

Privacy Policy – Soothful Sounds (iOS)

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1. Data Controller

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2. Scope

This Privacy Policy applies to the iOS app **Soothful Sounds** ("App") as well as to the associated information page hosted via **GitHub Pages** ("Website").

3. Principle: No Backend, No Direct Data Transmission to Us

The App is designed to be used **without a user account** and **without our own server/backend**. We do not operate our own infrastructure for processing personal data of app users.

- We do **not collect, store, or transmit** any personal data through the App to our own servers.
- We do **not** use any proprietary analytics, tracking, or advertising technologies in the App.
- Settings and configurations (e.g., sound mixes, timer settings) are – if available – stored **locally on your device**.

4. Data Processing by Apple (iOS / App Store / App Store Connect)

Even though we do not process data on our own servers, certain data is processed by **Apple** in connection with the use of the App and its distribution via the App Store. This may include:

- technical diagnostic data and log data (e.g., for stability, performance, crash diagnostics),
- information about downloads, installations, updates, and usage within the Apple platform,
- aggregated statistics and reports provided to us via **App Store Connect**.

Important: We use **exclusively** the information provided by Apple. We do **not** use third-party crash or analytics SDKs and generally do **not** receive direct identity data of individual users (such as name or email) through the App.

5. In-App Purchases (Planned)

If **In-App Purchases** (e.g., one-time purchase or subscription) are offered in the future, payment processing will be handled by Apple. Apple processes the data necessary for the purchase. We generally only receive information from Apple that is necessary for **activation** or **validation** of the purchase (e.g., purchase status), but no complete payment data (e.g., no credit card information).

This Privacy Policy will be updated as needed when In-App Purchases are introduced.

6. Website Hosting via GitHub Pages

The Website (e.g., with app information and this Privacy Policy) is hosted via **GitHub Pages**. When accessing the Website, data is typically processed for technical reasons that are necessary for the delivery and security of the Website. This may include:

- IP address,
- date and time of the request,
- accessed page/file,
- browser/device information (e.g., user agent),
- referrer information (if transmitted by the browser).

We have limited control over these server-side processing activities as permitted by the hosting setup. We do **not** use any proprietary tracking or marketing cookies on the Website.

7. Recipients / Categories of Recipients

Depending on usage, data (particularly technical log data) may be processed by the following recipients:

- **Apple** (provision of the App via the App Store, platform services, diagnostic data, App Store Connect reports, potential In-App Purchases)
- **GitHub** (hosting of the Website via GitHub Pages)

8. Processing in Different Regions (EU, Switzerland, UK, Norway)

The App is offered in the **EU, Norway (EEA), Switzerland**, and the **United Kingdom**. Depending on the residence/location of users, different data protection laws apply (e.g., GDPR in the EEA, UK GDPR in the United Kingdom, Swiss DPA). We comply with the applicable requirements.

9. Third Country Transfers

Through the use of Apple and GitHub services, data may be processed in countries outside the EU/EEA, Switzerland, or the United Kingdom. Where required, such transfers are made on the basis of applicable data protection regulations (e.g., adequacy decisions or appropriate safeguards).

10. Storage Duration

- **App:** We currently do **not** store any personal data on servers.
- **Website:** Log data from hosting is stored and deleted according to the hosting provider's policies.
- **Apple Reports:** Reports/statistics in App Store Connect are available within the Apple platform and are retained according to Apple's policies.

11. Your Rights

Depending on applicable data protection law, you have the right to:

- access,
- rectification,
- erasure,
- restriction of processing,
- data portability (particularly in the EEA/UK),
- object to certain processing activities (particularly in the EEA/UK).

To exercise your rights, please send an email to: matthiasbitzer94@outlook.de.

Furthermore, (depending on the region) you have the right to lodge a complaint with the competent data protection supervisory authority (e.g., the ICO in the United Kingdom, the FDPIC in Switzerland).

12. Changes to this Privacy Policy

We will update this Privacy Policy if the App, the services used, or legal requirements change – particularly when introducing **In-App Purchases** or new features.