In order to use the service, we will ask you to enter information about your reading preferences, name, email. We also automatically collect from your device language settings, IP address, time zone, type and model of a device, device settings, operating system, Internet service provider, mobile carrier, hardware ID, and other unique identifiers (such as IDFA and AAID). We need this data to provide our services, analyze how our customers use the service, to serve ads.

For improving the service and serving ads, we use third party solutions. As a result, we may process data using solutions developed by Amazon, BigQuery, Appsflyer, Facebook, Firestorage, Apple, Google, Amplitude, Firebase, Sendios, Snapchat, Pinterest, Tableau, Twitter, Zendesk, Hotjar, PayPal, TikTok. Therefore, some of the data is stored and processed on the servers of such third parties. This enables us to: (1) analyze different interactions (how often users make purchases, what is the average time spent by users on the website); (2) serve and measure ads (and are able to show them only to a particular group of users, for example, to users that have already visited the website). Consequently, we, in particular, better understand in what of our features and content you see the most value and are able to focus on them to enhance your experience and increase the quality of our products.

Please read our Privacy Policy below to know more about what we do with data (Section 3), what data privacy rights are available to you (Section 6) and who will be the data controller (Section 1), and how to influence personalized advertising (Subsection 3.7). If any questions remain unanswered, please contact us at support@nibble-app.com.

PRIVACY POLICY

This Privacy Policy explains what personal data is collected when you use Nibble mobile application (the “App”), the website located at: https://nibble-app.com (the “Website”), the services and products provided through them (together with the App and Website, the “Service”), how such personal data will be processed.

BY USING THE SERVICE, YOU PROMISE US THAT (I) YOU HAVE READ, UNDERSTAND AND AGREE TO THIS PRIVACY POLICY, AND (II) YOU ARE OVER 16 YEARS OF AGE (OR HAVE HAD YOUR PARENT OR GUARDIAN READ AND AGREE TO THIS PRIVACY POLICY FOR YOU). If you do not agree, or are unable to make this promise, you must not use the Service. In such case, you must (a) contact us and request deletion of your data; (b) delete the App from your device or leave the Website and not access or use it; and (c) cancel any active subscriptions or trials.

Any translation from English version is provided for your convenience only. In the event of any difference in meaning or interpretation between the English language version of this Privacy Policy available at https://nibble-app.com/policy/privacy-policy.pdf, and any translation, the English language version will prevail. The original English text shall be the sole legally binding version.

“GDPR” means the General Data Protection Regulation (EU) 2016/679 of the European Parliament and of the Council of 27 April 2016 on the protection of natural persons with regard to the processing of personal data and on the free movement of such data.

“EEA” includes all current member states to the European Union and the European Free Trade Association. For the purpose of this policy EEA shall include the United Kingdom of Great Britain and Northern Ireland.

“Process”, in respect of personal data, includes to collect, store, and disclose to others.

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1. **PERSONAL DATA CONTROLLER**

GTHW App Limited, a company registered and acting under the laws of the Republic of Cyprus with registration number HE 395742, having its registered address at 24 Peiraios Str., 1st floor, Strovolos, 2023 Nicosia, Cyprus, will be the controller of your personal data.

2. **CATEGORIES OF PERSONAL DATA WE COLLECT**

We collect data you give us voluntarily (for example, when you enter your name, email). We also collect data automatically (for example, your IP address). We also may receive data about you from third parties.

2.1. **Data you give us**

You provide us information about yourself in the process of account creation. For example: name, email address, quiz answers.

2.2. **Data provided by third parties**

When you use sign in with Apple to register an account in the Service, we get personal data from your Apple ID account. This data may include, in particular, your name and verified email address. You may choose to share your real email address or an anonymous one that uses the private email relay service. Apple will show you their detailed privacy information on the sign in with Apple screen. Find more about sign with Apple [here](#).

When you decide to log in using Facebook, we get personal data from your Facebook account. This includes your profile image, name, and Facebook ID. Unless you opt out on the Facebook Login screen, we will also collect other data, such as email address.

