

Information about the Processing of Personal Data

Hey there! This is the privacy policy of our app "AnkiGPT" (referred to as "App" from now on). In the following, we, the Nils Reichardt Agency, Grimmstraße 33, 40235 Düsseldorf, Germany (referred to as "AnkiGPT," "we," or "us"), provide information about the collection of personal data when using the app.

To make these information about data processing easier to understand, we offer simplified summaries (referred to as "Simply put:") of certain complex sections in highlighted text boxes. Even though we provide the summary, it is important and necessary for you to read the full and binding "Information about the Processing of Personal Data."

Below you'll find an overview of the content. By clicking on a specific heading, you'll be taken directly to the relevant section.

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1. Important Terms

Under the following link, you will find the official explanation of important terms from the General Data Protection Regulation (GDPR), some of which are used in this information. Please only click on this link and any other links provided in this information if you agree to open these third-party pages and agree to their data processing and privacy policies:

[GDPR Art. 4 "Definitions" \(dejure.org\)](#)

If you ever come across a word (e.g., "processing," "personal data," etc.) that you don't understand, it may be explained in the link mentioned above.

2. Scope

This privacy policy applies to this app "AnkiGPT" and to the personal data processed through this app.

For applications and websites of other providers, which may be referred to, for example, in section 1 of this policy through links, only the privacy notices and statements of those respective providers apply. Please only access these contents from other third-party providers if you agree to open these third-party contents and agree to their data processing and privacy policies.

3. Controller and Contact

The controller for the processing of personal data in this app, within the meaning of the GDPR, is:

Nils Reichardt Agency
Grimmstraße 33
40235 Düsseldorf

hereinafter referred to as "we," "us," or "AnkiGPT"

Managing Director: Nils Reichardt

Email: support@ankigpt.wtf

4. Hosting, Backend Infrastructure, and Data Storage Location

Our app is hosted on the Google Cloud Platform (with the data center region in Frankfurt am Main and Belgium) by Google LLC (hereinafter: "Google"), 1600 Amphitheatre Parkway, Mountain View, California 94043 USA, on our behalf and according to our instructions, and is technically operated using the backend infrastructure and software services of Google Cloud / Google Firebase, unless otherwise described below.

Your data: The data you add to the app and other additional information (hereinafter referred to as "Content") are stored by Google so that they are available to you and your class or group members.

Only the Firebase Authentication service (required for user authentication) and Firebase Hosting (web hosting of the web app) run on Google's data centers in the United States. In this regard, we refer to the EU Standard Contractual Clauses of the EU Commission.

This measure ensures that the requirements of the GDPR are strictly adhered to during data processing in the United States.

Furthermore, we have concluded a so-called "Data Processing Agreement" with Google, which ensures that Google only acts on our instructions and also complies with the provisions of European data protection laws, especially the GDPR, based on this agreement.

You can find more information about the Google Cloud Platform and its IT security and privacy here:

- <https://cloud.google.com/security/>
- <https://privacy.google.com/businesses/>
- https://privacy.google.com/businesses/compliance/#!?modal_active=none
- https://privacy.google.com/businesses/security/#!?modal_active=none
- <https://cloud.google.com/terms/data-processing-terms>
- <https://cloud.google.com/terms/data-processing-terms/partner/>
- <https://cloud.google.com/terms/eu-model-contract-clause>
- <https://firebase.google.com/support/privacy>

The technically necessary use of Google's services and the storage of your voluntarily provided content are based on your and our legitimate interests (Art. 6(1)(f) of the GDPR) in providing a secure, permanently available, and high-performance presentation, maintenance, and operation of this app so that you

can organize your school day quickly and easily with our app and focus on the essentials at school.

Backups (i.e., copies) are stored both within and outside the Google Cloud with another hosting provider within the EU.

The processing of the aforementioned data is based on your consent (Art. 6(1)(a) of the GDPR).

5. Your Rights

Simply put

You can exercise all your rights under the GDPR:

- Request information about your data that we hold
- Have your data corrected or deleted
- Restrict the processing of your data
- Object to the processing of your data
- Withdraw your consent to the processing of your data
- Request data transfer to yourself and, if applicable, to another company
- Lodge a complaint with the supervisory authority

Please contact us at the following address:

Email: support@ankigpt.wtf

Please note that if you delete or restrict the essential required data, the app cannot be used.

