

Logi — Privacy Policy

1. Who we are (Data Controller)

Logi ("Logi", "we", "us", "our") is a home-maintenance tracking application for iOS and Android.

The **data controller** responsible for your personal data is:

Per Emil Kristian Huovinen, operating as a sole proprietor Saarbrücker Str., 10405, Berlin Germany

Contact for privacy matters: [emil.huo+logiprivacy\[@\]gmail.com](mailto:emil.huo+logiprivacy[@]gmail.com)

Because Logi is currently operated by an individual sole proprietor, the person named above is personally the controller of your data under the General Data Protection Regulation (Regulation (EU) 2016/679, "**GDPR**").

Note on future change of controller. We intend, at a later stage, to transfer operation of Logi to a Swedish company (an *aktiebolag*). If and when that happens, the controller will change, and we will notify you and update this policy before the transfer takes effect.

We have not appointed a Data Protection Officer, as we are not required to under Article 37 GDPR. The contact above is the point of contact for all data-protection questions.

2. Scope

This policy explains what personal data we collect when you use the Logi mobile app and any associated website, why we collect it, the legal basis for processing it, who we share it with, how long we keep it, and the rights you have.

It does **not** cover third-party services you reach through Logi (for example, the app stores you download Logi from, or payment providers), which operate under their own privacy policies.

3. What data we collect and why

We collect only what we need to run the service. The table below is the authoritative summary; the sections that follow add detail.

Category	Examples	Why we process it	Legal basis (Art. 6 GDPR)
Account identity	Email address; password (stored only as a secure hash); display name; sign-in method (email, Google, or Apple)	Create and secure your account; authenticate you; contact you about the service	Performance of a contract (Art. 6(1)(b))
Home data	Street address; approximate geographic coordinates (latitude/longitude); year built; property type; size band; derived climate zone and jurisdiction	Provide the core service — tie maintenance schedules to your specific home and generate location-appropriate reminders	Performance of a contract (Art. 6(1)(b))
Household & property details	Property qualifiers you enter (e.g. whether you have a basement, number of bathrooms, roof type, whether you have a pool); the equipment/features you track and their install dates	Generate a personalised maintenance schedule tailored to your property	Performance of a contract (Art. 6(1)(b))
Maintenance activity	Reminders, custom reminder rules, and a log of maintenance tasks you record as completed	Track your maintenance history and drive future reminders	Performance of a contract (Art. 6(1)(b))
Notification preferences	Preferred reminder time;	Send reminders when you want them	Performance of a contract (Art. 6(1)(b))

Category	Examples	Why we process it	Legal basis (Art. 6 GDPR)
Subscription & payment status	time zone; digest settings Subscription tier and status; a payment-provider customer/subscription identifier	Manage paid subscriptions and billing	Performance of a contract (Art. 6(1)(b))
Usage & diagnostics	Product-analytics events (screens viewed, features used); crash reports and technical error data; device and app version information	Understand how the app is used, fix bugs, and improve the product	Legitimate interests (Art. 6(1)(f)) — to maintain and improve a reliable service
Support correspondence	Your email address and the content of messages you send us	Respond to your support requests	Legitimate interests (Art. 6(1)(f)) — to provide user support

3.1 A note on location data

To provide its core function, Logi stores the **address of your home** and its **approximate coordinates** (derived once, at the time you add a home, from the address you enter). This is treated as a form of location data and is one of the more sensitive items we hold. We use it only to:

- identify your home as a unique place,
- determine the correct climate zone and local jurisdiction so we can recommend the right maintenance tasks, and
- prevent duplicate records for the same address.

Logi does **not** track your device's live location. We do not access GPS, background location, or continuous location tracking.

3.2 Data you provide about others

If you invite another person to share a household with you, you provide us with information needed to send that invitation. Please only invite people you have a relationship with, and make sure they are content to be invited. Anyone invited has the same rights over their personal data as you do.

3.3 We do not knowingly collect special-category data

Logi is not designed to collect special categories of personal data (such as health, religion, or political views) as defined in Article 9 GDPR. Please do not enter such data into free-text fields.

4. Legal bases for processing

Under the GDPR we must have a lawful basis for each processing activity. We rely on:

- **Contract (Art. 6(1)(b))** — for everything necessary to provide the Logi service to you under our Terms & Conditions: your account, your home and maintenance data, reminders, and subscription management.
- **Legitimate interests (Art. 6(1)(f))** — for analytics, crash reporting, product improvement, service security, and responding to support requests. Where we rely on legitimate interests, we have considered your rights and interests and limited processing accordingly. You may object to this processing at any time (see Section 8).
- **Consent (Art. 6(1)(a))** — where we ask for it explicitly, for example for optional push notifications on your device. You can withdraw consent at any time, without affecting processing carried out before withdrawal.
- **Legal obligation (Art. 6(1)(c))** — where we must process data to comply with a legal duty (for example, keeping certain records for tax purposes in connection with paid subscriptions).

5. Who we share your data with (Processors and sub-processors)

We do not sell your personal data. We never share it for third-party advertising.

We use a small number of trusted service providers ("**processors**") who process data on our behalf, under contract, and only on our instructions. Each is bound by a data-processing agreement consistent with Article 28 GDPR.

