

Privacy Policy

Effective Date: 7 October 2026

This Privacy Policy explains how Dzhamanbaev Maksim ("we", "us", "our") collects, uses, stores, and shares personal data when you use the Punklex language-learning application and related services (the "Service"). This Policy is intended to comply with the General Data Protection Regulation (EU) 2016/679 ("GDPR") and other applicable data-protection laws.

1. Data Controller

The controller responsible for personal data processed through Punklex is:

- Provider: Dzhamanbaev Maksim
- Legal status: Individual service provider
- Address: Rua Dr. Paolo Pombo 82, 5.3, 4250-363 Porto, Portugal
- Privacy contact email: support@punklex.app

2. Personal Data We Process

We process only data reasonably necessary to provide, secure, maintain, and improve Punklex. The exact categories depend on the features you use.

2.1 Account and Authentication Data

We may process your email address, user identifier, authentication credentials or authentication tokens, and information provided by a supported sign-in provider.

Purpose: account creation, authentication, account security, and access management. Primary legal basis: performance of a contract under GDPR Article 6(1)(b), and where applicable our legitimate interests in protecting the Service under Article 6(1)(f).

2.2 Profile and Learning Data

We may process information such as your native language, target language, proficiency level, vocabulary lists, dictionaries, answers, exercise results, spaced-repetition state, learning progress, preferences, streak or activity information, and other settings you choose to provide.

Purpose: to provide and personalize the learning Service, synchronize progress, generate exercises, and maintain your learning history. Primary legal basis: performance of a contract under GDPR Article 6(1)(b).

2.3 User Inputs and AI Processing

Some Punklex features may use artificial-intelligence systems to generate, evaluate, translate, explain, or otherwise process language-learning content. Depending on the feature, text you submit, answers, prompts, conversation content, or other learning inputs may be transmitted to third-party AI service providers acting on our behalf.

AI providers currently used: OpenRouter. The underlying AI model provider may vary depending on the model selected for a particular request.

Purpose: to generate exercises, evaluate language-learning responses, provide explanations, and support AI-assisted learning features. Primary legal basis: performance of a contract under GDPR Article 6(1)(b).

We do not authorize third-party AI providers to use personal data for purposes unrelated to providing the requested service on our behalf, except where their own independent processing is disclosed and legally permitted.

2.4 Technical, Diagnostic, and Crash Data

We may process app version, operating system, device model, installation or device identifiers, crash reports, stack traces, performance information, and diagnostic logs.

Services used: no dedicated crash-reporting service is currently listed for production. If one is added, this Policy will be updated before release or use.

2.5 Analytics Data

Punklex records limited product-usage events that are linked to the user's Firebase UID/profile. These events may include feature usage, learning-flow events, app interactions, and related operational metadata used to understand how the Service is used and to improve learning features.

Analytics/event processing: Punklex records limited product-usage events associated with the user's Firebase UID/profile. Because these events can be linked to an account identifier, we treat them as personal data and do not describe them as anonymous. Non-essential analytics or measurement that involves access to or storage of information on a user's device will be activated only where the required consent has been obtained. Refusing or withdrawing consent to non-essential analytics will not prevent access to core paid or free learning functionality.

2.6 Push Notifications

If you enable push notifications, we may process push-notification tokens, notification preferences, device or app identifiers necessary for delivery, and message delivery status information.

Push notifications are delivered using Firebase Cloud Messaging (FCM) on Android and Apple Push Notification service (APNs) on iOS. Where Firebase Messaging is used on iOS, FCM operates in conjunction with APNs to deliver notifications to Apple devices.

2.7 Subscription and Purchase Information

Purchases and subscriptions made through Apple App Store or Google Play are processed by the relevant platform. We may receive limited transaction information such as subscription status, product identifier, entitlement status, transaction identifier, and purchase or expiry information. We do not normally receive your full payment-card details from the app store.

3. Children and Age Requirements

Punklex is intended for users aged 16 and older. Users under 16 may not create an account or use the Service.

We do not knowingly collect personal data from children in circumstances where such collection is prohibited. If you believe a child has provided data unlawfully, contact us at support@punklex.app.

4. SDKs and Consent Choices

The mobile application may use software development kits ("SDKs") for authentication, diagnostics, analytics, notifications, purchases, or similar functions. Where consent is required by applicable law, optional analytics or similar tracking technologies will not be activated until the required consent has been obtained.

You can withdraw or modify consent through Settings → Privacy, where applicable where available. Withdrawal does not affect processing that was lawful before consent was withdrawn.

4.1 Public Profiles and Shared Learning Content

Punklex does not provide direct user-to-user messaging or comments. User interaction is limited to sharing learning materials such as vocabulary collections, word lists, and exercises.

