

# Headway for Revolut – Kids & Teens Privacy Policy

Welcome to Headway!

This Privacy Policy explains what information we collect when you access and use the Headway mobile application (“App”), our website <https://makeheadway.com/> (the “Website”) and related services (together with App and the Website, the “Services”), how we use that information, and who we share it with. If any questions remain unanswered, please contact us at [support@get-headway.com](mailto:support@get-headway.com).

We have added short summaries at the beginning of each section to make them easier to understand. Please read this Privacy Policy carefully before using the Headway App and Website. If you are under 18, ask a parent or guardian to go over the terms below with you.

## General Terms

***In short: To use Headway, we ask for some personal info like your name, email, and reading preferences. We also collect some device info automatically. We use this data to run and improve the App, see which features people like most, and sometimes work with trusted companies like Google or Apple to help us do this. By using Headway, you confirm that you have read and agree to this policy, and that you are eligible under the Revolut – Kids & Teens program. If not, you should not use the Headway Subscription and should delete your account.***

In order to use the Services, we will ask you to enter information about your reading preferences, name, and email. We also automatically collect some information from your device, such as language settings, IP address, time zone, device type and model, device settings, operating system, Internet service provider, mobile carrier, hardware ID, and other unique identifiers (such as IDFA and AAID). We use this information to provide our Services, analyze how our customers use the App and make it better.

To improve our Services, we use third-party solutions. As a result, we may process data using solutions developed by **Facebook, Google, Amplitude, Firebase, Apple, Digital Ocean, Vercel, Customer.io, Zendesk, Microsoft, Tableau**. Some of the data is stored and processed on servers operated by such third parties. This helps us see how people use Headway, for example, which reading goals are most popular and how much time users spend reading. Because of this, we understand which features and content you enjoy the most, so we can focus on improving them and making Headway better for you.

BY USING THE SERVICES, YOU PROMISE US THAT (I) YOU HAVE READ, UNDERSTAND AND AGREE TO THIS PRIVACY POLICY, AND (II) YOU MEET REVOLUT – KIDS & TEENS ELIGIBILITY REQUIREMENTS AND, (III) WHERE REQUIRED BY LAW, YOUR PARENT OR

GUARDIAN AGREE TO THIS PRIVACY POLICY FOR YOU. If you do not agree, or are unable to make this promise, you must not use the Services. In such a case, you must delete your account using the functionality found in “Settings” in the App or the Website, or contact us and request deletion of your data, and delete the App from your device(s).

“**GDPR**” means the General Data Protection Regulation (EU) 2016/679 of the European Parliament and of the Council of 27 April 2016 on the protection of natural persons with regard to the processing of personal data and on the free movement of such data.

“**EEA**” includes all current member states of the European Union and the European Economic Area. For the purpose of this policy, EEA shall include the United Kingdom of Great Britain and Northern Ireland.

“**Process**”, in respect of personal data, includes collecting, storing, and disclosing to others.

## Table of contents

[CATEGORIES OF PERSONAL DATA WE COLLECT](#)  
[FOR WHAT PURPOSES WE PROCESS PERSONAL DATA](#)  
[UNDER WHAT LEGAL BASES WE PROCESS YOUR PERSONAL DATA \(Applies only to EEA-based users\)](#)  
[WITH WHOM WE SHARE YOUR PERSONAL DATA](#)  
[HOW YOU CAN EXERCISE YOUR PRIVACY RIGHTS](#)  
[AGE LIMITATION](#)  
[INTERNATIONAL DATA TRANSFERS](#)  
[CHANGES TO THIS PRIVACY POLICY](#)  
[SUPPLEMENTAL NOTICE FOR CALIFORNIA RESIDENTS](#)  
[SUPPLEMENTAL NOTICE FOR VIRGINIA RESIDENTS](#)  
[SUPPLEMENTAL NOTICE FOR NEVADA RESIDENTS](#)  
[ACCOUNT DELETION](#)  
[DATA RETENTION](#)  
[HOW “DO NOT TRACK” REQUESTS ARE HANDLED](#)  
[PERSONAL DATA CONTROLLER](#)  
[CONTACT US](#)

# 1. Categories of personal data we collect

In short: *We collect information you give us, such as your name, email, and reading preferences. We might receive information about you from third parties. For example, if you choose to sign in using your Google account, we get your basic profile information from them. We automatically collect info from your device, such as your IP address, device type and how you use Headway. In some cases, we use third-party service providers for such collection.*

## 1.1 Data you give us

We collect the information you give us when you sign up and/or use the Services, including:

- Your name, email address.
- Your reading preferences and goals (what you want to learn).
- Your responses to quizzes or questions in the App.

