

GLOBAL PRIVACY POLICY

1. INTRODUCTION AND SCOPE

Peekoraap Lab ("we," "us," or "our") is dedicated to providing a secure, highly private, and calm digital sanctuary. This Privacy Policy explains our practices regarding the collection, use, security, and global transfer of data from users ("you" or "your") of **Why App** (the "Application").

Our operations comply with the highest international privacy frameworks, including the European Union's General Data Protection Regulation (**GDPR**), the California Consumer Privacy Act (**CCPA/CPRA**), Brazil's General Data Protection Law (**LGPD**), and Colombian Statutory Law 1581 of 2012 (**Habeas Data**).

2. PRINCIPLES OF DATA MINIMIZATION

We collect only the absolute minimum amount of data required to provide a stable, premium, and functional experience.

- **No Social Data Harvesting:** Why App is a private tool. We do not request contacts, native location coordinates, or social media linkages.
- **No Sale of Data:** Peekoraap Lab does not sell, lease, or distribute your personal data to third-party data brokers or marketing agencies under any circumstances.

3. WHAT DATA WE COLLECT AND PROCESS

We categorize the data we collect into three groups:

A. Information You Provide Directly

- **Authentication Data:** When registering an account, we collect your email address and credentials, securely processed via **Firestore Authentication**.
- **Reflective Logs & Prompt Inputs:** Text, reflections, and thoughts entered into the Strategy Architect are processed and stored securely in Google Cloud Firestore database instances so they can be saved, archived, and updated inside your local Journey Hub dashboard.

B. Technical and Performance Telemetry (Automatically Collected)

- **Device Metadata:** Operating system type (iOS or Android), system version, screen size, and system language properties.
- **App Logs:** Session durations, screen transitions, and performance metrics (e.g., app crashes) necessary to ensure stable operations.

C. Transaction and Subscription Metadata

- **Billing Receipt Data:** We use **RevenueCat** to handle premium subscriptions. RevenueCat processes receipt tokens, subscription status, plan types, and expiration

dates. We do *not* collect, store, or view credit cards, account numbers, or bank details; payment processing is handled strictly by Apple or Google.

4. LEGAL BASES FOR PROCESSING DATA

Under global data frameworks, we rely on the following lawful bases to process your information:

- **Performance of a Contract:** Processing is necessary to deliver the features of the app (e.g., executing the AI Strategy sessions and rendering your logs in the Journey Hub).
- **Explicit Consent:** When submitting potentially sensitive emotional insights or habit logs to the AI processing API, you give us explicit, granular consent to process that information.
- **Compliance with Legal Obligations:** To meet tax, accounting, or regulatory requirements in global app distribution.

5. HOW YOUR DATA IS TRANSLATED AND PROCESSED BY AI

To provide the core features of the AI Strategy Chat Screen, we securely forward the prompts you type inside the chat screen to a Large Language Model (LLM) API.

- **Data Masking & Privacy Guard:** Prompt queries are forwarded securely via HTTPS.
- **No LLM Training:** Under our strict API agreements with artificial intelligence API providers, your private reflection logs and prompts are analyzed in real-time solely to return responses. **They are never used, analyzed, or stored by third parties to train their public or commercial AI models.**

6. REGION-SPECIFIC LEGAL DISCLOSURES & USER RIGHTS

A. European Union & United Kingdom (GDPR / UK GDPR)

If you reside within the European Economic Area (EEA) or the United Kingdom, you possess the following rights under the GDPR:

- **Right of Access & Correction:** You can review the personal data associated with your account.
- **Right to Be Forgotten (Erasure):** You can delete your account and wipe all associated Firestore data directly from the Application's settings screen.
- **Right to Restrict or Object:** You can object to data processing or withdraw your consent at any time.

B. California, USA (CCPA / CPRA)

If you are a resident of California, the CCPA/CPRA provides you with the following protections:

- **No Cross-Context Behavioral Advertising:** We do not track you across other platforms or share your data for targeted advertising.

- **Right to Know and Delete:** You have the right to request a summary of the categories of data collected and request complete deletion of that data. We guarantee you will not face discrimination for exercising your CCPA rights.

C. Brazil (LGPD)

In compliance with the *Lei Geral de Proteção de Dados*, Brazilian users have the right to obtain confirmation that their data is processed, request anonymization, correction, or block access to unnecessary data, and receive clear details on how we transfer data across international borders.

D. Colombia (Habeas Data - Ley 1581 de 2012)

As a company operating under Colombian jurisdiction, Peekoraap Lab strictly enforces the rights of the *Titulares de los Datos* (Data Owners):

- **Rights of the Owner:** You have the right to access, update, correct, and suppress your personal information stored in our databases.
- **Consent:** Your registration in Why App constitutes prior, express, and informed consent to compile and process your data according to this Privacy Policy. You may file complaints before the *Superintendencia de Industria y Comercio (SIC)* if you believe your Habeas Data rights have been violated.

7. SECURITY & RETENTION PERIODS

We employ robust security infrastructure (including SSL/TLS encryption for all data in transit and AES-256 encryption at rest inside Cloud Firestore) to defend your private records. We retain your personal data for as long as your account remains active. If you initiate account deletion from the app settings, all associated authentication records, profile details, and Firestore reflection logs are permanently erased from our active databases.

8. CHILDREN'S PRIVACY

Why App is designed and marketed exclusively for individuals who are 18 years of age or older. We do not knowingly collect personal information from children under 13 (or under 16 in the EEA). If we discover that a minor has submitted personal data to us, we will immediately delete the data from our servers.

9. CHANGES TO THIS PRIVACY POLICY

Peekoraap Lab reserves the right to modify this Privacy Policy at any time. Any changes will be posted on this page with an updated "Last Updated" timestamp. We encourage you to review this policy periodically.

10. CONTACT INFORMATION

To exercise your global data rights, submit privacy requests, or file a query with our Data Protection Officer, please reach out to us:

Email: lwhyappsupport@gmail.com