

Privacy Policy of PhotoGrid

Last Updated: 2025/07/14

1. Introduction

Welcome to **PhotoGrid** — a mobile application and website operated by **FOP Popova Oleksandra Serhiivna**, registered in Ukraine (Tax ID: 3410604421). This Privacy Policy explains how we collect, use, disclose, and safeguard your information when you use our app, website, and related services. We are fully committed to protecting your privacy and ensuring transparency in how your data is processed.

By accessing or using PhotoGrid, you agree to the terms outlined in this Privacy Policy. If you do not agree, please discontinue use of our services. We comply with the applicable laws of Ukraine, the **General Data Protection Regulation (GDPR)**, and other relevant international privacy standards.

Our goal is to maintain your trust by handling all personal and technical information responsibly, securely, and only for legitimate business purposes related to the functionality of PhotoGrid.

2. Information We Collect

We collect only the information necessary to deliver and improve the user experience. The types of data collected include:

2.1 Information You Provide Voluntarily

- **Account or Contact Data:** If you contact us via email or feedback form, we may collect your name, email address, and any other details you choose to include.
- **Subscription Information:** When purchasing premium access through **Google Play Billing**, transaction data (such as payment confirmation, product type, and subscription status) may be processed by Google — we do not receive or store your card details.
- **User Content:** Any photos, videos, or collages you create or edit remain your property and are processed locally on your device unless explicitly uploaded for temporary processing (e.g., AI enhancement or cloud sync).

2.2 Information Collected Automatically

- **Device Information:** We may collect device type, operating system version, language, app version, and unique identifiers (such as Firebase Instance ID) to maintain stability and security.

- **Usage Data:** This includes app activity logs, crash reports, performance metrics, and anonymized analytics from **Firebase** or **Google Analytics** to improve app reliability.
- **Cookies and Similar Technologies:** On the website, we may use cookies solely to enable essential functionality, such as saving language preferences. No advertising or tracking cookies are used.

We do **not** collect sensitive personal information such as financial data, biometric identifiers, or precise location data.

3. How We Use Your Information

We use the information collected through PhotoGrid solely to provide a reliable, safe, and enjoyable experience. All processing is guided by the principles of **lawfulness, fairness, transparency, data minimization, and purpose limitation**.

Specifically, we use your data for the following purposes:

1. **Service Delivery and Operation**

To provide, maintain, and improve the functionality of the PhotoGrid app and website — including saving user preferences, enabling collage creation, ensuring synchronization, and providing seamless performance across devices.

2. **User Support and Communication**

To respond to inquiries, handle feedback, resolve technical issues, and notify users about updates, changes, or security alerts. We may contact you only if you initiate communication or consent to receive follow-ups.

3. **Improvement and Analytics**

We use anonymized analytics data (via Firebase or Google Analytics) to understand app usage trends, optimize features, and improve overall performance. These statistics never include personal identifiers.

4. **Payments and Subscription Management**

To process premium subscriptions through **Google Play Billing**, confirm payments, and manage renewal or cancellation. PhotoGrid does not store or access any financial details — all billing data is processed by Google under their own Privacy Policy.

5. **Legal and Security Compliance**

To protect the rights, safety, and integrity of our users and business, prevent fraud, detect unauthorized use, and comply with applicable laws and regulations.

6. **Content Moderation (if applicable)**

To ensure user-generated content complies with our Terms of Use and does not contain illegal, infringing, or harmful material.

We never sell, rent, or trade personal data. All processing is limited to legitimate operational purposes, directly linked to the delivery and improvement of PhotoGrid's core services.

4. Legal Basis for Processing Personal Data

We process your personal data in accordance with **Article 6 of the General Data Protection Regulation (GDPR)** and applicable Ukrainian privacy legislation. The following legal grounds justify our processing:

1. **Performance of a Contract**

Processing is necessary to provide the services you request — such as app functionality, subscriptions, or customer support. Without this data, PhotoGrid cannot deliver essential features or respond to inquiries.

2. **Consent**

In specific cases (for example, when you choose to contact support or enable optional analytics), we process your data based on your explicit consent. You may withdraw consent at any time without affecting the lawfulness of prior processing.

