

Privacy Policy for Hutarka

Last updated: July 5, 2026

This Privacy Policy describes Our policies and procedures regarding information when You use the Service and tells You about Your privacy rights and how the law protects You.

Hutarka is designed to work entirely on Your device. We do not operate servers that collect Your personal data, We do not require You to create an account, and We do not use third-party analytics, advertising, or tracking. By using the Service, You agree to this Privacy Policy.

Interpretation and Definitions

Interpretation

The words of which the initial letter is capitalized have meanings defined under the following conditions. The following definitions shall have the same meaning regardless of whether they appear in singular or in plural.

Definitions

For the purposes of this Privacy Policy:

- **Application** refers to Hutarka, the software program provided by the Company.
- **Company** (referred to as either "the Company", "We", "Us" or "Our" in this Agreement) refers to Hutarka.
- **Country** refers to: Germany
- **Device** means any device that can access the Service such as a computer, a cellphone or a digital tablet.
- **Personal Data** is any information that relates to an identified or identifiable individual.
- **Service** refers to the Application.
- **Usage Data** refers to data collected automatically, either generated by the use of the Service or from the Service infrastructure itself (for example, the duration of a page visit).
- **You** means the individual accessing or using the Service, or the company, or other legal entity on behalf of which such individual is accessing or using the Service, as applicable.

Collecting and Using Your Personal Data

Types of Data Collected

Personal Data

Hutarka does not require You to create an account and does not ask You to provide personally identifiable information such as Your name, email address, or telephone number. We do not collect such information.

On-Device Data

To provide the learning experience, the Application stores a small amount of preference and progress data locally on Your Device using Apple's on-device storage. This includes:

- Your chosen native language (the language phrases are shown in)
- Your English level (from A1 to C1)
- Your daily learning goal
- Your learning progress (for example, which phrases you have practised)

This data never leaves Your Device. It is not transmitted to Us or to any third party, and We have no ability to access it. It exists solely so the Application can remember Your settings and progress between sessions.

Usage Data

We do not collect Usage Data. The Application does not include any third-party analytics, advertising, crash-reporting, or tracking technologies, and it does not send diagnostic or behavioural data to Us or to any third party.

Third-Party Services

Hutarka does not integrate any third-party analytics, advertising, authentication, or backend service providers, and does not share Your information with any third party.

The Application is distributed through the Apple App Store. Any information You provide to Apple in connection with downloading the Application, or Your use of the App Store itself, is governed by Apple's own privacy policy (<https://www.apple.com/legal/privacy/>), and is not shared with Us in an identifiable form.

Use of Your Data

Because the Application stores data only on Your Device and does not transmit it to Us, We do not use, analyze, or process Your data on Our own systems. The on-device data described above is used solely by the Application, on Your Device, to:

- Provide and maintain the Service, including remembering Your settings and progress.
- Adapt the learning content to Your selected native language and level.

Retention of Your Data

The on-device data is retained on Your Device for as long as the Application is installed, or until You reset Your progress within the Application (where such an option is provided). Because this data is not transmitted to Us, We do not retain any copy of it.

Transfer of Your Data

Your data is stored locally on Your Device and is not transferred to Us or to any other country or jurisdiction.

Delete Your Data

You are in full control of Your data at all times. Because all data is stored locally on Your Device:

- You can reset Your progress from within the Application, where such an option is provided.
- You can permanently and completely delete all data by uninstalling the Application from Your Device.

As We do not hold any copy of Your data, no request to Us is required in order to delete it.

Your Rights Under the GDPR

If You are located in the European Economic Area (EEA), the United Kingdom, or Switzerland, You have rights regarding Personal Data relating to You under the General Data Protection Regulation (GDPR), including the rights of access, rectification, erasure ("right to be forgotten"), restriction of processing, data portability, objection, and the right to withdraw consent.

Because Hutarka stores data only on Your Device and We do not collect or hold any Personal Data about You on Our systems, You can exercise most of these rights directly — for example, by editing Your settings, resetting Your progress within the Application, or uninstalling the Application to erase all data.

You also have the right to lodge a complaint with a supervisory authority, in particular in the EU member state of Your habitual residence, place of work, or place of the alleged infringement. In Germany, the competent authority is the Berliner Beauftragte für Datenschutz und Informationsfreiheit (<https://www.datenschutz-berlin.de/>).

If You believe We hold any information relating to You, or You have any question about Your rights, You may contact Us at the email address in the "Contact Us" section below. We will respond within one month, or inform You if We need additional time as permitted by the GDPR.

Legal Basis for Processing

Any processing that occurs takes place locally on Your Device to provide the Service You have chosen to use (performance of a contract, Article 6(1)(b) GDPR). We do not process Personal Data on Our own systems.

Data Controller

The data controller responsible for the Application is:

Pavel Vaitsikhouski
Germany
Contact: faulingo.app@gmail.com

Security of Your Data

Your data is stored on Your Device and is protected by the security measures of Your Device and its operating system. As no data is transmitted to Us, there is no transmission of Your data over the Internet by the Application. Please keep Your Device secure to protect the data stored on it.

Children's Privacy

Our Service does not address anyone under the age of 13, and We do not knowingly collect personally identifiable information from anyone under the age of 13. As the Application does not collect personal information and stores data only on the Device, no personal information about a child is transmitted to Us. If You are a parent or guardian and have any concern, please contact Us.

Changes to this Privacy Policy

We may update Our Privacy Policy from time to time. We will notify You of any changes by posting the new Privacy Policy on this page and updating the "Last updated" date at the top of this Privacy Policy.

You are advised to review this Privacy Policy periodically for any changes. Changes to this Privacy Policy are effective when they are posted on this page.

Contact Us

If you have any questions about this Privacy Policy, You can contact us:

- By email: faulingo.app@gmail.com

