

In order to use the Services, we will ask you to provide some information about you, such as your content preferences and email. We also automatically collect your device's language settings, IP address, time zone, device type and model, 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, and to serve ads.

We use third-party solutions for improving our Services and serving ads. As a result, we may process data using solutions developed by Meta (including Facebook, Instagram), Google, X (formerly Twitter), AppsFlyer, Amplitude, Firebase, Snapchat, Pinterest, Apple, DigitalOcean, Vercel, Customer.io, Zendesk, PayPal, Stripe, Microsoft, Tableau, TikTok, AppLovin, OpenAI, Anthropic, and Google. Some of the data is stored and processed on servers of such third parties. This enables us to: (1) analyze different interactions (how often users make subscriptions, what is the most popular goal chosen by users, what is the average time spent by users on our content); (2) serve ads (and to show them only to a particular group of users, for example, to subscribers). Consequently, we, in particular, better understand in which 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 2), what data privacy rights are available to you (Section 5), who will be the data controller (Section 15), and how to influence personalized advertising (Subsection 2.8). If any questions remain unanswered, please contact us at support@get-talino.app.

Privacy Policy

This Privacy Policy explains what personal data is collected when you use Talino, including our web and mobile applications (the "Product"), our website located at <https://get-talino.app/> (the "Website") and related services (together with the Product and the Website, the "Services"), how such personal data will be used, shared or otherwise processed.

BY USING THE SERVICES, 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 Services. In such case, you must (a) delete your account using the functionality found in "Settings" in the Product or the Website, or contact us and request deletion of your data; (b) cancel any subscriptions depending on how you subscribed (using the functionality provided by Apple or Google if you subscribed via an app store; or the functionality of our Website if you purchased your subscription via the Website); and (c) uninstall the Product from your device(s), where applicable.

"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 of the European Union and the European Economic Area. 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 collecting, storing, and disclosing to others.

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1. Categories of personal data we collect

We collect data you provide voluntarily (for example, when you enter your content preferences, name, email). We may also receive data about you from third parties (for example, when you sign in via Google). We also collect data automatically (for example, your IP address and activity logs) and use third-party service providers to collect it.

SEE MORE

1.1 Data you provide

You provide us with information about yourself when you register for and/or use the Services. For example, content preferences, name, email address. This may also include your answers to quizzes or assessments and, if you choose to provide it, a photo you upload in order to generate your personalized results or reports. We use any photo you upload solely to generate your results and not to identify you.

1.2 Data provided to us by third parties

When you decide to sign in using Sign in with Google, we get personal data from your Google account. This includes your email, name, profile image, and Google ID. You can revoke access provided to us on the [Apps Permissions](#) page. To know more about how Google processes your data, visit its [Privacy Policy](#).

When you use Sign in with Apple to register an account in the Product, we get personal data from your Apple ID account. This includes, 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 its detailed privacy information on the Sign in with Apple screen. Apple lets you revoke access provided to the Product in your Apple ID settings by following the [next steps](#). Find out more about Sign in with Apple [here](#).

When you decide to sign in using Facebook Login, we get personal data from your Facebook account. This includes your profile image, name, and an app-scoped user ID. If you also grant the email permission, we receive your email address; you can decline this on the Facebook Login screen. For more information, please refer to the [Permissions Reference](#) (which describes the categories of information that Facebook may share with third parties and the set of requirements) and the [Meta Privacy Policy](#). In addition, Facebook lets you control the choices you made when connecting your Facebook profile on their [Apps and Websites](#) page.

1.3 Data we collect automatically

a. Data about how you found us

We collect data about your referring app or URL (that is, the app or website you were on when you tapped our ad).

b. Device and Location data

We collect data from your device. Examples of such data include: language settings, IP address, time zone, device type and model, device settings, operating system and its version, Internet service provider, mobile carrier, and hardware ID.

c. Usage data

We record how you interact with our Services. 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 Services, and the amount of time you spend within them. We also track the age of your account and the duration of your subscription, your subscription orders, whether you currently have premium access, whether you accessed trial content, your total spending and refund activity across our platforms. We also record the ads in our Product or Website that you interact with (and the Internet links those ads lead to).

d. Advertising IDs

We collect your Apple Identifier for Advertising ("IDFA") or Google Advertising ID ("AAID") (depending on the operating system of your device). You can typically reset these numbers through your device's operating system settings (though we do not control this).

e. Cookies and pixels

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 Services. 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.