3. **Legitimate Interests**

We may process limited technical and analytical data to ensure app performance, prevent fraud, and improve usability. These activities are balanced against your privacy rights and never override your freedoms.

4. **Legal Obligations**

Certain records, such as financial transactions through Google Play Billing, may need to be retained to comply with accounting or consumer protection laws.

5. **Protection of Vital Interests and Security**

In rare cases, we may process information to prevent misuse, protect user safety, or respond to lawful government requests.

We adhere strictly to the principle of proportionality — collecting only what is necessary for specific, clearly defined purposes. All processing activities are documented and subject to periodic review to ensure ongoing compliance.

5. Retention of Data

We retain personal and technical information only for as long as necessary to fulfill the purposes outlined in this Privacy Policy. Retention periods vary depending on the type of data and the context in which it was collected:

1. **User Communications:** Emails and support requests are stored for up to **12 months** after resolution to ensure service quality and address follow-up issues.

2. **Subscription and Billing Records:** Retained in accordance with accounting and taxation requirements, typically for **up to 3 years**, in compliance with Ukrainian law.
3. **Analytical and Technical Data:** Aggregated, non-identifiable usage statistics are kept for **no longer than 24 months**, after which they are deleted or anonymized.
4. **User Content:** All photos, collages, or projects created in PhotoGrid remain stored **only locally on the user's device** unless voluntarily uploaded for temporary processing (e.g., AI enhancement). Such files are automatically deleted after processing is complete.

When retention periods expire, data is securely deleted, anonymized, or aggregated to prevent re-identification. We periodically review our storage practices to ensure compliance with **data minimization** and **purpose limitation** principles.

6. Disclosure of Information

We do not sell, rent, or exchange personal information with third parties. Your data is disclosed only in the limited cases described below and strictly under legal safeguards:

1. **Service Providers:**
We may share minimal technical information with trusted service providers who support app functionality — for instance, **Firebase** (app analytics, crash diagnostics) or **Google Play Billing** (payment processing). These partners act as **data processors**, bound by strict confidentiality and data protection obligations.
2. **Legal and Regulatory Authorities:**
We may disclose data if required by applicable law, court order, or government request, but only when such disclosure is necessary and lawful. We review every request carefully to ensure compliance and transparency.
3. **Business Transfers:**
In the unlikely event of a merger, acquisition, or asset transfer, user data may be included solely as part of the business assets, subject to equivalent privacy commitments and advance notice to users.
4. **Protection of Rights and Safety:**
We may share limited information to prevent fraud, enforce our Terms of Use, or protect users' rights, property, and safety.

All disclosures are evaluated under the **principle of proportionality** — meaning only the minimum amount of information necessary for the stated purpose is shared, always under secure and lawful conditions.

7. Data Security

We take your privacy and data protection seriously. **PhotoGrid** implements a combination of technical, organizational, and administrative measures designed to protect your information against unauthorized access, alteration, disclosure, or destruction.

7.1 Technical Safeguards

- All communication between the app, website, and servers is encrypted using **HTTPS/TLS protocols**, ensuring that transmitted data cannot be intercepted or tampered with.
- Data stored on our systems is protected by **multi-layered security**, including restricted access, firewall protection, and intrusion monitoring.
- Sensitive operational data (e.g., crash logs, billing confirmations) is stored only in anonymized or pseudonymized form whenever possible.

7.2 Organizational Safeguards

- Access to internal systems is granted only to authorized personnel who require it to perform their duties. Each authorized team member signs a **confidentiality and data protection agreement**.
- We regularly review internal processes, update security configurations, and conduct risk assessments to ensure compliance with industry best practices.

7.3 User Responsibility

While we take all reasonable precautions, no online system can be guaranteed 100% secure. You are responsible for maintaining the confidentiality of your device credentials and avoiding use of untrusted networks when accessing PhotoGrid.

In the unlikely event of a **data breach**, we will notify affected users and relevant authorities as required by law, outlining corrective actions and mitigation steps.

