

Privacy Policy – ToolGPT App

Effective Date: 14.03.2025

In this document, you will find details regarding the personal data that **ToolGPT App**, operated by Jacob König in Vienna, Austria (“we”), collects. We also explain the purposes for which we collect this data and how we process and protect it, in compliance with the General Data Protection Regulation (GDPR) and other applicable laws.

What Are Personal Data?

“Personal data” means any information relating to an identified or identifiable natural person. This includes details such as a person’s name, contact information, or even an IP address. Personal data is protected by privacy laws like the GDPR and the Austrian Data Protection Act (DSG), which regulate how such information can be collected, used, and shared.

User Data Collection & Storage

We collect and store certain personal information from you when you use the ToolGPT App. Most of this data is provided directly by you (for example, when you register an account). The data we collect is limited to what is necessary for providing our services:

- **Account Information:** Your name and email address, which you provide during registration. We also record the date your account was created.
- **Subscription Status:** Whether you are a free or Pro (subscribed) user, and details of your subscription status. This includes tracking your remaining token balance for the month.
- **Locally Stored Data:** Any AI tools that you manually save within the app are stored **locally on your device** (not on our servers).

Important: We **do not** collect or store the content of your tasks or the AI tool recommendations generated for you. Your task entries and the AI recommendations are processed in the app on the fly and are not saved to any database or server. They remain on your device and are not uploaded to us. Only if you choose to save an AI tool will it be stored locally on your device for your convenience.

All user profile data (such as the information listed above) is stored securely in our cloud database powered by **Firestore** (a service by Google). This data is kept only until you delete your account (see **User Rights & Data Deletion** below for more on account deletion).

You are not obligated to provide personal data that we request. However, without certain information (like your email and a password for authentication), you will not

be able to create an account or use the app's core features. If any data is required by law, we will inform you at the time of collection.

Authentication & Security

We use **Firebase Authentication** (provided by Google) to manage user sign-ups and logins. This allows you to register and log in securely using either an email address and password, via Google sign-in or Apple sign-in. We do **not** store your password or any additional authentication credentials on our servers; all authentication details are handled by Firebase.

Firebase provides us with a unique user ID and your email once you authenticate, and we rely on Firebase's secure infrastructure to protect your login information. We do not collect any other authentication data beyond what Firebase supplies. All communication between the app and Firebase (for login and data storage) is encrypted to safeguard your personal information.

We also implement industry-standard security measures to protect your data. For example, data transmitted between the app and our servers is encrypted (HTTPS/TLS) to prevent unauthorized access. We regularly update our systems and practices to maintain the security and confidentiality of your information.

Purposes of Data Processing

We process your personal data only for specific, legitimate purposes related to the operation and improvement of the ToolGpt App. These purposes include:

- **Providing and Improving Services:** To provide, maintain, and enhance the features and functionality of the app, ensuring you can effectively use our services (e.g. saving tools, tracking tokens).
- **Communication:** To communicate with you about important updates, changes, promotions, or announcements related to the app. For instance, we may send service notifications or support responses to your registered email.
- **Security and Enforcement:** To enforce our Terms of Service, prevent misuse of the app, and ensure the security and integrity of our platform. This includes monitoring for fraudulent or suspicious activities and securing user accounts.
- **Research and Analytics:** To analyze usage patterns and user interactions (in an aggregated/anonymized manner when possible) so we can understand how the app is used and improve the user experience and our services.
- **Contractual Necessity:** To fulfill our obligations to you as a user of the app. When you create an account or purchase a subscription, we process your data as needed to provide the service you requested (legal basis: Art. 6(1)(b) GDPR – performance of a contract or pre-contractual steps).
- **Legitimate Interests:** To safeguard our legitimate interests (or those of other users or third parties), provided such interests are not overridden by your

rights. For example, maintaining the security of our IT infrastructure or preventing fraud is in our legitimate interest (legal basis: Art. 6(1)(f) GDPR).

We will not use your personal data for any purposes that are incompatible with those listed above without first obtaining your consent.

