Privacy Policy

Effective Date: May 15, 2025 Company: Splitopia LLC

Address: 11 Southgate Blvd, D11, New Castle, Delaware

Contact Email: support@splitopia.app

1. Who We Are

Splitopia is a Telegram Mini App that helps people split group bills fairly and easily. We value your privacy and only collect the minimum data necessary to make the app work well.

2. What Data We Collect

We collect the following types of data from users:

- **Telegram profile data**, such as your Telegram user ID, username, display name, and profile photo. This helps identify you inside shared bills.
- Receipt data, including uploaded images of receipts and the text extracted from them using OCR (optical character recognition).
- **Bill-splitting metadata**, such as the items you claimed, how much each person owes, the amount of tip or tax, and the selected currency.
- Device and technical information, like your IP address, Telegram client version, and operating system. This helps ensure security and app performance.
- Analytics data, from self-hosted tools to understand usage patterns and improve the app.

All of this is required to provide and support the core functionality of Splitopia.

3. Why We Collect This Data

We process your data in order to:

- Identify you and personalize the bill-splitting experience
- Scan and understand receipt content
- Let users fairly claim items and calculate how much they owe

- Improve app performance and troubleshoot issues
- Protect the app from abuse or misuse

4. Legal Basis for Processing (GDPR)

For users in the European Economic Area (EEA), we process:

- Telegram data, receipt data, and bill-splitting info based on contractual necessity (to provide the service)
- Device and technical info, as well as analytics, under our legitimate interest in maintaining and improving the app

5. How Long We Keep Your Data

- Receipt images are stored for 2 months (60 days), then automatically deleted.
- Parsed receipt text and split data are stored indefinitely unless you request deletion.
- Analytics logs from our self-hosted system are stored for 6 months.
- Backups are retained for 30 days in a secure, rolling window.

6. Where and How Your Data Is Stored

- Your data is hosted on secure servers provided by Hetzner in Germany.
- Encrypted backups are stored with Wasabi in their EU data center.
- We use Google Cloud Vision (based in the U.S.) to extract text from receipt images.
- Some receipt content may be sent to OpenAI (U.S.) for enhancement and cleanup.
- Cloudflare is used globally to deliver content and protect the app from threats.

Where data is transferred outside the EEA, we use Standard Contractual Clauses (SCCs) to ensure it is protected.

7. Your Rights

You have the right to:

- Request a copy of your data (in a structured format like JSON)
- Ask us to delete your data

 Withdraw consent for optional features, like analytics (if we introduce consent-based tracking in the future)

To make a request, just email us at <u>support@splitopia.app</u>. We're also working on an in-app "Delete My Data" feature.

8. Children's Privacy

Splitopia is intended for users aged **13 and older**. If you are under 16 and located in the EEA, you must have consent from a parent or guardian. We do not knowingly collect data from anyone under the minimum age.

9. Cookies and Tracking

Our landing page (splitopia.app) uses:

- Essential cookies to enable the website and Mini App to function
- Self-hosted analytics to understand how users interact with our site

We do not use third-party marketing trackers.

10. How We Keep Your Data Secure

We use industry-standard security measures, including:

- Enforced HTTPS across all services
- Cloudflare firewall and DDoS protection
- Role-based access controls for internal tools
- Encryption for data both in transit and at rest
- Monitoring, abuse detection, and rate limiting

11. Updates to This Policy

We may update this Privacy Policy from time to time. When we do, we'll let you know via:

A banner on our landing page

• A notification in the Telegram Mini App

If you have any questions or need help regarding your data, please contact us at support@splitopia.app.