Our goal is to uphold the highest standard of integrity and transparency in protecting user information — not only to comply with regulation, but because privacy is a core principle of PhotoGrid.

8. Your Data Protection Rights

Under the **General Data Protection Regulation (GDPR)** and applicable privacy laws, users have a range of rights regarding their personal information. We fully support and respect these rights, and you may exercise them at any time by contacting us at **help@photogrid.club**.

8.1 Right of Access

You have the right to request confirmation as to whether we process your personal data and, if so, to receive a copy of that information in a clear and structured format.

8.2 Right to Rectification

You can request correction or completion of inaccurate or incomplete personal information we hold about you.

8.3 Right to Erasure (“Right to be Forgotten”)

You may request deletion of your personal data if it is no longer necessary for the purposes for which it was collected or if you withdraw your consent.

8.4 Right to Restrict or Object

You may request to restrict processing of your data or object to certain processing activities (for example, analytics) when you believe it affects your fundamental rights.

8.5 Right to Data Portability

Upon request, we will provide your personal data in a structured, commonly used, and machine-readable format for transfer to another service provider.

8.6 Right to Withdraw Consent

If you previously gave consent (e.g., for optional analytics or communications), you can withdraw it at any time without affecting the lawfulness of prior processing.

8.7 Right to Lodge a Complaint

You have the right to contact your local data protection authority or the Ukrainian Ombudsman for Personal Data Protection if you believe your rights have been violated.

We review and respond to all verified user requests within **30 calendar days**, ensuring every request is handled transparently and lawfully.

9. Cookies and Similar Technologies

We use cookies and similar technologies in a minimal and transparent way, primarily to improve functionality and user experience on our website <https://photogrid.club>. Cookies are small text files placed on your device that help remember certain preferences or session data.

9.1 Types of Cookies We Use

1. Essential

Cookies:

These cookies are necessary for the website to function properly. They enable core operations such as secure navigation, session management, and access to restricted areas.

Without these cookies, certain features of the site may not work correctly.

2. Preference

Cookies:

Used to remember your language, region, or other custom settings so that your experience remains consistent during future visits.

3. Analytical

Cookies:

We may use anonymous cookies to collect aggregated data about site performance and visitor behavior (via **Google Analytics** or similar services). These cookies help us understand how users interact with our content, allowing us to improve usability. All collected data is anonymized and cannot identify individual visitors.

We do **not** use cookies for advertising, retargeting, or behavioral profiling. You can control or delete cookies through your browser settings at any time. However, disabling essential cookies may limit website functionality.

For mobile app users, PhotoGrid does not use browser cookies; instead, we may use local storage mechanisms (e.g., app preferences) to save settings like interface language or feature configurations.

We are committed to **transparency and consent**: no non-essential cookies are stored without your explicit permission, and our cookie notice clearly explains their purpose and duration.

10. Children's Privacy

We understand the importance of protecting the privacy of minors online.

10.1 Age Limitation

PhotoGrid is intended for general audiences but is **not designed for use by children under the age of 13** (or the minimum age of digital consent in your country). We do not knowingly collect or process personal data from children. If you are under this age, please do not use PhotoGrid or provide any personal information.

10.2 Parental Guidance

If you are a parent or guardian and believe that your child has provided us with personal data, please contact us at **help@photogrid.club**. We will take immediate steps to verify and delete such information from our systems.

10.3 Educational Context

In jurisdictions where children aged 13–16 may use apps under parental consent, parents or legal guardians must review and approve the Privacy Policy before use. PhotoGrid does not intentionally target content, features, or advertising to minors.

10.4 Commitment to Child Safety

We fully comply with the **Children's Online Privacy Protection Act (COPPA)** and international child safety standards. Our goal is to ensure that the app remains a safe, creative environment for responsible users, without exposing minors to inappropriate content, advertising, or data collection practices.

We periodically review our features and user flow to ensure that **no inadvertent data collection** occurs from underage users and that parental rights are respected at all stages.

11. International Data Transfers

As part of providing our services, **PhotoGrid** may process or store information on servers located outside your country of residence, including within the **European Union**, the **United States**, or other jurisdictions where our service providers operate.