For more information, please refer to the Facebook [Permissions Reference](https://www.facebook.com/help/permissions_reference) (describes the categories of information, which Facebook may share with third parties and the set of requirements) and to the Facebook [Data policy](https://www.facebook.com/about/privacy). In addition, Facebook lets you control the choices you made when connecting your Facebook profile to the Website on their [Apps and Websites page](https://www.facebook.com/apps_and_websites).
When you decide to log in using Google, we receive personal data from your Google Account: name, email address, profile picture associated with your Google Account. You can revoke access provided to us on Apps Permissions page. To know more about how Google processes your data, visit its Privacy Policy.

2.3. Data we collect automatically:

2.3.1. Data about how you found us

We collect data about your referring app or URL (that is, the app or place on the Web where you were when you tapped/clicked on our ad).

2.3.2. Device and Location data

We collect data from your device. Examples of such data include: language settings, IP address, time zone, type and model of a device, device settings, operating system, Internet service provider, mobile carrier, hardware ID, and Facebook ID. We also record the ads in our Service with which you interact (and the Internet links to which those ads lead).

2.3.3. Usage data

We record how you interact with our Service. For example, we log your taps/clicks on certain areas of the interface, the features, and content you interact with, how often you use the Service, how long you are in the Service, and your purchases.

2.3.4. Advertising IDs

We collect your Apple Identifier for Advertising ("IDFA"), Identifier for Vendor ("IDFV") or Google Advertising ID ("AAID") (depending on the operating system of your device) when you access our App or Website from a mobile device. You can typically reset these numbers through the settings of your device's operating system (but we do not control this).

2.3.5. Transaction data

When you make payments through the Service, you need to provide financial account data, such as your credit card number, to our third-party service providers. We do not collect or store full credit card number data, though we may receive credit card-related data, data about the transaction, including: date, time and amount of the transaction, the type of payment method used.

2.3.6. Cookies

A cookie is a small text file that is stored on a user's computer for record-keeping purposes. Cookies can be either session cookies or persistent cookies. A session cookie expires when you close your browser and is used to make it easier for you to navigate our Service. A persistent cookie remains on your hard drive for an extended period of time. We also use tracking pixels that set cookies to assist with delivering online advertising.

Cookies are used, in particular, to automatically recognize you the next time you visit our Website. As a result, the information, which you have earlier entered in certain fields on the website may automatically appear the next time when you use our Service. Cookie data will be stored on your device and most of the times only for a limited time period.

3. FOR WHAT PURPOSES WE PROCESS YOUR PERSONAL DATA

We process your personal data:

3.1. To provide our Service
This includes enabling you to use the Service in a seamless manner and preventing or addressing Service errors or technical issues.

To host personal data and enable our Service to operate and be distributed we use **Amazon Web Services**, which is a hosting and backend service provided by Amazon.

We also use **Cloud Firestore**, which is a cloud computing services solution provided by Google. To monitor infrastructure and the Service’s performance, we use **Crashlytics**, which is a monitoring service provided by Google. We use **Firebase Performance Monitoring** and **Firebase Crash Reporting**, which is monitoring service provided by Google. To learn more, please visit Google’s **Privacy policy** and **Privacy and Security in Firebase**.

3.2. To customize your experience

We process your personal data, such as learning preferences and goals to adjust the content of the Service and make offers tailored to your personal preferences. As a result of such processing, we will be able to provide personalized service.

3.3. To manage your account and provide you with customer support

We process your personal data to respond to your requests for technical support, Service information or to any other communication you initiate. For this purpose, we may send you, for example, notifications or emails about, the performance of our Service, security, payment transactions, notices regarding our **Terms and Conditions** of Use or this Privacy Policy.

We use **Zendesk** ticketing system to handle customer inquiries. When you send us inquiries via contact form or via email, we will store the details provided by you via Zendesk ticketing system, which enables us to track, prioritize and quickly solve your requests. **Privacy Policy**.

