

PRIVACY POLICY

Effective Date: January 19, 2026
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1. INTRODUCTION

Welcome to **Outfitz** (the “App”). This Privacy Policy explains how **Mehmet Can Biyik** (“Company,” “we,” “us,” or “our”), as the data controller, collects, uses, stores, and protects your personal data when you use the App.

This Privacy Policy applies to all users of the App, including those who subscribe without creating an account (anonymous users) and those who create accounts via Apple or Google sign-in.

By using the App, you acknowledge that you have read, understood, and agree to the collection and processing of your personal data as described in this Privacy Policy.

Contact Information:

Email: outfitz@aigence.net
Data Controller: Mehmet Can Biyik

2. SCOPE AND APPLICABILITY

2.1 Scope

This Privacy Policy covers the collection and processing of personal data during the **onboarding and subscription process**, before you use any feature-specific services (e.g., account creation, photo upload, avatar creation).

2.2 Feature-Specific Privacy Notices

For detailed information about data processing in specific features, please refer to the following documents:

- **Privacy Notice - Sign Up:** Applies when you create an account via Apple or Google sign-in.
- **Privacy Notice - Image Processing:** Applies when you upload photos for AI try-on or avatar creation.
- **Explicit Consent Forms:** You will be asked for explicit consent when using features that process special category personal data (e.g., facial features, physical attributes).

2.3 Other Policies

Please also review the following policies:

- **Terms of Service:** Governs your use of the App.
- **Personal Data Retention and Destruction Policy:** Details how long we retain your data and how we delete it.

3. DATA CONTROLLER INFORMATION

Data Controller: Mehmet Can Biyik

Contact Email: outfitz@aigence.net

As the data controller, we are responsible for determining the purposes and means of processing your personal data and ensuring compliance with applicable data protection laws, including:

- **Turkey:** Personal Data Protection Law No. 6698 (KVKK)
- **European Union:** General Data Protection Regulation (GDPR)

4. PERSONAL DATA WE COLLECT

We collect the following categories of personal data during the onboarding and subscription process:

4.1 Subscription Data (via RevenueCat)

When you subscribe to the App, we collect and process the following data through **RevenueCat**, our subscription management platform:

- **User ID:** A randomly generated, unique identifier assigned by RevenueCat (not linked to your real identity).
- **Subscription Status:** Active, trial, expired, or canceled.
- **Purchase History:** Subscription start date, renewal dates, and payment status.
- **Device Identifier (IDFV):** A unique identifier for your device, used to link your subscription to your device.

Legal Basis: Contract performance (necessary to provide subscription services).

4.2 Device and Technical Information

We automatically collect the following technical data to ensure the App functions properly:

- **Device Model:** (e.g., iPhone 14, Samsung Galaxy S23)

- **Operating System Version:** (e.g., iOS 17.2, Android 14)
- **IP Address:** Used to determine your approximate location (country/city level) and prevent fraud.
- **App Version:** The version of the App you are using.

Legal Basis: Legitimate interest (necessary for app functionality, security, and fraud prevention).

4.3 Analytics and Usage Data

We collect analytics data to understand how users interact with the App and improve our services:

- **Crash Reports:** Automatically generated when the App crashes, including device info, OS version, and error logs.
- **Usage Statistics:** Which features you use, how long you spend in the App, and navigation patterns.
- **Attribution Data:** How you discovered the App (e.g., organic search, advertisement, referral).

Tools Used: - **Firebase Analytics:** For usage statistics and crash reporting.

- **Firebase Crashlytics:** For crash reporting and debugging. - **AppsFlyer / Adjust:** For attribution tracking (if applicable).

Legal Basis: Legitimate interest (app improvement, performance optimization, and user experience enhancement).

4.4 Advertising Identifier (IDFA)

On iOS devices, we may collect your **Identifier for Advertisers (IDFA)** to track ad performance and deliver personalized advertisements.

Legal Basis: Explicit consent (you will be asked for permission via Apple's App Tracking Transparency prompt).

Note: You can opt out of IDFA tracking at any time in your device settings (Settings > Privacy > Tracking).

4.5 Push Notification Data

If you enable push notifications, we collect:

- **Push Notification Token:** A unique identifier used to send notifications to your device.
- **Notification Preferences:** Which types of notifications you want to receive.

Legal Basis: Explicit consent (you will be asked for permission when you first open the App).

Note: You can disable push notifications at any time in your device settings.

4.6 Email Address (Optional)

If you provide an email address (e.g., for account creation, newsletter subscription, or customer support), we will collect and store it.

Legal Basis: - **Account creation:** Contract performance. - **Newsletter:** Explicit consent. - **Customer support:** Legitimate interest.

