



Privacy Policy

This Privacy Policy explains how cshuds ("we", "us") — the operator of the cshuds desktop application and related services, an independent sole trader based in Portugal — collects and processes personal data. We are the data controller under the EU General Data Protection Regulation (GDPR). Contact: info@cshuds.com.

1. Data we collect

- **Account data** — email address and (optionally) a handle, used to sign in and manage your subscription.
- **Subscription & payment data** — your subscription status and billing identifiers. Payments are handled by our Merchant of Record, Paddle; card details are entered directly with Paddle and we never receive or store full card numbers.
- **Device & usage analytics** — a per-installation device identifier, app version, operating system, and product-usage events (e.g. opening a HUD, creating a match). No message content or free text you type is collected. You can turn this off in Settings → Privacy.
- **Technical logs** — IP address, request metadata and timestamps recorded by our servers for security and reliability.
- **Camera feeds** — when you use the optional cameras feature, webcam video is transmitted peer-to-peer between participants. We do not store or record it; our servers only relay connection signalling and, where a direct connection is impossible, briefly relay the stream without retaining it.

2. Why we process it (legal bases)

- **Providing the service** (account, subscriptions, HUD delivery) — performance of a contract (Art. 6(1)(b)).
- **Payments, invoicing and tax** — legal obligation (Art. 6(1)(c)); handled via Paddle.
- **Security, fraud and abuse prevention** (e.g. limiting how many devices share one subscription) — legitimate interests (Art. 6(1)(f)).
- **Product analytics** — legitimate interests, and you may opt out at any time.

3. Who we share data with (processors)

- **Paddle** (Paddle.com Market Ltd) — Merchant of Record: payment processing, invoicing and tax.
- **Hosting provider** (Contabo) — server infrastructure.
- We do not sell your personal data. We may disclose data where required by law.

4. Cookies

Our website uses only strictly-necessary cookies (e.g. to remember your language). The desktop app does not use advertising or third-party tracking cookies. Paddle's checkout may set its own cookies as described in Paddle's privacy notice.

5. International transfers

Where a processor is located outside the European Economic Area, transfers are protected by appropriate safeguards such as the EU Standard Contractual Clauses.

6. Retention

Account records are kept while your account is active. Billing records are retained by Paddle and by us as required by tax and accounting law. Analytics events are retained for up to 180 days. Technical logs are kept for a short period for security purposes.

7. Your rights

You have the right to access, rectify, erase, restrict and port your personal data, and to object to processing based on legitimate interests. To exercise these rights, contact info@cshuds.com. You may delete your account and associated data from within the app or by contacting us. You also have the right to lodge a complaint with the Portuguese supervisory authority (CNPD).

8. Children

The service is not directed at children under 16, and we do not knowingly collect their data.

9. Changes

We may update this policy; material changes will be announced in the app or by email. The "Effective" date above reflects the current version.

Contact: info@cshuds.com.