AI Query Processing (ChatGPT Integration)

One of the features of the ToolGPT App is the integration of AI-powered tool recommendations and responses (using OpenAI's ChatGPT). When you input a prompt or task in the app to get an AI suggestion:

- **Data Processing by OpenAI:** Your prompt (the query or task description you enter) is securely transmitted from the app to OpenAI's ChatGPT service. ChatGPT processes your prompt and generates a response or recommendation, which is then sent back to the app.
- **No Storage of Prompts/Responses:** We do **not** store your prompts or the AI-generated responses on our servers. The content you input and the output from ChatGPT are used **only** to fulfill your request in that moment. Once you receive the AI's answer or recommendation, both your prompt and the response are **immediately discarded** from our systems. They are not saved in any database or log on our side.
- **Transient Data Handling:** This means your interactions with the AI are handled in real-time and are ephemeral – after the AI response is delivered to you, neither the question nor answer remain in our possession. (Please note that OpenAI may retain query data on their end for a limited time as part of their service operation or improvements, according to their own privacy policy. We do not control OpenAI's internal data retention policies, but **we** do not keep or reuse your queries or responses.)

By using the AI features, you understand that your prompt will be sent to an external AI service (OpenAI) for processing. We ensure that this transmission is secure. No AI query content is ever used by us for any purpose other than delivering you the response you requested.

Subscription & Payment Processing

Our app offers a Pro subscription (which provides additional benefits such as a higher token allowance). We handle subscriptions and payments using trusted third-party services to ensure your financial information remains secure:

- **RevenueCat (Subscription Management):** We use **RevenueCat** as a third-party service to manage and validate subscriptions. RevenueCat works in conjunction with the **Apple App Store** and **Google Play Store** to process in-app purchases and subscriptions. When you subscribe to the Pro plan,

RevenueCat communicates with Apple or Google to confirm the purchase and let us know your subscription status (free or Pro).

- **Payment Processing by Apple/Google:** All payments for subscriptions are processed through your platform of choice (Apple or Google). We **do not** collect or store any of your billing information (such as credit card numbers or payment details) on our servers. Your payment details are handled securely by Apple or Google via their in-app purchase system. We simply receive confirmation from them (through RevenueCat) that you have a valid subscription, so we can grant you the Pro features.
- **"Unlimited" Token Plan Clarification:** We offer an in-app subscription called **"Unlimited Token Subscription."** Despite the name *"unlimited,"* this plan has a fair-use limit of **300 tokens per month** for each subscriber. We use the term "unlimited" as a simplified brand name, but in practice the usage is capped at 300 tokens every month. This cap is in place to prevent abuse and ensure quality of service for all users. Rest assured, 300 tokens per month is the maximum you are allowed under this plan, and the app will notify you if you approach this limit.

Data Sharing with Third Parties

We value your privacy and handle your data with care. We do **not** sell, rent, or trade your personal information to any third parties for marketing or any other purposes. We only share your data with third parties in a few specific scenarios necessary for operating the app or when required by law. These are the only circumstances in which outside parties may receive access to your data:

- **Service Providers (Processors):** We share data with a few trusted third-party service providers **only as needed** to run the app and deliver our services to you. These providers act on our behalf and are contractually obligated to protect your information and use it only for the purposes we specify. The key service providers we use are:
 - **Google Firebase (Authentication & Storage):** We use Firebase Authentication to verify your identity (handle logins) and Firebase Firestore to store your user data (as described in the *User Data Collection & Storage* section). Firebase is a service provided by Google LLC. Basic account details like your email and profile info are stored on Firebase's systems.
 - **OpenAI (ChatGPT Service):** When you use the AI features, your prompts are sent to OpenAI's ChatGPT service (as described in *AI Query Processing*). OpenAI will briefly receive the content of your query in order to generate the response. We do not share any information with OpenAI beyond the prompt itself (which may include personal data only if you include such information in the prompt). OpenAI is a third-party processor that provides the AI functionality.

