Privacy policy

Version 1.4, last updated: 21 October 2026

The short version

- Your diary stays on your phone. There is no account and no server that receives your entries. We cannot read them.
- Laruna shows no ads and uses no analytics or tracking tools. Only on iPhone, and only if you agree, the app lets our subscription service know whether you installed Laruna after one of our ads in the App Store.
- If you subscribe, Apple handles the payment. Our subscription service RevenueCat receives a random identifier, a few technical details about your device and the purchase details, never your diary.
- If you write to us, we use your e-mail address and your message only to answer you.

Who is responsible

Yaroslav Sema, Siennieńska 20, 27-400 Ostrowiec Świętokrzyski, Poland. E-mail: support@laruna.app

We are the controller under the GDPR for the processing described under "Subscriptions", "App Store ad measurement", "When you contact us" and "This website". We have no data protection officer, because the law does not require us to appoint one.

Your diary: stored only on your device

Everything you enter in Laruna is stored only in the app's storage on your device. This includes your medication and doses, injection sites, weight and measurements, how you feel, protein and water, strength workouts, expenses, goals, notes and settings.

- We do not receive this data. There is no account and no cloud sync.
- The app's storage is not part of iCloud backups. To keep a copy or move to a new phone, use Settings, Privacy and data, Export and delete data, Export backup. You decide where that file is saved.
- The PDF summary and exports are created on your device. They leave it only if you share them yourself. These files are not encrypted: anyone who has the file can read it.
- Reminders are scheduled on your device. Face ID or your passcode are checked by your phone; the app only learns whether the check succeeded.

We do not process your diary entries. They are stored and used only on your device, at your instruction and under your sole control. For this reason we are not the controller of these entries under the GDPR, and your own use of the diary is a purely personal activity (Art. 2(2)(c) GDPR).

Because the entries concern your health, the app still asks you during setup to agree expressly that they are stored and used on your device. Should a court or an authority regard us as responsible for this processing, your explicit consent is its legal basis (Art. 9(2)(a) GDPR). You can withdraw it

at any time: Settings, Privacy and data, Export and delete data, Delete all data. This removes all entries from the device. Withdrawal does not affect the time before.

Storing your entries on your device is strictly necessary to provide the diary you asked for. No further consent is needed for it under the rules on device storage (§ 25(2) no. 2 TDDDG in Germany, § 165(3) TKG 2021 in Austria, art. 399(3) of the Polish Electronic Communications Law).

Subscriptions

When you start a free trial or a subscription:

- **Apple** (Apple Distribution International Ltd., Ireland) sells the subscription and processes your payment as a separate controller under its own privacy policy. We never see your card or bank details, your name or the e-mail address of your Apple account.
- **RevenueCat** (RevenueCat, Inc., 1032 E Brandon Blvd #3003, Brandon, FL 33511, USA) tells the app whether your subscription is active. When the app prepares the purchase screen and when it checks your subscription, it sends to RevenueCat: a random app user ID created on your device; an identifier that Apple assigns to your device for our apps (identifier for vendor, IDFV); the product, dates, price, currency and country of your purchase and the purchase record signed by Apple; a neutral code for the place in the app where you opened the purchase screen (for example "o2" for the strength plan); the app version, the device model, the operating system version and your language settings; and your IP address, which is transmitted with every internet connection. RevenueCat receives nothing from your diary.
- Purposes and legal bases: to give you access to what you paid for and to restore purchases (performance of the contract, Art. 6(1)(b) GDPR); to prevent misuse and to keep simple sales statistics that do not identify you (our legitimate interest, Art. 6(1)(f) GDPR). Reading this information from your device is strictly necessary to provide the subscription you ordered. The app does not contact RevenueCat before you reach the purchase screen.
- RevenueCat is our processor (Art. 28 GDPR) and is bound by contract to protect your data as described here. It processes the data in the USA and uses further service providers there, for example Amazon Web Services for hosting. There is no adequacy decision that covers RevenueCat. The transfer is based on the EU standard contractual clauses (Art. 46(2)(c) GDPR). You can read them at revenuecat.com/dpa or ask us for a copy.
- Storage period: RevenueCat keeps the purchase records linked to the random ID while your subscription runs and then until three years after the end of the year in which it ended, so that we can answer questions and claims. Then we delete them. If you never start a trial or a subscription, we delete the record at the latest 24 months after the app last contacted RevenueCat. You can ask for earlier deletion: send us the Support ID shown in the app under Settings, Subscription.
- You are not obliged to provide this data. Without it the app cannot confirm a subscription or unlock the paid features.