This includes our own (first-party) pixel and similar technologies that we operate to measure and analyze how our Services and marketing perform. Data collected through our first-party pixel is used by us for these purposes and is not shared with third parties for their own independent purposes.

Cookies are used, in particular, to automatically recognize you the next time you visit our website. As a result, the information you previously entered in certain fields on the website may automatically appear the next time you use our Services. Cookie data will be stored on your device and, most of the **time**, only for a ~~limited~~ period.

1.4 Data from AI-powered features

When you use our AI-powered features (for example, our AI chat features), we process the content of your interactions with the feature. This includes the messages you type and, if you use voice input, the audio you provide, which is processed for speech recognition. Please avoid sharing sensitive personal information in AI chats. We describe how we process this data in Section 2.

1.5. Payment and transaction data

If you choose to make a purchase, you provide your payment details, such as your card number, directly to our third-party payment providers, not to us. We never collect or store your full card number. Our payment providers share limited information about the transaction with us, such as its date, time and amount and the type of payment method used, so that we can confirm your purchase and manage your subscription.

2. For what purposes we process your personal data

We process your personal data:

2.1 To provide our Services

This includes enabling you to use the Services in a seamless manner and preventing or addressing Services errors or technical issues.

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To host personal data and enable our Services to operate and be distributed, we use cloud platforms for on-demand deployment, related hosting and backend services: **DigitalOcean** ([Data Processing Agreement](#)), **Google Cloud** ([Privacy Policy](#)), **Vercel** ([Privacy Policy](#)), and **Namecheap** ([Privacy Policy](#)).

We use **Firebase Performance Monitoring**, **Firebase Crash Reporting** and **Crashlytics**, which are monitoring services provided by **Google**. To learn more, please visit [Google's Privacy Policy](#), [Privacy and Security in Firebase](#) and [Firebase Data Processing and Security Terms](#).

Clarity is a user behavior and website debugging analytics tool. We use it to understand how users are interacting with our Services through session replays and heatmaps. Clarity was developed by **Microsoft**, so you may find more info about Clarity's approach to privacy in [Microsoft Privacy Statement](#).

Sentry is a code analysis tool that allows us to log front-end errors, monitor the performance of client-side code, and analyze code vulnerabilities. While performing its functions, Sentry may access a limited amount of your data, such as IP address, browser information, OS version, and device type. More info about Sentry data processing is in its [Privacy Policy](#).

CookieYes helps us to customize the cookie banner, record your consent and manage other cookie compliance needs. You may find more info about your data processing by CookieYes in the [Data Processing Agreement](#).

2.2 To customize your experience

We process your personal data, such as content preferences, to adjust the content of the Services and make offers tailored to your personal preferences. As a result of such processing, we will show more content in the Product from, for example, the “Self-Growth” category.

2.3 To manage your account

We process your personal data to secure access to your personal account and send you technical notifications or emails about the performance of our Services, security, payment transactions, notices regarding our Terms and Conditions of Use or this Privacy Policy.

2.4 To communicate with you regarding your use of our Services

We communicate with you, for example, by push notifications or by email. These may include reminders and motivational messages encouraging you to keep learning, as well as other information about the Services. For example, you may receive a daily push notification at a set time reminding you to continue. To opt out of receiving push notifications, you can change the settings on your device. To opt out of receiving emails, you can click the unsubscribe link in the footer of our emails.

SEE MORE

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

To communicate with you, we use **Firebase Cloud Messaging**, which is a message-sending service provided by Google. Firebase Cloud Messaging allows us to send messages and notifications to users of our Product across platforms such as Android and iOS. We integrate Firebase Cloud Messaging with **Firebase Analytics** to create analytics-based audiences and track opening and conversion events. As a result, we can, for example, send encouraging messages to users who have recently installed the Product. Please check [Google's Privacy Policy](#).

