

# Privacy Policy

Last updated: July 6, 2026 · Effective immediately

This Privacy Policy explains how **Trailair** ("we", "us", "the app") handles your information when you use our mobile application on iOS. We are committed to data minimisation: we collect only what is strictly necessary to deliver the service, and we do not sell your data for money. This policy is designed to comply with the EU/UK General Data Protection Regulation (GDPR), the California Consumer Privacy Act as amended by the California Privacy Rights Act (CCPA/CPRA), and other US state privacy laws.

## 1. Data controller

Trailair is operated by an independent developer, who acts as the data controller (as that term is defined by the EU/UK General Data Protection Regulation, GDPR) for any processing described in this policy.

Contact (general): [hello@trailair.online](mailto:hello@trailair.online)

Contact (privacy requests, GDPR Art. 15–22): [privacy@trailair.online](mailto:privacy@trailair.online)

The full identity and postal address of the publisher are available on written request to either email above, and are also disclosed to Apple Inc. as part of the App Store distribution agreement.

## 2. Data we collect

### 2.1 Stored locally on your device

The following data is stored **exclusively** on your device using Apple's SwiftData framework. It never leaves your phone and is not transmitted to our servers:

- Your watchlist (films you bookmark)
- Films you mark as already seen, with optional personal notes and tags
- Actors you choose to follow
- Reading progress on encyclopedia articles, essays, director profiles and analyses
- Quiz high scores
- Recent search queries (last few, stored in iOS UserDefaults)
- Language, appearance, notification and reader preferences

Uninstalling the app deletes all of this data permanently. You can also clear it inside the app via *Settings* → *Reset*, or export it as JSON via *Settings* → *Privacy & data* → *Export my data*.

### 2.2 Data transmitted to TMDB

Trailair displays film metadata, posters and trailers retrieved from [The Movie Database \(TMDB, United States\)](#). Requests sent to TMDB include the search terms you type, the film IDs you open and your preferred display language. We do not attach any user identifier to these requests. TMDB's [own privacy policy](#) applies to those interactions.

### 2.3 Data transmitted to OMDb

To enrich film details with Rotten Tomatoes, Metacritic and IMDb ratings, Trailair may query the [OMDb API \(United States\)](#). Each request contains either an IMDb ID or the film title and year. No user identifier is attached. OMDb's terms govern those interactions.

### 2.4 Data collected for advertising and diagnostics by Google

Trailair displays advertisements via **Google AdMob** to keep the app free of charge. The Google Mobile Ads SDK and the Google User Messaging Platform (UMP, for EU/UK consent management) may collect:

- Your Apple Advertising Identifier (IDFA), *only if you grant App Tracking Transparency permission*
- Device information (model, OS version, language, approximate location derived from IP)
- Ad interaction events (impressions, clicks)
- **Crash data, performance data and other diagnostic data** related to the SDK runtime, used to detect and prevent advertising fraud and improve SDK stability

If you decline tracking when the App Tracking Transparency prompt appears, AdMob serves non-personalised ads and does not access your IDFA. You can revisit your choice at any time inside Trailair via *Settings* → *Privacy & data* → *Manage ad consent*, or system-wide via *iOS Settings* → *Privacy & Security* → *Tracking*.

For full details, see [Google Privacy Policy](#).

## 2.5 Apple-provided diagnostics (MetricKit)

Trailair subscribes to Apple's **MetricKit** framework to receive aggregated crash and performance reports about the app itself. These reports are delivered by Apple to the developer in anonymised form and are only logged locally in debug builds; nothing is forwarded to any third party.

## 2.6 Notifications

With your permission, Trailair can send you local notifications — reminders to read the daily article and alerts when an actor you follow has a new film. These notifications are scheduled and delivered entirely on your device by iOS; no message content, device token or identifier is sent to us or to any third party. To check for new films from the actors you follow, the app queries TMDb using those actors' identifiers, exactly as described in section 2.2. You can turn notifications on or off at any time in *Settings* → *Notifications* inside the app, or system-wide via *iOS Settings* → *Notifications* → *Trailair*. No notification is ever sent unless you grant iOS notification permission.

