

RoomCraft AI Privacy Policy

Effective Date: October 1, 2025 Last Updated: September 29, 2025

This Privacy Policy describes how Ramos Tech ("Company," "we," "us," or "our"), the provider of the RoomCraft AI mobile application ("App" or "Service"), collects, uses, processes, and shares personal data from our users globally, with specific attention to the rights of individuals in the European Union (EU), United States (US), Canada, and Brazil.

1. Data Controller Information

Data Controller: Ramos Tech

Contact Email for Privacy Matters: support@roomcraft.io

2. Personal Data We Collect

We collect information that identifies, relates to, describes, or is reasonably capable of being associated with you ("Personal Data").

A. Data You Provide Directly

Category of Data	Specific Data Points	Purpose of Collection
Account & Identity Data	Name, Email address, User ID.	To create, maintain, and secure your account; to communicate with you about your subscription.
User Content (Input)	Photographs of rooms/interiors, text prompts, reference images, and stylistic inputs. NOTE: This data is essential for the core function of the App.	To process the images using the AI model and generate the requested Output.

Transactional Data	Subscription level, transaction identifiers, payment dates. NOTE: We do not store full payment card details; this data is handled by the Apple App Store.	To process payments, manage subscriptions, and provide billing support.
Support Data	Information you provide when contacting customer support.	To respond to your inquiries and improve customer service.

B. Data Collected Automatically

Category of Data	Specific Data Points	Purpose of Collection
Technical/Device Data	IP address, device ID, operating system version, app version, language settings.	For security (fraud prevention), troubleshooting, and compliance reporting.
Usage Data	Features used, time spent in the app, frequency of generations, crash reports, error logs.	To analyze usage patterns, optimize app performance, and inform product development.
Location Data	General, non-precise location (derived from IP address).	To ensure regional compliance (e.g., GDPR, LGPD) and localize content/pricing.

3. How We Use Your Personal Data (Legal Basis)

We rely on specific legal grounds for processing Personal Data, particularly for users protected by GDPR and LGPD.

Processing Activity	Legal Basis (GDPR/LGPD)	Description
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Service Delivery	Contractual Necessity	Processing User Content (Input) and Account Data to fulfill our commitment to provide the Service (generate images).
Subscription Management	Contractual Necessity	Processing Transactional Data to manage payments, billing, and subscription status.
Security & Compliance	Legal Obligation	Processing Technical Data to prevent fraud, ensure platform security, and respond to legal requests or regulatory requirements.
Product Improvement	Legitimate Interest	Processing anonymized or aggregated Usage Data to understand user behavior and improve the AI models and App features.
Marketing Communications	Consent or Legitimate Interest	Sending marketing emails about new features, where permitted by local law (e.g., using existing customer relationships).

4. How We Share Your Personal Data (Third Parties)

We share your Personal Data with third-party service providers essential for operating the App.

Third-Party Recipient	Data Shared	Purpose	Cross-Border Transfer
Google Gemini API (AI Service)	User Content (Input photos/prompts), Usage Data (generation requests).	To process the generative AI requests and produce the Output images. NOTE: Your Input is disconnected from your direct identity prior to being processed by the AI model.	Yes (primarily US)

Cloudflare R2 (Storage)	User Content (Input/Output images), Encrypted App Data.	Secure object storage for user-generated content and data backups.	Yes (Global/US)
Render.com (Backend/Hosting)	Account Data, Database records (Postgres/Redis), Usage Data.	Hosting and scaling our application backend, databases, and APIs.	Yes (US/Europe)
Apple App Store	Transactional Data, Subscription Status.	Payment processing and managing the subscription relationship between you and Apple.	Yes (Global)
Analytics Providers	Technical Data, Aggregated Usage Data.	To measure app performance and user engagement.	Yes (Global)

AI Data Usage Disclosure: We do not use the specific **Input photos and prompts** you submit for AI training unless we notify you and obtain your explicit consent, or unless the data is fully anonymized and aggregated for general model improvement.

5. Global Privacy Rights and Choices

Depending on your location, you may have the following rights regarding your Personal Data. To exercise any of these rights, please contact us at [\[privacy@roomcraftai.com\]](mailto:privacy@roomcraftai.com).

A. Rights for EU and Brazil Residents (GDPR & LGPD)

Right	Description	Processing Period
Right to Access	You have the right to confirm if we are processing your data and receive a copy of that data.	Respond within 30 days (GDPR) / 15 days (LGPD).

Right to Correction/Rectification	You can request that we update or correct any incomplete or inaccurate data we hold about you.	
Right to Erasure ("Right to be Forgotten")	You can request the deletion of your Personal Data, subject to certain legal exceptions (e.g., financial record retention).	
Right to Portability	You have the right to receive your Personal Data in a structured, commonly used, and machine-readable format.	
Right to Object/Withdraw Consent	You can object to processing based on legitimate interest or withdraw previously given consent at any time.	

B. Rights for US Residents (CCPA/CPRA, etc.)

Right	Description	Data Sale/Sharing
Right to Know	You have the right to request the specific pieces of Personal Data and categories of data we have collected about you.	We DO NOT sell or share your Personal Data (such as photos, prompts, or emails) with third parties for cross-context behavioral advertising or monetary consideration.
Right to Delete	You can request the deletion of your Personal Data, subject to legal exceptions.	
Right to Opt-Out	Since we do not sell or share your Personal Data as	

	defined by CCPA/CPRA, no opt-out link is required.	
Right to Non-Discrimination	We will not discriminate against you for exercising your privacy rights.	

C. International Data Transfer

Since the Service is global and utilizes providers like Google and Cloudflare, your Personal Data is transferred and processed outside of your home country (e.g., from the EU or Brazil to the US). We ensure that these transfers are protected by implementing appropriate safeguards, such as entering into standard contractual clauses (SCCs) approved by the European Commission, where necessary.

6. Data Security and Retention

Security: We implement appropriate technical and organizational measures (including encryption, access controls, and regular security audits) to protect your Personal Data from accidental loss, unauthorized access, and unauthorized disclosure. However, no electronic transmission or storage method is 100% secure, and we cannot guarantee absolute security.

Retention: We retain your Personal Data only for as long as necessary to fulfill the purposes outlined in this policy, including the duration of your account and subscription, or as required by law (e.g., tax records).

- **User Content (Photos/Prompts):** Your Input and Output are kept as long as your account is active to allow you to re-edit and access your project history. If you delete your account, this content is scheduled for deletion from our active systems.
- **Gemini API Data:** As a third-party service, Google retains API prompts and related data for 55 days for abuse monitoring, after which they are disconnected from your identity.

7. Changes to This Privacy Policy

We may update this Privacy Policy from time to time. When we make material changes, we will notify you by updating the "Last Updated" date at the top of this policy and by notifying you through the App or via email before the changes become effective.