Privacy Policy (GDPR Compliant)

Last updated: 21/12/2025

1. Data Controller

Data controller: **Samuel Ríos Carlos**
Postal address: **Calle Gas 11, Cádiz, España, 11008**
Email: **srios@exet.es**

2. Data Collected

We collect the following data during account creation and use:

- Email address.
- Alias or username selected by the user.
- Hashed password (bcrypt).
- History of transactional emails sent (e.g., account activation).
- Usage data collected via Google Analytics (e.g., page visits, session duration, device type), only if consent is given.
- Interaction with Ko-fi donation buttons (e.g., donation confirmation, Ko-fi user ID), only if the user chooses to donate.

We do not collect IP addresses directly; Google Analytics and Ko-fi may collect IPs according to their own privacy policies.

3. Purpose of Processing

The data collected is used to:

- Create and manage user accounts.
- Provide access to the App.
- Send transactional emails (account activation, future password recovery).
- Communicate essential service-related information.
- Analyze website traffic and usage patterns (via Google Analytics).
- Process donations via Ko-fi.

4. Legal Basis

- **Contract performance** (use of the App).
- **Consent** (voluntary registration, analytics, donations).

5. Data Recipients

We do not share user data with third parties, except with service providers acting as data processors:

- Hosting provider: **IONOS (Spain)**.
- DNS/CDN provider: **Cloudflare (EU/USA, SCCs)**.
- Email service via SMTP (**IONOS**).
- Analytics: **Google LLC (EU/USA, SCCs)**.
- Donation processing: **Ko-fi (EU/Global)**.

All processors operate under GDPR-compliant conditions.

6. Cookies

Exet uses cookies as follows:

- **Technical session cookies**: required for authentication, no consent needed.
- **Analytics cookies (Google Analytics)**: used to analyze website traffic, only set if user consents via Cookiebot.
- **Donation cookies (Ko-fi)**: used when interacting with Ko-fi donation buttons, only set if user chooses to donate.

7. Data Retention

- User account data is retained while the account is active.
- Upon deletion, all personal data and usage data are permanently removed.
- Analytics data is anonymized or aggregated according to Google's settings.
- A record of transactional emails may be retained for legal and audit purposes.

8. User Rights

Users may exercise their rights to:

- Access.
- Rectification.
- Erasure.
- Restriction.
- Objection.
- Data portability (when available).

To exercise any right, contact: **admin@exet.es**

9. Security Measures

We implement appropriate technical and organizational measures, including:

- Bcrypt password hashing
- Encrypted connections (HTTPS)
- Built-in Spring Boot Security mechanisms

10. International Transfers

- Cloudflare and Google may process data outside the EU under Standard Contractual Clauses.
- Ko-fi may process data outside the EU according to its privacy policy.
- No other international transfers are performed.