Privacy Policy for Pavonify



Effective Date: 1st March 2025 **Last Updated:** 1st March 2025

1. Introduction

Welcome to Pavonify ("we," "our," "us"). We are committed to protecting your privacy and ensuring that your personal data is handled securely and transparently. This Privacy Policy explains how we collect, use, and share your data in compliance with the General Data Protection Regulation (GDPR) and other applicable data protection laws.

2. Data We Collect

We collect and process the following types of data:

- Account Information: Name, email address, country, school affiliation, and role (student/teacher/lead teacher).
- Login Data: Username and hashed password.
- **Subscription Information:** Premium subscription status, Stripe subscription ID, and expiration date.
- Al Usage Data: Words and topics used for generating content via Gemini Al.
- **Analytics Data:** Usage data collected through Google Analytics (with IP anonymization enabled).
- **Class & Assignment Data:** Class affiliations, assignments completed, progress tracking, and achievements.
- Payment Data: Processed by Stripe (we do not store card details).
- **Cookies & Tracking:** Usage data collected via cookies for analytics and user experience improvement.

3. How We Use Your Data

We use your data for the following purposes:

- To create and manage your account.
- To enable your access to Pavonify's features (vocabulary lists, assignments, progress tracking).
- To provide AI-generated content based on selected vocabulary.
- To process payments and subscriptions securely via Stripe.
- To analyze and improve our services using Google Analytics.
- To communicate important updates, security notifications, and service-related messages.

4. Legal Basis for Processing

We process your data based on the following legal grounds:

- **Consent:** When you sign up, accept cookies, or agree to our Privacy Policy.
- **Contractual Necessity:** To provide the educational services you signed up for.
- Legitimate Interest: To improve our platform and services.
- Legal Compliance: To comply with applicable laws and regulations.



5. Data Sharing & Third Parties

We do not sell your data. However, we may share data with:

- Google Analytics (for usage tracking, with anonymized IPs).
- Stripe (for payment processing; see Stripe's Privacy Policy).
- Gemini AI (for generating parallel texts based on selected vocabulary).
- Legal Authorities (only when required by law).

6. Data Retention

- We retain your data as long as your account is active.
- Inactive accounts (no login for 2 years) are deleted.
- Subscription and payment data is retained as required by financial regulations.
- Al-generated content is stored for educational use and deleted upon request.

7. Your Rights Under GDPR

Under GDPR, you have the right to:

- Access your data (request a copy).
- **Rectify** incorrect or incomplete data.
- **Delete** your account and data.
- **Restrict** processing under certain conditions.
- **Object** to processing based on legitimate interest.
- Withdraw consent for non-essential processing (e.g., analytics cookies).

To exercise your rights, contact sam@pavonify.com.

8. Data Security

We implement industry-standard security measures, including:

- HTTPS encryption for secure data transmission.
- Hashed passwords (never stored in plaintext).
- Limited access to sensitive data.

9. Cookies & Tracking Technologies

We use cookies to enhance your experience. You can manage cookie preferences via our Cookie Banner.

10. Changes to This Privacy Policy

We may update this Privacy Policy periodically. Any significant changes will be communicated via email or website notifications.

11. Contact Us

If you have questions about this Privacy Policy, contact us at <u>sam@pavonify.com</u>.