PRIVACY POLICY

Spuddle

Effective Date: 28 September 2026

1. Introduction

Spuddle ApS ("Spuddle", "we", "us", or "our"), a company registered in Denmark with its registered office at Torvegade 25, 1400 Copenhagen K, operates the Spuddle mobile application (the "App") available on iOS and Android.

This Privacy Policy explains how we collect, use, store, share, and protect your personal data when you use the App, and describes your rights under applicable privacy law, including the EU General Data Protection Regulation (GDPR), the California Online Privacy Protection Act (CalOPPA), and the California Consumer Privacy Act (CCPA).

If you have questions about this Policy, please contact us at info@spuddleapp.com.

2. Data Controller

The data controller responsible for your personal data is:

Spuddle ApS
Torvegade 25, 1400 Copenhagen K, Denmark
Email: info@spuddleapp.com
Website: https://www.spuddleapp.com/contact/

3. Data We Collect

We collect the following categories of personal data:

3.1 Account and Identity Data

- Name and profile image (provided via OAuth sign-in through Google or Apple, or entered directly on registration)
- Email address
- Hashed password (where email/password sign-in is used)
- OAuth tokens from your Google or Apple account, stored at rest in encrypted form

3.2 Technical and Device Data

- Session IP address and user-agent string, collected automatically when you access the App (geolocation is explicitly disabled; we do not derive precise location from IP addresses)
- Timezone
- Expo push notification tokens (to deliver in-app reminders and announcements)
- Crash and error reports, including user identification, collected via Sentry

3.3 Usage and Learning Data

- Activity dates and session timestamps
- XP and streak progress

- Product analytics events (named event types covering screen views, taps, form submissions, sign-in success/failure, and OTP flows), collected via PostHog
- Onboarding answers (e.g. work field, Excel usage, learning goals, daily goal, and Excel experience), used to show a summary at the end of onboarding and improve the App.
- Age range and gender, if provided during onboarding. Both are optional and only used in aggregate to understand our users.

3.4 Payment Data

Spuddle uses Superwall as a paywall and subscription-orchestration layer. Actual payment processing is handled exclusively by Apple (via StoreKit) and Google (via Google Play Billing). We do not receive, store, or process your payment card details. Superwall receives only purchase and entitlement confirmation events.

4. How We Collect Data

We collect data

- Directly from you, when you create an account, sign in, or use App features
- Automatically, through session management, analytics, and crash-reporting tools described in Section 6
- From third-party identity providers (Google, Apple) when you choose OAuth sign-in

5. Legal Basis for Processing (GDPR)

For users in the European Economic Area (EEA), we process your personal data on the following legal bases:

- Contract performance (Article 6(1)(b)): processing necessary to provide the App and manage your subscription
- Legitimate interests (Article 6(1)(f)): security monitoring, fraud prevention, crash reporting, and first-party product analytics to improve the App
- Consent (Article 6(1)(a)): push notifications (you may withdraw consent at any time via App Settings)
- Legal obligation (Article 6(1)(c)): where processing is required by applicable law

6. Third-Party Services and Sub-processors

We use the following sub-processors who may process your personal data on our behalf:

6.1 Better Auth

Authentication and session management. Collects session IP address and user-agent. No geolocation. Hosted on our infrastructure.

6.2 Resend

Transactional email delivery. Used to send email verification OTPs and password-reset OTPs. Resend processes your email address solely to deliver these messages.

6.3 PostHog

First-party product analytics. Hosted on PostHog's EU instance (eu.i.posthog.com). We collect named product events tied to your user ID. PostHog is used for internal product improvement only; data is not used for advertising or third-party profiling.

6.4 Sentry

Crash and error monitoring, deployed on both the mobile App and backend. Your user ID may be attached to error reports to help us diagnose issues.

6.5 Superwall

Subscription and paywall orchestration. Receives purchase and entitlement events from Apple and Google. Does not receive payment card data.

6.6 Apple (APNs) and Google (FCM)

Push notification delivery infrastructure. We send push notifications via the Expo Push Service, which routes to Apple Push Notification Service (APNs) and Google Firebase Cloud Messaging (FCM). Your push token is transmitted to these services solely to deliver notifications you have enabled.

6.7 Apple App Store and Google Play

App distribution and payment processing. Payments are processed entirely by Apple and Google in accordance with their own privacy policies.

