
Privacy Policy for the "VPRYTUL" App

Thank you for downloading the "VPRYTUL" app. To ensure you can use our service safely and comfortably, please read this Privacy Policy and the related Terms of Service. This document is designed to explain in plain language: what Personal Data we collect, how we securely process and retain it, and what rights you have regarding your information. Together with the Terms of Service, this Policy constitutes our agreement with you.

1. Introduction

1.1. This Privacy Policy explains how we collect and process your information through the official "VPRYTUL" mobile application and its associated website, www.vprytul.app (collectively, the "Service"). When we say "we," "us," or "our," we mean the SERHIY PRYTULA CHARITY FOUNDATION (EDRPOU code: 43720363), acting as the Data Controller. We determine the purposes of processing your data and are responsible for its security.

1.2. The purpose of this Service is to provide a convenient digital tool to support the Foundation's activities, participate in beneficial initiatives (quests), interact with the charitable community, and track your personal impact.

2. Collection of Personal Data

2.1. We collect, retain, and use the following types of Personal Data:

2.1.1. Device information, including IP address, geolocation, operating system type, and app version;

2.1.2. App usage statistics: pages viewed, session duration, and navigation paths;

2.1.3. The email address you use for registration;

2.1.4. Phone number;

2.1.5. Profile data: name (or nickname), profile picture (avatar), country, and region of residence;

2.1.6. Information provided when setting up recurring payments (subscriptions) or newsletters;

2.1.7. Content you create and publish within the app (e.g., quest completion reports, comments, photos);

2.1.8. Your communication history with customer support or other users.

2.2. If you share third-party Personal Data with us, you must obtain their prior User Consent.

2.3. Messages sent to other users in private or group app chats are confidential and are not read by us.

2.4. To protect the Service from cyberattacks, we log the last IP address used to log in and may use it to determine your approximate location (country and city).

2.5. By using the app, you agree to the rules regarding user-generated content (photos/videos). If you publish content using our campaign hashtags, you grant us the right to use it in our project reports and presentations to showcase the community's achievements.

2.6. Providing data is voluntary. However, if you do not provide the basic information required for registration or if you withdraw your User Consent, you will not be able to use the app.

3. Sources of Information

3.1. We obtain information in two ways:

3.1.1. Information you provide directly (e.g., filling out a profile or completing quests).

3.1.2. Information collected automatically (e.g., technical device data collected via cookies and analytics systems).

4. How We Use Your Data

4.1. We use your information to:

4.1.1. Ensure the full operation of the app and provide access to its features;

4.1.2. Inform you about the status of your quests, donations, or requests;

4.1.3. Send important notifications, offers, and Foundation news relevant to your interests;

4.1.4. Understand how users interact with the app to improve its interface and functionality;

4.1.5. Prevent fraud and guarantee data security;

4.1.6. Enforce our Terms of Service.

5. Legal Basis (Legitimate Interest and Obligations)

5.1. We process your data based on legitimate interest to:

5.1.1. Manage the app and personalize your user experience;

5.1.2. Communicate with you (via email, push notifications, etc.) to provide technical or informational support.

5.2. For legal reasons, we may use your data to investigate illegal activities, protect user rights, or comply with applicable laws.

6. Disclosure of Personal Information

6.1. Your data may be accessible to our employees, contractors (including software developers as Data Processors), or agents strictly within the scope necessary to support the Service.

6.2. We do not sell or share your data with third-party companies for their own marketing purposes.

6.3. We may disclose your information to third parties only:

6.3.1. If explicitly required by law (e.g., by a court order);

6.3.2. To protect our legal rights or prevent fraud;

6.3.3. With your explicit User Consent.

7. Cross-Border Data Transfer

7.1. Because we use modern cloud technologies, the collected information may be stored and processed on secure servers located outside your country. We guarantee that data transfers comply with all international security standards.

8. Third-Party Service Links

8.1. The app may contain links to external sites (e.g., payment gateways). We do not control these sites and are not responsible for their privacy policies. We recommend reviewing the privacy practices of these platforms before using them.

9. Data Retention

9.1. We retain your Personal Data only for as long as you are a registered user of the app, or as long as necessary to fulfill the purposes outlined in this Policy.

10. Account and Data Deletion (Account Management)

10.1. You have the right to delete your account and all associated Personal Data at any time.

10.2. How to delete your account: You can initiate the permanent deletion of your profile directly in the app settings (go to "Profile" -> "Settings" -> "Profile" -> "Delete Account") or by sending a request to our support email.

10.3. Upon a deletion request, your data will be securely erased from our servers. We may only retain anonymized statistical information or transaction data that we are required to keep under financial laws.

11. Security of Personal Information

11.1. We implement modern technical and organizational measures to protect your data from loss or unauthorized access.

11.2. Your information is stored on secure servers (including AWS) managed by the Foundation and our technical partner, Qela Inc.

11.3. You are responsible for maintaining the confidentiality of your password and other authorization credentials. We will never ask you to send us your password.

12. Cookies and Analytics

12.1. The Service (including the mobile app and www.vprytul.app website) collects information about your behavior, device analytics, and page visits to gather statistics, ensure stability, personalize your experience, and adapt our initiatives to user interests. We do this using various technologies, including cookies and mobile SDKs. You can limit analytics collection in your device settings.

13. Your Rights

13.1. You have the right to request access to your personal information by sending us a request.

13.2. You may change or withdraw your User Consent for data processing at any time.

13.3. We process your requests free of charge within one month (in complex cases, this period may be extended, and we will notify you accordingly).

13.4. If we cannot fulfill a request, we will provide an explanation. You also have the right to lodge a complaint with your national data protection authority.

14. Your GDPR Rights (for EU Residents)

If you reside in the European Union, you have additional rights:

Right to Erasure (Right to be Forgotten): to request the complete deletion of your data.

Right to Rectification: to update inaccurate or outdated information.

Right to Data Portability: to receive your data in a structured, commonly used digital format for transfer to other services.

Right to Restriction of Processing: to temporarily block the use of your data.

15. Your CCPA Rights (for US Residents)

If you are a resident of California or another state with similar privacy legislation, you have the right to know what categories of Personal Information we collect and with whom we share it. You also have the right to opt out of the sale or sharing of your data for targeted

advertising. We guarantee non-discrimination: you will not receive a lower quality of Service for exercising your privacy rights.

16. Children's Privacy

16.1. This app is not intended for users under the age of 16 (or the applicable minimum age of digital consent in your jurisdiction). We do not knowingly collect Personal Data from children. If we discover that a child has provided us with their data without verifiable parental consent, we will immediately delete this information.

17. Changes to This Privacy Policy

17.1. We may update this Privacy Policy from time to time.

17.2. In the event of material changes, we will notify you through the app or via email.

18. Legal Information and Contact Details

18.1. This Policy has been drafted in compliance with the Law of Ukraine "On Personal Data Protection," the European GDPR, and the CCPA.

18.2. If you have any questions regarding privacy, data management, or account deletion, please contact us:

Email: vprytul@prytulafoundation.org

Address: 65 Oles Honchar Street, Kyiv, 01054, Ukraine.