Privacy Policy

Effective Date: 15 October 2025

This Privacy Policy describes how **Shazarch s.r.l.**, an Italian company with its registered office in Italy ("**Shazarch**," "we," "us," or "our"), collects, uses, shares, and protects personal information in connection with the Tadarc mobile applications (iOS and Android) and the websites https://www.shazarch.com and https://www.shazarch.c

By accessing or using our Services, you acknowledge that you have read and understood this Privacy Policy.

1. Data Controller and Contact

The data controller is:

Shazarch s.r.l.

Legal Representative: Valerio Palma

Email: info@shazarch.com Jurisdiction: Italy (EU)

For GDPR and UK GDPR purposes, Shazarch s.r.l. determines the purposes and means of processing personal data.

2. Scope of This Policy

This Privacy Policy applies to:

- Tadarc iOS and Android applications;
- Our websites www.tadarc.app;
- Related marketing and communication activities.

This Policy complies with:

- EU General Data Protection Regulation (GDPR)
- UK GDPR
- ePrivacy Directive
- California Consumer Privacy Act (CCPA) (for users in California, USA)

3. Categories of Data We Collect

We collect the following categories of information depending on how you use our Services:

- Account and login information: when logging in with Google, Apple, or Meta accounts.
- Device and technical information: device model, OS version, IP address, ad identifier (IDFA/AAID), browser type.
- **Usage data**: app interactions, session duration, pages visited, in-app behavior.
- Precise location data: collected and shared with Google Places services where required for app functionality.
- Cookies and trackers: on the website, via CookieScript consent platform.
- Analytics data: via Google Analytics and Firebase.
- Payment-related data: limited to confirmation of successful transactions (payment processing is handled by third parties).

We do **not** display third-party ads inside the app.

4. Legal Bases for Processing (GDPR / UK GDPR)

We process personal data on the following legal bases:

 Contractual necessity: to provide the Services (e.g., authentication, functionality, support).

- Legitimate interests: to improve our Services, analytics, and security.
- Legal obligations: to comply with applicable law.
- Consent: for location tracking, cookies, and marketing communications.

5. Purposes of Processing

We use personal data to:

- Provide, maintain, and improve the Services;
- Authenticate users and enable account login;
- Provide customer support;
- Analyze usage through analytics tools;
- Ensure compliance with security and legal requirements;
- Send marketing communications or measure advertising campaigns, where consent is given.

We do not conduct interest-based advertising inside the app.

6. Cookies and Tracking Technologies

- **Website**: We use cookies and tracking technologies via CookieScript. Non-essential cookies are set only with your consent.
- **iOS**: Tracking is subject to Apple's AppTrackingTransparency framework.
- Android: A consent mechanism will be implemented to comply with GDPR.
- Users can manage cookie preferences through their browser or device settings.

7. Data Sharing and International Transfers

We may share your data with:

- Service providers (Google Cloud, Firebase, analytics, geolocation APIs);
- Legal authorities where required by law.

Data may be transferred outside the EEA (e.g., Google Cloud infrastructure). Transfers rely on **standard contractual clauses** or other adequate safeguards.

We do not sell personal data.

8. Data Retention

We retain personal data **as long as necessary** for the purposes described in this Policy, including to comply with legal obligations, resolve disputes, and enforce agreements.

9. Children's Privacy

Our Services are accessible to children aged 4+ in some jurisdictions.

- For users under 16 in the EU/EEA, parental consent is required where applicable.
- We do not knowingly collect personal information from children without legally required consent.
- If we learn that we have collected such data improperly, we will delete it promptly.

For U.S. users, we comply with **COPPA** where applicable.

10. Your Rights Under GDPR / UK GDPR

You may exercise the following rights at any time:

- Access your data;
- Rectify inaccurate or incomplete data;
- Erase data ("right to be forgotten");
- Restrict processing;
- Object to processing;
- Data portability;
- Withdraw consent at any time.

To exercise your rights, contact: **info@shazarch.com**. We may require proof of identity to process your request.

11. Additional Rights for California Residents (CCPA)

If you reside in California, you have the right to:

- Know what personal information we collect and how we use it;
- Request deletion of your personal information;
- Opt out of the sale or sharing of personal information (see Section 15);
- Non-discrimination for exercising your rights.

To exercise your CCPA rights, contact: info@shazarch.com.

12. Security

We implement technical and organizational measures to protect personal data against unauthorized access, loss, or misuse.

No security system is impenetrable, and you share information at your own risk.

13. Changes to this Policy

We may update this Privacy Policy periodically. We will post updates on our websites and in the app. The revised Policy becomes effective upon posting.

14. Contact Information

For privacy questions or data subject requests:

Shazarch s.r.l.

Email: info@shazarch.com

Attn: Valerio Palma, Legal Representative

15. Do Not Sell or Share My Personal Information (CCPA)

Shazarch s.r.l. does not sell personal information for monetary value.

However, we may share certain information (such as device identifiers and analytics data) with partners to operate and improve our Services.

California residents have the right to opt out of such sharing.

You may exercise this right by sending an email to **info@shazarch.com** with the subject line "CCPA Opt-Out."

We will process your request and confirm when the opt-out has been applied.

You may also manage analytics and tracking preferences through:

- The **cookie banner** on our websites <u>www.shazarch.com</u> and <u>www.tadarc.app</u>;
- Your mobile device privacy settings.

We do not discriminate against users who choose to exercise their privacy rights.