

PRIVACY POLICY

Effective Date: April __, 2026

Last Updated: April __, 2026

This Privacy Policy explains how (Company name) (registered in Bali, Indonesia) ("we", "our", or "us") collects, uses, discloses, and protects information about you when you use the (App name) mobile application (the "App"). We are committed to protecting your privacy in accordance with applicable data protection laws, including the Indonesian Personal Data Protection Law (UU PDP No. 27/2022), and, to the extent applicable, the General Data Protection Regulation (GDPR) and other relevant international standards.

Please read this policy carefully. By downloading, installing, or using the App, you agree to the practices described herein. If you do not agree, please do not use the App.

1. About Us & Data Controller

The App is operated by (Company Name), registered in Bali, Indonesia. (Company Name) acts as the Data Controller, determining the purposes and means of processing your personal data in accordance with Indonesian UU PDP No. 27/2022 and GDPR.

For any privacy-related inquiries, exercise of your rights, or to reach our legal team, please contact: (email address).

2. Scope and Applicability

This Policy applies to all users of the App regardless of geographic location. Our primary user base is global, and we endeavor to comply with applicable data protection laws in the jurisdictions where our users reside, including but not limited to:

Indonesia: UU PDP No. 27/2022 (Personal Data Protection Law);

European Union / EEA: General Data Protection Regulation (GDPR);

United Kingdom: UK GDPR and Data Protection Act 2018;

United States: California Consumer Privacy Act (CCPA) where applicable;

Other jurisdictions: We apply reasonable data protection standards globally.

3. Information We Collect

3.1 Information You Provide Through Sign-In

The App uses third-party authentication services (Apple Sign-In and Google Sign-In). When you log in, we receive only the minimum information provided by those services, which typically includes:

A unique, pseudonymous user identifier (UID) assigned by Apple or Google (we do not store your original Apple ID or Google account handle);

Your email address (which Apple may relay or hide depending on your privacy settings);

Your display name (if you choose to share it).

We do NOT receive your Apple ID or Google account password. We do NOT have access to other data stored in your Apple or Google account.

3.2 Subscription and Payment Information

All subscription purchases are processed exclusively through Apple App Store (in-app purchases) or Google Play Store. We do NOT collect, store, or process your payment card details. We receive only:

Confirmation of subscription status (active, expired, cancelled);

Subscription tier (Free or Pro);

Transaction identifiers provided by Apple or Google for customer support purposes.

Apple and Google's respective privacy policies govern the processing of your payment information.

3.3 Usage and Analytics Data

We use standard mobile analytics tools (such as Firebase Analytics or equivalent) that automatically collect limited technical and behavioral data, including:

Device type, operating system version, and app version;

App screens visited, features used, and session duration;

Crash reports and error logs;

General geographic region (country-level only, derived from IP address);

IP address (used for analytics and security; not stored long-term in user profiles).

This data is aggregated and used solely to improve the App's performance and user experience. We do not use it to build individual behavioral profiles for advertising purposes.

3.4 Notification Preferences

If you grant permission, the App may send you push notifications related to App updates or surf conditions. You may withdraw notification permissions at any time through your device settings. We store only whether you have opted in or out of notifications, we do not store the content of any notifications.

3.5 Information We Do NOT Collect

We explicitly do NOT request access to, collect, or store the following:

Your precise or approximate GPS location or geolocation data;

Access to your device camera or microphone;

Access to your photo library or files;

Contacts, calendar, or any other device data;

Sensitive personal data such as health information, biometrics, race, religion, or political opinions;

Data from users known to be under the age of 18.

4. How We Use Your Information

We use the information we collect for the following purposes:

Account authentication and management: to create and maintain your account using Apple or Google Sign-In credentials;

Subscription management: to verify and display your subscription status within the App;

App functionality: to provide access to surf spot data and decision-support features according to your subscription tier;

Push notifications: to send relevant updates if you have granted permission;

Analytics and improvement: to understand how users interact with the App and to improve its features, performance, and content;

Security and fraud prevention: to detect and prevent unauthorized access or abuse of the App;

Legal compliance: to meet our obligations under applicable laws.

We do NOT use your data for targeted advertising, cross-app tracking, or sale to third parties.

5. Legal Basis for Processing (GDPR)

For users in the European Economic Area (EEA) and UK, our legal bases for processing personal data are:

Contract performance: processing necessary to provide the App services you have subscribed to (Art. 6(1)(b) GDPR);

Legitimate interests: analytics to improve the App, security monitoring, and fraud prevention, where your fundamental rights do not override these interests (Art. 6(1)(f) GDPR);

Consent: sending push notifications, which you may withdraw at any time (Art. 6(1)(a) GDPR);

Legal obligation: complying with applicable laws and regulations (Art. 6(1)(c) GDPR).

6. Sharing of Information

We do not sell or rent your personal data. To operate the App, we use trusted service providers (data processors), including but not limited to:

Firebase (Google LLC) — for cloud hosting, database management, and analytics;

Apple and Google — for user authentication and subscription infrastructure.

