# Privacy Policy

Effective: 7 October 2026

## 1. Controller

The controller responsible for data processing within the meaning of the GDPR is:

- Name/Company: Norbert Weiß
- Address: Alt Nowawes 83 b, 14482 Potsdam, Germany
- Email: info@camprio.de
- Website: https://www.camprio.de

## 2. General Information on Data Processing

We only process personal data to the extent necessary. Location and sensor data are processed locally on the device; in some cases we transmit location data to Apple servers for MapKit PoI features, as well as to the German Federal Environment Agency (Umweltbundesamt) or Open-Meteo for air quality and pollen values. Otherwise, motion and location data are only processed locally on the device and only to the extent required to provide a functional app and our content and services.

Processing is carried out on the basis of the GDPR, in particular Art. 6(1)(b) (contract/service provision), (c) (legal obligation) and (f) (legitimate interest), as well as — where required — Art. 6(1)(a) (consent).

## 3. Categories of Data Processed and Purposes

**App and Device Data (minimal)**

- Categories: Device model, operating system version, app version (processed locally, only to the extent technically necessary).
- Purposes: Operation and functionality of the app.
- Legal basis: Art. 6(1)(b) GDPR.

**Location Data (Weather Feature + MapKit for PoI)**

- Categories: Approximate/precise location, location searches.
- Purposes:
  - Display of local weather information.
  - Display of Points of Interest via MapKit.
- Processing: Partly locally on the device. For weather information, location coordinates are sent to Apple's WeatherKit API; for Points of Interest, to the MapKit API.
- Processor: Apple Inc. (WeatherKit API, MapKit API).
- Legal basis: Art. 6(1)(a) GDPR (consent).
- Withdrawal: Can be revoked at any time in the device settings.

**Location Data (POI search via OpenStreetMap)**

- Categories: Approximate GPS coordinates (latitude, longitude).
- Purposes: Search for nearby points of interest (e.g. dive schools) via the Overpass API (OpenStreetMap).
- Processing: Anonymous coordinate queries are sent to the Overpass API. No user accounts are created, no cookies are set, no tracking takes place. Only the search coordinates and a radius are transmitted.
- Data recipient: OpenStreetMap Foundation (OSMF), St John's Innovation Centre, Cowley Road, Cambridge, CB4 0WS, United Kingdom.
- Legal basis: Art. 6(1)(f) GDPR (legitimate interest in providing relevant nearby suggestions). Location access is based on existing consent via system permissions.
- License: Returned POI data is licensed under the Open Data Commons Open Database License (ODbL). © OpenStreetMap contributors.
- OSMF Privacy Policy: https://osmfoundation.org/wiki/Privacy_Policy

**Location Data (Air Quality & Pollen)**

- Categories: GPS coordinates (current location, or the coordinates of saved parking locations).
- Purposes: Display of current air quality and pollen values for the current location and for saved parking locations; basis for the optional AI-powered health advisory (see "Allergy Profile" and "AI-Powered Health Advisory" below).
- Processing: Within Germany, a public list of all measuring stations (including their coordinates), provided by the German Federal Environment Agency (Umweltbundesamt), is first downloaded; the nearest station is determined exclusively locally on the device, so that **no** location data is transmitted to the Umweltbundesamt — only a station code is queried. Outside Germany, and for pollen data (only available within Europe), GPS coordinates are sent directly to the Open-Meteo API.
- Data recipients: Umweltbundesamt (UBA), Wörlitzer Platz 1, 06844 Dessau-Roßlau, Germany; OpenMeteo GmbH, Hintere Schilligmatte 6, 6463 Bürglen (UR), Switzerland.
- Legal basis: Art. 6(1)(a) GDPR (consent via location permission).
- Privacy policies: Umweltbundesamt | Open-Meteo
- Transfer: Switzerland (Open-Meteo) – EU adequacy decision in place; no additional safeguards required. The Umweltbundesamt is located within Germany/the EU.

**Allergy Profile (local setting)**

- Categories: Selection of pollen types the user is allergic to (e.g. birch, grass, ragweed) – a settings preference.
- Purposes: Personalisation of the optional AI-powered health advisory and the corresponding badge on the main screen.
- Processing: Stored exclusively locally on the device; **no** iCloud synchronisation and no transmission to us. Only when an external AI provider or Private Cloud Compute is used for the health advisory is the selection transmitted to the chosen provider together with the air quality/pollen values (see "AI-Powered Health Advisory" below).
- Legal basis: Art. 6(1)(a) GDPR (consent by making a selection in Settings).
- Deletion: The selection can be changed or reset at any time in the app settings.

