Privacy Policy

for the mobile app "VinciFi"

As of: January 2026

1. Controller

VinciFi GmbH

Durchschnitt 27

20146 Hamburg

Germany

Email: info@vincifi.com

2. Data Protection Officer

A Data Protection Officer has not been legally appointed, as the statutory thresholds are not currently met. If you have any questions regarding data protection, you may contact the address mentioned above at any time.

3. Overview of Data Processing

This Privacy Policy informs you about the type, scope, and purpose of the processing of personal data when using the mobile application "VinciFi" for iOS and Android. The App offers structured financial information and AI-supported analyses.

4. Processed Data Categories

4.1 Inventory and Registration Data:

Email address, User ID (Provider ID from Apple/Google).

4.2 Usage Data:

Interactions within the App, session duration, accessed functions, times of use.

4.3 Input Data (Prompts):

Text inputs that you make in the chat with VinciFi AI.

4.4 Device and Metadata:

Operating system and version, App version, device identifiers, language settings, IP address (in shortened/anonymized form).

4.5 Crash and Diagnostic Data:

Crash reports, error logs, performance data.

4.6 Push Tokens:

Device-related IDs for the delivery of notifications.

5. Purposes of Processing

- Provision and operation of App functions.
- Authentication via Google OAuth or Sign in with Apple.
- AI-supported answering of user inquiries (chatbot function).
- Technical error analysis and stability improvement.
- Delivery of push notifications.
- Reach measurement and optimization of user experience.

6. Legal Bases for Processing

- **Art. 6(1)(b) GDPR:** For the performance of the user contract (provision of App content and AI responses).
- **Art. 6(1)(f) GDPR:** Legitimate interest in the security of IT systems, troubleshooting, as well as analysis for product improvement.
- **Art. 6(1)(a) GDPR:** Consent (e.g., for sending push notifications or collecting optional analytics data).

7. Services Used and Recipients

We use specialized service providers as processors (Art. 28 GDPR):

- **Google Firebase** (Analytics, Crashlytics, Performance Monitoring, Authentication): For analysis, troubleshooting, and user management. Provider: Google Ireland Ltd.
- **Microsoft Azure AI Foundry** (Sweden Central): For the provision of the AI models (GPT). The processing of your input data takes place on servers in Sweden. The data is not used to train the base models of Microsoft or OpenAI.
- **Apple Inc.** (Sign in with Apple): For authentication.
- **Airship** (Airship Group, Inc.): For the delivery of push notifications.
- **Amazon Web Services (AWS):** Hosting of the backend infrastructure (Location: EU).

8. Transfer to Third Countries

Some of the mentioned service providers have their headquarters in the USA. The transfer takes place on the basis of the **EU-US Data Privacy Framework** (provided the provider is certified) or using **EU Standard Contractual Clauses (SCCs)**, supplemented by additional security measures (such as IP anonymization).

9. Storage Duration

- **Account Data:** Personal data is stored only as long as is necessary for the stated purposes or as long as statutory retention obligations exist.
- **Chat Inputs (Azure AI):** Are processed only as long as necessary for the generation of the response and abuse prevention.
- **Analysis Data (Firebase):** Automatic deletion after a maximum of 14 months.
- **Crash Logs:** Deletion after 90 days.

10. Special Notes on AI (GDPR & EU AI Act)

VinciFi uses artificial intelligence to answer complex financial questions automatically.

- **Technology Used:** We use GPT models via Microsoft Azure AI Foundry at the Sweden location.

- **Transparency:** When interacting with the chatbot, you are communicating with an AI system. The responses are generated purely statistically and do not reflect human opinion.
- **No Profiling/Automated Decision-Making:** No automated decision-making takes place pursuant to Art. 22 GDPR that produces legal effects concerning you. The AI serves purely informative purposes.
- **Data Minimization:** We ask you not to enter any sensitive personal data (e.g., account numbers, health data) into the chat.

11. Your Rights

You have the following rights regarding your personal data vis-à-vis us:

- Access, rectification, and deletion.

- Restriction of processing and data portability.

- **Right to Object:** You may object to the processing of your data at any time for reasons arising from your particular situation.
- **Withdrawal of Consent:** You may withdraw consent once given (e.g., for analytics) at any time in the App settings.

12. Right to Lodge a Complaint

You have the right to lodge a complaint with a data protection supervisory authority regarding the processing of your personal data by us.

13. Amendments

We update this policy in the event of technical changes (e.g., new AI models). The current version is always accessible in the App.