7. Cookies and Tracking Technologies

The App uses the following technologies:

- Session tokens: temporary tokens stored in secure storage to keep you logged in during a session
- Local storage: used to store your preferences and learning progress on your device
- Web beacons / analytics pixels: used by PostHog to track product analytics events

We do not use the Facebook Pixel, advertising SDKs, or any cross-app tracking technologies.

8. Push Notifications

With your permission, we send push notifications for reminders and announcements. You can manage notification preferences at any time via Settings within the App or through your device's notification settings. Withdrawing consent does not affect any other aspect of your account.

9. Data Retention

We retain your personal data for as long as your account is active or as necessary to provide the App.

When you request deletion of your account:

- Your account is immediately soft-deleted (flagged as deleted and no longer accessible)
- OAuth tokens, push notification tokens, and active sessions are revoked immediately at the point of deletion
- Your personal data is permanently and irreversibly deleted from our systems within 30 days of the soft-delete date

Anonymised or aggregated analytics data that cannot be linked back to you may be retained beyond this period for product improvement purposes.

10. International Data Transfers

Spuddle ApS is based in Denmark and our primary infrastructure is hosted in Denmark via Cloudflare D1 (EU region). Some of our sub-processors (including Sentry and Superwall) may process data outside the EEA. Where such transfers occur, we ensure appropriate safeguards are in place, including Standard Contractual Clauses (SCCs) approved by the European Commission, in accordance with GDPR Chapter V.

PostHog analytics data is processed exclusively on PostHog's EU infrastructure (eu.i.posthog.com) and does not leave the EEA.

11. Data Security

We implement appropriate technical and organisational measures to protect your personal data, including:

- Encryption of OAuth tokens at rest
- Secure session management via Better Auth
- Crash monitoring and anomaly detection via Sentry
- Access controls limiting data access to authorised personnel only

No method of transmission over the internet or electronic storage is 100% secure. If you become aware of any security vulnerability in our App, please contact us at info@spuddleapp.com.

12. Your Rights

12.1 Rights Under GDPR (EEA Users)

If you are located in the EEA, you have the following rights:

- Right of access: request a copy of the personal data we hold about you
- Right to rectification: request correction of inaccurate or incomplete data
- Right to erasure: request deletion of your personal data (subject to legal retention obligations)
- Right to restriction: request that we limit processing of your data in certain circumstances
- Right to data portability: receive your data in a structured, machine-readable format
- Right to object: object to processing based on legitimate interests
- Right to withdraw consent: where processing is based on consent (e.g. push notifications), withdraw at any time without affecting prior processing

To exercise any of these rights, contact us at info@spuddleapp.com. We will respond within 30 days. You also have the right to lodge a complaint with the Danish Data Protection Authority (Datatilsynet) at www.datatilsynet.dk.

12.2 Rights Under CalOPPA (California Users)

Under CalOPPA, California users may request disclosure of the categories of personal information we collect, how we use it, and whether it is shared with third parties. You may make such a request by contacting us at info@spuddleapp.com.

We do not track users across third-party websites and do not respond to Do Not Track signals, as no industry standard for such responses currently exists.

12.3 Rights Under CCPA (California Residents)

Under the CCPA, California residents have the right to:

- Know what personal information we collect, use, disclose, or sell
- Request deletion of your personal information
- Opt out of the sale of personal information. We do not sell personal information
- Non-discrimination for exercising your privacy rights

To submit a CCPA request, contact us at info@spuddleapp.com. We will verify your identity and respond within 45 days.

13. Children's Privacy

The App is not directed at children under the age of 13. We do not knowingly collect personal data from children under 13. If you believe we have inadvertently collected data from a child under 13, please contact us at info@spuddleapp.com and we will delete it promptly.

14. Changes to This Privacy Policy

We may update this Privacy Policy from time to time. When we do, we will revise the effective date at the top of this document and, where changes are material, notify you via the App or by email. Your continued use of the App after any update constitutes acceptance of the revised Policy.

15. Contact Us

If you have any questions or concerns about this Privacy Policy or our data practices, please contact:

Spuddle ApS
Torvegade 25, 1400 Copenhagen K, Denmark
Email: info@spuddleapp.com
Contact form: https://www.spuddleapp.com/contact/