These providers process data only on our behalf under contractual safeguards. We may also disclose data if required by law or to protect our legal rights.

7. International Data Transfers

As a company registered in Indonesia serving global users, your data may be processed and stored on servers located outside your country of residence. Where we transfer personal data from the EEA, UK, or other jurisdictions with data transfer restrictions, we implement appropriate safeguards in accordance with applicable law (e.g., Standard Contractual Clauses under GDPR).

We guarantee that any international transfer of personal data is conducted only to jurisdictions or recipients that ensure a level of protection at least equivalent to the standards provided under UU PDP No. 27/2022.

8. Representative in the European Union

As (App Name) is established outside the European Economic Area (EEA) and offers services to users within the EU/EEA, we acknowledge our obligations under Article 27 of the GDPR.

All privacy inquiries from EU/EEA residents are handled directly by our legal team at (email address). We are evaluating the appointment of a formal EU Representative as our user base grows. In the interim, our direct contact point remains fully operational and responsive within the timeframes required by GDPR.

9. Data Retention

We retain your personal data only for as long as necessary to fulfill the purposes described in this Policy:

Account data: retained for the duration of your active account and for a reasonable period thereafter to resolve disputes or comply with legal obligations;

Analytics data: retained in aggregated or anonymized form; device-level data is typically retained for up to 24 months;

Payment and subscription records: retained as required by applicable tax and commercial laws (typically up to 7 years under Indonesian law).

Upon account deletion, we will delete or anonymize your personal data within 30 days, except where retention is required by law.

10. Your Rights

Depending on your jurisdiction, you may have the following rights regarding your personal data:

10.1 Rights Under Indonesian PDP Law (UU PDP)

Right to request information about the personal data we hold about you

Right to request correction of inaccurate data

Right to request deletion of your personal data

Right to withdraw consent to processing

Right to Withdraw Consent: You may withdraw your consent at any time. Upon receiving such a request, we will stop processing your data within 3 business days, unless retention is required for legal or contractual purposes.

*Response Time: We will respond to and fulfill your requests regarding your data rights (access, correction, or deletion) within 30 days of receiving a verified request.

10.2 Rights Under GDPR (EEA/UK Users)

Right of access (Art. 15);

Right to rectification (Art. 16);

Right to erasure / 'right to be forgotten' (Art. 17);

Right to restriction of processing (Art. 18);

Right to data portability (Art. 20);

Right to object to processing (Art. 21);

Right to lodge a complaint with a supervisory authority.

10.3 Rights Under CCPA (California Users)

Right to know what personal information is collected, used, shared, or sold;

Right to delete personal information;

Right to opt-out of sale of personal information (note: we do not sell personal information);

Right to non-discrimination for exercising your rights.

To exercise any of your rights, please contact us at email. We will respond within the timeframe required by applicable law (generally within 30 days).

11. Age Limitations

The App is strictly intended for users aged 18 and older (or the age of legal majority in their jurisdiction). We do not knowingly collect personal data from individuals under 18. Our content is designed for experienced adult surfers.

If we become aware that we have inadvertently collected personal data from an individual under 18, we will promptly delete such data. If you believe a minor has provided us with data, please contact us at (email address).

12. Security

We implement appropriate technical and organizational security measures to protect your personal data against unauthorized access, alteration, disclosure, or destruction. These measures include encryption in transit (TLS), access controls, and regular security reviews. However, no method of transmission over the internet or electronic storage is 100% secure, and we cannot guarantee absolute security.

12.1 Data Breach Notification

In accordance with UU PDP No. 27/2022, in the event of a personal data breach, we will provide written notification within 72 hours to the affected Users and the relevant Indonesian Data Protection Authority.

13. Third-Party Interactions

The App provides information about Local Partners (e.g., guides or photographers). When you interact with them through third-party communication services or external links (e.g., messaging apps or email clients), you do so directly. The App only displays partner information; it does not share your user profile or personal data with these partners. Any information exchange is subject to the partner's own privacy policy and practices.

14. Changes to This Privacy Policy

We may update this Privacy Policy from time to time. When we do, we will revise the "Last Updated" date at the top of this Policy and notify you through the App or via the email address associated with your account. Your continued use of the App after the effective date of the revised Policy constitutes your acceptance of the changes.

We encourage you to review this Policy periodically.

15. Contact Us

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

Email: (email address)

Company: (Company Name) (registered in Bali, Indonesia)

We are committed to resolving complaints and disputes related to your privacy and our collection or use of your personal data. Indonesian users may also contact the National Data Protection Commission (Komisi Informasi Pusat) if their concerns are not resolved.

Indonesian users may also lodge formal complaints regarding our data practices with the Ministry of Communication and Informatics (KOMINFO) or the established Data Protection Authority of the Republic of Indonesia.

This Privacy Policy was prepared in accordance with Indonesian UU PDP No. 27/2022, GDPR, and international best practices.

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