- **RevenueCat, Apple App Store, and Google Play:** These services/processors handle our subscription purchases. RevenueCat (a service provider) interfaces with Apple and Google on our behalf. When you make a purchase, Apple or Google will process your payment details, and RevenueCat will inform us of your subscription status. We may share identifiers like your user ID or receipts with RevenueCat/Apple/Google as needed to manage subscriptions and verify purchases. No sensitive payment data is ever shared with us directly (it stays with Apple/Google).
- **Legal Compliance:** If we are under a legal obligation to disclose your data – for example, in response to a court order, subpoena, or other legal process – we may share information as required by law. We will only do so after verifying the request is legitimate and necessary. Where possible and lawful, we would inform you of such disclosure.
- **With Your Consent:** In any situation where you have given us specific consent to share your data with a third party, we will honor that consent. For instance, if in the future you opt-in to a feature that involves sending data to another service, we will share your data in that context **only** with your explicit permission.

Aside from the cases above, **no personal data is shared with any other third parties**. We do not disclose your information to anyone else. All third parties that process your data (Firebase, OpenAI, RevenueCat/Apple/Google) are listed above and have privacy measures in place. We ensure that each of these providers only receives the minimum information necessary for them to perform their function.

International Data Transfers

Some of the third-party service providers we use are located outside of the European Union (EU) or the European Economic Area (EEA). In particular, using our app may involve transferring your personal data to servers in the **United States** or other countries that may have different data protection standards than your home country. For example, the OpenAI service processing your AI queries and parts of Firebase or RevenueCat's infrastructure may be based in the U.S.

Whenever we transfer personal data out of the EU/EEA, we take steps to ensure that an adequate level of protection is accorded to your information in line with GDPR requirements. These steps include:

- **Adequacy Decisions:** If the data is sent to a country that the European Commission has recognized as providing an adequate level of data protection, we rely on that decision.
- **Standard Contractual Clauses:** In the absence of an adequacy decision, we use European Commission-approved Standard Contractual Clauses (SCCs) or equivalent legal safeguards as part of our agreements with the service

providers. These clauses contractually require your data to be protected to EU privacy standards regardless of where it is processed.

- **Other Safeguards:** We may also implement additional technical and organizational measures (such as encryption and strict access controls) to protect data transferred internationally. We continually monitor legal developments and our partners' practices to ensure ongoing compliance.

By using the ToolGPT App, you understand that your data may be transferred to and processed in countries outside your own. However, please rest assured that we **always** safeguard your privacy by ensuring any such transfers are lawful and secure.

User Rights & Data Deletion

As a user of the ToolGPT App and as a data subject under GDPR and other applicable laws, you have several rights regarding your personal data. We are committed to upholding these rights. Subject to certain legal conditions and exceptions, you have the right to:

- **Access Your Data:** You can request confirmation of whether we are processing your personal data, and if so, request a copy of the data we hold about you (commonly known as a data access request).
- **Rectification:** You have the right to ask us to correct or update any inaccurate or incomplete personal data we have on file about you. We appreciate it when you keep your information up-to-date.
- **Erasure (Right to be Forgotten):** You can request that we delete your personal data. This includes the option to **delete your account** in the app, which will remove all personal information we have about you (see below for details on account deletion).
- **Restriction of Processing:** You can ask us to restrict the processing of your personal data (for example, to stop using it temporarily) in certain circumstances – such as if you contest the accuracy of the data or object to us processing it.
- **Object to Processing:** You have the right to object to certain types of processing, including processing for direct marketing purposes or when we process data based on a legitimate interest. If you object, we will reconsider our processing activities or cease processing your data, unless we have compelling legitimate grounds to continue.
- **Withdraw Consent:** If we ever rely on your consent to process your data (in scenarios where consent is needed), you can withdraw that consent at any time. Withdrawing consent will not affect the lawfulness of any processing we carried out based on your consent before its withdrawal.
- **Data Portability:** You have the right to receive your personal data that you provided to us in a structured, commonly used, machine-readable format, and to have that data transmitted to another controller where technically feasible.

(This right applies when the processing is based on your consent or a contract and is carried out by automated means.)