Provider	What they do for Logi	Data involved	Processing location
Supabase	Hosts our database, user authentication, and backend functions — the core storage for your account, home, and maintenance data	All account, home, household, and maintenance data	European Union (Frankfurt, Germany)

Provider	What they do for Logi	Data involved	Processing location
PostHog	Product analytics and crash/error reporting	Usage events, crash and diagnostic data, a pseudonymous user identifier	European Union (Frankfurt) — PostHog EU Cloud
Google (Google Places / Geocoding API)	Address autocomplete and converting an address to coordinates when you add a home	The address text you search and the selected address	Google infrastructure (may include the United States)
Google (Firebase Cloud Messaging)	Delivers push notifications to your device	A device push token and the notification content	Google infrastructure (may include the United States)
Apple App Store / Google Play	Process in-app subscription purchases and billing	Purchase and subscription data. Logi never sees or stores your full card details	Provider infrastructure (may include the United States)
RevenueCat	Manages and validates subscription status across billing channels	Purchase and subscription identifiers and status; a pseudonymous app user identifier	RevenueCat infrastructure (United States)

We may also disclose personal data if required to do so by law, or to protect our rights, safety, or property, or those of our users.

If we later offer subscriptions purchased through our website, an additional payment processor (such as Stripe) will act as a processor for those payments, and this policy will be updated to describe it before that option becomes available.

6. International data transfers

We keep your core data within the European Union. Our primary database (Supabase) and our analytics (PostHog) are both hosted in the EU, in Frankfurt, Germany.

Some peripheral providers listed in Section 5 (notably Google, and certain payment providers) may process limited data outside the European Economic Area, including in the United States. Where personal data is transferred outside the EEA, we ensure an appropriate safeguard is in place under Chapter V of the GDPR — typically the European Commission's **Standard Contractual Clauses**, and/or the provider's certification under the **EU–U.S. Data Privacy Framework** where applicable.

You can request more information about these safeguards using the contact details in Section 1.

7. How long we keep your data (Retention)

We keep personal data only as long as necessary for the purposes described in this policy.

- **Account and service data** — retained while your account is active.
- **After account deletion** — when you delete your account, we delete or irreversibly anonymise your personal data within **30 days**, except where we must retain certain records to comply with a legal obligation. In particular, invoicing and tax records related to paid subscriptions are retained for the period required by German commercial and tax law (generally up to 10 years).
- **Analytics and diagnostic data** — retained for **12 months** and then deleted or aggregated into non-identifying statistics.
- **Support correspondence** — retained for as long as needed to resolve your request and for a reasonable period afterwards.

Because Logi keeps a local copy of your data on your device for offline use, deleting the app or your account will also clear that local copy from the device.

8. Your rights

Under the GDPR you have the following rights over your personal data. We will respond to any request within one month.

- **Right of access (Art. 15)** — obtain a copy of the personal data we hold about you.
- **Right to rectification (Art. 16)** — correct inaccurate or incomplete data. Most of this you can do directly in the app.
- **Right to erasure (Art. 17)** — ask us to delete your data ("right to be forgotten").
- **Right to restriction (Art. 18)** — ask us to limit how we process your data in certain circumstances.
- **Right to data portability (Art. 20)** — receive your data in a structured, commonly used, machine-readable format, or have it transmitted to another controller where technically feasible.
- **Right to object (Art. 21)** — object to processing based on our legitimate interests, including analytics.

- **Right to withdraw consent (Art. 7)** — where we rely on consent, withdraw it at any time.

How to exercise your rights. You can request account deletion and submit other data requests through our deletion request form at <https://logi-app.webflow.com> (also reachable from within the app), or by emailing us at [emil.huo+logiprivacy\[@\]gmail.com](mailto:emil.huo+logiprivacy[@]gmail.com). We may need to verify your identity before acting on a request.

Right to complain. If you believe we have handled your data unlawfully, you have the right to lodge a complaint with a supervisory authority. As we are based in Berlin, the competent authority is:

Berliner Beauftragte für Datenschutz und Informationsfreiheit (BlnBDI)
Alt-Moabit 59–61 10555 Berlin, Germany Email: mailbox@datenschutz-berlin.de
Tel: +49 30 13889-0 Website: <https://www.datenschutz-berlin.de>

You may also complain to the supervisory authority in your own country of residence.

9. How we protect your data

We take appropriate technical and organisational measures to protect your data, including:

- encryption of data in transit (HTTPS/TLS),
- encrypted storage of session tokens on your device,
- row-level access controls in our database so that each user and household can only access their own data,
- restricted administrative access, and
- separation of payment-card handling — card details are handled entirely by the payment provider and are never stored by Logi.

No system is perfectly secure, but we work to protect your information and to address vulnerabilities promptly.

10. Children

Logi is not intended for children under **13**, and you must be at least 13 to create an account. We do not knowingly collect personal data from children under 13.

Where local law sets a higher age of digital consent (in parts of the EU this is **16**), users below that age should only use Logi with the consent of a parent or guardian, as required by their local law.

If you believe a child has provided us with personal data, please contact us and we will delete it.

11. Automated decision-making

Logi generates maintenance reminders automatically based on your home's characteristics and the tasks you track. This helps schedule maintenance, but it does not produce legal or similarly significant effects about you within the meaning of Article 22 GDPR. We do not use your data for profiling that affects your legal rights.

12. Changes to this policy

We may update this policy from time to time. If we make material changes, we will notify you through the app or by email before the changes take effect. The "Last updated" date at the top shows when this policy was last revised.

13. Contact

For any question about this policy or your personal data:

Per Emil Kristian Huovinen [emil.huo+logiprivacy\[@\]gmail.com](mailto:emil.huo+logiprivacy[@]gmail.com) Saarbrücker Str., 10405 Berlin, Germany