PRIVACY POLICY

Effective on 2026-10-01.

This Privacy Policy describes how Aleksandr Kobozev (“HotAi Lab”, “we”, “us”, or “our”) collects, uses, and protects information when you use the HotAi Lab mobile application (the “App” or the “Service”).

We are committed to protecting your privacy and processing personal data in a transparent and limited manner.

1. Information We Collect

1.1 User-Provided Content (Photos, Text and Images)

The App allows you to upload or capture photos and images for the purpose of AI-based image processing.

- Photos and any custom text provided are transmitted **only to perform the requested AI processing**.
- We **do not permanently store** photos on our servers.
- Photos are **automatically deleted immediately after processing is completed**.
- Photos are **not used to train, fine-tune, or improve AI models**.
- We do not create user profiles based on photos.

1.2 AI Processing (Third-Party Provider)

- AI image processing is performed using Google AI Studio API (Gemini)
- Photos are sent to Google solely to generate the requested output.
- Processing is governed by Google’s applicable data processing and security terms.
- Google does not receive data for advertising or AI training purposes from us.

1.3 AI Video Processing (Third-Party Providers)

When you use video generation features, the photo(s) you select and any text prompt you provide are processed as follows:

● Video generation is performed using AI models developed by Kling AI (Kuaishou Technology / Kling AI Pte. Ltd.), accessed through fal.ai (Features & Labels, Inc.), a generative media infrastructure provider.

● Your photos and prompts are sent to these providers solely to generate the requested video.

● The generated video is returned to you in the App. We do not permanently store your photos or generated videos on our servers.

● We configure our requests so that input photos and generated videos are automatically deleted from the provider's storage within **24 hours**, and request data is not retained in the provider's request history.

● We do not provide your photos or videos to these providers for advertising purposes, and we do not authorize them to use your content to train AI models on our behalf.

● Processing may take place on servers located outside your country, including in the United States, Singapore.

● Processing is governed by the respective providers' privacy policies and terms (see Section 7).

1.4 Device and Technical Information

We may automatically collect limited technical information necessary for the operation of the App, including:

- Device type and operating system version
- App version
- Language and region settings (via expo-localization)
- Crash reports and performance diagnostics

This data does not include precise location data and is not used to identify you personally.

1.5 Analytics Information

We use Amplitude to collect anonymized usage analytics to understand how users interact with the App.

Collected data may include:

- Feature usage events
- Session duration
- General interaction patterns

We do not use analytics data for advertising, tracking across apps, or profiling users.

1.6 Push Notifications

We use expo-notifications to send service-related notifications only, such as:

- Processing status updates
- Important service messages

We do not send marketing or promotional notifications.

2. Collection, Use, and Storage of Facial Data

Photos you upload to the App may contain images of faces. This section explains how such images are handled.

2.1 What We Do Not Collect

- We do not collect, extract, or store facial geometry, face templates, faceprints, or any other biometric identifiers.
- We do not use facial recognition or face-matching technology to identify, verify, or track any person.
- We do not use Apple's TrueDepth camera, ARKit face tracking, or Face ID data.
- We do not create profiles, databases, or analytics based on faces.

2.2 How Facial Images Are Used

- Facial images are used exclusively to provide AI-powered generation, editing, animation, or

transformation features requested by the user.
● Facial images are processed only when you actively select a photo and request a feature.
● Facial images are not used for advertising, marketing, profiling, or any purpose other than producing the output you requested.
● Facial images are not used by us to train, fine-tune, or improve AI models.

2.3 Sharing With Third Parties

● To perform the requested processing, photos containing faces are transmitted to the AI service providers described in Sections 1.2 and 1.3 (Google Gemini for image processing; fal.ai and Kling AI for video generation).
● These providers process the photos solely to generate the requested output on our behalf.
● We do not sell, rent, or share facial images with advertisers, data brokers, or any other third parties.

2.4 Storage and Retention

● We do not permanently store facial images on our servers.
● Photos and generated outputs are deleted after processing is completed, and in any case within **24 hours**.
● We do not keep backups of facial images.

2.5 Your Choices

● You decide which photos to upload. Please upload only photos of yourself or of people who have given you permission.

● You can request deletion of any data related to you at any time by contacting **support@hotaibot.pro**.

3. How We Use Information

We use collected information solely to:

- Provide and operate the App
- Perform AI image processing and AI video generation requested by you
- Improve app performance and stability
- Deliver service-related notifications
- Comply with legal obligations

4. Subscriptions and Purchases

The App offers paid subscriptions processed through Apple’s In-App Purchase system.

To manage subscriptions and validate purchase status, we use **RevenueCat**, a third-party service provider that helps us securely manage subscription entitlements and purchase events.

RevenueCat processes limited information related to subscriptions, such as:

- Subscription status and entitlement information
- App-specific user identifiers
- Purchase and renewal events provided by Apple

We do not receive or store your payment card details, Apple ID credentials, or other financial information. All payments are processed directly by Apple.

RevenueCat acts solely as a service provider on our behalf and processes data in accordance with applicable data protection laws.

5. Data Retention

- User photos and generated videos **are deleted after AI processing is completed**, and within **24 hours** at most.
- We do not maintain backups of user images or videos.
- Analytics and diagnostic data are retained only as long as necessary for operational purposes.
- We do not sell, rent, or monetize personal data.

6. Sharing of Information

We share information **only** with trusted service providers acting on our behalf, including:

- Google (Gemini AI processing)
- fal.ai (AI video generation infrastructure)
- Kling AI (AI video generation models)
- Amplitude (analytics)
- Expo / Apple (app infrastructure and notifications)

These providers are permitted to use data **only to perform services for us** and in accordance with applicable data protection laws.

We do not share data with advertisers or data brokers.

7. Third-Party Services

The App relies on the following third-party services to operate and provide its functionality:

- **fal.ai – AI video generation infrastructure** https://fal.ai/legal/privacy-policy
- **Kling AI – AI video generation models** https://kling.ai/docs/privacy-policy
- **Apple App Store** – in-app purchases and subscription processing https://www.apple.com/legal/privacy/
- **RevenueCat** – subscription management and entitlement validation https://www.revenuecat.com/privacy/
- **Google AI Studio (Gemini API)** – AI image processing https://policies.google.com/privacy
- **Amplitude** – usage analytics https://amplitude.com/privacy
- **Expo** – application infrastructure and notifications https://expo.dev/privacy

These third-party services process data only as necessary to provide their respective services and in accordance with their own privacy policies.

8. User Rights

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

- Request access to personal data
- Request deletion of personal data
- Withdraw consent where applicable

Requests can be submitted via: **support@hotaibot.pro**

9. Children’s Privacy

The App is not directed to children.

We do not knowingly collect personal data from children.

If we become aware that personal data has been collected from a child without appropriate consent, we will take steps to delete such information.

10. Security

We implement reasonable administrative and technical safeguards to protect information.
However, no method of transmission or storage is 100% secure.

11. International Data Transfers

Your information may be processed in countries where our service providers operate.
We take steps to ensure appropriate safeguards are in place.

AI video processing may involve transfer of your photos to service providers in the United States, Singapore.

12. Changes to This Privacy Policy

We may update this Privacy Policy from time to time.
Changes will be posted within the App or on our website.

13. Contact Us

If you have any questions or concerns about this Privacy Policy, contact:

Aleksandr Kobozev
support@hotaibot.pro