

PRIVACY POLICY

Last Updated: 24.01.2026

Controller: DC SOFT BILISIM TEKNOLOJILERI LIMITED SIRKETI

Contact: support@scoutwise.ai

1. INTRODUCTION

This Privacy Policy explains how ScoutWise (“we”, “us”) collects, uses, and shares your personal data when you use our App, in compliance with the General Data Protection Regulation (GDPR) and other applicable laws.

2. DATA WE COLLECT

- **Account Data:** Email address, password (hashed), age/date of birth (for age verification).
- **Usage Data:** Logs, IP address, device information, interactions within the App.
- **User Content:** Prompts, queries, and search history input into the AI system.

3. PURPOSES AND LEGAL BASIS (GDPR Art. 6)

We process your personal data based on the following legal grounds:

Purpose	Legal Basis (GDPR)
Providing the Service: Creating accounts, processing AI queries, delivering results.	Performance of Contract (Art. 6(1)(b))
Security & Improvement: Preventing fraud, ensuring network security, fixing bugs.	Legitimate Interest (Art. 6(1)(f))
Legal Compliance: Complying with tax and consumer laws.	Legal Obligation (Art. 6(1)(c))
Marketing/Analytics: Personalized ads (if any) or tracking.	Consent (Art. 6(1)(a))

4. DATA STORAGE AND INTERNATIONAL TRANSFERS

4.1. Storage Location: Our primary servers and database infrastructure are hosted by Supabase in Frankfurt, Germany (EU). This ensures your data remains within the EEA.

4.2. Transfer to Provider (Turkey): As the Provider is located in Türkiye (a "third country" under GDPR), your data may be accessed from outside the EEA for administration and support purposes.

- We rely on **Article 49(1)(b) of the GDPR** (transfer necessary for the performance of a contract) to provide the App services to you.
- Where applicable, we may also rely on **Standard Contractual Clauses (SCCs)** approved by the European Commission to ensure the safety of your data.

5. DATA RETENTION

We retain your personal data only as long as necessary:

- **Account Data:** Until you delete your account.
- **Logs/Usage Data:** Up to 1 Year for security purposes.
- **Prompt History:** Anonymized after 30 Days or upon account deletion.

6. YOUR RIGHTS (GDPR)

Under the GDPR, you have the following rights:

- **Right of Access:** Request a copy of your data.
- **Right to Rectification:** Correct inaccurate data.
- **Right to Erasure ("Right to be Forgotten"):** Request deletion of your data.
- **Right to Restriction:** Limit how we use your data.
- **Right to Data Portability:** Receive your data in a structured format.
- **Right to Object:** Object to processing based on legitimate interests.
- **Right to Withdraw Consent:** Withdraw consent at any time (e.g., for marketing).

To exercise these rights, please contact us at: **support@scoutwise.ai**

7. THIRD-PARTY SERVICES

We use the following third-party processors:

- **Supabase (Germany):** Database and Authentication.
- **Render (Germany):** Backend deployment and cron jobs.
- **OpenAI API, DeepSeek API:** AI Processing.
- **App Stores (Apple/Google):** Payment processing (we do not see your credit card details).

8. SUPERVISORY AUTHORITY

If you believe your privacy rights have been violated, you have the right to lodge a complaint with a Data Protection Authority (DPA) in your country of residence.