3.4. To communicate with you regarding your use of our Service

We communicate with you, for example, by emails. These may include, for example, emails with information about the Service.

The services that we use for these purposes may collect data concerning the date and time when the message was viewed by the Website’s users, as well as when they interacted with it, such as by clicking on links included in the message.

To communicate with you we also use **Firebase Cloud Messaging**, which is message sending service provided by Google. Firebase Cloud Messaging allows us to send messages and notifications to users of our Service across platforms such as Android and iOS when you access our Service from a mobile device or across your internet browser when you access our Service from a laptop. We integrate **Firebase Notifications** with **Firebase Analytics** to create analytics-based audiences and track opening and conversion events. As a result, we can, for example, send reminders only to users who used the Service more frequently. Google's **privacy policy**.

3.5. To research and analyze your use of the Service

This helps us to better understand our business, analyze our operations, maintain, improve, innovate, plan, design, and develop the Service and our new products. We also use such data for statistical analysis purposes, to test and improve our offers. This enables us to better understand what categories of users use our Services. As a consequence, we often decide how to improve the Service based on the results obtained from this processing. For example, if we discover that users choose certain category of interactive stories less frequently, we may focus on improving the category or decide to remove it.

To perform research and analysis about how users interact with our Service we use **Appsflyer**. Appsflyer enables us to understand, in particular, how users find us (for example, who was the advertiser that delivered an ad to users, which led you to our Website). Appsflyer also provides us with different analytics
tools that enable us to research and analyze your use of the Service. Privacy Policy. Appsflyer allows you to Opt Out of having data from my device sent to Appsflyer’s servers for apps usage collection.

We use Facebook Analytics, which is a service provided by Facebook that allows us to use different analytical tools. On Facebook Analytics we get, in particular, aggregated demographics and insights on how many people visit our Service, how often users make purchases, and other interactions. Lean more about Facebook’s approach to data from its Privacy Policy.

To track and analyze behavior of our Service’s users (in particular, how they react to changes of the Service structure, text or any other component), we use Firebase Remote Config. Firebase Remote Config is an A/B testing and configuration service provided by Google, which also enables us to tailor the content that our Service’s users see (for example, it allows us to show different onboarding screens to different users). Privacy Policy and Privacy and Security in Firebase.

Amplitude is an analytics service provided by Amplitude Inc. We use this tool to understand how customers use our Service. Amplitude collects various technical information, in particular, time zone, type of device (phone, tablet or laptop), unique identifiers (including advertising identifiers). Amplitude also allows us to track various interactions that occur in our Service. As a result, Amplitude helps us to decide what features we should focus on. Amplitude provides more information on how they process data in its Privacy Policy.

We also use Firebase Analytics, which is an analytics service provided by Google. In order to understand Google’s use of data, consult Google’s partner policy. Firebase Privacy information.

To perform our Website analysis, we also use Tableau, a company providing interactive data visualization products focused on business intelligence. Tableau Privacy Policy.

BigQuery, an analytical service provided by Google, allows us to analyze large and complex datasets about the Website. We also use Firebase Analytics, which is an analytics service provided by Google. In order to understand Google’s use of data, consult Google’s partner policy.

We also use Hotjar, a behavior analytics tool that analyses Service use, providing feedback through tools such as heatmaps, session recordings, and surveys. Hotjar’s Privacy Policy.

3.6. To send you marketing communications

We process your personal data for our marketing campaigns. As a result, you will receive information about our products, such as, for example, special offers or new features and products available on the Service. We may show you advertisements on our Service, and send you emails for marketing purposes. If you do not want to receive marketing emails from us, you can unsubscribe following instructions in the footer of the marketing emails.

3.7. To personalize our ads

We and our partners use your personal data to tailor ads and possibly even show them to you at the relevant time. For example, if you visited our Website or installed the App, you might see ads of our products in your Facebook’s feed.

How to opt out or influence personalized advertising

iOS: On your iPhone or iPad, go to Settings > Privacy > Apple Advertising and deselect Personalized Ads.