**AI-Powered Health Advisory (optional)**

- Categories: Air quality and pollen values of the respective location, selected allergy profile.
- Purposes: A short, AI-generated note on what the current air quality/pollen values could mean for the selected allergies – for both the current location and saved parking locations.
- Processing: Three-tier, analogous to "Activity"/"Travel Report": first an externally configured AI provider (if enabled), otherwise Apple Intelligence/Private Cloud Compute, otherwise a purely local, non-AI text template – the latter never leaves the device. Data is only processed externally in the first two cases.

- Processor/provider: See "External AI Services" or "Apple Intelligence"/"Private Cloud Compute" above, depending on selection.
- Legal basis: Art. 6(1)(a) GDPR (consent by selecting at least one allergy).
- Note: This advisory does not replace medical advice.

**Motion/Orientation Sensors (Motion Sensor)**

- Categories: Accelerometer, gyroscope.
- Purposes: Local determination of distance, speed and location.
- Processing: Exclusively locally on the device; no transmission to us or third parties; no server-side storage. Only the number of laps, invitations and subscribed event information is stored.
- Legal basis: Art. 6(1)(b) GDPR (to provide the core functionality). If the system requires a separate permission, additionally Art. 6(1)(a) GDPR.

**Analytics, Advertising, Tracking**

- No analytics services, no tracking and no advertising are used.

**Crash Reporting**

- No crash reporting services (Apple, Sentry, Firebase Crashlytics or similar) are used.

**iCloud / CloudKit (Saved Parking Locations, Vehicle Profiles, Tags, Activity Templates)**

- Categories: Saved parking locations including name, address, GPS coordinates, arrival and departure date/time, notes, and optionally photos; vehicle profiles (name, track width, wheelbase, calibration data); custom location tags (name, color); saved activity prompt templates (name, free text, category).
- Purposes: Synchronisation of this app data between the user's own devices (iPhone, iPad) under the same iCloud account.
- Processing: Data is transmitted and stored in encrypted form via Apple's CloudKit. Only the respective iCloud account holder has access. No access by us or other third parties takes place.
- Processor: Apple Inc.
- Legal basis: Art. 6(1)(a) GDPR (consent by enabling iCloud on the device).
- Deletion: The data can be deleted at any time in the app. When iCloud is deactivated, data is removed in accordance with Apple's iCloud policies.

**iCloud Key-Value Store (Settings Synchronisation)**

- Categories: Travel notes (free text, e.g. "Traveling with a dog", "Interested in hiking"); AI provider selection (preference setting, not personal data in the strict sense).
- Purposes: Synchronisation of user-defined travel notes between the user's own devices (iPhone, iPad) under the same iCloud account, in order to personalise AI-generated summaries of nearby places.
- Processing: Data is transmitted and stored in encrypted form via Apple's iCloud Key-Value Store. Only the respective iCloud account holder has access. No access by us or other third parties takes place.
- Processor: Apple Inc.
- Legal basis: Art. 6(1)(a) GDPR (consent by enabling iCloud on the device).
- Deletion: Travel notes can be deleted at any time in the app settings. When iCloud is deactivated, data is removed in accordance with Apple's iCloud policies.

**iCloud Keychain (API Key Synchronisation)**

- Categories: API keys for optional AI providers (technical credentials, not personal data in the strict sense).
- Purposes: Synchronisation of the API key across the user's own devices (iPhone, iPad) under the same iCloud account, so that the key entered once is available on all the user's devices.
- Processing: **End-to-end encrypted** via iCloud Keychain. Apple has no technical access to the plaintext. Only the respective iCloud account holder has access.
- Processor: Apple Inc.
- Legal basis: Art. 6(1)(a) GDPR (consent by enabling iCloud Keychain on the device).
- Deletion: The API key can be deleted at any time in the app settings (AI Settings).

**Account/Login, Server Backend**

- Not applicable; no user accounts are maintained and no app usage data is stored on servers.

**In-App Purchases/Subscriptions**

- Not applicable.