If you are anonymously registered and you delete the browsing data, you will lose access to your account and all data associated with it.

As a user of our app, you have various rights under the GDPR, including but not limited to Articles 15 to 18, 20, 21, 77, etc. of the GDPR:

a. Right to Information

You can request information about the personal data we process about you. In your request for information, please specify your request to facilitate the compilation of the necessary data.

b. Right to Rectification

If the information concerning you is (no longer) correct, you can request rectification. If your data is incomplete, you can request completion.

c. Right to Erasure

Subject to the conditions of Article 17 of the GDPR, you have the right to request the erasure of your personal data. Your right to erasure depends, among other things, on whether the data concerning you is covered by a retention obligation or whether we still need it to fulfill our legal rights and obligations.

d. Right to Restriction of Processing

Subject to the provisions of Article 18 of the GDPR, you have the right to request the restriction of the processing of your data.

e. Right to Object

You have the right to object, on grounds relating to your particular situation, at any time to the processing of your personal data, especially when we process your data based on legitimate interests. However, we may not always be able to comply with this, for example, if we are required to archive the data for tax law purposes. In this case, the data will be blocked for further use and deleted after the end of the statutory retention period.

f. Right to Withdraw Consent

If you have given us consent to process your data, you have the right to withdraw your consent at any time. This does not affect the lawfulness of processing based on consent before its withdrawal.

g. Right to Data Portability

You have the right to receive the personal data concerning you, which you have provided to us, in a structured, commonly used, and machine-readable format. If you have provided the data on the basis of consent or a contract, you have the right to have the data transferred to another controller designated by you.

h. Right to Lodge a Complaint

If you believe that we have violated data protection regulations in the processing of your data, you have the right to lodge a complaint with a supervisory authority, which will examine your complaint.

You can find a list of addresses of the supervisory authorities for data protection here:

BFDI - Addresses and Links

However, we are also open to feedback and will address any issues if you provide us with a notification at support@ankigpt.wtf.

6. Contacting Us

Simply put

When you contact us, we only store your data to process your request.

When you voluntarily contact us (such as by email or WhatsApp), we only store the data and messages you provide (such as your email address, phone number, and any other voluntarily provided information) to process your inquiry (such as contact request, consultation request, or suggestions for improvement).

The data generated in connection with the contact will be deleted or permanently anonymized once storage is no longer necessary or processing will be restricted if legal retention obligations exist.

The transmission of your data as a result of such a request is voluntary on your part, and by doing so, you simultaneously give your consent (legal basis is Art. 6(1)(a) of the GDPR). In addition, we have a legitimate interest in processing the data under Art. 6(1)(f) of the GDPR, as we want to respond to or process your request. If your request aims to conclude a contract, the legal basis for processing the data is also provided under Art. 6(1)(b) of the GDPR.

7. Our Handling of Your Data

Simply put

We process your data when you:

- Use our app
- Communicate with us

During the purely informational use of this app, which means if you do not register with your personal data (nickname, email, etc.) or otherwise provide us with information, we only collect the access data that your device transmits to our server.

The following non-personally identifiable access data is stored with each use of our app:

- The name of the accessed file and/or content in the app
- The date and time of the request
- The amount of data transferred
- The access status (file transferred, file not found, etc.)
- The type of access (GET, POST)
- The device and operating system used
- Cookies

For reasons of data security, to investigate unauthorized access or misuse of the app, and to potentially pursue resulting legal obligations and claims, the complete IP address of the requesting device is recorded, stored, and automatically deleted 6 months after the end of the access.

If you want to use our app, we collect the aforementioned data that is technically necessary for us to even offer you our app and ensure the improvement of stability, functionality, and security for both parties. Therefore, the collection of this data is based on a legitimate interest on both sides (legal basis is Art. 6(1)(f) of the GDPR).

If you are older than 16 years, the processing of the aforementioned data is based on your consent (legal basis is Art. 6(1)(a) of the GDPR).

8. Account

To use the app, it is necessary to create an account (customer account) or log in with an existing account and password and have a nickname, as mentioned below.

a. Registration with Anonymous Accounts

The app can be used without providing personal data because it is not necessary to voluntarily provide any personal data in the app (except for the IP address).

