

Effective date: 05 Nov 2025

Controller: MINISTRY DESIGN AGENCY sp. z o.o.

Address: UL. HOŻA 86 /410, 00-682, Warszawa, Poland

Contact: kamiruapp@gmail.com

This Privacy Policy explains how we process personal data when you use the Kamiru iOS app (the “Service”).

1) Who we are & scope

- **Controller:** MINISTRY DESIGN AGENCY sp. z o.o. decides why and how your data is processed.
- This Policy covers **the iOS app**

2) What we process (by feature)

Core operations (applying styles & delivering outputs)

- **You provide:** photos, optional **text prompts** for styles, and selections from our **predefined styles**.
- **We create:** visual **outputs** (hair/beard styles, colors).
- **Ephemeral handling:** Photos and outputs are processed **in memory** and we aim to **delete them within 24 hours** of processing completion. We do **not** keep temp files or backups.

Diagnostics & stability

- **Firebase Crashlytics:** crash logs, device/OS/app info.

Product analytics (no ads in-app)

- **Amplitude** (basic in-app events: feature use, funnels, device/OS/app info).
- **Firebase Remote Config** (feature flags/variants).

Attribution/marketing (for our external ads only)

- **AppsFlyer:** install/engagement attribution. If you **allow tracking (ATT)** we may collect **IDFA**. If you **decline**, we **do not** collect IDFA; attribution may rely on **non-IDFA aggregated methods**.

Subscriptions

- **Adapty:** paywalls, subscription status/receipt metadata (Apple processes payment).

Support

- If you e-mail us, we receive your **e-mail address** and message content.

3) Purposes & legal bases (GDPR/UK GDPR)

- **Provide the Service (apply styles, deliver outputs)** → **Contract** (Art. 6(1)(b)).
- **Crash reporting & Remote Config** → **Legitimate interests** (Art. 6(1)(f)) to keep the app stable and safe.
- **Product analytics (Amplitude)** → **Legitimate interests** (Art. 6(1)(f)) to understand performance and improve the app. In-app controls are available.
- **Attribution for our ad campaigns (AppsFlyer):**
 - With **ATT consent** → **Consent** (Art. 6(1)(a)) using **IDFA**.
 - If **declined** → **no IDFA**; we may use aggregated/non-IDFA methods consistent with platform rules.
- **Subscriptions/receipt checks (Adapty/Apple)** → **Contract and legal obligation** (tax/anti-fraud).

We don't perform automated decision-making with legal or similarly significant effects, and we don't run personalized in-app advertising.

4) What we don't do

- **No model training:** We **do not** use your photos, prompts, or outputs to train AI models.

- **No biometrics:** We **do not** perform identification/recognition or create biometric templates.
- **No child data:** The Service is for **adults only**. Do **not** upload images of **minors**.

5) Retention

- **Photos/outputs:** Deleted within **24 hours** of processing completion.
- **Analytics:** kept by vendors for their **default retention** (we may configure shorter windows).
- **Crash logs:** vendor **default retention**.
- **Attribution data (AppsFlyer):** vendor default.
- **Support e-mails:** up to **25 months** unless law requires longer (then we minimize where possible).

6) Your controls

- **In-app controls:** Settings → Privacy
 - Delete my photos/outputs (trigger immediate deletion where applicable)
 - Disable/limit analytics (where available)
 - Clear/reset analytics identifiers (where available)
- **System controls:** iOS **App Tracking Transparency (ATT)** prompt → you can **Allow** or **Ask App Not to Track** at any time via iOS Settings.
- **Data rights:** See Section 9 (access, deletion, etc.). Request via kamiruapp@gmail.com. We aim to respond within **30 days**.

7) Security

- We apply **commercially reasonable** administrative and technical measures.

- Content may exist **unencrypted in memory** while being processed; we currently do **not** provide end-to-end encryption or at-rest encryption for images. Transmission uses standard transport security where available. No method of transmission or storage is 100% secure.

Note: If you want stronger guarantees (e.g., region pinning or at-rest encryption), contact us; we're evaluating options.

8) Processors & international transfers

We use service providers (“processors”) acting on our instructions:

- **Amplitude (analytics)** — receives app events/identifiers (no photos). **Region:** EU/US (vendor DCs). **Safeguards:** EU-US Data Privacy Framework (where certified) and/or **SCCs/UK Addendum**.
- **AppsFlyer (attribution)** — receives install/engagement data; **IDFA only if you consent** (ATT). **Region:** global. **Safeguards:** DPF/SCCs.
- **Adapty (subscriptions)** — subscription status and receipt metadata. **Region:** vendor DCs. **Safeguards:** DPF/SCCs.
- **Firebase (Crashlytics/Remote Config/Firestore for preset storage)** — crash data, feature flags, non-image metadata. **Region:** vendor DCs. **Safeguards:** DPF/SCCs.
- **Google Cloud Platform (infrastructure)** — app/backend infrastructure. **Region:** vendor DCs. **Safeguards:** DPF/SCCs.
- **Google Gemini (AI inference)** — receives **ephemeral photos/outputs** for transformation; we aim to **delete ≤24h**. **Region:** nearest available (vendor). **Safeguards:** DPF/SCCs.

International transfers: When data leaves the EEA/UK/Switzerland, we rely on the **EU-US Data Privacy Framework** (where a vendor is certified) and/or **Standard Contractual Clauses** (and the UK Addendum) plus supplemental measures. For Japan (APPI) and Brazil (LGPD), we include cross-border transfer notices as required.

9) Your rights

Depending on where you live (e.g., EU/UK, Brazil, Japan, California), you may have rights to **access, correct, delete, restrict, object, portability**, and to **withdraw consent** (for consent-based processing) without affecting prior processing.

- **How to exercise:** e-mail kamiruapp@gmail.com from the address associated with your request. We may ask for information to verify your identity.
- **California (CPRA):** If our AppsFlyer use is considered a “**share**” for cross-context behavioral advertising, you may request to **opt-out of sale/share** by e-mailing us; we will honor your choice and disable tracking signals (including IDFA) where applicable.
- **Appeals/complaints:** You can contact your local data protection authority.

10) Children

The Service is for **users who have reached the Age of Majority** in their place of residence. **Do not** upload images of **minors**. If we learn we processed data about a minor, we may delete it and restrict access.

11) Changes

We may update this Policy. We'll show the updated version **in-app**. If you don't agree, stop using the Service.

12) Contact

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