

## Privacy Policy

Tobi AI (hereinafter: 'we', 'us', 'our', or the 'App') provides translation and AI-powered services. This Privacy Policy is compliant with the General Data Protection Regulation (GDPR 2016/679). By using the App, you are consenting to our processing of data as set forth in this Privacy Policy. Our terms of service apply to your use of the App.

### 1. What data does our App obtain?

#### 1.1 We collect data about you and the way the App is used in various ways.

a. Automatically Collected Data – The App collects certain data automatically, such as: the type of device you use, device identifiers (including IDFA, IDFAV, resettable advertising identifiers, and app instance identifiers), IP address, geographical/location data, operating system, Wi-Fi MAC address, internet browser type, connection status, and diagnostic data. Additionally, we collect attribution and analytics identifiers through integrated third-party SDKs (such as Firebase, AppsFlyer, and Facebook), including Firebase ID, AppsFlyer ID, anonymous IDs (anonId), and client unique identifiers (cuid).

b. User Provided Data – The App obtains the data you provide when you download and use the App. This includes: (a) transaction-related data, such as when you make purchases, respond to offers, or subscribe; (b) data you provide when you contact us for help; and (c) data you enter or submit when using core features, such as text inputs, target/source language selections, selected translation scenes, digital human voice preferences, and voice recordings for translation, speech-to-text, and AI processing.

c. We may also get data from other sources and may combine it with data collected about you.

### 2. Data Sharing and AI Translation Processing

2.1 To the extent feasible, we only use your data in an anonymized, hashed or obfuscated way. We only use personally identifiable information to the extent required to provide our services.

2.2 We may share your data with third parties in the ways described in this Privacy Statement. We may disclose your data (a) as required by law, such as to comply with a subpoena or legal process, (b) when we believe in good faith that disclosure is necessary to protect our rights, safety, or investigate fraud, (c) with trusted service providers who work on our behalf, and (d) with third-party advertising networks, attribution partners, and analytics companies as described below.

#### 2.3 AI Translation and Voice Processing (Channel-Specific Disclosures):

- Text Translation: When you use text translation, Tobi AI collects the text you enter, selected source and target languages, selected digital human voice option, and technical request information needed to provide the feature. This data is sent to Tobi AI backend server (app-d.tobiaitranslate.com) and is

processed by OpenAI GPT-4.1, Google Gemini 3.1 Flash-Lite, and ElevenLabs to generate translated text and speech output.

- Voice Translation: When you use voice translation, Tobi AI collects your voice recording, selected target language, selected translation scene, selected digital human voice option, and technical request information needed to provide the feature. This data is sent to Tobi AI backend server (app-d.tobiatranslate.com) and is processed by ElevenLabs Scribe for speech-to-text, Google Gemini 3.1 Flash-Lite for translation, and ElevenLabs for speech generation.

- Camera Translation: Camera translation does not send captured or selected images to Tobi AI backend or third-party AI services. Camera images are processed using Apple system frameworks (such as Vision and TranslationSession) for text recognition and translation entirely on-device or via system capabilities.

We use this data only to provide translation, speech recognition, text-to-speech, security, abuse prevention, and service reliability. The App requires and obtains explicit user consent through an in-app prompt identifying these specific data recipients before transmitting data for AI processing. Our third-party AI service providers are required to protect personal data with safeguards appropriate to their processing role.

2.4 We may use and share data (including Automatically Collected Data and User Provided Data in an anonymized or hashed form) for advertising purposes by us or our partners, utilizing device identifiers (like IDFA) to serve interest-based advertisements and measure campaign performance through partners such as AppsFlyer, Facebook, and Firebase.

2.5 We work with analytics companies to help us understand how the App is being used, such as frequency, duration, and user interaction metrics.

2.6 If you have allowed us to collect precise location data via your device settings, we may share it with ad network partners to tailor localized ads within the App.

2.7 Paid versions of our App generally do not contain advertising and will not use your data for advertising purposes, though data collection software/SDKs will continue to operate for core functionality, security, and analytics.

### 3. Managing Your Data

3.1 You can stop all collection of data by the App easily by uninstalling the App using standard system uninstall processes.

3.2 You may at any time opt out of precise location data collection by disabling 'Location' in your device settings.

3.3 You can control advertising identifiers and cross-app tracking via your device settings (e.g., 'Limit Ad Tracking' or 'App Tracking Transparency' on iOS).

#### 4. Business Transfers

4.1 Data about you may be disclosed as part of any merger, acquisition, or sale of company assets, or during insolvency, bankruptcy, or receivership.

#### 5. Children

5.1 We do not use the App to knowingly solicit data from or market to children under the age of 13. If a parent or guardian becomes aware that a child has provided data without consent, please contact us at [laerrrr22@gmail.com](mailto:laerrrr22@gmail.com), and we will delete or anonymize such data within a reasonable time.

#### 6. Security

6.1 We implement robust physical, electronic, and procedural safeguards to protect your data, limiting access to authorized personnel, contractors, and secure cloud infrastructure. While we strive to protect your data, no security system is entirely impenetrable.

#### 7. Data Retention Policy

7.1 User Provided Data and translation logs are retained for as long as necessary to provide the App's services and for a reasonable operational period. Automatically collected data and analytics/attribution logs (including Firebase, AppsFlyer, and backend diagnostics) are retained for up to 12 months, after which they may be stored in aggregate form. You can request deletion of your data by contacting us at [laerrrr22@gmail.com](mailto:laerrrr22@gmail.com).

#### 8. Changes

8.1 This Privacy Policy may be updated periodically. We will notify you of any changes by posting the updated Privacy Policy within the App or on our App Store page.

#### 9. Face Data

Tobi AI does not collect, analyze, process, store, retain, disclose, or share face data. The camera and photo features are used only to capture or select images for text recognition and translation via Apple system frameworks. The app does not perform face detection, face recognition, face landmark extraction, face geometry analysis, biometric identification, or TrueDepth/ARKit face tracking.