

# Privacy Policy – Crow’s Nest

**Last Updated:** 09 April 2026

This Privacy Policy explains how Crow’s Nest (“we,” “us,” or “our”) collects, uses, stores, and protects personal data when you use the Crow’s Nest mobile application (the “**App**”) and related services (the “**Service**”).

This Policy applies to users worldwide.

This Privacy Policy is designed to comply with the **EU General Data Protection Regulation (GDPR)**, **UK GDPR**, the **California Consumer Privacy Act (CCPA/CPRA)**, and other **applicable international data protection laws**.

By downloading, accessing, or using the App, you acknowledge that you have read and understood this Privacy Policy.

If you do not agree with this Policy, please do not use the App.

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## 1. Data Controller

The Service is operated by:

**Mber Holdings AB**

Registered in Sweden

Principal place of business: Uppsala, Sweden

Email:

crowsnest.customer.service@gmail.com

For the purposes of applicable data protection laws, **Mber Holdings AB acts as the Data Controller** responsible for the processing of personal data described in this Policy.

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## 2. Definitions

**Personal Data**

Any information relating to an identified or identifiable natural person.

### **Processing**

Any operation performed on personal data, including collection, storage, use, disclosure, or deletion.

### **User Content**

Information and content you create or upload within the App, including itineraries, travel plans, notes, images, documents, and attachments.

### **Device Identifiers**

Identifiers associated with your device such as IP address, device identifiers, or advertising identifiers.

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## **3. Information We Collect**

### **3.1 Information You Provide**

We may collect personal data that you voluntarily provide when using the App, including:

- Name or username
- Email address
- Profile photo
- Travel itineraries and travel preferences
- Travel notes and plans
- Uploaded tickets, documents, or confirmations
- Communications with customer support

Where travel preferences are used to generate AI-powered itineraries, **travel preference data is processed without user identifiers and is not linked to your account.** See Section 4 for further details.

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### **3.2 Automatically Collected Information**

When you use the App, certain technical and usage information may be collected automatically, including:

- IP address
- Device model and operating system version
- Device language settings
- App usage data and feature interactions
- Date and time of activity
- Crash reports and performance diagnostics
- Referring or exit screens

Although this information may not directly identify you by name, it **may still be considered personal data under applicable privacy laws** because it can be associated with your device or account.

This information helps us:

- operate and maintain the Service
  - improve reliability and performance
  - understand how the App is used
  - detect and prevent security incidents.
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### 3.3 Advertising and Tracking Information

Because the App may display advertisements, certain advertising-related data may be processed, including:

- Advertising identifiers (e.g., Apple IDFA where permitted)
- Ad impressions and interaction data
- Approximate location derived from IP address

Advertising-related tracking occurs only after obtaining user consent where required, including through **Apple's App Tracking Transparency (ATT)** framework.

Users can withdraw permission at any time through their device settings.

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### 3.4 Payment Information

Crow's Nest **does not collect or store payment card information.**

All purchases and subscriptions are processed exclusively through **Apple In-App Purchases**, which are governed by Apple's own privacy policies.

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## 4. Artificial Intelligence Processing

Certain features of the App use **artificial intelligence (AI)** to generate travel itineraries and recommendations.

AI is used only to process the travel preferences and information you voluntarily provide to generate suggested itineraries.

Uploaded images, documents, and attachments stored in the App **are not transmitted to or processed by AI systems.**

When you request an AI-generated itinerary, your travel preferences may be transmitted to trusted AI service providers, such as **OpenAI**, for processing. Travel preference data is processed **without user identifiers and is not linked to your account** before transmission.

These providers process data solely to generate itinerary results on our behalf.

**Crow's Nest does not permit AI providers to use user data submitted through the App for their own purposes, including model training.**

Some AI service providers are located outside the European Economic Area, including in the United States. Where such transfers occur, appropriate safeguards are used, including **Standard Contractual Clauses (SCCs)** and other legally approved mechanisms.

AI-generated itineraries are recommendations only and do not constitute automated decisions producing legal or similarly significant effects.

Users should independently verify travel information such as availability, opening hours, safety conditions, and pricing.

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## 5. How We Use Personal Data

We use personal data for the following purposes:

- providing and operating the App
- generating travel itineraries
- storing and managing User Content
- enabling sharing features
- displaying advertisements
- providing customer support
- improving performance and usability
- detecting fraud or abuse
- communicating service updates
- complying with legal obligations

We collect **only the minimum personal data necessary** to provide the Service.

We follow the principles of **data minimisation and purpose limitation** when processing personal data.

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## 6. Legal Basis for Processing (GDPR)

Where GDPR applies, we rely on the following legal bases:

### **Contractual necessity**

Processing required to provide the Service requested by users.

### **Legitimate interests**

Improving the App, maintaining security, and preventing abuse.

