**PRIVACY POLICY FOR CITIZENSHIP TEST APP**

*Last Updated: 8th May 2025*

**1. Introduction**

Welcome to the **Citizenship Test App** ("we", "our", or "us"). We value your privacy and are committed to protecting your personal information. This Privacy Policy outlines how we collect, use, disclose, and safeguard your data when you access or use our mobile application (the “App”), available on the Google Play Store and Apple App Store.

By downloading, accessing, or using the App, you consent to the data practices described in this Privacy Policy. If you do not agree with this policy, please discontinue use of the App.

**2. Who We Are**

The Citizenship Test App is developed and maintained by **\_\_\_\_\_\_\_\_\_\_\_** (Company/Developer Name). We are responsible for the handling of your personal information in compliance with applicable laws.

If you have any questions about this policy or wish to exercise your privacy rights, please contact us at:

* **Business Name:** \_\_\_\_\_\_\_\_\_\_\_
* **Contact Email:** \_\_\_\_\_\_\_\_\_\_\_
* **Mailing Address:** \_\_\_\_\_\_\_\_\_\_\_
* **Country of Operation:** \_\_\_\_\_\_\_\_\_\_\_

**3. Applicability & Jurisdiction**

This Privacy Policy applies to all individuals who access or use the App, regardless of location. We strive to comply with the privacy laws and regulations of all jurisdictions in which our users reside, including but not limited to:

* **Canada** – Personal Information Protection and Electronic Documents Act (PIPEDA)
* **European Economic Area (EEA)** – General Data Protection Regulation (GDPR)
* **United States** – California Consumer Privacy Act (CCPA) and California Privacy Rights Act (CPRA)
* **Children’s Privacy** – Children’s Online Privacy Protection Act (COPPA)
* **App Store Platforms** – Apple App Store and Google Play policies

**4. Types of Data We Collect**

We collect the following categories of information from users of the App:

* **Device and Technical Data:** Model, operating system, device identifiers, crash logs, language settings
* **Usage Data:** App interactions, session duration, feature usage patterns, tap/swipe behavior
* **IP Address and Approximate Location**
* **App Store Data:** Subscription status, purchase confirmations (note: we do not store payment card details)
* **Support Communications:** Any information you submit via contact or feedback features
* **Diagnostic and Analytics Data:** Performance metrics and error diagnostics

We do **not** collect personally identifiable information such as name, email address, or physical location unless voluntarily submitted.

**5. How We Collect Data**

We collect data using the following methods:

* **Automatically:** When you use the App, we automatically collect technical and usage data through software development kits (SDKs) and analytics services.
* **Voluntarily:** If you contact us for support, submit feedback, or interact with certain features, you may voluntarily provide additional information.
* **Third-Party Platforms:** We may collect or access data provided by Apple or Google in connection with your account, such as purchase confirmations or subscription status.

**6. Purpose of Data Collection**

We use your data for the following purposes:

* To operate, maintain, and improve the functionality and performance of the App
* To analyze usage trends and user behavior
* To detect, prevent, and fix technical issues or security vulnerabilities
* To communicate with users in response to support or feedback inquiries
* To comply with legal obligations, platform terms, and privacy laws
* To administer subscriptions or in-app purchases (as applicable)

**7. Legal Basis for Processing (GDPR)**

For users in the European Economic Area, we process your data based on the following legal grounds:

* **Consent:** Where you have given us explicit permission (e.g., for analytics)
* **Contractual Necessity:** When processing is necessary to fulfill our agreement with you
* **Legitimate Interests:** For purposes such as app improvement or fraud prevention, balanced against your rights
* **Legal Obligation:** Where we are required by law to process data

**8. Sharing and Disclosure of Data**

We do **not sell** or rent your personal data. We may share your information under the following circumstances:

* **Service Providers:** Trusted third parties who perform services on our behalf (e.g., analytics, crash reporting)
* **Legal Compliance:** When required to comply with legal obligations or respond to lawful requests by public authorities
* **Business Transfers:** In the event of a merger, acquisition, or asset sale, your data may be transferred to the acquiring entity

All such third parties are bound by confidentiality and data protection obligations.

**9. Third-Party Services**

We may use the following third-party services within the App, each governed by its own privacy policies:

* **Google Firebase** – analytics and crash reporting
* **Google AdMob or Apple Ads** – for displaying in-app advertisements (if applicable)
* **Apple App Store / Google Play Services** – for app distribution, purchase processing, and app usage reporting

These services may collect and process data in accordance with their respective terms. We recommend reviewing their policies:

* Google Privacy Policy: <https://policies.google.com/privacy>
* Apple Privacy Policy: <https://www.apple.com/legal/privacy/>

**10. Children’s Privacy**

Our App is **not intended for use by children under the age of 13**. We do not knowingly collect or solicit personal information from minors. If you are a parent or guardian and believe your child has provided us with personal information, please contact us at \_\_\_\_\_\_\_\_\_\_\_.

If we become aware that a child under 13 has submitted personal data without verified parental consent, we will delete such information as quickly as possible.