Android: To opt-out of ads on an Android device, go to Settings > Privacy > Ads and enable Opt out of Ads personalization. In addition, you can reset your advertising identifier in the same section (this also may
help you to see less of personalized ads). To learn even more about how to affect advertising choices on various devices, please look at the information available here.

**macOS:** On your MacBook, you can disable personalized ads: go to System Preferences > Security & Privacy > Privacy, select Apple Advertising, and deselect Personalized Ads.

**Windows:** On your laptop running Windows 10, you shall select Start > Settings > Privacy and then turn off the setting for Let apps use advertising ID to make ads more interesting to you based on your app activity. If you have other Windows version, please follow the steps here.

To learn even more about how to affect advertising choices on various devices, please look at the information available here.

In addition, you may get useful information and opt out of some interest-based advertising, by visiting the following links:

- Digital Advertising Alliance (Canada) – [http://youradchoices.ca/choices](http://youradchoices.ca/choices)

**Browsers:** It is also may be possible to stop your browser from accepting cookies altogether by changing your browser’s cookie settings. You can usually find these settings in the “options” or “preferences” menu of your browser. The following links may be helpful, or you can use the “Help” option in your browser.

- Cookie settings in Internet Explorer
- Cookie settings in Firefox
- Cookie settings in Chrome
- Cookie settings in Safari web and iOS

Google allows its users to opt out of Google’s personalized ads and to prevent their data from being used by Google Analytics.

We value your right to influence the ads that you see, thus we are letting you know what service providers we use for this purpose and how some of them allow you to control your ad preferences.

We use Facebook pixel on the Service. Facebook pixel is a code placed on the Service collecting data that helps us track conversions from Facebook ads, build targeted audience and remarket to people who have taken some action on the Service (for example, made a purchase).

We use Facebook Ads Manager together with Facebook Custom Audience, which allows us to choose audiences that will see our ads on Facebook or other Facebook’s products (for example, Instagram). Through Facebook Custom Audience we may create a list of users with certain sets of data, such as an IDFA, choose users that have completed certain actions in the Service (for example, visited certain sections of the Service). As a result, we may ask Facebook to show some ads to a particular list of users. As a result, more of our ads may show up while you are using Facebook or other Facebook’s products (for example, Instagram). You may learn how to opt out of advertising provided to you through Facebook Custom Audience here.

Facebook also allows its users to influence the types of ads they see on Facebook. To find how to control the ads you see on Facebook, please go here or adjust your ads settings on Facebook.

**Google Ads** is an ad delivery service provided by Google that can deliver ads to users. In particular, Google allows us to tailor the ads in a way that they will appear, for example, only to users that have conducted certain actions with our Service (for example, show our ads to users who have made a purchase). Some other examples of events that may be used for tailoring ads include, in particular, visiting our Website.
Google allows its users to [opt out of Google’s personalized ads](https://www.google.com/ads_SETTINGS) and to [prevent their data from being used by Google Analytics](https://www.google.com/privacy-center).

We also use [Snapchat Advertising Platform](https://www.snapchat.com/) together with [Snapchat Audience Based Match](https://www.snapchat.com/), which is an ad delivery service provided by Snapchat that can link the activity of some users of our Service with the Snapchat advertising network and show some of our ads to them. As a result, you may see more of ads on Snapchat in case you use our Service. Snapchat allows you to [Opt Out](https://www.snapchat.com) of their audience based ads. [Privacy Policy](https://www.snapchat.com).

[TikTok Ads](https://www.tiktok.com/) is the service provided by TikTok that can deliver ads to its users. The ads can be tailored to specific categories of users (for instance, based on their geographical location). [TikTok’s Privacy Policy](https://www.tiktok.com).

We also use [Twitter Ads](https://www.twitter.com/) provided by Twitter to deliver advertising. Twitter Ads allows us to choose specific audiences based on geographic areas or user’s interests. As a result, we may ask Twitter to deliver our ads to certain list of users. Twitter allows you to [Opt Out](https://support.twitter.com/) of its internet-based advertising. [Privacy Policy](https://www.twitter.com).