### **Consent**

Analytics, advertising tracking, and optional features.

### **Legal obligations**

Processing necessary to comply with applicable laws.

Users may withdraw consent at any time without affecting processing already carried out.

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## 7. Cookies and Similar Technologies

The App may use cookies, SDKs, or similar technologies to:

- maintain user sessions
- analyze app performance
- support advertising functionality

Users can manage tracking permissions through their device settings.

Disabling certain technologies may limit functionality.

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## 8. Advertising

The App may display advertisements provided by third-party advertising networks.

Advertising partners may receive:

- device identifiers
- advertising identifiers
- IP address
- ad interaction data

These providers may use their own tracking technologies in accordance with their privacy policies.

Crow's Nest does not control third-party advertising technologies.

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## 9. Sharing of Personal Data

We may share personal data with trusted service providers that help operate the App, including:

- cloud infrastructure providers
- **analytics providers used to measure app performance and usage**
- advertising networks
- customer support platforms
- email delivery services

Where travel preferences are transmitted to AI service providers such as OpenAI for the purpose of generating itineraries, such data is processed **without personal identifiers and is not linked to user accounts**. Crow's Nest does not share identifiable personal data with AI service providers.

These providers process personal data **only according to our instructions and contractual obligations**.

We may also disclose personal data when required by law or when necessary to protect our legal rights or prevent fraud.

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## 10. User Content

Users retain ownership of their User Content.

By uploading content to the App, you grant Crow's Nest a **non-exclusive, worldwide, royalty-free license** to host, store, reproduce, and display such content solely for the purpose of operating and delivering the Service.

Content visibility depends on your profile settings:

### **Private profiles**

Content is visible only to the account owner.

### **Public profiles**

Selected content may appear in discovery or search features.

Users are responsible for content they choose to make public.

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## 11. Data Retention

Personal data is retained only as long as necessary to:

- provide the Service
- comply with legal obligations
- resolve disputes
- maintain system security.

Typical retention periods may include:

- account data — retained until account deletion
  - analytics logs — typically up to 12 months
  - crash diagnostics — retained for limited technical analysis periods.
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## 12. Account Deletion

Users may request deletion of their account through the App settings or by contacting customer support.

A **14-day deactivation period** allows users to cancel accidental deletion requests.

After this period:

- account information will be deleted or irreversibly anonymised
- access to the Service will be permanently revoked.

Certain data may be retained when required for legal, regulatory, or security purposes.

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## 13. Your Privacy Rights

Depending on your jurisdiction, you may have the right to:

- access your personal data
- correct inaccurate data
- request deletion
- restrict processing

- object to processing
- request data portability
- withdraw consent.

Requests can be submitted to:

crowsnest.customer.service@gmail.com

Where applicable, we respond within **30 days**.

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## 14. California Privacy Rights

Residents of California may have additional rights including:

- the right to know what personal data is collected
- the right to request deletion
- the right to correct inaccurate data
- the right to opt out of the sale or sharing of personal information.

Crow's Nest **does not sell personal data** and does not share personal data for cross-context behavioural advertising.

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## 15. Data Security

We implement appropriate technical and organizational measures including:

- encryption
- secure infrastructure
- access controls
- regular security reviews.

However, no system can guarantee absolute security.

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## 16. Data Breach Notification

In the event of a personal data breach, affected users and relevant authorities will be notified **within 72 hours where required by law**.

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## 17. Children and Age Restrictions

The App is intended for users **18 years of age or older**.

Users must confirm during registration that they are at least 18 years old.

Accounts belonging to users identified as under 18 may be suspended and associated personal data deleted.

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## 18. International Data Transfers

Service providers used by Crow's Nest may operate globally.

Personal data may therefore be transferred outside the European Economic Area, including to the United States.

Where such transfers occur, we rely on appropriate safeguards including:

- **Standard Contractual Clauses (SCCs)**
  - **EU-US Data Privacy Framework**
  - other legally approved safeguards.
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## 19. Supervisory Authority

Users located in the European Economic Area have the right to lodge a complaint with a supervisory authority.

Our lead supervisory authority is:

**Swedish Authority for Privacy Protection (IMY)**

<https://www.imy.se>

Users may also contact the supervisory authority in their country of residence.

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## 20. Apple App Store Privacy Requirements

This App complies with Apple's privacy guidelines, including:

- App Tracking Transparency (ATT)
- App Store privacy labels
- required data disclosure categories.

The App may process:

- User Content
  - Usage Data
  - Device Identifiers.
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## 21. Changes to This Policy

We may update this Privacy Policy from time to time.

If changes are material, we will notify users through the App or via email.

Where required by law, renewed consent will be requested.

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## 22. Contact

Crow's Nest  
Operated by **Mber Holdings AB**  
Uppsala, Sweden

Email:  
crowsnest.customer.service@gmail.com