- **Lodge a Complaint:** If you believe your data protection rights have been violated, you have the right to file a complaint with the relevant data protection supervisory authority. For example, in Austria the authority is the Österreichische Datenschutzbehörde (Austrian Data Protection Authority).

Account Deletion: You can delete your ToolGPT App account at any time. This option may be provided within the app's settings, or you can contact us to request deletion. When you delete your account, we will erase **all** personal data associated with your account from our systems. This includes your profile information, subscription status, and any other data we hold that is linked to your identity in Firebase Firestore. Account deletion is irreversible – once completed, we cannot recover your account or data. If you wish to use the app again, you would need to create a new account.

Please note that we **do not offer an option to export or download your data directly through the app prior to deletion**. If you need to retain any information (for example, a list of any tools you saved locally), please ensure you have separately saved that information before initiating an account deletion. *(While the app does not have an in-app data export feature, you still retain the right to data portability as described above – you may contact us to assist with any data export request.)*

To exercise any of your rights, you can contact us using the information provided in the Contact section below. We will respond to your requests in accordance with applicable law, typically within one month. For security, we may need to verify your identity before fulfilling certain requests (such as providing a data export or deleting data) to ensure that we do not disclose or remove information to the wrong person.

Retention Policy

We retain your personal data **only for as long as necessary** to fulfill the purposes outlined in this Privacy Policy or as required to provide you with our services. In practice, this means we keep your data for as long as you maintain an account with us. If you remain an active user, we will continue to store your profile and subscription information so that the app continues to function for you.

If you choose to delete your account (or if we receive a verified request from you to erase your data), we will promptly delete your personal data from our active databases. In general, once your account is deleted, your personal information will no longer be accessible through our app or systems.

However, there are a few exceptions to immediate deletion in order to comply with legal and administrative obligations:

- We may retain certain data for a short period in backup systems, which are kept securely. Any personal data in backups will be purged or overwritten in accordance with our regular backup retention cycle.
- We may retain data if necessary to comply with applicable laws or regulations. For example, if financial transactions occurred (such as subscription payments), we might need to keep a record of those transactions for a certain period to satisfy accounting or tax regulations.
- If there is an outstanding issue, claim, or dispute requiring us to keep your information (for instance, an unresolved legal matter), we will retain the necessary data until the issue is resolved and/or for the duration that legal requirements demand.

In all cases, when we retain data for legal or contractual requirements, we ensure it's only kept for the **minimum duration necessary** and access to it is restricted. After the applicable retention period expires, or once the reason for retention has been resolved, the data will be securely deleted or anonymized.

Age Limit for Consent (Children's Privacy)

Our services are not directed to individuals under the age of 14, and we do not knowingly collect personal data from children under 14 without appropriate consent. Under the Austrian Data Protection Act (DSG) – and consistent with the GDPR – children under 14 years old cannot legally provide consent for the processing of their personal data in the context of online services like this app.

If you are under 14 years of age, you **must have your parent or legal guardian's permission** to use the ToolGPT App. If we become aware that we have inadvertently collected personal data from a child under 14 without verifiable parental consent, we will take steps to delete that information promptly. Parents or guardians who believe that we might have any information from or about a child under 14 may contact us (see below), and we will ensure that the data is removed.

Contact Information

If you have any questions, concerns, or requests regarding this Privacy Policy or your personal data, please do not hesitate to contact us. The responsible entity (Data Controller) for the ToolGPT App is:

Jacob König
1010 Vienna, Austria

Email: jkoenig.project@gmail.com

You can reach out to us via the email above for any privacy-related inquiries—such as asking about your data, requesting deletion, or anything else outlined in the **User Rights** section. We are committed to resolving any issues and answering your questions to ensure you feel safe and informed while using our app.

Last Updated: 14.03.2025

This Privacy Policy may be updated from time to time. We will notify you of any significant changes by posting the new policy within the app and updating the “Last Updated” date. We encourage you to review this policy periodically to stay informed about how we are protecting the personal data we collect. By continuing to use the app after any changes come into effect, you acknowledge the revised policy.