App Store ad measurement (iPhone, only with your consent)

We may advertise Laruna in the App Store with Apple Ads. To see which ads lead to installations and subscriptions, the iPhone app asks you once during setup whether it may tell us. Your answer

changes nothing else in the app. You can change it at any time: Settings, Privacy and data, Measure App Store ads.

- If you allow it, the app asks Apple's AdServices framework on your iPhone for an attribution token and passes it once to RevenueCat, together with the random app user ID described under "Subscriptions". RevenueCat sends the token to Apple. Apple answers whether Laruna was installed after an Apple ad was tapped or shown and, if so, with the IDs of the campaign, ad group, keyword and ad, where the ad was shown, the country or region and whether it was a first download or a re-download. RevenueCat stores this with the data described under "Subscriptions", so that we can see, for example, how many trials and subscriptions came from a campaign. Nothing from your diary is included, and the data is not used to show you ads.
- If you do not allow it, the app does not request the token and passes nothing.
- Legal basis: your consent (Art. 6(1)(a) GDPR). Reading the token on your device also requires this consent under § 25(1) TDDDG in Germany, § 165(3) TKG 2021 in Austria and art. 399(1) of the Polish Electronic Communications Law. You can withdraw it at any time in the app's settings. Withdrawal does not affect the time before. If you want data that was already passed to be deleted, write to us (see "Your rights").
- RevenueCat processes this data as our processor in the USA, with the safeguards described under "Subscriptions". Apple creates the token and answers RevenueCat's query. For its own advertising Apple is responsible under its notice "Apple Advertising & Privacy". The app does not ask for permission to track you (App Tracking Transparency) and does not link this data with data from other companies.
- Storage period: as for the other RevenueCat data under "Subscriptions".

When you contact us

If you write to support@laruna.app, we process your e-mail address, your name if you give it, and the content of your message to answer you and deal with your request. The legal basis is Art. 6(1)(b) GDPR if it concerns your subscription or the contract with us, otherwise Art. 6(1)(f) GDPR (our legitimate interest in answering enquiries).

Please do not send health details. We do not need them to help you. If your message contains them anyway, we use them for nothing other than reading and answering your message, and we delete such a message within 30 days after your request is closed. If health details are needed to deal with a complaint or a claim, we first ask for your explicit consent (Art. 9(2)(a) GDPR) or keep them only as far as necessary to establish, exercise or defend legal claims (Art. 9(2)(f) GDPR).

Our mailbox is provided by Google Ireland Limited, Gordon House, Barrow Street, Dublin 4, Ireland. Incoming mail is routed to it by Cloudflare, Inc., USA. According to Cloudflare, the messages are not stored there.

We delete requests 12 months after they are closed. Messages that concern a claim or a dispute are kept until the claim is time-barred (three to six years, depending on the applicable law, counted to the end of the calendar year).

This website

laruna.app is delivered by Cloudflare, Inc., 101 Townsend Street, San Francisco, CA 94107, USA, as our processor. When you open a page, Cloudflare processes your IP address, the date and time, the page requested and the browser and device information that your browser sends, in order to deliver the page and protect it against attacks (Art. 6(1)(f) GDPR; our legitimate interest in a secure and reliable website). We keep no log files of our own and do not combine this data with other data. Cloudflare may process the data on servers outside the EU, including in the USA. Cloudflare is certified under the EU-US Data Privacy Framework (adequacy decision (EU) 2023/1795). In addition, the EU standard contractual clauses are part of our contract with Cloudflare (cloudflare.com/cloudflare-customer-dpa). According to Cloudflare, this data is processed only for a limited period.