2.5 To provide you with customer support

We process your personal data to respond to your requests for technical support.

SEE MORE

We use the **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 the Zendesk ticketing system, which enables us to track, prioritize and quickly solve your requests. To learn more, please visit this [Privacy Policy](#).

2.6 To research and analyze your use of the Services

This helps us understand our business and how our Services are used, and to maintain, improve and develop the Services and new products. We also use this data for statistical analysis and to test and improve our offers. It lets us see, for example, which features and categories of content our users prefer and which groups of users use our Services, and we use what we learn to decide what to improve. For example, if we find that users engage more with content in the "Productivity" category, we may add more content to that category.

SEE MORE

To perform research and analysis about how users interact with our Services, 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 Services). AppsFlyer also provides us with different analytics tools that enable us to research and analyze use of the Services. See their [Processing Customer Data](#) page to find out more on how AppsFlyer processes your data.

We use **Meta advertising and analytics services**, including **Meta Pixel** and **Meta Conversions API**, which are tools provided by **Meta Platforms**, Inc. These tools allow us to receive aggregated insights on how many people access the Services, how users interact with the Services, how often users make purchases or complete other key actions, and how our marketing campaigns perform. This information helps us improve the Services and optimize our advertising efforts. **Meta** provides more information about how it processes data in its [Privacy Policy](#).

To analyze how visitors use our Services and to measure the effectiveness of some ads, we use **Google Analytics**, a web analysis program of Google. To provide us with analytics, Google Analytics places cookies on your device. In Google Analytics, we, in particular, receive aggregated information about the data you enter on our Services and users' interactions within the Services. Google allows you to influence the collection and processing of information generated by Google, in particular, by installing a browser plug-in, available [here](#).

We also use **Google Tag Manager**, a tag management service provided by Google to manage and deploy measurement and marketing tags on our Services. Google Tag Manager does not itself collect personal data, but it enables the tags it manages to do so. For more information, please refer to [Google's Privacy Policy](#).

We also use **Amplitude**, a product analytics service provided by Amplitude, Inc., to understand how users interact with our Services. Amplitude collects various technical information, in particular your time zone, type

of device (phone or tablet), unique identifiers (such as IDFA). Amplitude also allows us to track various interactions within the Product or the Website (for example, when you enter your goals or quiz answers on onboarding). This helps us decide which features to focus on. You can find more information about Amplitude's privacy practices in its [Privacy Notice](#).

To understand how users respond to changes we make to the Product or the Website, for example, to their structure, text or any other component, we use **Firestore Remote Config**, a configuration service provided by Google that also supports A/B testing. See [Firestore Data Processing and Security Terms](#) and [Privacy and Security in Firestore](#).

We also use **Google Analytics for Firestore**, an app analytics service provided by Google, to understand how users engage with the Product. To learn how Google uses this information, see [How Google uses information from sites or apps that use our services](#), [Privacy and Security in Firestore](#) and [Google's Privacy Policy](#).

We also use **Tableau**, a data visualization and business intelligence service provided by **Salesforce**, to analyze and visualize data about how our Services are used. Tableau is used for our internal reporting and does not itself collect data from your device. To learn more, please see their [Privacy Information](#) page.

2.7 To send you marketing communications

We process your personal data for our marketing campaigns. We may add your email address to our marketing list. As a result, you will receive information about our products, such as special offers. If you do not want to receive marketing emails from us, you can unsubscribe by following the instructions in the footer of the marketing emails.

We may send you push notifications for marketing purposes. To opt out of receiving push notifications, you need to change the settings on your device.

SEE MORE

We use **Customer.io**, a customer engagement platform, to manage our communications with you. This service allows us to send you relevant information, such as newsletters, special offers, and service updates via channels like email and push notifications. You can learn more by visiting their [Privacy Policy](#).

2.8 To personalize our ads

We and our partners, including Meta and Google, use your personal data to tailor ads and show them to you at relevant times. For example, if you have installed our Product, you might see ads of our products, for example, in your Facebook or Instagram feed.

