

Privacy Policy

Effective Date: 27 February 2026

1. Introduction

This document explains how we handle your information when you use our application. We are committed to protecting your privacy and being transparent about our data practices. This policy has been prepared in accordance with the UK General Data Protection Regulation (UK GDPR) and the Data Protection Act 2018.

We do not collect, store, or transmit any personal data, with the sole exception of limited, optional access to your device's location services as described below.

2. Data Controller

For the purposes of the UK GDPR, the data controller responsible for your personal data is the operator of this application. If you have any questions about this Privacy Policy or our data practices, please contact us using the details provided at the end of this document.

3. What Data We Collect

Personal Data: We do not collect, store, or transmit any personal data. We do not require you to create an account, provide your name, email address, or any other identifying information.

Location Data: If you choose to grant permission, the application may access your device's location while the app is actively in use. This location data is processed locally on your device in real time and is not stored, recorded, logged, or transmitted to us or to any third party. Location data is used solely to provide location-based features within the application during your active session.

Subscription Data: When you subscribe to the application, basic transaction information (such as purchase date and subscription status) is stored locally on your device by the operating system and our application to manage your subscription. This data is not transmitted to us or to any third party other than Apple, which processes the transaction. We do not operate any server infrastructure that receives or stores your subscription or payment data.

Usage Data: We may collect anonymous usage data such as general analytics or crash reports to help us improve the application. Any usage data we collect is fully

anonymous and does not contain any personal data or information that could be used to identify you.

Cookies and Tracking: We do not use cookies, web beacons, pixels, or any other tracking technologies.

4. Payments and Subscriptions

The application offers a monthly subscription through Apple's In-App Purchase mechanism. All payment processing is handled entirely by Apple. We do not collect, receive, process, or have access to any of your financial information, including credit or debit card numbers, bank account details, or billing addresses.

When you make a purchase, Apple processes the transaction in accordance with its own terms and privacy policy. We receive only a transaction receipt from Apple, which is verified locally on your device using Apple's StoreKit framework. We do not transmit this receipt to any external server.

Basic subscription information (such as your subscription status and purchase date) is stored locally on your device to enable access to subscription features. This information is not transmitted off-device by us.

You can manage your subscription or cancel it at any time through your Apple ID account settings. For more information on how Apple handles your payment data, please refer to Apple's Privacy Policy at <https://www.apple.com/uk/legal/privacy/>.

5. Location Services

Access to your device's location is entirely optional. The application will request your permission before accessing location services, and the app will function without location access, although certain location-dependent features may be unavailable.

When location access is granted, the following applies:

- Your location is accessed only while the application is actively in use (i.e. in the foreground).
- Location data is processed locally on your device and is never transmitted off-device.
- Location data is not stored, cached, or logged by the application.

- No location history is maintained.

You can revoke location permission at any time through your device's system settings. On most devices, this can be found under Settings > Privacy > Location Services. Revoking permission takes effect immediately.

6. Lawful Basis for Processing

To the extent that accessing your device's location constitutes the processing of personal data under the UK GDPR, our lawful basis for this processing is your explicit consent (Article 6(1)(a) of the UK GDPR). You provide this consent when you grant the application permission to access your location through your device's permission prompt. You may withdraw this consent at any time by revoking location access in your device's system settings.

To the extent that local storage of subscription status constitutes the processing of personal data, our lawful basis is the performance of a contract to which you are a party (Article 6(1)(b) of the UK GDPR), namely the provision of subscription features you have purchased.

7. Data Sharing and Third Parties

We do not share, sell, rent, or disclose any personal data to third parties. We do not use third-party analytics services, advertising networks, or social media integrations that could independently collect data from you through the application.

The only third-party service involved in the operation of the application is Apple, which processes In-App Purchase transactions. When you make a purchase, your transaction is handled directly by Apple in accordance with Apple's own terms and privacy policy. We do not receive any financial or payment data from Apple. For information on how Apple processes your data, please refer to Apple's Privacy Policy at <https://www.apple.com/uk/legal/privacy/>.

8. International Data Transfers

We do not transfer any personal data outside of your device, and therefore no international data transfers take place on our part. Please note that Apple may process your payment data in accordance with its own privacy policy, which may involve international transfers. We have no control over or involvement in Apple's data processing practices.

9. Data Retention

We do not retain any personal data on external servers. Location data accessed during your use of the application exists only in your device's temporary memory during your active session and is not persisted in any form. Subscription information is stored locally on your device for as long as the application is installed and is removed when the application is deleted.

10. Your Rights Under UK Data Protection Law

Under the UK GDPR and the Data Protection Act 2018, you have a number of rights regarding your personal data. Because we do not collect or store personal data on external servers, most of these rights are satisfied by default. Nevertheless, for completeness, your rights include:

Right of Access: You have the right to request a copy of any personal data we hold about you. As we hold none on our servers, there is no data to provide.

Right to Rectification: You have the right to request correction of inaccurate personal data.

Right to Erasure: You have the right to request deletion of your personal data. You can delete all locally stored data by uninstalling the application.

Right to Restrict Processing: You have the right to request that we restrict the processing of your personal data.

Right to Data Portability: You have the right to receive your personal data in a structured, commonly used, and machine-readable format.

Right to Object: You have the right to object to the processing of your personal data.

Right to Withdraw Consent: Where processing is based on consent, you have the right to withdraw that consent at any time. For location services, you can withdraw consent by revoking location permissions in your device's system settings.

If you wish to exercise any of these rights, or if you have any concerns about how your data is handled, please contact us using the details provided below. You also have the right to lodge a complaint with the Information Commissioner's Office (ICO) at <https://ico.org.uk/> if you believe your data protection rights have been infringed.

11. Children's Privacy

We do not knowingly collect personal data from children under the age of 13. Since our application does not collect any personal data from any user, no special measures are required. If you are a parent or guardian and believe your child has somehow provided personal data through the application, please contact us and we will investigate promptly.

12. Security

Although we do not collect or store personal data on external servers, we take reasonable measures to ensure that the application operates securely on your device. Any location data accessed during use and any subscription information stored locally are handled within the standard security framework provided by your device's operating system. Payment transactions are secured by Apple's own infrastructure and security measures.

13. Changes to This Privacy Policy

We may update this Privacy Policy from time to time to reflect changes in our practices or for legal, regulatory, or operational reasons. Any changes will be posted within the application, and the effective date at the top of this policy will be updated accordingly. We encourage you to review this policy periodically. Your continued use of the application following any changes constitutes your acceptance of the revised policy.

14. Contact Us

If you have any questions, concerns, or requests regarding this Privacy Policy or our data practices, please contact us at:

Email: privacy@primatology.xyz

You may also contact the Information Commissioner's Office (ICO) if you have concerns about how your personal data is being handled:

Information Commissioner's Office

Wycliffe House, Water Lane, Wilmslow, Cheshire, SK9 5AF

Website: <https://ico.org.uk/>

Telephone: [0303 123 1113](tel:03031231113)