A randomly generated pseudonymous display name may be shown with shared learning content. Other users are not shown your email address, Google or Apple sign-in identity, Firebase UID, or other private account details.

Although the public display name is pseudonymous, shared content may remain internally associated with your account identifier for purposes such as ownership, moderation, abuse prevention, security, synchronization, and deletion requests.

If shared content is reported or reasonably suspected to violate these Terms, applicable law, or third-party rights, we may review, restrict, or remove that content and may use the internal account association to investigate the issue.

5. Data Processors and Third-Party Services

Depending on the final production configuration, third-party service providers may include:

- Google / Firebase — Firebase Authentication and Firebase-linked product event processing associated with the user's Firebase UID/profile.
- Hosting / database provider — Oracle Cloud Infrastructure, Frankfurt region (Germany), hosting the Rust/Axum/PostgreSQL backend.
- AI provider(s) — OpenRouter and the underlying model provider selected for a particular request.
- Apple App Store and Google Play — application distribution, purchase processing, and subscription management.

We require processors to protect personal data in accordance with applicable data-protection law and, where required, appropriate data-processing terms.

6. International Data Transfers

Some service providers may process or allow access to personal data outside the European Economic Area ("EEA"). Where required, we use legally recognized safeguards for international transfers, which may include an adequacy decision, the EU-U.S. Data Privacy Framework where applicable, or Standard Contractual Clauses approved by the European Commission together with supplementary measures where appropriate.

7. Data Retention

We retain personal data only for as long as reasonably necessary for the purposes described in this Policy, including providing the Service, maintaining security, complying with legal obligations, resolving disputes, and enforcing agreements.

- Account and learning data: generally retained while your account remains active and deleted or anonymized after account deletion, subject to legal retention requirements.
- Account deletion target: deletion is initiated promptly after a verified request. Account data is targeted for deletion from active systems without undue delay and in any event within 30 days, subject to lawful retention requirements and limited backup cycles.
- Firebase-linked product event data: retained only for as long as reasonably necessary for product operation and improvement and according to the configured Firebase retention settings. The final configured retention period will be documented before public release.
- Crash and diagnostic data: no dedicated crash-reporting service is currently listed for production. If introduced, its retention period will be documented here.
- Transaction and legally required records may be retained for longer where required by tax, accounting, fraud-prevention, dispute-resolution, or other law.

8. Account and Data Deletion

You may request deletion of your Punklex account:

- (a) inside the application at Settings → Account → Delete Account;
- (b) through <https://punklex.app/delete-account>;
- (c) by contacting us at support@punklex.app.

After a verified deletion request, we delete or anonymize personal data associated with the account within the stated deletion period, except data that we are required or permitted to retain for legal, tax, security, fraud-prevention, dispute-resolution, or similar legitimate purposes.

Deleting the Punklex account does not automatically cancel a subscription managed by Apple or Google. Subscriptions must be managed through the applicable app-store account.

9. Your Rights

Subject to the conditions and limitations in applicable law, you may have the right to:

- access your personal data;
- correct inaccurate or incomplete data;
- request erasure of personal data;
- request restriction of processing;
- receive certain data in a structured, commonly used, machine-readable format and transmit it to another controller;
- object to processing based on legitimate interests;
- withdraw consent at any time where processing is based on consent;
- lodge a complaint with a competent data-protection authority.

If you are in Portugal, the competent supervisory authority is the Comissão Nacional de Proteção de Dados (CNPD). You may also be entitled to complain to another competent supervisory authority depending on your habitual residence, place of work, or the place of the alleged infringement.

To exercise your rights, contact support@punklex.app. We may need to verify your identity before fulfilling a request.

10. Security

We use technical and organizational measures appropriate to the nature and risk of the processing, including measures designed to protect data in transit, restrict access to production systems, secure authentication, protect infrastructure, and monitor relevant security and diagnostic events. No system can guarantee absolute security.

11. Changes to This Privacy Policy

We may update this Privacy Policy when our Service, technology, legal obligations, or processing practices change. We will make the current version available through the Service or our website and, where required, provide additional notice of material changes.

12. Data Minimization and Sensitive Information

Punklex is designed as a language-learning service and does not require users to provide special-category personal data such as health information, biometric data used for identification, political opinions, religious beliefs, or similar sensitive information.

Users should avoid entering confidential, highly sensitive, or unnecessary personal information into free-text or AI-assisted features. If such information is voluntarily submitted, it may be processed to provide the requested feature, subject to applicable law.

We seek to limit logs, analytics events, and AI payloads to information reasonably necessary for the relevant purpose and to avoid including account details in AI prompts unless required for the requested feature.

13. Contact

- Data Controller: Dzhamanbaev Maksim
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- Support email: support@punklex.app