How to opt out or influence personalized advertising

iOS: On your iPhone or iPad, go to Settings > Privacy & Security > 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 may also help you see fewer personalized ads).

macOS: On your MacBook, you can disable personalized ads by going to System Preferences > Security & Privacy > Privacy, selecting Apple Advertising, and deselecting Personalized Ads.

Windows: On your laptop running Windows 10, you can 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 another Windows version, please follow the steps [here](#).

Browsers: You **can also** stop your browser from accepting cookies altogether by changing its 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 [Microsoft Edge](#)
- Cookie settings in [Firefox](#)
- Cookie settings in [Chrome](#)
- Cookie settings in Safari ([web](#) and [iOS](#))

To learn more about how to influence advertising choices across various devices, please see the information available [here](#).

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

- Network Advertising Initiative – <https://optout.networkadvertising.org/>
- Digital Advertising Alliance – <https://optout.aboutads.info/>
- Digital Advertising Alliance (Canada) – <https://youradchoices.ca/choices>

- Digital Advertising Alliance (EU) – <https://www.youronlinechoices.com/>
- DAA AppChoices page – <http://www.aboutads.info/appchoices>

Google allows its users to [opt out of Google's personalized ads](#) and to prevent their data from being used by [Google Analytics](#).

SEE MORE

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.

In addition to the analytics purposes described in Section 2.6, we use the **Meta Pixel** to track conversions from Meta Ads, build targeted audiences, and remarket to people who have taken certain actions on the Services (for example, made a purchase).

We also use our own first-party pixel to measure conversions and the effectiveness of our own marketing, without relying on a third party for those purposes.

We use **Meta Ads Manager** together with **Meta Custom Audiences**, which allows us to choose audiences that will see our ads on Facebook or other Meta products (for example, Instagram). Through Meta Custom Audiences we may create a list of users with certain sets of data, such as an IDFA, and choose users that have completed certain actions in the Product (for example, installed it). As a result, we may ask Meta to show some ads to a particular list of users. You may learn how to opt out of advertising provided to you through Meta Custom Audiences [here](#).

Meta also allows its users to influence the types of ads they see on Facebook and Instagram. To find how to control the ads you see, please go [here](#) or adjust your [ads settings](#).

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 who have conducted certain actions with our Product (for example, show our ads to users who have purchased a subscription). Other examples of events that may be used to tailor ads include, in particular, installing our Product. Google allows its users to [opt out of Google's personalized ads](#) and to prevent their data from being used by [Google Analytics](#).

We use **Birch** (formerly Revealbot), an advertising automation platform, to manage and optimize our advertising campaigns. More information is available in [Birch's Privacy Policy](#).

We also use **AppLovin**, a mobile advertising and marketing platform, including its **AXON** advertising engine, to promote our Services, deliver and optimize our ads, and measure the performance of our campaigns. For more information, please refer to the [AppLovin Privacy Policy](#).

We also use **X Ads** ([Privacy Policy](#)) provided by **X** (formerly Twitter) to deliver advertising. X Ads allows us to choose specific audiences based on geographic areas or users' interests. As a result, we may ask X to deliver our ads to a certain list of users. You may opt out of X's internet-based advertising.

We use **Pinterest Ads** to deliver group-based advertisements. For example, you may see our ads if you are interested in specific services, information, or offers. For more information, please refer to the [Pinterest Privacy Policy](#).

TikTok Ads is the service provided by **TikTok** for delivering ads to its users. The ads can be tailored to specific categories of users (for instance, based on their geographical location). For more information, please refer to [TikTok's Privacy Policy](#).

We also use the **TikTok Pixel** on the Services. The TikTok Pixel is a piece of code that collects data helping us measure conversions from TikTok Ads, build targeted audiences, and optimize our campaigns.

We also use the **Snapchat Advertising Platform** ([Privacy Policy](#)) together with **Snapchat Audience-Based Match**, an ad delivery service provided by **Snapchat** that can link the activity of some users of our Services to the Snapchat advertising network and show some of our ads to them. As a result, you may see more ads on Snapchat in case you use our Services. Snapchat allows you to [opt out of their audience based ads](#).

