receive a copy of it,
- rectification of your data (we will correct your first name at your request if it is incorrect),
- erasure of your data (the easiest way is to delete your Account in **Settings**),
- restriction of processing,
- portability of the data you have provided to us,
- **object** to processing based on our legitimate interest,
- **withdraw consent at any time**, without affecting the lawfulness of processing carried out before its withdrawal,
- lodge a complaint with the **President of the Personal Data Protection Office** (Prezes Urzędu Ochrony Danych Osobowych, ul. Stawki 2, 00-193 Warszawa, uodo.gov.pl).

We respond to requests without undue delay, and at the latest within one month.

9. Automated decisions and profiling

We do not make decisions about you based solely on automated processing that produce legal effects concerning you or similarly significantly affect you. The following operate automatically: the selection of questions for review based on your answers, the filter of prohibited words in first names and usernames, and abuse detection mechanisms. A decision to block or delete an Account is taken by a human. We do not profile you for advertising purposes.

10. Age

The App is intended for persons who have reached the age of 16. We do not knowingly collect data of younger persons. If we learn that an Account belongs to a person under the age of 16, we will delete it.

11. Marketing consent, analytics and advertising

1. In **Settings** → **Privacy** there is a switch for consent to the collection of information for marketing purposes. It is off by default.
2. **We do not currently process any data on the basis of this consent**. The App does not use analytics tools, advertising pixels (e.g. Meta, TikTok) or advertisements.
3. Before we introduce such tools, we will update this Policy and ask for new, specific consent. In that request, we will specify the tools, the providers and the scope of data. Without this consent, they will not be activated.

12. Device storage: cookies and similar technologies

1. The App **does not use cookies**. In the browser or app storage (localStorage, sessionStorage), it saves only information necessary for the service to work or information that remembers your choice, which is why such information does not require consent (Article 399(3) of the Electronic Communications Law [ustawa Prawo komunikacji elektronicznej]):

What	Why	How long
login session (access tokens, account identifier, email address, login method)	keeping you logged in	until you log out or delete the Account
language, theme, sounds, vibration	remembering settings	until changed or the data is cleared
state of an interrupted lesson	resuming the lesson	until it is completed or reset
information about hidden rules screens and about prompts to create an Account that have been shown	so that they are not shown again	until a reset or deletion of the Account
temporary data for logging in with Google (state and one-time security code)	secure return from Google login	deleted immediately after the return
one-time information about the welcome message after logging in (sessionStorage)	displaying the welcome message	deleted immediately

2. **Cloudflare Turnstile** (bot protection) runs in your browser and processes signals necessary to distinguish a human from a bot, including the IP address and browser data. Details: the Turnstile privacy policy (cloudflare.com/turnstile-privacy-policy).

3. You can delete the saved data in your browser or app settings. This will log you out and, in the case of an Anonymous Account, result in the loss of progress.

13. Security

We apply measures appropriate to the risk, including: encrypted connections, passwordless login (one-time codes valid for 10 minutes), bot protection, access control at database level (each account has access only to its own data and to data shared with it by friends), encrypted backups and restricted access to production data.

14. Changes to the Privacy Policy

We will give notice of significant changes in the App and will also inform Users who have an Account by email.