

Privacy Policy — Zwinoo (EN)

Last updated: 23/03/2026

Publisher: Zwinoo Limited

Address: Pod 2, the Old Station House, 15a Main Street, Blackrock, Dublin, Ireland

Contact email (GDPR / support): admin@zwinoo.com

Website: <https://www.zwinoo.com>

DPO / privacy contact: admin@zwinoo.com

Scope: Zwinoo mobile application (Europe & Africa) and related services.

1) Who is responsible?

Zwinoo Limited is responsible for processing your personal data when you use the Zwinoo application.

2) Data we process

We only process the data necessary for the operation of the app and its related services:

- **Identity & contact:** email, username (alias), phone number, city of residence, avatar, internal user ID and related settings.
- **Banking data for payments:** IBAN and BIC (for outgoing transfers via WISE); card data, where applicable, is processed exclusively by Stripe (we do not have access to it).
- **Device & usage:** device type (mobile/tablet), operating system (Android/iOS). No advertising ID or proprietary unique identifier.
- **Files & content:** images and/or PDFs you choose to upload, as well as photos taken within the app (UGC) and sent to the server.
- **Camera / scanner:** access to scan QR codes or take photos. The live feed is not stored except for files you choose to save/send.
- **Notifications:** permission to receive notifications (important events, account information, rare non-commercial promo codes).
- **Support messages:** communications (content + voluntary attachments) via in-app help and support.
- **Minimal diagnostics:** limited technical events (e.g., error codes, failure/fallback states, snackbar display). We do not store IP addresses, except for temporary technical logs managed by the hosting infrastructure.

No location data is collected by the application.

No access to your contacts, microphone, or Bluetooth.

3) Purposes and legal bases

- **Service provision** (account creation/management, app features, real-time display) — contract performance
 - **Payments & billing** (invoicing, user transfers via WISE, collections via Stripe) — contract performance and legal obligation
 - **Security / anti-fraud / integrity** — legitimate interest
 - **Transactional push notifications** — legitimate interest
 - **Non-essential notifications** (rare promo codes) — consent (withdrawable at any time via system/app settings)
 - **Product improvement / technical analytics** — legitimate interest (service operation & quality)
 - **Support & assistance** — contract performance / legitimate interest
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4) Third-party services (processors)

- Google Firebase (Auth, Firestore, FCM, etc.) — hosting, cloud services, authentication, real-time database, notifications
- Google Play Services / reCAPTCHA — phone/captcha verification
- Stripe — payments
- WISE — user payouts (IBAN/BIC)
- Google APIs, Fixer.io — additional features (e.g., exchange rates)

These providers act on our behalf and under our instructions.

No sale of data.

No advertising.

5) Where is data processed?

Infrastructure is primarily operated on Google Cloud Firebase — region **europa-west1 (EU)**.

According to current information, no transfers outside the EEA are planned.

If such transfers become necessary, they will be governed by Standard Contractual Clauses or an equivalent mechanism, and this policy will be updated.

6) Retention periods

- **Account & related data:** during use; then up to 3 years after last activity or deletion request (unless legal obligations apply)
 - **Security/diagnostic logs:** up to 6 months
 - **Billing & accounting records:** 5 years
 - **Uploaded files/images:** for the lifetime of the account; deleted upon request or account deletion
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7) Your rights (GDPR)

You may exercise the following rights: access, rectification, erasure, restriction, objection, data portability, and post-mortem instructions (depending on country).

Contact: admin@zwinoo.com

Target response time: 72 hours (no later than 30 days under GDPR)

You may withdraw your consent at any time.

8) Account & deletion

You can delete your account:

- directly from the app (“Delete my account”), or
- by emailing admin@zwinoo.com from the address linked to your account

Deletion results in the removal of your account data and related content, except for items retained due to legal obligations (e.g., billing records up to 5 years).

9) Security

We implement appropriate technical and organizational measures:

HTTPS/TLS, App Check between UI and backend, access controls, Firebase security rules, logging & monitoring, backend secret management, and least-privilege principle.

However, no service is completely risk-free.

10) Minors

Zwinoo is intended for users aged **12+**.

Minors must use the app with parental or guardian consent and supervision.

Zwinoo does not specifically target children and complies with applicable digital consent ages (EU: 13–16).

11) Changes

We may update this policy to reflect changes in services or legal requirements. You will be informed of any material changes via the app and/or email. The effective date is indicated at the top of this document.

Contact: admin@zwinoo.com — Zwinoo Limited, Dublin, Ireland

Additional statement

Zwinoo respects your privacy:
no advertising and no sale of data.

We collect: email, hashed password, username, phone number, city of residence, avatar, and IBAN/BIC for user payouts.

Payments are processed via Stripe and transfers via WISE; Zwinoo never stores card data.

The app uses Firebase (Auth, Firestore, FCM) in the EU (europe-west1), with no intentional transfer outside the EU/EEA.

Uploaded photos/files remain associated with your account until deletion.

You can delete your account and exercise your GDPR rights at any time via in-app support or email.

Security incidents are notified within 72 hours if required.

The app is intended for users aged **12 and over**.