We use **Microsoft Advertising** to promote our Services. You may find more info how we do it in [Microsoft Privacy and Personalization](#).

LinkedIn Marketing Solutions allow us to engage the **LinkedIn** community in our marketing activities. You have [choices](#) about the data that LinkedIn collects about you. For more information, please refer to the [LinkedIn Privacy Policy](#).

We use **LinkedIn Insight Tag** on the Services. LinkedIn Insight Tag is a piece of code embedded in the Services that collects data to help us track conversions from LinkedIn Ads, build targeted audiences, and remarket to users who have interacted with our Services (for example, visiting a specific page or filling out a form). This tool helps us optimize our LinkedIn advertising efforts by ensuring our ads reach the most relevant professional audiences. Additionally, the LinkedIn Insight Tag provides analytics to help us measure the effectiveness of our campaigns and refine our strategies to drive better engagement and business outcomes. For more information, please refer to the [LinkedIn Privacy Policy](#).

2.9 To process your payments and refunds

We provide paid products and/or services within the Services. To process payments, we use third-party payment processors. When you buy a subscription, you provide your payment details directly to them, not to us; we never collect or store your full card details. The processor then confirms to us that the payment has been made.

We also process your personal data to handle refund requests, as set out in our Terms and Conditions of Use. If you request a refund for a subscription bought through an App Store, we may share your usage data and other information about your activity in the Services with that App Store. We do this only to help the App Store verify and process your refund request fairly.

SEE MORE

We use **Solidgate**, a payment gateway provider. We may also use **Stripe** ([Privacy Policy](#)) and **PayPal** ([Privacy Statement](#)) to process your payments.

2.10 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 under our Terms and Conditions of Use).

2.11 To comply with legal obligations

We may process, use, or share your data where the law requires it. In particular, we keep records of your purchases and payments in order to meet our tax, accounting and financial reporting obligations and to respond to audits, and we may disclose your data in response to requests from courts, regulators, tax authorities or law enforcement agencies made by available legal means. We may retain some of this information after you close your account for as long as required by law.

2.12 To ensure the security of the Services

We process your personal data to ensure the security of our Services.

SEE MORE

We use **reCAPTCHA** provided by Google to enhance the security of our Website and protect it from fraudulent activity and abuse. reCAPTCHA helps us determine whether certain actions on our Website are

performed by a human or an automated bot. It helps us prevent fraudulent use of our Services and maintain their security and integrity. You can learn more by visiting [Google's Privacy Policy](#).

2.13 To provide AI-powered features

We offer AI-powered features, including AI chat features and features that generate results or reports from information you provide. When you use these features, we process the content of your interactions to generate responses or results and to operate the features. These interactions are handled through our backend, which acts as a secure intermediary between the Product and our AI providers, and are retained only as long as necessary to operate the feature. If you use voice input, your audio is processed for speech recognition. We do not use the content of your AI interactions to serve you ads.

To power these features, we use third-party AI providers: **OpenAI** ([Privacy Policy](#)), **Anthropic** ([Privacy Policy](#)) and **Google** ([Gemini API Additional Terms of Service](#), [Privacy Policy](#)). They process the content you submit solely to return a response or result to us, and under the terms on which we use their services, they do not use your inputs or outputs to train their AI models. The providers and features we use may change over time.

3. Under what legal bases we process your personal data (applies only to EEA-based users)

In this section, we let you know the legal basis we use for each specific purpose of processing. For more information on a particular purpose, please refer to Section 2. This section applies only to EEA-based users.

We process your personal data under the following legal bases.

3.1 Your consent

We rely on your consent to send you marketing emails and push notifications; to store and access cookies and similar technologies on your device that are not strictly necessary, including for advertising and analytics; and to process any special category data you choose to provide. You can withdraw consent at any time by using the unsubscribe link in our marketing emails, changing your device settings, or updating your cookie preferences. Withdrawing consent does not affect the lawfulness of processing carried out before you withdrew it.

