

Privacy Policy — Migra

Last updated: 16 July 2026

Effective date: 16 July 2026

Migra ("the App") is developed and published by Ilkay Keyik ("we", "us", "our"), based in Türkiye. This Privacy Policy explains what data Migra collects, how it is used, and the rights you have over it.

Migra is a migraine tracking app. Because migraine data is health data, we designed the App around a simple principle: your health data stays on your device. We do not operate user accounts, we do not sell data, and we do not show ads.

1. Data You Enter in the App

Migraine attacks, pain intensity and location, symptoms, suspected triggers, medication name/dose/time, notes, and any other entries you make are stored only in a local database on your device.

- We have no server-side copy of this data.
- We cannot access it, read it, or recover it for you.
- It is included in your encrypted iPhone/iCloud device backup if you have backups enabled. That backup is governed by Apple's privacy policy, not ours.
- Deleting the App deletes this data permanently.

2. Apple Health (HealthKit)

If you grant permission, Migra reads the health data types you explicitly authorize on the Apple Health permission screen, in order to correlate them with your migraine episodes and generate insights on your device. You can review and change exactly which types are shared at any time.

We commit to the following, as required by Apple:

- HealthKit data is never used for advertising, marketing, or similar services.
- HealthKit data is never sold, rented, or shared with third parties, data brokers, or information resellers.
- HealthKit data is never disclosed for any purpose other than improving your health and wellness experience within the App.
- HealthKit data is processed on your device only and is not transmitted to our servers.

You can revoke Health access at any time in Settings → Privacy & Security → Health → Migra.

3. Location and Weather

Migra can correlate barometric pressure, temperature, and humidity with your attacks.

- We request approximate (coarse) location only.
- Your coordinates are sent to our weather data provider, Open-Meteo (open-meteo.com), solely to retrieve forecast data for your area.
- We do not store your location on any server. Weather results are cached locally on your device.
- Open-Meteo's data handling is governed by their own privacy policy.
- Location permission is optional. Denying it disables weather correlation only; every other feature keeps working.

4. Voice Entry (Optional)

If you use voice entry to log an attack:

1. Speech-to-text runs on your device using Apple's on-device speech recognition. Your audio recording is not uploaded to us.
2. The resulting text transcript is sent over an encrypted connection to our backend (Google Firebase Cloud Functions) and forwarded to Google's Gemini API to convert free-form text into structured fields.
3. The transcript is processed in-memory and not stored in our logs or database. Google processes it as a data processor under the Google Cloud / Gemini API terms and does not use API content to train its models.
4. The structured result is returned to your device and saved locally.

Do not dictate information you do not want processed by a third-party model. Voice entry is entirely optional — you can always log attacks manually.

5. Subscriptions and Purchases

Migra is a paid subscription app. Purchases are processed by Apple; we never see or handle your payment card, billing address, or Apple ID.

We use RevenueCat, Inc. to manage and validate subscription entitlements. RevenueCat receives:

- an anonymous, randomly generated app user ID (not your name or email),
- your Apple purchase receipt, subscription status, and country,
- basic device metadata (device model, OS version, app version).

RevenueCat cannot access your migraine data. See RevenueCat's privacy policy at revenuecat.com/privacy.

6. Diagnostics

Migra does not include any third-party analytics or advertising SDK. Crash and performance data may be shared with Apple if you have enabled "Share with App Developers" in iOS settings; this data is aggregated and does not contain your health entries.

7. What We Do Not Do

- We do not sell or rent your data. Ever.
- We do not show advertisements or use advertising identifiers (IDFA).
- We do not require an account, email address, or phone number.
- We do not share your health data with insurers, employers, or data brokers.
- We do not use your health data to train AI models.

8. Notifications

Reminders and medication-overuse warnings are scheduled and delivered as local notifications generated on your device. Their content is not transmitted to us.

9. Doctor Report / PDF Export

Reports are generated on your device. When you export or share a PDF, you decide where it goes (email, Files, messaging apps, printing). Once shared, that copy is outside our control and outside the protections of this policy.

10. Data Retention and Deletion

- In-app: delete individual entries at any time, or wipe all data from the App's settings.
- Uninstall: deleting Migra removes the local database and all health entries permanently. This cannot be undone.
- Subscription records held by Apple and RevenueCat are retained per their own retention schedules and are required for billing and legal compliance.

Because we hold no copy of your health data, we cannot restore it after deletion.

11. Your Rights (GDPR / KVKK / CCPA)

If you are in the European Economic Area, the United Kingdom, Türkiye, or California, you have rights to access, rectify, erase, restrict, port, and object to processing of your personal data.

For the health data in Migra, these rights are exercised directly by you on your device — you already have full access, editing, and deletion control, and no copy exists with us.

For subscription-related data, contact us at yavuzozyavuz434@gmail.com and we will assist within 30 days.

Legal basis for processing (GDPR Art. 6/9): your explicit consent for health data (Art. 9(2)(a)), and performance of contract for subscription processing (Art. 6(1)(b)).

Under KVKK (Law No. 6698), the data controller is Ilkay Keyik. Requests may be submitted to yavuzozyavuz434@gmail.com.

12. Children

Migra is not directed at children under 13 (or under 16 in the EEA). We do not knowingly collect data from children. If you believe a child has provided us data, contact yavuzozyavuz434@gmail.com.

13. International Transfers

Where data is transmitted (voice transcripts, subscription validation), it may be processed on servers located outside your country, including in the United States and the European Union. These transfers are covered by Standard Contractual Clauses or equivalent safeguards in our agreements with Google and RevenueCat.

14. Security

Data on your device is protected by iOS file-level encryption and your device passcode. All network traffic uses TLS. No method of transmission or storage is 100% secure; we cannot guarantee absolute security.

15. Changes to This Policy

We may update this policy. Material changes will be announced in the App and the "Last updated" date above will change. Continuing to use Migra after an update constitutes acceptance.

16. Contact

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