

# CleanFin — Privacy Policy

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**Effective Date:** February 19, 2026

In this Privacy Policy, We describe Our policies and procedures on the collection, use, and disclosure of Your information when You use the Service and tell You about Your privacy rights and how the law protects You.

We use Your Personal Data to provide and improve the Service. By using the Service, You agree to the collection and use of information in accordance with this Privacy Policy.

## 1. Who We Are

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**App:** CleanFin (the "App")

**Contact:** support@cleanfin.info

This policy explains what data we process, for what purposes, how we protect it, and your rights.

## 2. Scope

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This policy applies to data processed within the App, including locally stored financial and personal data, encrypted files in the Private Space, and limited data sent to third-party public APIs to provide market data for the What-If Simulator.

## 3. Data We Process

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### **On your device (locally):**

Financial data (transactions — amount, currency, date, type, category, account, notes).

Categories and accounts (name, emoji, icon, type, balance, currency).

Reports and analytics data (calculated locally from your transactions).

What-If Simulator scenarios (asset symbol, amount, purchase date, prices, ROI — stored in CoreData).

Secret Folder — encrypted files (photos, PDFs, documents), secret contacts (name, phone, email), secret passwords (service, login, password).

Device storage information (total and used storage space).

Settings, preferences, and subscription status.

### **Permissions (requested contextually and only when needed):**

Face ID / Touch ID / Device Passcode — biometric authentication to access the Private Space (Secret Folder).

Photo Library — importing photos into the Secret Folder.

Document Access — importing PDFs and documents into the Secret Folder via the system file picker.

### **Market data (via public APIs):**

The App fetches publicly available market data (cryptocurrency prices, stock prices, currency exchange rates) to power the What-If Investment Simulator. Only asset identifiers and date ranges are sent — no personal data is transmitted.

## **4. Purposes of Processing**

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- Provide core App features: financial tracking, budgeting, reports, investment simulation.
- Secure storage of sensitive files, contacts, and passwords in the encrypted Private Space.
- Device storage analysis and system information display.
- Local notifications (if enabled by user).
- Fetching public market data for the What-If Simulator.
- Processing in-app subscriptions via Apple StoreKit.

## **5. Market Data via Public APIs**

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The App fetches publicly available financial data from the following services:

**CoinGecko API** — cryptocurrency prices (historical and current).

**Yahoo Finance API** — stock and commodity prices.

**Frankfurter API** — currency exchange rates.

**What is transmitted:** Only asset identifiers (e.g., "bitcoin", "AAPL"), date ranges, and currency codes. No personal user data, device identifiers, or account information is ever sent to these services.

**Retention:** Market data is cached locally for the duration of the session only. No data is stored on external servers on our behalf.

Processing by these services is subject to their respective Terms of Use and Privacy Policies.

## **6. Third-Party Services**

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### **Apple StoreKit (In-App Purchases):**

- Purpose: Processing subscriptions and premium feature access.
- Data collected by Apple: Payment and transaction information.
- Privacy Policy: <https://www.apple.com/legal/privacy/>
- Subscription management is handled entirely by Apple.

The App does not integrate any third-party analytics, attribution, advertising, or tracking SDKs. We do not use Firebase, AppsFlyer, Facebook SDK, Google Analytics, or any similar services.

## **7. Legal Bases**

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- Contract/performance: provide App functionality (financial tracking, reports, simulator, secure storage).
- Consent: Face ID / Touch ID, photo library access, document access.
- Legitimate interests: security of encrypted data and app integrity.

## 8. Sharing and Disclosure

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We share data only as minimally needed to operate the App:

Market data providers: CoinGecko, Yahoo Finance, Frankfurter — we transmit only public asset identifiers and date parameters to fetch market data. No personal data is shared.

Apple: StoreKit for subscription processing, per Apple's policies.

Apple/system services: biometric authentication, photo library, document picker — per iOS permissions.

**We do not sell personal data. We do not use ad SDKs. We do not track users across apps or websites. We do not collect or transmit any personal information to external servers.**

## 9. International Transfers

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Market data requests are sent to public APIs that may be hosted outside your country (including the United States). Only public asset identifiers and dates are transmitted — no personal data leaves your device.

Subscription processing is handled by Apple according to Apple's privacy practices.

## 10. Security

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All Secret Folder files are encrypted using AES-GCM encryption with a device-specific key derived via SHA-256.

Biometric authentication (Face ID / Touch ID) is required to access the Private Space; the Secret Folder auto-locks when the app moves to background.

CoreData storage uses NSFileProtectionComplete (device-level encryption while locked).

All network communications use HTTPS.

No API keys or secrets are stored in the App binary — all market data APIs used are public and require no authentication.

All financial data and personal information is stored exclusively on your device.

## 11. Retention

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All local data remains on your device until you delete it or uninstall the App.

Financial transactions, categories, and accounts are stored in UserDefaults on your device.

What-If scenarios are stored in CoreData on your device.

Encrypted Secret Folder files are stored in the app's sandboxed Documents directory.

No user data is stored on any external server. We do not maintain any server-side databases or backups of your data.

## **12. Your Rights**

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- Access, correction, and deletion of all local data: manage within the App's Settings.
- Withdraw consents in iOS Settings: Face ID, Photo Library access.
- Export your financial data as CSV from the App.
- Data requests: support@cleanfin.info.

## **13. Children**

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The App is not directed to children under 13. If you believe a child provided data, contact us at support@cleanfin.info.

## **14. Changes**

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We may update this policy. The latest version is available from the App and on our website.

## **15. Contact**

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support@cleanfin.info