We use [Pinterest Ads](https://www.pinterest.com/) to deliver group-based advertisements. For example, you may see our ads if you are interested in specific services, information, or offers. [Pinterest Privacy Policy](https://www.pinterest.com).

### 3.8. To process your payments

We provide paid products and/or services within the Service. For this purpose, we use third-party services for payment processing (for example, payment processors). As a result of this processing, you will be able to make a payment for a subscription and we will be notified that the payment has been made.

We will not store or collect your payment card details ourselves. This information will be provided directly to our third-party payment processors.

We use [Solidgate](https://www.solidgate.com), which is a payment gateway service provider.

### 3.9. To enforce our Terms and Conditions of Use and to prevent and combat fraud

We use personal data to enforce our agreements and contractual commitments, to detect, prevent, and combat fraud. As a result of such processing, we may share your information with others, including law enforcement agencies (in particular, if a dispute arises in connection with our [Terms and Conditions of Use](https://www.termsfeed.com/privacy-policy-generator)).

### 3.10. To comply with legal obligations

We may process, use, or share your data when the law requires it, in particular, if a law enforcement agency requests your data by available legal means.

### 4. UNDER WHAT LEGAL BASES WE PROCESS YOUR PERSONAL DATA

In this section, we are letting you know what legal basis we use for each particular purpose of processing. For more information on a particular purpose, please refer to [Section 3](#). This section applies only to EEA-based users.

We process your personal data under the following legal bases:

- **4.1. your consent**

  Under this legal basis we will send you marketing communications. You have the right to withdraw your consent any time by using the unsubscribe link in the footer of our emails. We will also send you push notifications if you allow us to. You can disable notifications any time in the settings of your device.

- **4.2. to perform our contract with you;**
Under this legal basis we:

- Provide our Service (in accordance with our Terms and Conditions of Use)
- Customize your experience
- Provide you with customer support
- Communicate with you regarding your use of our Service
- Process your payments

4.3. for our (or others') legitimate interests, unless those interests are overridden by your interests or fundamental rights and freedoms that require protection of personal data;

We rely on legitimate interests:

- to research and analyze your use of the Service

Our legitimate interest for this purpose is our interest in improving our Service so that we understand users’ preferences and are able to provide you with a better experience (for example, to make the use of the Service easier and more enjoyable, or to introduce and test new features).

- to personalize our ads

The legitimate interest we rely on for this processing is our interest to promote our Service in a reasonably targeted way.

- to enforce our Terms and Conditions of Use and to prevent and combat fraud

Our legitimate interests for this purpose are enforcing our legal rights, preventing and addressing fraud and unauthorised use of the Service, non-compliance with our Terms and Conditions of Use.

4.4. to comply with legal obligations.

5. **WITH WHOM WE SHARE YOUR PERSONAL DATA**

We share information with third parties that help us operate, provide, improve, integrate, customize, support, and market our Service. We may share some sets of personal data, in particular, for purposes and with parties indicated in Section 3 of this Privacy Policy. The types of third parties we share information with include, in particular:

5.1. **Service providers**

We share personal data with third parties that we hire to provide services or perform business functions on our behalf, based on our instructions. We may share your personal information with the following types of service providers:

- cloud storage providers (Amazon, Google, Cloud Firestore)
- data analytics providers (Facebook, Firebase, Appsflyer, Amplitude, Crashlytics)
- measurement partners
- communication service providers (Firebase, Zendesk)
- marketing partners (in particular, social media networks, marketing agencies, email delivery services; Facebook, Google, Snapchat, TikTok, Twitter)
• payment service providers (Solidgate)

5.2. Law enforcement agencies and other public authorities

We may use and disclose personal data to enforce our Terms and Conditions of Use, to protect our rights, privacy, safety, or property, and/or that of our affiliates, you or others, and to respond to requests from courts, law enforcement agencies, regulatory agencies, and other public and government authorities, or in other cases provided for by law.

