

Privacy Policy

Last Updated: October 6, 2025

This Privacy Policy describes how Splitgram (“we”, “us”, or “our”) collects, uses, and protects your information when you use the Splitgram mobile application (the “Service”).

We are committed to protecting your privacy and ensuring you understand how your data is handled. Please read this Privacy Policy carefully.

By using the Service, you agree to the collection and use of information in accordance with this Privacy Policy.

1. Information We Collect

1.1 Information You Provide Directly

We do NOT collect or store: - Your video recordings - Your audio recordings - Your personal media content - Your Photos library contents

All video and audio recordings are: - Processed locally on your device - Saved directly to your device’s Photos library - Never uploaded to our servers - Never transmitted over the internet by our app

1.2 Automatically Collected Information

We may automatically collect the following information:

Device Information: - Device model and type (e.g., iPhone 15 Pro) - iOS version - Device capabilities (camera support, available resolutions) - Available storage space (to prevent recording failures) - Thermal state (for performance optimization)

Usage Analytics: - App launch and session duration - Feature usage (which layouts, quality settings selected) - Recording duration statistics (not the actual recordings) - App crashes and errors (for debugging) - Performance metrics (frame rates, memory usage)

Subscription Information: - Subscription status (free or premium) - Subscription type and duration - Purchase history (managed by Apple and RevenueCat) - Trial usage status

1.3 Information from Third-Party Services

Apple: - App Store account information (managed by Apple) - Purchase and subscription data (via App Store) - Device identifiers (for analytics)

RevenueCat: - Subscription status and entitlements - Anonymous user identifiers - Purchase events

2. How We Use Your Information

We use the collected information for the following purposes:

2.1 To Provide the Service

- Enable dual-camera recording functionality
- Manage video quality and performance settings
- Save recordings to your Photos library
- Verify device compatibility and capabilities
- Monitor storage space to prevent recording failures

2.2 To Manage Subscriptions

- Verify premium subscription status
- Enable/disable premium features accordingly
- Process subscription purchases and renewals
- Handle subscription restoration across devices

2.3 To Improve the Service

- Analyze app performance and stability
- Identify and fix bugs and crashes
- Understand feature usage patterns
- Optimize recording quality and performance
- Develop new features based on usage trends

2.4 To Communicate with You

- Send important service announcements
- Provide technical support responses
- Notify about app updates or changes
- Send promotional offers (with your consent)

3. How We Share Your Information

3.1 We Do NOT Sell Your Data

We do not sell, rent, or trade your personal information to third parties for marketing purposes.

3.2 Third-Party Service Providers

We share limited information with trusted third-party services:

Apple Inc. - Subscription and purchase data (via In-App Purchase) - Device and usage analytics (via App Store Connect) - Crash reports and diagnostics

RevenueCat - Anonymous user identifiers - Subscription status and events - Purchase and entitlement data - Used solely for subscription management

Analytics Providers (if applicable) - Anonymous usage statistics - Performance metrics - Crash reports - No personally identifiable information

3.3 Legal Requirements

We may disclose your information if required to: - Comply with legal obligations or court orders - Protect our rights, property, or safety - Prevent fraud or security issues - Enforce our Terms and Conditions

3.4 Business Transfers

In the event of a merger, acquisition, or sale of assets, your information may be transferred to the acquiring entity.

4. Data Storage and Security

4.1 Local Storage

- All video and audio recordings are stored locally on your device
- Recordings are saved directly to your Photos library
- We do not maintain copies of your recordings on our servers
- You control recording deletion through the Photos app

4.2 Security Measures

We implement security measures to protect your information: - Data encryption in transit (HTTPS/TLS) - Secure API communication with third-party services - No storage of sensitive media content on external servers - Regular security audits and updates

4.3 Data Retention

User-Generated Content: - Videos and recordings: Retained on your device indefinitely (you control deletion) - App preferences: Stored locally until app deletion

Analytics and Usage Data: - Retained for up to 12 months for analysis purposes - Anonymous aggregated data may be retained longer for trend analysis

Subscription Data: - Retained as long as necessary for subscription management - Historical purchase data retained per Apple and RevenueCat policies

5. Your Privacy Rights

5.1 Access and Control

You have the right to: - **Access:** View what data we collect through app settings - **Deletion:** Delete your recordings from your Photos library anytime - **Opt-out:** Disable analytics through iOS device settings - **Uninstall:** Remove the app and all local data from your device

5.2 iOS Privacy Controls

You can manage permissions through iOS Settings: - **Camera Access:** Settings > Privacy & Security > Camera > Splitgram - **Microphone Access:** Settings > Privacy & Security > Microphone > Splitgram - **Photos Access:** Settings > Privacy & Security > Photos > Splitgram - **Analytics:** Settings > Privacy & Security > Analytics & Improvements

5.3 Marketing Communications

- You can opt out of promotional emails by following unsubscribe instructions
- Service-related announcements cannot be opted out of while using the Service
- You control notification permissions through iOS Settings

5.4 Data Deletion Request

To request deletion of any data we may hold: 1. Email us at joshmus7@msn.com 2. Provide your device identifier or user ID 3. Specify what data you want deleted 4. We will respond within 30 days

Note: Deleting data may affect your ability to use certain features or restore purchases.