If you are under 16 years old, the use of our app is prohibited. It is exclusively intended for students and not for school children.

Every user who presses the "Generate" button is automatically assigned an anonymous account.

With this registration method, only the IP address is processed temporarily in accordance with section 9 (["9. Processing of the IP address"](#)).

The processing of the IP address is technically necessary for your device to establish a connection to our servers and to allow you to access and use the information from your group rooms or other application features of the app (purpose of processing).

The legal basis for the processing of the aforementioned data is our legitimate interest (Art. 6(1)(f) of the GDPR) in making the app and its application features permanently available and providing the app with stability, functionality, and security, thereby fulfilling your legitimate interest (Art. 6(1)(f) of the GDPR) in using the app to organize your school day quickly, easily, and digitally.

The disadvantage of this registration is that we cannot technically determine to whom a specific account belongs. Therefore, the anonymous account is tied to the device with which the registration was made for technical reasons. If you log out, uninstall the app, or lose your device, you will lose access to your account.

b. Registration with Email & Password or Google/Apple Sign In

In addition to anonymous registration, you can voluntarily register for the use of the app using an email address and password or through Google or Apple Sign In (hereinafter referred to as "registration data"). It is up to you which registration data you choose to use. It can even be a fantasy address like "smartfox[at]xyz.com".

Registration using the registration data is based on your request, i.e., voluntary on your part, if and because you reject anonymous registration in order to experience more services due to technical reasons, namely:

- We store the aforementioned registration data to reset your forgotten password at your request.

- In addition, during registration using the registration data, we can enable you to log into our app from any device and anywhere in the world, allowing you to work flexibly and free from device constraints.
- Furthermore, providing the email address allows us to keep you up to date on activities in "AnkiGPT" and updates to the privacy policy/terms and conditions.
- Additionally, we can inform you about security-related information regarding your account (e.g., login from a foreign device).

The purpose of registration and login with the registration data is to allow you to log into your account from any device at any time. If you have forgotten your password, you can select the "Forgot password" option. We will then send you an email with a link to reset your password. Furthermore, this allows the prevention and tracking of app misuse.

By voluntarily providing your registration data to take advantage of the app's technically necessary benefits, you give your consent to the processing of the registration data (legal basis is Art. 6(1)(a) of the GDPR). Without giving your consent, the use of this app is only possible according to section 9.a (anonymous account).

9. Processing of the IP Address

The use of our app requires a connection between your device and our server to retrieve information from the app or provide information within the app.

For this purpose, the IP address is technically necessary to enable communication between your device and our servers. This also constitutes the purpose of processing the IP address.

Another purpose of processing the IP address is to ensure security against attacks. This helps prevent unauthorized access by employing automated security mechanisms that protect user data from misuse.

A note on IP addresses and personal identification: The technically necessary IP address stored at Google Firebase is not visible to us. A unique connection between an IP address and a specific internet connection, including its owner, can only be established by the user's internet service provider for a limited period. As an individual or company, one could only access the owner of the internet connection through a sovereign/official act of the state (e.g., court orders, government decision, etc.) upon request, if there is a legitimate interest (such as the enforcement of copyright infringements or criminal offenses).

Additionally, there may be cases where many devices share a single IP address, making it impossible to identify an individual accurately (e.g., using the app via a university's Wi-Fi).

The storage of the IP address is done on Google's servers, and according to Google, it is only temporary. Despite written inquiries to Google, it was not possible to determine the exact storage period.

In addition, we store the IP address when you accept the privacy policy to fulfill our obligation to provide evidence.

Due to statutory limitation periods, we are required to store this data for 3 years. The deletion period begins at the end of the year in which the data was stored.

The legal basis for the technically necessary processing of the IP address is our legitimate interest (Art. 6(1)(f) of the GDPR) in making the app and its application features permanently available, providing the app with

stability, functionality, and security, thereby fulfilling your legitimate interest (Art. 6(1)(f) of the GDPR) in using the app to organize your school day quickly, easily, and digitally.

In the cases of section 9.b., the legal basis for the processing of your IP address, in addition to the legitimate interest, is your consent in accordance with Art. 6(1)(a) of the GDPR.