The website sets no cookies and uses no analytics and no fonts or scripts from third parties. Only if Cloudflare suspects an automated attack may it show a security check before the page. That check uses a strictly necessary cookie.

What we do not do

No ads in the app. No analytics or tracking tools in the app. The only measurement is the optional App Store ad measurement described above. No sale or sharing of data for marketing. No profiling and no decisions based solely on automated processing (Art. 22 GDPR).

Your rights

For the data for which we are the controller (subscription and ad measurement data, messages, website data) you have the right of access (Art. 15 GDPR), rectification (Art. 16), erasure (Art. 17), restriction of processing (Art. 18) and data portability (Art. 20), and the right to withdraw consent at any time (Art. 7(3)).

Right to object: where we process data on the basis of our legitimate interests (Art. 6(1)(f) GDPR), you can object at any time on grounds relating to your particular situation (Art. 21 GDPR).

To use these rights, write to support@laruna.app. We answer within one month. Subscription data is stored under a random ID. To find it we need the Support ID from Settings, Subscription (Art. 11 GDPR). Your diary is only on your device. There you can view, export and delete it yourself. We cannot do that for you.

You have the right to lodge a complaint with a data protection authority, in particular in the EU country where you live or work or where you think the infringement took place. The authority responsible for us is the President of the Personal Data Protection Office (Prezes UODO), ul. Stanisława Moniuszki 1A, 00-014 Warszawa, Poland, uodo.gov.pl. In Austria: Datenschutzbehörde, Barichgasse 40-42, 1030 Wien, dsb.gv.at. In Germany: the data protection authority of your federal state (list at bfdi.bund.de).

Age

Laruna is for adults. It is not intended for anyone under 18.

Changes

We update this policy when the app changes and show the date at the top.

Additional information for Switzerland

This section applies if you are in Switzerland. It supplements the rest of this policy. References to the GDPR apply by analogy to the corresponding provisions of the Swiss Federal Act on Data Protection (FADP).

- Controller: as stated under "Who is responsible". We have not appointed a representative in Switzerland, because the conditions of Art. 14 FADP are not met: your diary stays on your device, and we process only a small amount of data about subscriptions, support and the website.
- Countries to which data is disclosed: Poland (where the controller lives), Ireland (Apple Distribution International Ltd., which handles the purchase as a separate controller, and Google Ireland Limited, mailbox). These countries have adequate data protection under Annex 1 of the Swiss Data Protection Ordinance. USA: RevenueCat, Inc. (subscription management, processor) on the basis of the EU standard contractual clauses with the adaptations needed for Switzerland, which the Swiss authority FDPIC has recognised (Art. 16(2)(d) FADP). Cloudflare, Inc. (website and mail routing) states that it is certified under the Swiss-U.S. Data Privacy Framework (Art. 16(1) FADP); standard contractual clauses apply in addition. Where Google processes e-mail in the USA as well, the same applies to Google LLC. You can ask us for a copy of the safeguards.
- Your rights under the FADP: access, delivery or transfer of your data in a common electronic format, rectification, erasure, objection to processing and withdrawal of consent. Write to support@laruna.app. We usually answer within 30 days.
- Cookies and device storage: the website sets no cookies, apart from the security check described under "This website". The app stores your entries and settings and a random identifier for the subscription check on your device. On iPhone, and only with your consent, it also reads the attribution token described under "App Store ad measurement". You can delete this data in the app's settings at any time or remove the app.
- Supervisory authority: Federal Data Protection and Information Commissioner (FDPIC), Feldeggweg 1, 3003 Bern, edoeb.admin.ch.