5. HOW WE USE YOUR PERSONAL DATA

We use your personal data for the following purposes:

5.1 Subscription Management

- Processing payments and managing your subscription status.
- Providing access to premium features.
- Sending subscription-related notifications (e.g., renewal reminders, payment failures).

5.2 App Functionality and Performance

- Ensuring the App works properly on your device.
- Debugging and fixing technical issues.
- Preventing fraud and unauthorized access.

5.3 Analytics and Improvement

- Understanding how users interact with the App.
- Identifying and fixing bugs and crashes.
- Improving user experience and developing new features.

5.4 Marketing and Communication

- Sending promotional offers, updates, and newsletters (only if you opt in).
- Conducting A/B testing to optimize the App experience.

5.5 Legal Compliance

- Complying with legal obligations (e.g., tax reporting, responding to legal requests).
- Protecting our rights and enforcing our Terms of Service.

6. DATA SHARING AND THIRD-PARTY SERVICES

We do **not** sell your personal data to third parties. However, we share your data with the following trusted service providers to operate the App:

6.1 RevenueCat (Subscription Management)

- **Purpose:** Managing subscriptions, processing payments, and tracking subscription status.
- **Data Shared:** User ID, subscription status, purchase history, device identifier (IDFV).
- **Location:** United States (RevenueCat, Inc.)
- **Privacy Policy:** <https://www.revenuecat.com/privacy>

6.2 Apple App Store / Google Play Store (Payment Processing)

- **Purpose:** Processing subscription payments.
- **Data Shared:** Payment information (handled directly by Apple/Google; we do not have access to your payment details).
- **Location:** United States (Apple Inc., Google LLC)
- **Privacy Policies:**
 - Apple: <https://www.apple.com/legal/privacy/>
 - Google: <https://policies.google.com/privacy>

6.3 Amazon Web Services (AWS) (Cloud Storage and Infrastructure)

- **Purpose:** Hosting the App's backend, storing user data, and delivering content.
- **Data Shared:** All data collected by the App (subscription data, device info, analytics, user-uploaded content).
- **Location:** United States (AWS servers in US-East-1 region)
- **Privacy Policy:** <https://aws.amazon.com/privacy>

6.4 Google Gemini API (AI Processing)

- **Purpose:** Processing images for AI try-on and avatar creation (only when you use these features).
- **Data Shared:** User-uploaded photos (see Privacy Notice - Image Processing for details).
- **Location:** United States (Google LLC)
- **Privacy Policy:** <https://policies.google.com/privacy>

6.5 Firebase (Analytics and Crash Reporting)

- **Purpose:** Collecting usage statistics, crash reports, and analytics data.
- **Data Shared:** Device info, OS version, app version, usage statistics, crash logs.
- **Location:** United States (Google LLC)
- **Privacy Policy:** <https://firebase.google.com/support/privacy>

6.6 AppsFlyer / Adjust (Attribution Tracking)

- **Purpose:** Tracking how users discover the App (e.g., ads, referrals).

- **Data Shared:** Device identifier (IDFV), IP address, attribution data.
- **Location:** United States / Germany
- **Privacy Policies:**
 - AppsFlyer: <https://www.appsflyer.com/legal/privacy-policy/>
 - Adjust: <https://www.adjust.com/terms/privacy-policy/>

7. INTERNATIONAL DATA TRANSFER

Your personal data may be transferred to and processed in countries outside your jurisdiction, including the **United States**, where our service providers (Google LLC, AWS, RevenueCat) are located.

7.1 Adequacy of Protection

The United States does not have an adequacy decision from the European Commission or the Turkish Personal Data Protection Board. However, we ensure adequate protection through the following measures:

- **Standard Contractual Clauses (SCCs):** We have entered into SCCs with our service providers to ensure GDPR-compliant data transfers.
- **Service Provider Commitments:** Our service providers (Google, AWS, RevenueCat) have implemented appropriate technical and organizational measures to protect your data.

7.2 Your Rights

You have the right to object to international data transfers. However, please note that refusing such transfers may prevent us from providing the App's services.

8. DATA RETENTION

We retain your personal data only for as long as necessary to fulfill the purposes described in this Privacy Policy or as required by law.

8.1 Retention Periods

Data Category	Retention Period	Destruction Period
Subscription Data (RevenueCat)	2 years after subscription ends or account deletion	During the first periodic destruction period (annually, November-December)

Data Category	Retention Period	Destruction Period
Device and Technical Information	2 years after last activity	During the first periodic destruction period
Analytics and Crash Reports	2 years after collection	During the first periodic destruction period
Push Notification Data	Until you disable notifications or delete your account	Immediately upon request
Email Address	2 years after last activity or until you unsubscribe	Immediately upon request

8.2 Inactive User Deletion

If you do not use the App for **2 consecutive years**, your personal data will be automatically deleted during the next periodic destruction process (conducted annually between November-December).