## 1.2 Data provided to us by third parties

When you decide to log in using **Google**, we get personal data from your Google account. This includes your email, name, profile image, and Google ID. You can revoke access provided to us on the [Apps Permissions](#) page. To know more about how Google processes your data, visit its [Privacy Policy](#).

When you use Sign In with **Apple** to register an account in the App, we get personal data from your Apple ID account. This data may include, in particular, your name and verified email address. You may choose to share your real email address or an anonymous one that uses the private email relay service. Apple will show you its detailed privacy information on the Sign In with Apple screen. Apple lets you revoke access provided to the App in your Apple ID settings by following the next [steps](#). Find more about Sign In with Apple [here](#).

When you log in with Facebook, we receive personal data from your Facebook account. This includes your profile image, name, and Facebook ID. Unless you opt out on the Facebook login screen, we will also collect other data, such as your email address. For more information, please refer to the [Facebook Permissions Reference](#) (describes the categories of information, which Facebook may share with third parties and the set of requirements) and to the [Facebook Privacy Policy](#). In addition, Facebook lets you control the choices you made when connecting your Facebook profile on their [Apps and Websites](#) page.

## 1.3 Data we collect automatically:

When you use the App or Website, we automatically collect data about your device and activity:

- Device and Location data: We collect data from your device, such as language settings, IP address, time zone, device type and model, device settings, operating system and version, Internet service provider, mobile carrier, hardware ID, and Facebook ID.
- Usage data: We record how you interact with our Services. For example, we log your taps/clicks on specific areas of the interface, the features and content you interact with, how often you use the Services, and how much time you spend within them. We also track the age of your account and the duration of your subscription.
- Cookies: A cookie is a small text file stored on your device to help our Services work properly. We only use necessary cookies (to make the App or Website function) and preference cookies (to remember your choices, like language or settings). Cookies can be either session or persistent. A session cookie expires when you close your browser and helps you navigate our Services. A persistent cookie remains on your device for an extended period.

# 2. For what purposes we process your personal data

In short: ***We use your data to run the App smoothly, keep your account safe, fix any technical issues, personalize your experience, and improve Headway. This includes showing content you like, sending reminders or updates, answering your questions, analyzing how people use Headway, preventing fraud, and following the law. We may use trusted tools and services to help with these tasks.***

We process your personal data:

## **2.1 To provide our Services**

This includes enabling you to use the Services seamlessly and preventing or addressing errors or technical issues in the Services.

To host personal data and enable our Services to operate and be distributed, we use cloud platforms for on-demand deployment, related hosting and backend services: **Digital Ocean** ([Data Processing Agreement](#)), **Google Cloud** ([Privacy Policy](#)), **Vercel** ([Privacy Policy](#)), and **Namecheap** ([Privacy Policy](#)).

We use **Firebase Performance Monitoring**, **Firebase Crash Reporting** and **Crashlytics**, which are monitoring services provided by Google. To learn more, please visit [Google's Privacy Policy](#), [Privacy and Security in Firebase](#) and [Crashlytics' Data Collection Policy](#).

**Clarity** is a user behavior and website debugging analytics tool. We use it to understand how users are interacting with our Services through session replays and heatmaps. Clarity was developed by Microsoft, so you may find more info about Clarity's approach to privacy in [Microsoft Privacy Statement](#).

**Sentry** is a code analysis tool that allows us to log front-end mistakes, monitor the performance of client-side code, and analyze code vulnerabilities. While performing its functions, Sentry may access a limited number of your data, such as IP address, browser information, OS version, and device type. More info about Sentry data processing is in the [Privacy Policy](#).

**CookieYes** helps us customize the cookie banner, record your consent and manage other cookie compliance needs. You may find more information about your data processing by CookieYes in the [Data Processing Agreement](#).

## **2.2 To customize your experience**

We process your personal data, such as reading preferences, to adjust the content of the Services and make offers tailored to your personal preferences. As a result of such processing, we will show more books from, for example, the "Self-Growth" category.

## **2.3 To manage your account**

We process your personal data to secure your access to your personal account and send you technical notifications or emails about the performance of our Services, security, notices regarding our Terms and Conditions of Use or this Privacy Policy.