## 2.7 Data we explicitly do NOT collect

- No account, no sign-up, no email harvesting
- No precise geolocation
- No contacts, photos, microphone or camera access
- No cross-app or cross-site tracking by Trailair itself
- No analytics SDK other than the ones disclosed above

## 3. Why we process your data (legal bases under GDPR)

- **Performance of the service** (Art. 6(1)(b)) — to display films, read editorial content, and save your local preferences and progress.
- **Consent** (Art. 6(1)(a)) — for personalised advertising via IDFA, only after the UMP consent screen and the iOS App Tracking Transparency prompt.
- **Legitimate interest** (Art. 6(1)(f)) — to serve non-personalised ads, detect ad fraud, and keep recent search history for usability.

## 4. Sub-processors and recipients

We rely on the following sub-processors. Each transfer is limited to the data described above and to the purposes listed.

Provider	Role	Country	Data transmitted	Transfer safeguard
Google LLC (AdMob, UMP, Mobile Ads SDK)	Advertising and consent management	United States	IDFA (if consented), device info, IP, ad events, SDK diagnostics	EU-US Data Privacy Framework + Standard Contractual Clauses
The Movie Database (TMDB)	Film metadata, posters, trailers	United States	Search query, film ID, preferred language	Art. 49(1)(b) GDPR — necessary for performance of the user's request
OMDb API	Ratings (Rotten Tomatoes, Metacritic, IMDb)	United States	IMDb ID or film title + year	Art. 49(1)(b) GDPR — necessary for performance of the user's request
Apple Inc.	App distribution, ATT, MetricKit, SKAdNetwork postbacks	Worldwide (EU servers)	Standard App Store telemetry, anonymised diagnostics, ad attribution postbacks	Apple Developer Program data processing terms

We do not sell or rent your personal data for money. Under US state laws such as the CCPA/CPRA, disclosing your advertising identifier to Google for personalised ads can be treated as a "sale" or "share"; see Section 9.3 for how to opt out.

## 5. Data retention

- **Local data on your device:** retained until you delete it from *Settings* → *Reset*, or until you uninstall the app.
- **Advertising data on Google's side:** follows Google AdMob's standard schedule (typically up to 13 months for ad-event logs, longer for aggregated reports).
- **TMDB and OMDb logs:** governed by their respective policies; we do not control them.
- **MetricKit diagnostics:** handled by Apple under its standard developer telemetry retention.

## 6. Your rights under GDPR

You have the right to access (Art. 15), rectify (Art. 16), erase (Art. 17), restrict or object to processing (Art. 18 and 21), receive your data in a portable format (Art. 20), withdraw consent at any time (Art. 7(3)), and lodge a complaint with your national supervisory authority.

Because most of your data stays on your device, the fastest way to exercise your rights is from inside the app:

- *Settings* → *Reset* for erasure (Art. 17)
- *Settings* → *Privacy & data* → *Export my data* for portability (Art. 20)
- *Settings* → *Privacy & data* → *Manage ad consent* to withdraw or update tracking consent (Art. 7(3))

For any other request, email [privacy@trailair.online](mailto:privacy@trailair.online). We respond within 30 days. You also have the right to lodge a complaint with the data protection or privacy authority of your country of residence; residents of other countries should contact their own local authority.

## 7. Children

Trailair is rated **12+** on the App Store due to occasional references to mature themes in film synopses. We do not knowingly collect personal data from children under 13. If you believe a child has provided personal data, contact [privacy@trailair.online](mailto:privacy@trailair.online) and we will delete it without undue delay. Non-personalised ads are served by default for users who do not consent.

