

Privacy Policy

What personal data the CITIZEN app collects, why it is collected, who it is shared with, and what you can do about it.

Last updated **8 August 2026** Applies to **CITIZEN for iOS** Controller based in **Georgia (Sakartvelo)**

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Disclaimer

Citizen is an independent preparation platform.

The app is not an official resource and is not affiliated with, endorsed or sponsored by the Government of Georgia or any of its state bodies.

All materials are provided for informational purposes only, do not replace official sources and do not guarantee any exam result.

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What we do not do

Most privacy policies are written to cover everything a product might one day do. It is worth stating plainly what CITIZEN does *not* do:

- We do not show advertising and we work with no advertising networks.
- We do not use any analytics or tracking SDK. The app contains none.
- We do not track you across other apps or websites, and we do not ask for the App Tracking Transparency permission.
- We do not use cookies or web beacons. The app has no embedded browser.
- We do not sell, rent or trade your personal data. Ever.
- We do not collect your location.
- We do not read your address book, call history, messages, photo library, microphone or camera.
- We never see or store your payment card details.
- We do not send marketing email or newsletters.

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What we collect and why

3.1 Data you give us

DATA	WHEN	WHY WE NEED IT	LEGAL BASIS
Email address	When you create an account	To identify your account, send a sign-up confirmation code and let you reset your password	Contract
Password	When you register with email	To secure your account. Stored only as a salted cryptographic hash — we cannot read it	Contract
Nickname	You choose it, changeable any time	To label your profile and your row in the leaderboard	Contract
Profile picture	Only if you pick one from your photo library	Shown beside your nickname in your profile and the leaderboard	Consent
Mood emoji	Only if you choose one	Shown beside your leaderboard entry	Consent
Interface language	When you change it in Settings	To keep the app in your language on all your devices	Contract

3.2 Data created by using the app

DATA	WHAT IT CONTAINS	WHY WE NEED IT	LEGAL BASIS
Learning progress	Which questions you answered and how, your mistakes, saved questions and folders, per-topic statistics	To keep your progress when you reinstall the app or sign in on another device	Contract
Score	A single number earned by answering questions	To rank you in the leaderboard	Contract
Subscription status	Whether a subscription is active and when it expires	To unlock premium features on every device you sign in on	Contract
Session data	Authentication tokens stored on your device	So you stay signed in between launches	Contract
Technical connection data	IP address, timestamps and request logs recorded by our hosting provider	Security, abuse prevention, diagnosing failures	Legitimate interest

3.3 Sign in with Apple

If you sign in with Apple, Apple sends us your Apple ID email address and, on first sign-in only, the name on your Apple ID, which we use to pre-fill your nickname. You may choose Apple's *Hide My Email* option, in which case we receive a relay address instead of your real one and never learn your real address.

3.4 Purchases

Subscriptions are purchased and processed by Apple. Your card, billing address and Apple ID password are handled entirely by Apple and are never transmitted to us. We receive from our subscription provider only an anonymous purchase identifier and the status and expiry date of your subscription.

3.5 Access to your device's address book

The app contains a directory of useful contacts — lawyers, translators, language courses. If you tap "save to contacts", iOS asks for permission and the app writes that one contact card into your address book.

We use this permission **only to add a card**. The app never reads, uploads, copies or analyses your existing contacts, and no data from your address book ever leaves your device.

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What other users can see

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What other users can see

The leaderboard is public to everyone using the app. Your entry shows:

- your nickname;
- your profile picture, if you set one;
- your mood emoji, if you set one;
- your score and your overall progress as a percentage;
- whether you have an active subscription.

Nothing else is shared with other users. Your email address, your answers and your individual mistakes are never visible to anyone but you.

If you would rather not be identifiable there, choose a nickname that is not your real name and do not add a photo.

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Where your data is stored

Your account data — your profile, your learning progress and your profile picture — is stored on Supabase infrastructure in **West EU (Ireland), region eu-west-1**, inside the European Union.