## 2.4 To communicate with you regarding your use of our Services

We communicate with you, for example, by push notifications or by email. These may include reminders and motivational messages encouraging you to continue reading, as well as other information about the Services, your account, and important updates. As a result, you may, for example, receive a push notification every day at a particular time reminding you to read. To opt out of receiving push notifications, you need to change the settings on your device. To opt out of receiving marketing emails (in case you consented to receiving them), you should click the unsubscribe link in the footer of our emails.

The services we use for these purposes may collect data on the date and time the message was viewed by our App's users, as well as when they interact with it, such as by clicking links included in the message.

To communicate with you, we use **Firebase Cloud Messaging**, which is a message sending service provided by Google. Firebase Cloud Messaging allows us to send messages and notifications to users of our App across platforms such as Android and iOS. Please check [Google's Privacy Policy](#).

We use **Customer.io**, to manage our communications with you. This service allows us to send you administrative information and updates via channels like email and push notifications. You can learn more about how Customer.io processes your data by visiting their [Privacy Policy](#).

## 2.5 To provide you with customer support

We process your personal data to respond to your technical support requests.

We use the **Zendesk** ticketing system to handle customer inquiries. When you send us inquiries via the contact form or via email, we will store the details provided by you via the Zendesk ticketing system, which enables us to track, prioritize and quickly solve your requests. To learn more, please visit this [Privacy Policy](#).

## 2.6 To research and analyze your use of the Services

This helps us to better understand our business, analyze our operations, maintain, improve, innovate, plan, design, and develop the Services and our new products. We also use such data for statistical purposes. This enables us to better understand what features and categories of books our users like more and which categories of users use our Services. As a result, we often decide how to improve the Services based on the results of this processing. For example, if we discover that users more often read book summaries from the "Productivity" category, we may create and introduce more book summaries into this category.

We use **Amplitude** by Amplitude Inc. We use this tool to understand how customers use our Services. Amplitude collects various technical information, in particular, time zone, type of device (phone or tablet). Amplitude also allows us to track various interactions (entering your reading goals) that occur on the App or the Website. As a result, Amplitude helps us to decide which features we should focus on. Amplitude provides more information on how they process data in its [Privacy Policy](#).

To perform our Website analysis, we also use **Tableau**, a company providing interactive data visualization products focused on business intelligence – [Tableau Privacy Policy](#).

## **2.7 To enforce our Terms and Conditions of Use and to prevent and combat fraud**

We use personal data to enforce our agreements and contractual commitments, to detect, prevent, and combat fraud. As a result of such processing, we may share your information with others, including law enforcement agencies (in particular, if a dispute arises in connection with our Terms and Conditions of Use).

## **2.8 To comply with legal obligations**

We may process, use, or share your data when the law requires it, in particular if a law enforcement agency requests it by lawful means.

## **2.9 To ensure the security of the Services**

We process your personal data to ensure the security of our Services.

We use **reCAPTCHA** provided by Google to enhance the security of our Website and protect it from fraudulent activity and abuse. reCAPTCHA helps us determine whether certain actions on our Website are performed by a human or an automated bot. It helps us prevent fraudulent use of our Services and maintain their security and integrity. You can learn more by visiting Google's [Privacy Policy](#).

# **3. Under what legal bases we process your personal data (applies only to EEA-based users)**

In short: *If you live in the EEA or UK, we explain why we use your data for each purpose:*

- *To provide the service, customize your experience, manage your account, and provide support: we need your data to fulfill our contract with you.*
- *For research, communication, and preventing fraud: we use your data based on our legitimate interests, as long as it doesn't override your rights.*
- *To follow the law: we use your data when required by legal obligations.*

In this section, we are letting you know what legal basis we use for each particular purpose of processing. For more information on a particular purpose, please refer to Section 2. This section applies only to EEA-based users.

We process your personal data under the following legal bases.

### 3.1 Performing our contract with you

Under this legal basis, we:

- Provide our Services (in accordance with our Terms and Conditions of Use);
- Customize your experience;
- Manage your account and provide you with customer support;
- Communicate with you regarding your use of our Services.