3.2 Performing our contract with you

Under this legal basis, we:

- Provide our Services in accordance with our Terms and Conditions of Use;

- Provide the AI-powered features you choose to use;
- Customize your experience;
- Manage your account and provide you with customer support;
- Communicate with you regarding your use of our Services; and
- Process your payments.

3.3 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 communicate with you about your use of our Services. This includes, for example, sending you push notifications proposing you to explore new content. The legitimate interest we rely on for this purpose is our interest in encouraging you to use our Services and helping you get value from them.
- to research and analyze your use of the Services. Our legitimate interest for this purpose is understanding what users prefer and improving the Services to provide you with a better experience.
- to send you marketing communications. The legitimate interest we rely on for this processing is promoting our Services in a measured and appropriate way.
- to personalize our ads. The legitimate interest we rely on for this processing is promoting our Services in a reasonably targeted way.
- to secure the Services, enforce our Terms and Conditions of Use and prevent and combat fraud. Our legitimate interests for this purpose are enforcing our legal rights, preventing and addressing fraud and unauthorized use of the Services, and non-compliance with our Terms and Conditions of Use.

3.4 Compliance with legal obligations

We process your data to meet our tax, accounting and financial reporting obligations, including keeping records of your purchases and payments, and to respond to lawful requests from courts, regulators, tax authorities and law enforcement agencies.

4. 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 Services. We may share some sets of personal data, in particular, for purposes indicated in Section 2 of this Privacy Policy. The types of third parties we share information with include, in particular:

4.1 Service providers

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

- mobile app marketplaces (Apple App Store, Google Play);
- cloud storage providers (Google, DigitalOcean, Vercel, Namecheap);
- data analytics providers (Meta, Google, AppsFlyer, Firebase, Amplitude, Tableau, Google Tag Manager);
- measurement partners (RevealBot, Firebase, Clarity, Sentry, CookieYes);
- marketing partners (in particular, social media networks, marketing agencies, Meta, Google, X, TikTok, Snapchat, Pinterest, Microsoft, LinkedIn, AppLovin);
- payment processing providers (Stripe, Solidgate, PayPal);
- communication services providers (Customer.io, Zendesk, Firebase); and
- AI service providers (OpenAI, Anthropic, Google).

4.2 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.

4.3 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.

5. How you can exercise your privacy rights

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

Accessing, reviewing, updating and correcting your personal data. You may review, edit, or change the personal data that you have previously provided through the Services.

Deleting your personal data. You can request erasure of your personal data as permitted by law. When you request deletion, we will erase your personal data unless we are permitted or required by law to retain it. In

some cases we must keep certain data for a period, for example, to meet our tax and accounting obligations, and where that applies, we will complete your request once those obligations have been met.

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 to limit how we use it. You can object to the use of your personal data for direct marketing at any time, and we will stop processing it for that purpose.

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 a supervisory authority. We would encourage you to contact us directly so that we can 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 took place.

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

To exercise any of your privacy rights, please send a request to support@get-talino.app. We will respond within the time required by applicable law.

6. 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 at support@get-talino.app.

7. International data transfers

We do business globally. We may transfer personal data to countries other than the country in which the data was originally collected in order to provide the Services set forth in the Terms and Conditions of Use and for purposes indicated in this Privacy Policy.

Where we transfer personal data originating from the EEA or the United Kingdom to a country outside those areas, we put appropriate safeguards in place. In particular, we rely on one of the following: (i) an **adequacy decision**, where the European Commission (or, for UK data, the UK Government) has determined that the destination country or certification framework, such as the EU-US Data Privacy Framework, provides an adequate level of protection ([details available here](#)); or (ii) **Standard Contractual Clauses** approved by the

European Commission, together with the UK Addendum or the UK International Data Transfer Agreement where UK data is involved ([details available here](#)), along with any additional measures needed to protect the data.

8. 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 through our Services or by other available means and will have an opportunity to review the revised Privacy Policy. By continuing to access or use the Services after those changes become effective, you agree to be bound by the revised Privacy Policy.