For users in the European Economic Area this means the database holding your data does not leave the EEA.

Some of our other providers are established outside the EEA — Apple, RevenueCat and Resend are United States companies. Where personal data reaches them, the transfer is covered by those providers' Data Processing Agreements and by the European Commission's Standard Contractual Clauses.

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How long we keep it

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How long we keep it

- **While your account exists** — we keep your account data for as long as the account is open, because the whole purpose of the account is to preserve your progress.
- **When you delete your account** — your profile, learning progress, score, leaderboard entry and profile picture are erased immediately and permanently. We keep no archived copies of deleted accounts.
- **Purchase records** — Apple and RevenueCat retain transaction records under their own policies and applicable accounting law, independently of us.
- **Server logs** — retained for a short period for security purposes and then discarded.

You can delete your account yourself at any time, inside the app: **Settings → Account → Delete account**. No email to us is required, and the deletion is permanent.

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Data kept on your device

The app stores data locally on your iPhone so that it works offline: your settings, your learning progress, downloaded questions, images and audio, and your authentication tokens. This data never leaves your device except as described in this policy, and all of it is removed when you delete the app.

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Security

All communication between the app and our servers uses HTTPS. Passwords are stored only as salted hashes. Access to the database is restricted by row-level security rules, so one account cannot read another account's data. Administrative access is limited to the developer.

No system is perfectly secure, and we cannot guarantee absolute security. If a breach ever affects your personal data and creates a risk to you, we will notify you and the competent supervisory authority as the law requires.

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Your rights

Wherever you live, you may ask us to:

- **Access** the personal data we hold about you and receive a copy of it;
- **Correct** anything inaccurate — your nickname, picture, mood and language can also be changed directly in the app at any time;
- **Delete** your data — available immediately in the app, as described in section 7;
- **Restrict or object** to processing based on our legitimate interests;
- **Receive your data** in a portable, machine-readable format;
- **Withdraw consent** where processing is based on consent, such as your profile picture or mood, by removing them in the app.

To exercise any of these rights, email mikhail.bukhrashvili@gmail.com. We will respond within one month. We may need to verify that the request comes from the account holder before we act on it. Exercising your rights is free, and we will never treat you differently for doing so.

If you are in the European Economic Area or the United Kingdom and you believe we have mishandled your data, you also have the right to lodge a complaint with your national data protection supervisory authority. If you are in Georgia, the competent authority is the Personal Data Protection Service of Georgia.

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California residents

Under the California Consumer Privacy Act (CCPA/CPRA) and the California Online Privacy Protection Act (CalOPPA), California residents have the right to know what personal information is collected and how it is used, to request its deletion, to correct it, and not to be discriminated against for exercising those rights. Sections 3 to 7 set out this information for all users.

We do not sell or share your personal information as those terms are defined under California law, and we have not done so in the preceding twelve months. We therefore do not offer a "Do Not Sell or Share My Personal Information" mechanism, because there is nothing to opt out of.

Requests may be sent to mikhail.bukhrashvili@gmail.com.

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Children

CITIZEN is not directed at children under 13, and we do not knowingly collect personal data from them. If you are a parent or guardian and believe your child has created an account, write to us and we will delete the account and its data.

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Links to other services

The app contains links to outside resources, and the contacts directory includes phone numbers, websites and social media profiles of third parties. Once you leave the app, this policy no longer applies. We do not control those services and are not responsible for their content or their privacy practices.

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Changes to this policy

We may update this policy as the app changes. The date on the first page always shows the current version. If a change materially affects how we use your personal data, we will tell you in the app before it takes effect. Continuing to use CITIZEN after that means you accept the updated policy; if you do not, you can delete your account.

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Governing law

This policy is governed by the law of Georgia (Sakartvelo). Nothing in it removes any right you have under the mandatory consumer or data protection law of the country where you live.

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Contact

Questions, requests or complaints about this policy or about your data:

mikhail.bukhrashvili@gmail.com

Developer: ge-developer.tilda.ws

We answer every message, and within one month at the latest.