### 3.2 Legitimate interests, unless those interests are overridden by your interests or fundamental rights and freedoms that require the protection of personal data

We rely on legitimate interests:

- to communicate with you regarding your use of our Services. This includes, for example, sending you push notifications proposing that you read a new book summary. The legitimate interest we rely on for this purpose is our interest in encouraging you to use our Services more often. We also take into account the potential benefits to you of reading more book summaries, which may help you advance in life and career.
- to research and analyze your use of the Services. Our legitimate interest for this purpose is to improve our Services by understanding users' preferences and providing you with a better experience (for example, to make using the App or the Website easier and more enjoyable, or to introduce and test new features).
- to enforce our Terms and Conditions of Use and to prevent and combat fraud. Our legitimate interests for this purpose are enforcing our legal rights, preventing and addressing fraud and unauthorised use of the Services, and non-compliance with our Terms and Conditions of Use.

### 3.3 Compliance with legal obligations

## 4. Who We Share Your Information With

In short: ***We may share your personal data with trusted third parties who help us run, improve, and support Headway. This includes service providers for apps, cloud storage, analytics, and communications. We may also share data if required by law, with law enforcement bodies, or during business changes like mergers or sales.***

The types of third parties we share information with include, in particular:

### 4.1 Service providers

We share personal data with third parties that we hire to provide services or perform business functions on our behalf, based on our instructions. We share your personal information with the following types of service providers:

- mobile app marketplaces (Apple App Store, Google Play Market);
- cloud storage providers (Google, Digital Ocean, Vercel, Namecheap);

- data analytics providers (Amplitude, Tableau);
- measurement partners (Firebase, Clarity, Sentry, CookieYes);
- communication services providers (Customer.io, Zendesk, Firebase).

#### 4.2 Law enforcement agencies and other public authorities

We may use and disclose personal data to enforce our Terms and Conditions of Use, to protect our rights, privacy, safety, or property, and/or that of our affiliates, you or others, and to respond to requests from courts, law enforcement agencies, regulatory agencies, and other public and government authorities, or in other cases provided for by law.

#### 4.3 Third parties as part of a merger or acquisition

As we develop our business, we may buy or sell assets or business offerings. Customers' information is generally one of the transferred business assets in these types of transactions. We may also share such information with any affiliated entity (e.g., parent company or subsidiary) and may transfer such information in the course of a corporate transaction, such as the sale of our business, a divestiture, merger, consolidation, or asset sale, or in the unlikely event of bankruptcy.

## 5. How you can exercise your privacy rights

In short: ***You can see, update, or delete your data, and ask us to stop using it. EEA users can also request a copy of their data or file a complaint with a data protection authority.***

To be in control of your personal data, you have the following rights:

- **Accessing / reviewing / updating / correcting your personal data.** You may review, edit, or change the personal data that you had previously provided on the Services.
- **Deleting your personal data.** You can request erasure of your personal data as permitted by law. When you request deletion of your personal data, we will use reasonable efforts to honor your request. In some cases, we may be legally required to keep some of the data for a certain time; in such an event, we will fulfill your request after we have complied with our obligations.
- **Objecting to or restricting the use of your personal data.** You can ask us to stop using all or some of your personal data or limit our use thereof.

**Additional information for EEA-based users.** If you are based in the EEA, you have the following rights in addition to the above:

- **The right to lodge a complaint with the supervisory authority.** We would love you to contact us directly, so we can address your concerns. Nevertheless, you have the right to lodge a complaint with a competent data protection supervisory authority, in particular in the EU Member State where you reside, work or where the alleged infringement has taken place.
- **The right to data portability.** If you wish to receive your personal data in a machine-readable format, you can send a respective request to us as described below.

To exercise any of your privacy rights, please send a request to [support@get-headway.com](mailto:support@get-headway.com).

## 6. Age limitation

Age limits are one of the eligibility criteria under the Revolut – Kids & Teens program rules. If your Revolut – Kids & Teens account is registered in the UK, you are eligible to access the Headway Subscription if you are at least 13 years old. If your Revolut – Kids & Teens account is registered in the EEA, you are eligible to access the Headway Subscription if you have reached the age of consent under the relevant personal data protection legislation.

If you learn that anyone younger has provided us with personal data, please contact us at [support@get-headway.com](mailto:support@get-headway.com).

## 7. International data transfers

**In short: *Your personal data may be stored and processed on servers outside your country, possibly in countries that do not have the same data protection laws (such as the USA). When we transfer data out of the EEA or the UK, we use legal safeguards like Standard Contractual Clauses (SCCs) or the UK Addendum to ensure your data receives a protected level of security.***

We do business globally. We may transfer personal data to countries other than the country in which the data was originally collected in order to provide the Services set forth in the Terms and Conditions of Use and for purposes indicated in this Privacy Policy. If these countries do not have the same data protection laws as the country in which you initially provided the information, we deploy special safeguards.