6. Permissions and Access

6.1 Required Permissions

The app requires the following permissions to function:

Camera Access (Required) - Purpose: Capture video from front and back cameras simultaneously - Usage: Only active during recording - Data: Processed locally, never transmitted to servers

Microphone Access (Required) - Purpose: Record audio synchronized with video - Usage: Only active during recording - Data: Processed locally, saved to device only

Photos Library Access (Required) - Purpose: Save completed recordings to Photos - Usage: Write access only for saving videos - Data: Videos saved to your library, controlled by you

6.2 Optional Permissions

Notifications (Optional) - Purpose: Alert you to recording completion or issues - You can enable/disable in iOS Settings

7. Children's Privacy

7.1 Age Restrictions

- The Service is not intended for children under 13 years of age
- We do not knowingly collect information from children under 13
- If we discover we have collected data from a child under 13, we will delete it immediately

7.2 Parental Controls

- Parents/guardians should monitor children's device usage
- iOS parental controls can restrict app access and purchases
- We recommend parents review recordings created by minors

8. International Data Transfers

8.1 Data Location

- Your recordings remain on your device (no international transfer)
- Analytics data may be processed in various countries
- Third-party services (Apple, RevenueCat) may process data internationally

8.2 Data Protection

- We ensure adequate protection for international transfers
- Comply with applicable data protection laws (GDPR, CCPA, UK GDPR)
- Use standard contractual clauses where appropriate

9. Cookies and Tracking

9.1 Cookies

- The app does not use browser cookies (native iOS app)
- No web-based tracking mechanisms

9.2 Analytics Tracking

- We may use analytics SDKs to collect usage data
- You can opt out through iOS privacy settings
- We do not use advertising identifiers

9.3 Do Not Track

- As a native app, standard web "Do Not Track" signals do not apply
- Use iOS privacy settings to limit tracking

10. Third-Party Links and Services

10.1 Social Media Sharing

When you share videos to social media: - You initiate the transfer to third-party platforms - Those platforms' privacy policies apply to shared content - We do not control how third parties use shared videos

10.2 Third-Party Privacy Policies

- **Apple:** <https://www.apple.com/legal/privacy/>
- **RevenueCat:** <https://www.revenuecat.com/privacy/>
- **Instagram:** <https://help.instagram.com/privacy/>
- **TikTok:** <https://www.tiktok.com/legal/privacy-policy>

- **Snapchat:** <https://www.snap.com/privacy/privacy-policy>

We are not responsible for third-party privacy practices.

11. California Privacy Rights (CCPA)

If you are a California resident, you have additional rights:

11.1 Right to Know

- Categories of personal information collected
- Sources of personal information
- Business purposes for collection
- Categories of third parties with whom we share data

11.2 Right to Delete

- Request deletion of personal information we hold
- Subject to certain exceptions

11.3 Right to Opt-Out

- Opt out of sale of personal information (we do not sell data)

11.4 Non-Discrimination

- We will not discriminate for exercising your rights

To exercise these rights, contact us at joshmus7@msn.com.

12. European Privacy Rights (GDPR/UK GDPR)

If you are in the EU/UK, you have rights under GDPR:

12.1 Legal Basis for Processing

- **Contractual Necessity:** To provide the Service
- **Legitimate Interests:** Improve service, prevent fraud
- **Consent:** Marketing communications (where applicable)

12.2 Your Rights

- Right to access your data
- Right to rectification of inaccurate data
- Right to erasure (“right to be forgotten”)
- Right to restrict processing
- Right to data portability
- Right to object to processing
- Right to withdraw consent

12.3 Data Controller

We are the data controller for your personal information.

12.4 Complaints

You have the right to lodge a complaint with a supervisory authority.

13. Changes to This Privacy Policy

13.1 Updates

- We may update this Privacy Policy from time to time
- Changes are effective immediately upon posting
- Material changes will be notified through the app or email
- Continued use after changes constitutes acceptance

13.2 Notification

- Update date shown at the top of this policy
- Significant changes highlighted in app updates
- Review periodically for updates

14. Data Breach Notification

In the event of a data breach: - We will notify affected users without undue delay - Notification includes nature of breach and mitigation steps - Report to relevant authorities as required by law - Note: Since recordings stay on your device, breach risk is minimal

15. Your Responsibilities

You are responsible for: - Maintaining device security (passcode, biometric locks) - Managing permissions granted to the app - Controlling who has access to your recordings - Complying with laws when recording others - Obtaining consent when recording individuals (where required) - Protecting your Apple ID and device access

16. Contact Us

For questions about this Privacy Policy or to exercise your privacy rights:

Email: joshmus7@msn.com

For GDPR/UK GDPR requests: Please include “GDPR Request” in your email subject

For CCPA requests: Please include “CCPA Request” in your email subject

Response Time: We will respond to privacy requests within 30 days

17. Summary of Key Privacy Practices

What we DO: - Process recordings locally on your device - Save videos directly to your Photos library - Collect minimal usage analytics for improvements - Protect your data with industry-standard security - Give you control over your content and permissions

What we DON'T DO: - Upload your recordings to our servers - Sell your personal information - Share your videos with third parties - Access your recordings after saving to Photos - Collect unnecessary personal information

By using Splitgram, you acknowledge that you have read and understood this Privacy Policy and agree to its terms.

Last Updated: October 6, 2025