

PRIVACY POLICY

Last Updated: June 18, 2026

Your privacy matters to us. This Privacy Policy explains how **Drops Way di Oleksiy Lomovskyy** ("we", "our", or "us") processes personal data in accordance with the EU General Data Protection Regulation (GDPR) through our mobile application.

1. Data Controller

The data controller responsible for your personal data is:

- **Company Name:** Drops Way di Oleksiy Lomovskyy
- **Address:** Via Brescia, 19, 07026 Olbia (SS), Italy
- **Email:** info@dropsway.net

2. Personal Data We Process

We minimize data collection to protect your privacy. We process the following categories of personal data:

- **Account Data:** Your email address, collected exclusively at registration.
- **Asset/Appliance Logs:** Names or identifiers you choose to assign to your tracked home assets (e.g., "fridge", "washer"). *Note: We do not collect or require appliance brand information, photos of your appliances, receipts, or your physical home address.*
- **Transaction Data:** Information regarding your subscription status, processing via our third-party billing providers.
- **Device and Advertising Identifiers:** Mobile tracking IDs (such as IDFA on iOS or AAID on Android) and device metadata used strictly to deliver targeted ads.

3. Purpose and Legal Basis

We process your personal data under the following legal foundations:

- **Performance of a Contract (Art. 6(1)(b) GDPR):** To create your account, log your selected maintenance items, and manage your subscription entitlements.
- **User Consent (Art. 6(1)(a) GDPR):** To serve you personalized, tracked advertisements inside the mobile app via Google Ads. You can withdraw your consent to tracking at any time through your mobile OS device settings.

- **Legitimate Interest (Art. 6(1)(f) GDPR):** We process minimal technical metadata (such as device type and basic system logs) based on our legitimate business interests to:
 - Ensure the security, stability, and integrity of the mobile application.
 - Detect, prevent, and mitigate fraud, spam, or malicious software activities.
 - Debug errors and maintain standard network infrastructure to keep the app running smoothly.

4. Third-Party Data Processors and Sharing

We do not sell your personal data. We share necessary data points only with the data processors required to operate the app:

- **RevenueCat, Inc.:** Used to manage in-app subscriptions, verify purchase receipts, and unlock your premium app features.
- **Google LLC (Google Pay & Google Ads):** Used to handle checkout securely via Google Pay and to serve tracked, personalized advertisements within the mobile app.

5. International Data Transfers

When data is processed by processors headquartered outside the European Economic Area (EEA), such as RevenueCat, Inc. or Google LLC in the United States, we ensure standard safeguards are met. Transfers are protected via the **EU-U.S. Data Privacy Framework** or standard contract clauses approved by the European Commission, ensuring your data receives equivalent GDPR protection.

6. Data Retention

- **Account & Asset Data:** Your email and asset logs are retained as long as your account remains active. If you choose to delete your account, this data will be immediately removed from our active databases.
- **Advertising Data:** Tracking data used by Google Ads is managed according to Google's standard data retention cycles for advertising IDs.

7. Your GDPR Rights

As a resident of the European Union, you hold the following rights:

- **Right to Access:** Request a copy of the data we hold about you (your email and logs).
- **Right to Rectification:** Request corrections to inaccurate information.
- **Right to Deletion ("Right to be Forgotten"):** Request total erasure of your account.

- **Right to Restrict or Object to Processing:** Opt out of tracking or ad personalization at any time through your smartphone settings (e.g., disabling "Allow Apps to Request to Track").
- **Right to Lodge a Complaint:** You have the right to file an official complaint with a data protection authority. Our local supervisory authority in Italy is the **Garante per la protezione dei dati personali** (Piazza Venezia n. 11, Roma).

8. Contact Us

For any privacy inquiries, account deletion requests, or data questions, please reach out to us at: info@dropsway.net