In particular, if we transfer personal data originating from the EEA to countries with not adequate level of data protection, we use one of the following legal bases: (i) Standard Contractual Clauses approved by the European Commission (details available [here](#)), or (ii) the European Commission adequacy decisions about certain countries (details available [here](#)).

## 8. Changes to this Privacy Policy

**In short: *We may update this Privacy Policy occasionally. If we make significant changes, we'll notify you and give you a chance to review them. Continuing to use our Services means you accept the updated Privacy Policy.***

We may modify this Privacy Policy from time to time. If we decide to make material changes to this Privacy Policy, you will be notified through our Services or by other available means and will have an opportunity to review the revised Privacy Policy. By continuing to access or use the Services after those changes become effective, you agree to be bound by the revised Privacy Policy.

## 9. Supplemental notice for California residents

In short: ***This notice applies to California residents under the CCPA. It explains what personal information we collect, who we share it with (like service providers and advertising partners), and that we do not sell personal information. California users have the right to access their data, request deletion, and not be discriminated against for exercising these rights. To make a verified request or authorize an agent, contact us at [support@get-headway.com](mailto:support@get-headway.com).***

This Supplemental California Privacy Notice only applies to our processing of personal information that is subject to the California Consumer Privacy Act of 2018 (the “CCPA”). The CCPA provides California residents with the right to know what categories of personal information we have collected about them and whether we disclosed that personal information for a business purpose (e.g., to a service provider) in the preceding twelve months. California residents can find this information below.

Category of Personal Information Collected	Categories of Third Parties Personal Information is Disclosed to for a Business Purpose
Identifiers	Service providers Users or third parties you share with Advertising partners
Personal information categories listed in Cal. Civ. Code § 1798.80(e)	Service providers Users or third parties you share with
Commercial information	Payment solutions partners
Internet or other electronic network activity	Service providers Users or third parties you share with Advertising partners
Geolocation data	Service providers Advertising partners
Inferences drawn from other personal information to create a profile about a consumer	Service providers Advertising partners

The categories of sources from which we collect personal information and our business and commercial purposes for using personal information are set forth above.

**“Sales” of Personal Information under the CCPA.** For purposes of the CCPA, we do not “sell” personal information, nor do we have actual knowledge of any “sale” of personal information of users who use the Headway Subscription with Revolut – Kids & Teens promo codes.

**Non-Discrimination.** California residents have the right not to be subjected to discriminatory treatment by us for exercising their rights under the CCPA.

**Authorized Agent.** Only you, or someone legally authorized to act on your behalf, may make a verifiable consumer request related to your personal information. To designate an authorized agent, please contact us as set forth below.

**Verification.** When you make a request, we will ask you to provide sufficient information that allows us to reasonably verify you are the person about whom we collected personal information or an authorized representative, which may include confirming the email address associated with any personal information we have about you.

If you are a California resident and would like to exercise any of your rights under the CCPA, please contact us at [support@get-headway.com](mailto:support@get-headway.com). We will process such requests in accordance with applicable laws.

## 10. Supplemental notice for Virginia residents

In short: ***This notice applies to Virginia residents under the Virginia Consumer Data Privacy Act (VCDPA). It explains how we collect and use personal data to operate our Services and your rights to access, correct, delete, or obtain a copy of your data. You may also opt out of targeted advertising by emailing [support@get-headway.com](mailto:support@get-headway.com) with the subject “Virginia Do Not Sell Request.” We do not sell personal data or use it for automated decision-making with legal effects.***

This Supplemental Virginia Privacy Notice only applies if you reside in the Commonwealth of Virginia. Where applicable, it describes how we use and process your personal data and explains your particular rights under the Virginia Consumer Data Privacy Act (“VCDPA”).

### **Disclosures about the use of your personal data**

We may collect and use certain information about you, some of which may be personal data (such as your name, email address, IP address, or other information which may be reasonably linked to you), in order to operate the Services and to maximize your experience.

If you would like more information about the categories of your personal data we collect or the purposes for which we collect them, please read Section 1 and Section 2. To learn more about sharing of your personal data with our business partners and other third parties, please read Section 4.