## 8. International data transfers

- **Google AdMob:** covered by the EU-US Data Privacy Framework adequacy decision (July 2023) and Google's Standard Contractual Clauses.
- **TMDB and OMDb:** Article 49(1)(b) GDPR — the transfer is necessary to perform your request for film information.

## 9. United States privacy rights (California CCPA/CPRA and other states)

This section applies to residents of US states with comprehensive privacy laws, including California (CCPA/CPRA), Virginia (VCDPA), Colorado (CPA), Connecticut (CTDPA), Utah (UCPA), Texas (TDPSA), Oregon, Montana and others.

### 9.1 Notice at collection — categories of personal information

In the past 12 months, depending on your tracking choice, the following categories (using CCPA category names) may be collected and disclosed to our advertising partner:

CCPA category	Examples	Collected	Sold / Shared	Purpose
Identifiers	IDFA, device identifiers	Only if you opt in to App Tracking	Shared with Google (only if you opt in)	Personalised advertising, frequency capping, fraud prevention
Internet or network activity	Ad impressions, clicks, interaction with ads	Yes	Shared with Google (only if you opt in)	Ad delivery and measurement
Geolocation data	Coarse region derived from IP by Google	Yes (by Google)	Shared with Google (only if you opt in)	Ad delivery, fraud prevention
Commercial / inferences	Profiles or inferences drawn by Trailair	No — we draw none	No	—

We do **not** collect sensitive personal information (precise geolocation, government identifiers, account credentials, message contents, biometric or health data), and we do not knowingly "sell" or "share" the personal information of consumers under 16.

### 9.2 "Sale" and "Sharing" of personal information

We do not sell your personal information for money. When you opt in to tracking, the disclosure of your IDFA and ad-interaction data to Google AdMob for personalised advertising may qualify as a "sale" or "share" (cross-context behavioural advertising) under the CCPA/CPRA and similar laws. We treat it as such for your opt-out rights below.

### 9.3 Your right to opt out — "Do Not Sell or Share My Personal Information"

Personalised advertising is **off by default**: it only happens if you actively opt in. You can opt out — or stay opted out — at any time:

- **Decline the App Tracking Transparency prompt** shown on first launch, or turn tracking off in *iOS Settings* → *Privacy & Security* → *Tracking*. When tracking is off, no IDFA is accessed and only non-personalised ads are served.
- **In the app:** *Settings* → *Privacy & data* → *Manage ad consent*.

Because Trailair is a native iOS app that uses no web cookies, opt-out is enforced through these device-level and in-app controls. Where the Global Privacy Control (GPC) applies, we honour it to the extent technically feasible.

### 9.4 Your other rights

- **Right to know / access** the categories and specific pieces of personal information collected.
- **Right to delete** personal information.
- **Right to correct** inaccurate personal information.
- **Right to opt out** of targeted advertising, sale, sharing, and profiling.
- **Right to non-discrimination:** we will never deny service, charge a different price, or provide a different quality of service because you exercised your privacy rights.

### 9.5 How to exercise your rights

The fastest way is inside the app: *Settings* → *Privacy & data* → *Export my data* (access & portability) and *Settings* → *Reset* (deletion). For any other request, email [privacy@trailair.online](mailto:privacy@trailair.online). We respond within 45 days (extendable once where permitted). You may use an authorised agent with your written permission. We do not offer financial incentives in exchange for your personal information.

## 10. Security

Network traffic is encrypted with HTTPS / TLS 1.2+. Local data benefits from iOS file-system encryption when your device is locked. We follow Apple's App Transport Security requirements and do not whitelist any insecure origin.

## 11. Changes to this policy

We may update this policy from time to time. The "Last updated" date at the top reflects the most recent change. Material changes will be announced in the app's release notes.

## 12. Contact

For any privacy-related question or to exercise your rights, write to [privacy@trailair.online](mailto:privacy@trailair.online). We respond within 30 days.