

Privacy Policy – Cruza

Effective Date: October 1, 2025

Last Revised: October 1, 2025

This Privacy Policy (“Policy”) outlines how Wagstaffe Training Limited (“Company,” “we,” “us,” or “our”) collects, uses, and protects your personal information through the use of the Cruza mobile application (the “App”). By using the App, you consent to the practices described in this Policy.

1. DATA COLLECTION AND USE

We collect and process the following types of data:

- **Location Data:** We collect location data for the purpose of providing the core functionality of the App, such as tracking driving statistics. This data is stored locally on your device.
- **Game Center Statistics:** If you choose to enable Game Center, anonymized driving statistics may be shared with Apple to allow comparison of your performance with other users.

We do not collect, store, or transmit personal information to any external servers (outside of Apple), and no personal data is used for advertising purposes.

2. DATA STORAGE AND RETENTION

- **Local Storage:** All data is stored locally on your device. You control the retention and deletion of your data.
 - **Game Center Data:** Anonymized aggregate data may be retained according to Apple’s Game Center policies.
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3. USER RIGHTS AND CONTROL

As a user, you have the right to:

- **Access:** View your data stored within the App.
- **Deletion:** Delete your data at any time through the App's settings.
- **Opt-Out:** Disable Game Center sharing to stop the sharing of your anonymized statistics with Apple.

You can also manage location permissions directly through your device settings.

4. THIRD-PARTY SERVICES

The App integrates with the following third-party services:

- **Apple iOS Services:** The App uses Apple's Core Location and Game Center services. These services are governed by Apple's privacy policies.

We do not share any data with other third-party services, advertising networks, or social media platforms.

5. SECURITY MEASURES

We implement reasonable technical measures to protect your data, including secure local storage. However, no method of electronic data transmission or storage is entirely secure, and we cannot guarantee the absolute security of your information.

6. LEGAL COMPLIANCE

6.1 GDPR (EU Residents)

If you are an EU resident, you have the following rights under the General Data Protection Regulation (GDPR):

- **Right to Access:** Request access to your personal data.
- **Right to Erasure:** Request the deletion of your data.
- **Right to Rectification:** Request the correction of any incorrect data.

- Right to Restrict Processing: Limit the processing of your data.

6.2 CCPA (California Residents)

If you are a California resident, under the California Consumer Privacy Act (CCPA), you have the right to:

- Know what data we collect.
- Delete your personal data.
- Opt-out of any sale of your data (though we do not sell your personal information).

We do not discriminate against users who exercise their privacy rights.

7. POLICY UPDATES

We may update this Privacy Policy from time to time. Material changes will be communicated via in-app notifications. Continued use of the App after such changes constitutes acceptance of the updated Policy.

8. CONTACT INFORMATION

If you have any questions, data protection-related inquiries, or concerns about this Privacy Policy, please contact us at:

Wagstaffe Training Limited

 Email: cruza@petprojectsatlas.com