If you do not agree to the storage of your IP address, the app cannot be used for technical reasons.

10. Storage Period and Retention Obligations

Unless otherwise specified in this privacy policy, the data collected within the scope of support requests through our own services will be stored for a period of 2 years, unless we have a legal obligation to retain the data.

All retention periods begin at the end of the month in which the processing of the request is completed.

In other cases, the duration of the storage of personal data is determined by legal retention obligations (such as commercial or tax law). After the expiration of the retention period, the data will be deleted at the end of the month, unless it is necessary for the initiation, performance, and termination of a contract and/or there is a legitimate interest on our part in processing the data.

If the app is not used for more than two years, the account will be automatically deleted.

11. Use of GPT by OpenAI

To generate flashcards, the GPT API by OpenAI, L.L.C. is used. Therefore, you are not allowed to insert personal data into the text that serves as the basis for generation. As long as you do not insert personal data into the text, no personal data will be transmitted to OpenAI, L.L.C.

You can find the privacy policy of OpenAI, L.L.C. here: [OpenAI Privacy Policy](#)

12. Anonymous Statistical Analysis of App Usage

To continuously improve and make the app more user-friendly, the app collects completely anonymous statistical data on app usage. This data cannot be traced back to any individual user. For example, this data helps identify frequently occurring errors in specific sections of the app, which can then be improved.

13. Recipients or Categories of Recipients

In general, the personal data you provide to us is only processed by us. However, to fulfill our tasks and obligations, it may be necessary for us to disclose your personal data to natural and legal persons, authorities, institutions, or other entities. The following categories of recipients may be considered:

- Google Cloud, as mentioned in [Section 4. Hosting, Backend Infrastructure, and Storage Location for Your Data](#)
- Courts (e.g., in litigation proceedings)
- Non-public entities, if they act as processors
- Lawyers, tax advisors, notaries, auditors

14. SSL/TLS Encryption

For the purpose of data security and to protect the transmission of confidential content, such as the inquiries you send to us, this app uses SSL/TLS encryption, which is provided by Google Firebase by default. You can recognize an encrypted connection by the change of the browser's address bar from "http://" to "https://" and the padlock symbol in the browser bar. Through SSL/TLS encryption, the data you transmit to us cannot be read by third parties during transmission.

15. Data Transfer to Third Countries outside the EU

a. Firebase Authentication

To use AnkiGPT, it is necessary to have a user account (the reason for this necessity has been explained in detail in [Section 8. Account](#)).

For security reasons, the IP address is temporarily logged and may be retained in backups for up to 180 days [according to Google](#).

If you have linked your account with an email address or a Google account, this email address (or the email address associated with the Google account) is stored in Firebase Authentication because this information is required for login.

The Firebase Authentication service is hosted by Google in the United States. To enable privacy-compliant processing, we have concluded EU Standard Contractual Clauses with Google.

The legal basis for the temporary storage of the IP address, in the case of registration according to section 9 lit. b, is your consent (Art. 6(1)(a) GDPR) to use the service. Otherwise, the technically necessary storage is based on your and our legitimate interest (Art. 6(1)(f) GDPR) in providing the app in a performant manner.

b. Firebase Hosting

Firebase Hosting is used for web hosting of the web app (<https://ankigpt.wtf>). If you use the AnkiGPT web app, you send a request to Firebase Hosting to load the page.

For security reasons, the IP address is logged with each access. This IP address is stored for a few months [according to Google](#).

The Firebase Hosting service is hosted by Google in the United States. To enable privacy-compliant processing, we have concluded EU Standard Contractual Clauses with Google.

The legal basis for the temporary storage of the IP address, in the case of registration according to section 9 lit. b, is your consent (Art. 6(1)(a) GDPR) to use the service. Otherwise, the technically necessary storage is based on your and our legitimate interest (Art. 6(1)(f) GDPR) in providing the web app in a performant manner.

16. Data Protection Officer

The data controller is required to provide the contact details of their designated data protection officer, if the obligation to appoint a data protection officer exists under Article 37 GDPR.

Currently, we are not obligated to have a data protection officer.

17. Reservation of Changes to this Information

Changes in legal requirements or laws may require an adaptation of this information. Therefore, we kindly ask you to review this information each time you visit our website.