

# NESTUDO

## PRIVACY POLICY

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### 1. INTRODUCTION

Nestudo ('we', 'our', or 'us') is committed to protecting your privacy. This Privacy Policy explains how we collect, use, disclose, and safeguard your personal information when you use the Nestudo application, website, and associated services (collectively, the 'Service').

By accessing or using the Service, you signify that you have read, understood, and agree to our collection, storage, use, and disclosure of your personal information as described in this Privacy Policy.

### 2. DATA CONTROLLER

Nestudo acts as the data controller for personal data collected through the Service in compliance with the Turkish Law on Protection of Personal Data (KVKK, Law No. 6698) and, to the extent applicable, the European Union General Data Protection Regulation (GDPR, Regulation EU 2016/679) and the UK GDPR.

If you have any questions about our privacy practices, you can contact us at [info@nestudo.com](mailto:info@nestudo.com).

### 3. INFORMATION WE COLLECT

We collect several different types of information for various purposes to provide and improve our Service to you:

**3.1 Personal Data You Provide:** When you register for an account, we collect your name, email address, age range, and optional profile information (such as gender or avatar).

**3.2 Usage Data:** We automatically collect data generated through your use of the Service, including focus session durations, XP points, achievements, league standings, room interactions, chat metadata (but not the content unless reported), and streak data.

**3.3 Device and Technical Data:** Information such as your device model, operating system version, unique device identifiers, IP address, and application version.

**3.4 Advertising Identifiers:** We may collect your device's advertising identifier (IDFA on iOS, AAID on Android) to serve advertisements through third-party networks.

**3.5 Financial and Subscription Data:** Subscription status and purchase history are managed through RevenueCat and respective app stores (Apple App Store / Google Play). We do not directly collect or store your raw credit card information.

**3.6 Audio Content:** Audio files (MP3, WAV, etc.) uploaded or streamed within Focus Rooms are temporarily stored or processed to provide the ambient audio experience.

## 4. HOW WE USE YOUR INFORMATION

We use the collected data for various purposes:

- To provide, maintain, and secure our Service.
- To manage your account and subscriptions.
- To enable interactive features such as Rooms, messaging, and leaderboards.
- To send administrative notifications, such as updates, security alerts, and support messages.
- To deliver personalized or contextual advertisements (via third-party networks like Google AdMob).
- To monitor and analyze usage patterns to improve the user experience.
- To enforce our Terms of Service and comply with legal obligations.

## 5. LEGAL BASIS FOR PROCESSING (EEA/UK/TURKEY USERS)

We process your personal data on the following legal bases:

- (a) Performance of Contract: To provide the Service you have registered for.
- (b) Legitimate Interests: To improve the Service, ensure security, and prevent fraud.
- (c) Consent: For marketing communications and non-essential data processing where required by law.
- (d) Legal Obligation: Where processing is required by applicable law.

## 6. ADVERTISING AND TRACKING

The Service is supported by advertising. We use third-party advertising networks, such as Google AdMob, which may use tracking technologies (like Advertising IDs) to collect information about your interactions with the app and other apps to serve personalized or contextual advertisements.

Opt-Out: You can opt out of personalized advertising by using your device settings:

- On iOS: Settings > Privacy & Security > Tracking
- On Android: Settings > Google > Ads

Please note that opting out will not remove ads from the app, but they will be less relevant to your interests.

## 7. DATA SHARING AND DISCLOSURE

We do not sell your personal data. We may share your information only in the following situations:

7.1 Service Providers: We share data with trusted third-party vendors who perform services on our behalf, including Amazon Web Services (hosting), RevenueCat (subscription management), and Google AdMob (advertising). These providers are bound by strict data processing agreements.

7.2 Legal Requirements: We may disclose your information if required to do so by law, court order, or governmental request.

7.3 Business Transfers: In the event of a merger, acquisition, or sale of assets, user data may be transferred as a business asset, subject to ongoing confidentiality commitments.

## 8. DATA RETENTION

We will retain your Personal Data only for as long as is necessary for the purposes set out in this Privacy Policy. Active accounts will have their data retained. If you delete your account, your personal profile data will be permanently removed from our active databases within 30 days. We may retain anonymized, aggregated analytics data indefinitely. We will also retain data as necessary to comply with legal obligations and resolve disputes.

## 9. YOUR DATA PROTECTION RIGHTS

Depending on your location (e.g., EU, UK, Turkey), you have specific rights regarding your personal data:

- The right to access, update, or delete the information we have on you.
- The right of rectification (to fix inaccurate data).
- The right to object to or restrict processing.
- The right to data portability (to receive a copy of your data).
- The right to withdraw consent at any time.

To exercise these rights, please contact us at [info@nestudo.com](mailto:info@nestudo.com). We will respond to all legitimate requests within 30 days.

## 10. ACCOUNT DELETION

You have the right to delete your account at any time directly through the application settings. Upon initiating deletion, your account and associated personal data will be flagged for permanent deletion and processed within 30 days, subject to any legal retention requirements.

## 11. INTERNATIONAL DATA TRANSFERS

Your information, including Personal Data, may be transferred to - and maintained on - computers located outside of your state, province, country, or other governmental jurisdiction where the data protection laws may differ (e.g., data may be processed in the United States via AWS or Google). We take all reasonable steps to ensure your data is treated securely and subject to appropriate safeguards.

## 12. SECURITY OF DATA

The security of your data is important to us. We implement commercially acceptable security measures (such as SSL/TLS encryption for data in transit) to protect against unauthorized access, alteration, unauthorized sharing, or loss of your personal information. However, no method of transmission over the Internet or method of electronic storage is 100% secure.

## 13. CHILDREN'S PRIVACY

The Service is intended solely for persons who are 13 years of age or older. We do not knowingly collect personally identifiable information from anyone under the age of 13. If you are a parent or guardian and you are aware that your Child has provided us with Personal Data, please contact us immediately so we can take steps to remove that information from our servers.

## 14. CHANGES TO THIS PRIVACY POLICY

We may update our Privacy Policy from time to time. We will notify you of any material changes by posting the new Privacy Policy on this page and updating the 'Effective Date' at the top of this document. You are advised to review this Privacy Policy periodically for any changes.

## 15. CONTACT US

If you have any questions about this Privacy Policy, please contact us:

By Email: [info@nestudo.com](mailto:info@nestudo.com)

Website: [nestudo.com](http://nestudo.com)