11.1 Lawful Basis for Transfers

Whenever data is transferred internationally, we ensure that adequate protection measures are in place in compliance with **Article 46 of the GDPR** and equivalent Ukrainian data protection standards.

All transfers are based on one or more of the following safeguards:

- **Standard Contractual Clauses (SCCs)** approved by the European Commission;
- **Adequacy decisions** for countries recognized as providing sufficient data protection;
- **Binding contractual obligations** with third-party processors ensuring confidentiality and lawful handling of information.

11.2 Service Provider Locations

Our infrastructure and trusted partners (for example, Google Firebase or Google Cloud) may process technical and analytical data across multiple global data centers. These partners operate under privacy frameworks compliant with **GDPR** and **ISO 27001 security standards**.

11.3 User Rights and Transparency

Regardless of where your information is processed, your privacy rights remain fully protected. We do not transfer or store personal data in any country lacking enforceable privacy protections.

You may contact us at **help@photogrid.club** to request details about the jurisdictions in which your data may be processed and the safeguards applied.

We continually monitor regulatory developments related to international data transfers to ensure ongoing compliance and accountability.

12. Links to Other Websites

Our website <https://photogrid.club> and related materials may include links to external websites, online stores, or informational resources. These links are provided for convenience and reference only.

12.1 No Responsibility for Third-Party Content

PhotoGrid has no control over and assumes no responsibility for the content, privacy practices, or operations of third-party websites. When you follow a link to an external page, you are subject to that website's own terms and privacy policy, which may differ from ours.

12.2 Safe Linking Practices

We take care to include only legitimate, reputable, and secure external links, but we cannot guarantee that linked pages remain up to date, virus-free, or aligned with our security standards at all times. Users are encouraged to exercise caution and review the respective policies of any third-party sites before interacting with them or providing personal data.

12.3 Exclusion of Liability

PhotoGrid shall not be liable for any direct or indirect damages, losses, or consequences arising from your use of or reliance on third-party content accessed via links from our website or app.

12.4 Continuous Review

We periodically review all external references included on our site and remove or update them if they no longer meet our quality, security, or relevance criteria.

In summary, while external resources may complement your experience, your interaction with them is entirely voluntary and outside our control.

13. Updates to This Policy

We may update or modify this Privacy Policy from time to time to reflect changes in our practices, legal requirements, or the evolution of our services.

13.1 Notification of Changes

When material updates are made, we will notify users by:

- Posting a revised version on our official website <https://photogrid.club>;
- Updating the date of the last revision at the top of the policy;
- In certain cases (for example, major functional or legal updates), providing an in-app notification or email alert to ensure transparency.

13.2 Scope of Revisions

Updates may include adjustments to data processing practices, integration of new security measures, or compliance with new legislation (e.g., GDPR amendments or Ukrainian data protection standards).

We recommend reviewing this policy periodically to remain informed about how we protect your information.

13.3 Continued Use as Acceptance

By continuing to use **PhotoGrid** after the publication of any changes, you acknowledge and agree to the updated version of this Privacy Policy. If you do not agree with any of the revisions, you may discontinue using the service or contact us for clarification before proceeding.

Our commitment remains the same — to be transparent, responsible, and user-centered in everything related to your privacy.

14. Contact Information

If you have any questions, concerns, or complaints about this Privacy Policy or our data practices, please contact us using the information below. We aim to respond to all legitimate requests within **30 calendar days**.

Data Controller: FOP Popova Oleksandra Serhiivna

Tax Identification Number (TIN): 3410604421

Registered Address: 106 Vidrozhennia Avenue, Apt. 39, Kamianske, Dnipropetrovsk Region, 51938, Ukraine

Email: help@photogrid.club

Phone: +380 68 917 7032

Website: <https://photogrid.club>

If you believe that your data protection rights have been infringed, you may also file a complaint with the **Ukrainian Commissioner for Human Rights (Ombudsman)** or your local data protection authority in the EU.

We appreciate your trust in PhotoGrid and remain fully dedicated to protecting your privacy through transparency, accountability, and continuous improvement of our data handling practices.