8.3 Immediate Deletion

You can request immediate deletion of your personal data at any time by:

- Deleting your account through the App's settings (if you have an account).
- Contacting us at outfitz@aigence.net.

For more details, please see our **Personal Data Retention and Destruction Policy**.

9. YOUR RIGHTS

Under applicable data protection laws (KVKK, GDPR), you have the following rights:

9.1 Right to Access

You have the right to know whether we are processing your personal data and, if so, to request access to that data.

9.2 Right to Rectification

You have the right to request correction of inaccurate or incomplete personal data.

9.3 Right to Erasure (Right to be Forgotten)

You have the right to request deletion of your personal data when:

- The data is no longer necessary for the purposes for which it was collected.
- You withdraw your consent (if processing was based on consent).
- You object to processing based on legitimate interest.
- The data was processed unlawfully.

9.4 Right to Restriction of Processing

You have the right to request that we limit the processing of your personal data in certain circumstances (e.g., while we verify the accuracy of the data).

9.5 Right to Data Portability

You have the right to receive your personal data in a structured, commonly used, and machine-readable format and to transmit it to another data controller.

9.6 Right to Object

You have the right to object to processing based on legitimate interest or for direct marketing purposes.

9.7 Right to Withdraw Consent

If processing is based on your consent, you have the right to withdraw your consent at any time. Withdrawal does not affect the lawfulness of processing before withdrawal.

9.8 Right to Lodge a Complaint

You have the right to lodge a complaint with the relevant data protection authority:

- **Turkey:** Personal Data Protection Authority (KVKK) - <https://www.kvkk.gov.tr>
- **EU:** Your local data protection authority

9.9 How to Exercise Your Rights

To exercise any of these rights, please contact us at:

Email: outfitz@aigence.net

We will respond to your request within **30 days** in accordance with applicable laws.

10. SECURITY MEASURES

We take the security of your personal data seriously and have implemented appropriate technical and administrative measures to protect it from unauthorized access, loss, alteration, or disclosure.

10.1 Technical Measures

- **Encryption:** Data is encrypted in transit (TLS/SSL) and at rest (AES-256).
- **Access Control:** Only authorized personnel have access to personal data.
- **Firewalls and Intrusion Detection:** We use firewalls and intrusion detection systems to protect our servers.
- **Regular Security Audits:** We conduct regular security audits and vulnerability assessments.

10.2 Administrative Measures

- **Data Minimization:** We collect only the data necessary for the purposes described in this Privacy Policy.
- **Employee Training:** Our employees are trained on data protection principles and security best practices.
- **Incident Response Plan:** We have an incident response plan in place to address data breaches.

10.3 Data Breach Notification

In the event of a data breach that poses a risk to your rights and freedoms, we will notify you and the relevant data protection authority within **72 hours** in accordance with KVKK and GDPR requirements.

11. CHILDREN'S PRIVACY

The App is intended for users aged **13 years or older**. We do not knowingly collect personal data from children under 13. If we become aware that we have collected personal data from a child under 13, we will delete it immediately.

If you are a parent or guardian and believe your child has provided us with personal data, please contact us at outfitz@aigence.net.

12. COOKIES AND TRACKING TECHNOLOGIES

The App does not use cookies. However, we use the following tracking technologies:

- **Device Identifiers (IDFV, IDFA):** Used for subscription management, analytics, and advertising.
- **Firebase Analytics SDK:** Collects usage statistics and crash reports.
- **AppsFlyer / Adjust SDK:** Tracks attribution data.

You can opt out of IDFA tracking by disabling “Allow Apps to Request to Track” in your device settings (iOS: Settings > Privacy > Tracking).

13. CHANGES TO THIS PRIVACY POLICY

We may update this Privacy Policy from time to time to reflect changes in our practices, legal requirements, or service offerings. If we make material changes, we will notify you by:

- Posting the updated Privacy Policy within the App.
- Sending a notification via email (if you have provided an email address).
- Displaying a notice within the App.

Your continued use of the App after the effective date of the updated Privacy Policy constitutes your acceptance of the changes.

14. CONTACT US

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

Email: outfitz@aigence.net

Data Controller: Mehmet Can Büyükk

15. GOVERNING LAW

This Privacy Policy is governed by the laws of the **Republic of Turkey** and applicable international data protection laws (KVKK, GDPR).

By using Outfitz, you acknowledge that you have read, understood, and agree to this Privacy Policy.