5.3. Third parties as part of a merger or acquisition

As we develop our business, we may buy or sell assets or business offerings. Customers’ information is generally one of the transferred business assets in these types of transactions. We may also share such information with any affiliated entity (e.g. parent company or subsidiary) and may transfer such information in the course of a corporate transaction, such as the sale of our business, a divestiture, merger, consolidation, or asset sale, or in the unlikely event of bankruptcy.

4. HOW YOU CAN EXERCISE YOUR PRIVACY RIGHTS

To be in control of your personal data, you have the following rights:

Accessing / reviewing / updating / correcting your personal data. You may review, edit, or change the personal data that you had previously provided on the Service.

Deleting your personal data. You can request erasure of your personal data as permitted by law.

When you request deletion of your personal data, we will use reasonable efforts to honor your request. In some cases, we may be legally required to keep some of the data for a certain time; in such event, we will fulfill your request after we have complied with our obligations.

Objecting to or restricting the use of your personal data. You can ask us to stop using all or some of your personal data or limit our use thereof.

Additional information for EEA-based users:

If you are based in the EEA, you have the following rights in addition to the above:

The right to lodge a complaint with supervisory authority. We would love you to contact us directly, so we could address your concerns. Nevertheless, you have the right to lodge a complaint with a competent data protection supervisory authority, in particular in the EU Member State where you reside, work or where the alleged infringement has taken place.

The right to data portability. If you wish to receive your personal data in a machine-readable format, you can send respective request to us as described below.

To exercise any of your privacy rights, please send a request to support@nibble-app.com.

5. AGE LIMITATION

We do not knowingly process personal data from persons under 16 years of age. If you learn that anyone younger than 16 has provided us with personal data, please contact us.

6. INTERNATIONAL DATA TRANSFERS

We may transfer personal data to countries other than the country in which the data was originally collected in order to provide the Service set forth in the Terms and Conditions of Use and for purposes indicated in this Privacy Policy. If these countries do not have the same data protection laws as the country in which you initially provided the information, we deploy special safeguards.
In particular, if we transfer personal data originating from the EEA to countries with not adequate level of data protection, we use one of the following legal bases: (i) Standard Contractual Clauses approved by the European Commission (details available here), or (ii) the European Commission adequacy decisions about certain countries (details available here).

7. **CHANGES TO THIS PRIVACY POLICY**

We may modify this Privacy Policy from time to time. If we decide to make material changes to this Privacy Policy, you will be notified by available means such as email and will have an opportunity to review the revised Privacy Policy. By continuing to access or use the Service after those changes become effective, you agree to be bound by the revised Privacy Policy.

8. **FOR CALIFORNIA RESIDENTS**

California’s Shine the Light law gives California residents the right to ask companies once a year what personal information they share with third parties for those third parties’ direct marketing purposes. Learn more about what is considered to be personal information under the statute.

To obtain this information from us, please send an email message to support@nibble-app.com, which includes “Request for California Shine the Light Privacy Information” on the subject line and your state of residence and email address in the body of your message. If you are a California resident, we will provide the requested information to you at your email address in response.

9. **DATA RETENTION**

We will store your personal data for as long as it is reasonably necessary for achieving the purposes set forth in this Privacy Policy (including providing the Service to you), which includes (but is not limited to) the period during which you have an account with the Service. We will also retain and use your personal data as necessary to comply with our legal obligations, resolve disputes, and enforce our agreements.

10. **HOW “DO NOT TRACK” REQUESTS ARE HANDLED**

This Service does not support “Do Not Track” requests. To determine whether any of the third-party services it uses honor the “Do Not Track” requests, please read their privacy policies.

11. **CONTACT US**

You may contact us at any time for details regarding this Privacy Policy and its previous versions. For any questions concerning your account or your personal data please contact us at support@nibble-app.com.

Effective as of: 5 December 2022