### **Data Rights**

Section 5 of our Privacy Policy describes the data rights we offer to all users and how to exercise these rights. This includes the right to access, review, correct, update your data, obtain a portable copy of your data, or delete data related to your stored preferences and your use of the Services.

Before completing your request, we may require some information sufficient to authenticate your identity.

Additionally, VCDPA provides Virginia residents with these data rights:

**Opt out of the Processing of your Personal Data for Targeted Advertising.** In order to exercise your choice as a Virginia resident, please contact us at [support@get-headway.com](mailto:support@get-headway.com) with the subject line “Virginia Do Not Sell Request”. We will process such requests in accordance with applicable laws.

Please note that we do not process personal data for purposes of (1) the sale of personal data, as defined by the VCDPA, or (2) profiling in furtherance of decisions that produce legal or similarly significant effects concerning the consumer. We also do not conduct targeted advertising to users who use the Headway Subscription with Revolut – Kids & Teens promo codes.

**Confirm whether your Personal Data is being Processed.** You may confirm whether your personal data is being processed by emailing us at [support@get-headway.com](mailto:support@get-headway.com).

**Appeal a Case with regard to your Request.** In the case where we declined to take action on your data rights request or have rejected your request, you may contact us at [support@get-headway.com](mailto:support@get-headway.com) to initiate an appeal of this decision. Please use the subject line “Appeal of Refusal to Take Action on Privacy Request” and provide the relevant information in the email. Once we receive your appeal, we will notify you in writing within 60 days of any action taken or not taken in response to the appeal, including a written explanation of the reasons for the decision.

If your appeal is denied, you may contact the Office of the Virginia Attorney General by these means:

[Office of the Attorney General | Virginia.gov](https://www.virginia.gov)  
[www.virginia.gov/agencies/office-of-the-attorney-general/#vagov](https://www.virginia.gov/agencies/office-of-the-attorney-general/#vagov)  
202 North Ninth Street  
Richmond, VA 23219

## 11. Supplemental notice for Nevada residents

In short: ***This notice applies to Nevada residents. If you live in Nevada, you have the right to ask us not to sell your personal information. We do not currently sell your information, but you can still contact us.***

If you are a resident of Nevada, you have the right to opt out of the sale of certain personal information to third parties who intend to license or sell that personal information. You can exercise this right by contacting us at [support@get-headway.com](mailto:support@get-headway.com) with the subject line “Nevada Do Not Sell Request” and providing us with your name and the email address associated with your account. Please note that we do not currently sell your personal information as sales are defined in Nevada Revised Statutes Chapter 603A.

## 12. Account deletion

In short: ***You can delete your account anytime through Settings in the app/website, or by emailing [support@get-headway.com](mailto:support@get-headway.com). We will remove your account and data within 30 days, retaining only the information necessary for required purposes. After you start deletion, you cannot use your account or access subscription features.***

You can delete your account at any time using the functionality found in “Settings” in the App or the Website, or by contacting us at [support@get-headway.com](mailto:support@get-headway.com). Upon your request, we will delete your account and all associated data, except for limited information, which will be stored for specific purposes and a limited period, as set forth in this Privacy Policy. The deletion process may take up to 30 days to complete.

Please note that once you initiate the deletion process, your account can no longer be used, and you will lose access to all subscription features.

## 13. Data retention

In short: ***We keep your personal data only as long as needed to provide our services and fulfill the purposes in this Privacy Policy. We may also retain some data as required to meet legal obligations, resolve disputes, and enforce agreements.***

We will store your personal data for as long as it is reasonably necessary for achieving the purposes set forth in this Privacy Policy (including providing the Services to you), which includes (but is not limited to) the period during which you have an account with the Services. We will also retain and use your personal data as necessary to comply with our legal obligations, resolve disputes, and enforce our agreements.

## 14. How “Do Not Track” requests are handled

Except as otherwise stipulated in this Privacy Policy, this App does not support “Do Not Track” requests. To determine whether any of the third-party services it uses honor the “Do Not Track” requests, please read their privacy policies.

## 15. Personal data controller

**GTHW App Limited**, a company registered and acting under the laws of the Republic of Cyprus with registration number HE 395742, having its registered address at Omonoias Avenue 13, Office 1B, Limassol 3052, Cyprus, will be the controller of your personal data.

## 16. Contact us

You may contact us at any time for details regarding this Privacy Policy and its previous versions. For any questions concerning your account or your personal data, please contact us at [support@get-headway.com](mailto:support@get-headway.com).

Last Update: November 28, 2025