

## Stilaro Privacy Policy (English)

Last Updated: December 9, 2025

### 1. Information We Collect

Stilaro collects the following information, necessary to provide our personalized style recommendation services:

#### 1.1 Account and Contact Data

Name (Optional): Used for in-app personalization.

Email Address: Required for account creation, essential communication, and notifications.

Payment Data: Collected and processed exclusively by our certified third-party payment provider for premium transactions. Stilaro does not store full card details.

#### 1.2 Image Data (Sensitive Data)

Face and body photos: Used exclusively for the analysis of features, silhouette, and measurements to provide personalized style recommendations.

Clothing item photos: Used for identifying your wardrobe to generate outfit suggestions.

#### 1.3 Usage and Operational Data

Interactions: Items viewed, outfits selected, and style preferences.

Device Information: Model, Operating System (OS), language, and anonymous identifiers.

Approximate Geolocation Data: Obtained only with consent (usually at a city/country level) to offer regionally relevant trends.

### 2. How We Use Your Information

Analysis and Personalization: Analyzing photos to offer personalized recommendations and clothing suggestions.

Platform Improvement: Improving our Artificial Intelligence (AI) technology and user experience.

Statistics and Analysis: Performing internal and statistical analysis, using pseudonymized or anonymized information.

Legal Compliance: Complying with legal and security obligations.

### 3. Legal Basis for Processing

The processing of your personal data is based on the following legitimations:

Explicit Consent (Art. 9.2.a GDPR): This is the legal basis for processing Face, body, and clothing item photos, which are considered special category data (sensitive). This consent is freely given, specific, informed, and unambiguous, and is obtained during onboarding.

Performance of a Contract (Art. 6.1.b GDPR): Applicable for account management and payment processing.

**Legitimate Interest (Art. 6.1.f GDPR):** Applicable to improving app functionality, fraud prevention, and internal statistical analysis, provided that your rights and freedoms do not override our interest.

**Legal Obligation (Art. 6.1.c GDPR):** Applicable for compliance with legal or judicial requirements.

#### 4. Security and Storage

**Encryption and Access:** Your data is stored encrypted (AES-256), and access is strictly restricted.

**Certifications:** We comply with the ISO/IEC 27001 standard and conduct regular security audits.

**Retention:** Data is retained only for as long as necessary for the purposes described.

**Data Breaches:** We commit to notifying relevant supervisory authorities and affected users within 72 hours of becoming aware of any security breach, in accordance with Art. 33 of the GDPR.

#### 5. Sharing Information

Stilaro does not sell or share your data for external advertising without express consent. We only share information with:

**Service Providers:** Necessary entities for the app's operation (hosting, AI, analysis). We formalize Data Processing Agreements (DPA) with all of them.

**Legal Requirements:** When legally required by authorities or to protect our rights and security.

#### 6. User Rights

You have the following rights, which you can exercise by contacting stilaroapp@gmail.com:

**Access and Rectification:** Access your data and correct it if it is inaccurate.

**Erasure ("Right to be Forgotten"):** Request the deletion of your data.

**Withdrawal of Consent:** Withdraw the consent given for the processing of sensitive data, such as images, at any time.

**Restriction and Objection:** Restrict the processing of your data or object to processing based on legitimate interest or profiling.

**Portability:** Receive your data in a structured, commonly used, and machine-readable format.

#### 7. Cookies and Similar Technologies

We use analytical and session cookies to improve your experience and remember preferences. Non-essential tracking cookies will not be loaded without your active consent (ePrivacy Directive).

#### 8. Minors

Our app is not directed at children, and we do not knowingly collect information from children under 13 years of age.

## 10. Global Compliance (GDPR, CCPA, LGPD)

This policy applies to all users and complies with key global regulations:

GDPR (Europe): Ensuring explicit consent for sensitive images and all mentioned rights.

CCPA/CPRA (USA): Stilaro does NOT sell or share data for external advertising.

LGPD (Brazil): Applying the principles of Purpose, Adequacy, and Necessity.