

# Privacy Policy

Effective Date: 31 October 2025

This Privacy Policy ('Policy') explains how Roger Sans, as the data controller, processes personal data in connection with the mobile application **Tiles** ('the App').

## 1. Data Controller and Contact Information

The data controller for the processing of personal data through the App is **Roger Sans**, an independent developer, who may be contacted at **support@thetiles.app**.

## 2. Categories of Personal Data Processed

The App may collect and process the following categories of personal data:

- Identification data (Apple ID and iCloud identifiers via Apple's CloudKit service);
- User profile data (username, avatar, and optional profile information);
- Content data (pins, traces, photos, and text voluntarily created by the user);
- Location data (used to display nearby tiles and unlock content, not continuously tracked);
- Friendship or connection data (optional relationships created within the App).

## 3. Purposes and Legal Bases for Processing

Personal data is processed for the following purposes and based on the corresponding legal bases under the General Data Protection Regulation (GDPR):

- To provide and maintain the App's core functionality — Article 6(1)(b) GDPR (performance of a contract).
- To ensure account authentication and secure storage — Article 6(1)(c) GDPR (legal obligation).
- To respond to user inquiries and support requests — Article 6(1)(f) GDPR (legitimate interest).

## 4. Data Storage and Security

All personal data is stored within Apple's CloudKit infrastructure, hosted on servers operated by Apple Inc. under GDPR-compliant conditions. The App does not transfer or store any personal data outside Apple's ecosystem or the European Union.

## 5. Data Retention

Data will be retained only for as long as necessary to fulfil the purposes described above or as required by applicable law. When a user deletes their account or removes the App, related CloudKit records are deleted accordingly.

## 6. Data Sharing and Transfers

The developer does not sell, rent, or disclose personal data to any third party. Data processing occurs solely through Apple's infrastructure for technical operation of the App.

## **7. User Rights**

In accordance with the GDPR, users have the right to access, rectify, erase, or restrict processing of their data, as well as the right to data portability and the right to lodge a complaint with a supervisory authority.

## **8. Children's Privacy**

The App is not intended for use by individuals under 16 years of age. No data is knowingly collected from minors without parental consent.

## **9. Updates to This Policy**

This Policy may be amended periodically. Users will be notified of material changes through an in-app notice or updated publication. Continued use of the App constitutes acceptance of the revised Policy.

## **10. Contact**

For questions, data access, or deletion requests, please contact **support@thetiles.app**.