9. Supplemental notice for California residents

This notice applies to our processing of personal information that is subject to the California Consumer Privacy Act of 2018, as amended by the California Privacy Rights Act (together, the "CCPA").

Personal information we collect. In the preceding twelve months, we have collected the following categories of personal information. The sources of personal information are described in [Section 1](#), the purposes for which we use each category are described in [Section 2](#), and the categories of third parties to whom we disclose personal information for a business purpose are described in [Section 4](#).

Category of Personal Information Collected	Categories of Third Parties Personal Information is Disclosed to for a Business Purpose
Identifiers (e.g. name, email address, IP address, device and advertising identifiers, account identifiers)	Service providers; advertising partners.
Personal information categories listed in Cal. Civ. Code § 1798.80(e) (e.g. name, contact details, payment-related information)	Service providers; payment processing providers
Commercial information (e.g. subscription orders, purchase and refund history, trial and premium status)	Payment processing providers.

Internet or other electronic network activity (e.g. usage data, interactions with the Services and with our ads)	Service providers; advertising partners.
Geolocation data (approximate location derived from your IP address)	Service providers; advertising partners.
Inferences drawn from other personal information to create a profile about a consumer	Service providers; advertising partners.

Retention. We retain each category of personal information for as long as your account is active and for as long as necessary for the purposes described in [Section 2](#). After that, we retain personal information only where we are permitted or required to do so, in particular, to meet our tax, accounting and financial reporting obligations, to resolve disputes and to enforce our agreements. Our general approach to retention is described in [Section 13](#), and our account deletion process is described in [Section 12](#).

Sale and sharing of personal information. We do not receive monetary consideration in exchange for your personal information. However, the CCPA defines these terms broadly: a "sale" can include disclosures made for other valuable consideration, and "sharing" covers disclosures for cross-context behavioral advertising whether or not any consideration is involved. We and our advertising partners use certain personal information to deliver advertising tailored to your interests as described in Section 2.8. Some of those activities may therefore fall within either definition. Regardless of how it is characterized, you can opt out at any time using the methods described below.

We do not knowingly sell or share the personal information of consumers under 16 years of age.

Sensitive personal information. We do not collect sensitive personal information as defined by the CCPA. If this changes, we will obtain your consent where the law requires it.

Your California privacy rights. Subject to the CCPA's exceptions, you have the right to know what personal information we have collected about you, including the categories above and the specific pieces of personal information we hold; to request deletion of your personal information; to request correction of inaccurate personal information; to opt out of the sharing of your personal information for cross-context behavioural advertising; and not to receive discriminatory treatment for exercising any of these rights.

Submitting a request. To exercise any of these rights, contact us at support@get-talino.app. Only you or someone legally authorized to act on your behalf may make a verifiable consumer request regarding your personal information. To opt out of the sale or sharing of your personal information, you can contact us at support@get-talino.app with the subject line "Do Not Sell or Share My Personal Information".

To use an authorized agent, please contact us at the address above. When you make a request, we will ask you to provide sufficient information to reasonably verify that you are the person about whom we collected personal information or an authorized representative, which may include confirming the email address associated with your account. We will respond within the time required by the CCPA.

10. Your other U.S. state privacy rights

If you are a resident of a U.S. state that has enacted a comprehensive consumer privacy law, you may have additional rights described in this section. The specific rights available to you, and how they apply, depend on your state of residence and applicable law.

Targeted advertising and sale. We do not receive money in exchange for your personal data. Some state laws define "sale" more broadly, to include disclosures made for other valuable consideration, and our interest-based advertising activity (see Section 2.8) may fall within those definitions and within these laws' definition of "targeted advertising." You can opt out of targeted advertising, and of any sale of your personal data, using the methods described below.

Profiling. We do not use your personal data for profiling that produces legal or similarly significant effects concerning you.

Sensitive data. We do not collect sensitive data as defined by these laws. If this changes, we will obtain your consent where the applicable law requires it.