**10. Children’s Privacy**

The Citizenship Test App is **not intended for children under the age of 13** and we do not knowingly collect personal information from children under this age. If you are under 13, please do not use the App or submit any information through it.

If we learn that we have inadvertently collected personal data from a child under 13 without verified parental consent, we will promptly delete such information. Parents or guardians who believe their child has provided personal information may contact us at **\_\_\_\_\_\_\_\_\_\_\_** to request deletion.

**11. User Rights (GDPR, CCPA, PIPEDA)**

Depending on your jurisdiction, you may have the following rights regarding your personal information:

* **Right to Access:** Request a copy of the personal data we hold about you.
* **Right to Rectification:** Request corrections to inaccurate or incomplete data.
* **Right to Erasure:** Request deletion of your personal data under certain conditions.
* **Right to Data Portability:** Receive your data in a structured, machine-readable format.
* **Right to Object/Restrict Processing:** Limit how we use your information.
* **Right to Withdraw Consent:** Withdraw your consent at any time for processing that relies on it.
* **Right to Opt-Out (CCPA):** Request that we not “sell” your personal information (we do not sell data).
* **Right to Lodge a Complaint:** Submit complaints to a supervisory authority (e.g., the Office of the Privacy Commissioner of Canada or a European Data Protection Authority).

To exercise any of these rights, contact us at: **\_\_\_\_\_\_\_\_\_\_\_**

**12. Retention of Data**

We retain your personal data only for as long as is necessary to fulfill the purposes outlined in this Privacy Policy, unless a longer retention period is required or permitted by law. This includes:

* While your use of the App is active
* To comply with our legal and contractual obligations
* To resolve disputes and enforce agreements

When data is no longer needed, we securely delete or anonymize it in accordance with applicable data retention practices.

**13. Data Security**

We implement reasonable administrative, technical, and physical safeguards to protect your personal data. These include:

* **Encryption of data in transit**
* **Secure communication protocols**
* **Access control and authentication procedures**
* **Routine vulnerability scanning and updates**

While we strive to protect your information, no system can be guaranteed 100% secure. We encourage you to protect your own data by using secure passwords and keeping your device software up to date.

**14. International Data Transfers**

Your data may be transferred to and processed in countries outside your country of residence, including the **United States**, **Canada**, and **European Union member states**, where privacy laws may differ.

When transferring personal data internationally, we implement appropriate safeguards such as:

* **Standard Contractual Clauses (SCCs)**
* **Adequacy decisions by the European Commission**
* **Binding corporate rules**
* **Your express consent**

By using the App, you consent to the transfer of your information to jurisdictions that may not offer the same level of protection.

**15. In-App Purchases & Payments**

The App may offer optional features or content via **in-app purchases or subscriptions**, processed through:

* **Google Play Billing** (for Android users)
* **Apple In-App Purchase** (for iOS users)

We do not process or store your credit card or banking details directly. All payment and billing information is handled securely by Google or Apple. You may manage your subscriptions or request refunds directly through your app store account.

For more information, please refer to:

* Google Play Terms: <https://play.google.com/about/play-terms.html>
* Apple Media Services Terms: <https://www.apple.com/legal/internet-services/itunes/>

**16. Cookies & Tracking Technologies**

While cookies are not typically used in mobile apps, the Citizenship Test App may use the following tracking technologies:

* **Device Identifiers (e.g., IDFA, GAID)**
* **Analytics SDKs (e.g., Google Firebase)**
* **Crash Reporting Tools (e.g., Firebase Crashlytics)**

These help us understand user interactions, detect bugs, and improve performance. You can limit or disable these technologies by adjusting your device settings for ad tracking or data sharing preferences.

**17. Do Not Track Signals**

Some web browsers and mobile operating systems include a “Do Not Track” (DNT) feature. Currently, the App does **not respond** to DNT signals, as there is no uniform standard for compliance on mobile platforms. You may still use your device's privacy settings to control app tracking behavior.

**18. Changes to This Policy**

We may update this Privacy Policy to reflect changes in our practices, services, legal requirements, or user feedback. When changes are made, we will:

* Update the “Last Updated” date at the top of this policy
* Post the revised policy in the App or provide notification where legally required

We encourage users to periodically review this policy. Continued use of the App after policy changes constitutes your acceptance of those changes.

**19. Your Consent**

By using the Citizenship Test App, you agree to the terms of this Privacy Policy and consent to the collection, use, and processing of your personal data as described herein.

If you do not agree, you should refrain from using the App. You may withdraw your consent at any time by contacting us at: **\_\_\_\_\_\_\_\_\_\_\_**

**20. Contact Information**

If you have any questions about this Privacy Policy, would like to exercise your rights, or wish to file a privacy-related complaint, please contact us:

* **Email:** \_\_\_\_\_\_\_\_\_\_\_
* **Mailing Address:** \_\_\_\_\_\_\_\_\_\_\_
* **Privacy Contact/Officer (if applicable):** \_\_\_\_\_\_\_\_\_\_\_

We aim to respond to privacy inquiries within **30 days** of receipt. If you're located in the EEA or UK, you may also contact your local data protection authority.