Your rights (subject to your state's law and applicable exceptions). You may:

- access and confirm whether we process your personal data;
- correct inaccuracies in your personal data;
- delete personal data we hold about you;
- obtain a portable copy of your personal data; and
- opt out of (a) the sale of your personal data, (b) targeted advertising, and (c) where applicable, profiling that produces legal or similarly significant effects. Your rights (subject to your state's law and applicable exceptions):

How to exercise your rights. To exercise any of these rights, contact us at support@get-talino.app. We will respond within the time required by applicable law. To opt out of targeted advertising or the sale of your personal data, you can email us at support@get-talino.app with the subject line "U.S. State Privacy – Targeted Advertising / Sale Opt-Out."

Verification and authorized agents. We may need to verify your identity before fulfilling a request. You may use an authorized agent to submit a request where permitted by your state's law.

Appeals. If we decline to act on your request, you may appeal by contacting us at support@get-talino.app with the subject line "Appeal of Refusal to Take Action on Privacy Request." We will respond to your appeal within the time required by applicable law. If your appeal is denied, you may contact your state Attorney General.

11. Supplemental notice for Nevada residents

If you are a resident of Nevada, you have the right to opt out of the sale of certain "covered information" to third parties who intend to license or sell that personal information. Under Nevada law, a "sale" means the exchange of covered information for monetary consideration. You can exercise this right by contacting us at support@get-talino.app with the subject line "Nevada Do Not Sell Request" and providing us with your name and the email address associated with your account. Please note that we do not currently sell covered information as sales are defined in Nevada Revised Statutes Chapter 603A.

12. Account deletion

You can delete your account at any time using the "Settings" functionality in the Product or on the Website, or by contacting us at support@get-talino.app. The deletion process may take up to 30 days to complete and cannot be reversed.

When you delete your account, we delete the personal data associated with it, except where we are permitted or required to retain certain information. In particular, we may retain:

- records of your purchases, payments and refunds, to meet our tax, accounting and financial reporting obligations;
- information needed to establish, exercise or defend legal claims, including in relation to disputes, chargebacks or misuse of the Services;
- a record of choices you have made, such as marketing opt-outs or requests not to sell or share your personal data, so that we can continue to honor them;
- information we need to detect, prevent and combat fraud and abuse of the Services; and
- a record of your deletion request, so that we can demonstrate that we handled it.

We keep this information only for as long as necessary for the relevant purpose, as described in [Section 13](#). We may also retain data that has been aggregated or de-identified so that it can no longer be associated with you.

Please note that once you initiate the deletion process, your account can no longer be used, and you will lose access to all subscription features. Deleting your account does not cancel your subscription. To avoid any additional charges, you must cancel your subscription before deleting your account.

13. Data retention

We keep your personal data only for as long as it is reasonably necessary for achieving the purposes described in this Privacy Policy. In practice, we retain most of your personal data for as long as you have an account with us, and delete or de-identify it after your account is deleted.

Where we keep personal data for longer, we determine how long by reference to the following criteria:

- whether we are required to retain it by law, for example, records of purchases and payments that we must keep to meet our tax, accounting and financial reporting obligations;
- whether we need it to establish, exercise or defend legal claims, taking into account the applicable limitation periods;
- whether we need it to detect, prevent and combat fraud or abuse of the Services;
- whether we need it to honor a choice you have made, such as a marketing opt-out or a request not to sell or share your personal data; and
- the nature and sensitivity of the data and the risk of harm from unauthorized use or disclosure.

Content of your interactions with our AI-powered features is retained only for as long as necessary to operate the relevant feature.

Personal data that we have aggregated or de-identified, so that it can no longer be associated with you, may be retained for longer. Copies of your data may also remain in our backups for a limited period after deletion, after which they are overwritten in the ordinary course.

14. How “Do Not Track” requests are handled

Except as otherwise stipulated in this Privacy Policy, this Product 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.

15. Personal data controller

Talino is the controller of your personal data. If you have any questions about how we process your personal data, or if you wish to exercise your privacy rights, you may contact us at support@get-talino.app.

16. 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@get-talino.app.

Any translation from the 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 document and any translation, the English language version will prevail. The original English text shall be the sole legally binding version.

Last Update: September 4, 2026