**Push Notifications**

- Not applicable.

**Apple Intelligence**

- Categories: Texts, queries, contextual data, photos (for local image analysis).
- Purposes: AI-powered features (e.g. text analysis, suggestions); AI-powered photo analysis in the "Smart Gallery" feature (automatic categorization, quality scoring, duplicate detection).
- Processing: Primarily locally on the device. Advanced requests (e.g. Writing Tools) may be partially processed via Apple servers — subject to Apple's Private Cloud Compute policies. Photo analysis (categorization, quality scoring, duplicate detection) is performed exclusively locally on the device via Apple's Vision framework; the photos themselves never leave the device.
- Processor: Apple Inc.
- Data storage: Local requests are not retained. Server-based requests are subject to Apple Intelligence privacy policies.
- Legal basis: Art. 6(1)(a) GDPR (consent).

**AI Photo Captioning with Nearby Attraction Detection (optional)**

- Categories: GPS coordinate and capture date from a photo's EXIF metadata.
- Purposes: Automatic generation of a photo caption mentioning a nearby, named attraction (only when "AI Photo Analysis" is enabled in Settings); using the photo's actual capture date as its stored timestamp (independently of that setting, for every photo picked from the library).
- Processing: When AI Photo Analysis is enabled, a photo's GPS location is briefly read on-device from its original EXIF data and sent to Apple's MapKit API to search for a nearby attraction (see "Location Data (Weather Feature + MapKit for PoI)" above). The coordinate is not stored, synced, or otherwise transmitted by us; only the resulting caption text (if any) is saved to the photo. The capture date is additionally read from a photo's EXIF data whenever an existing photo is picked from the library, and stored as the photo's timestamp.
- Processor: Apple Inc. (MapKit API), solely for the attraction search.
- Legal basis: Art. 6(1)(a) GDPR (consent by enabling AI Photo Analysis in Settings).

**Private Cloud Compute (optional, iOS/iPadOS 27 and later)**

- Categories: Same as "External AI Services" below (POI context, activity-plan or travel-report data, possibly photos).
- Purposes: Alternative to purely on-device processing for the "POI Summary", "Activity", "Travel Report", and "Health Advisory" features, offering a larger context window and stronger model performance than on-device processing.
- Processing: When enabled, the request is processed on Apple's servers with the same privacy guarantees as on-device processing: end-to-end encrypted, not logged, no access by Apple, us, or third parties. Requires an internet connection; automatically falls back to on-device processing on failure.
- Processor: Apple Inc. (the same entity as above, no additional third party).
- Activation: Disabled by default; must be explicitly selected as a provider by the user in the AI settings.
- Legal basis: Art. 6(1)(a) GDPR (consent through activation).
- Info: https://security.apple.com/blog/private-cloud-compute/

**External AI Services (optional)**

- Categories: (a) *POI summaries:* POI name, opening hours, category, amenities, location context (place name, region, GPS coordinates, current weather, season/month), relevant travel notes where applicable. (b) *Activity planning:* User intent (free text, e.g. "I want to go hiking"), location name, GPS coordinates, address/region, time of day, month, weather (temperature, wind), geography context (e.g. coastal, mountains), travel notes, optional vehicle name, and the location's air quality/pollen values plus selected allergy profile where available. (c) *Travel report:* Parking location names, addresses, GPS coordinates, arrival and departure dates/times, number of nights per stop, notes per location, general travel notes, and each location's stored air quality/pollen values plus selected allergy profile where available. (d) *Health advisory:* Air quality and pollen values of the location, selected allergy profile.
- Purposes: (a) AI-powered summaries of nearby places and enrichment of activity suggestions. (b) Generation of personalised activity plans based on the user's request (Activity feature). (c) Generation of an AI-written travel report based on saved parking locations and notes (Travel Report feature). (d) Generation of a short note on what the current air quality/pollen values could mean for the selected allergies (Health Advisory feature). All features are only active if enabled by the user.
- Processing: Data is transmitted encrypted (HTTPS) to the user's chosen provider.
- Possible providers: Mistral AI SAS (France, EU), OpenAI, Inc. (USA), Anthropic, PBC (USA), Google LLC (USA) or OpenRouter, Inc. (USA).
- Activation: Disabled by default. The user must actively select a provider and enter their own API key (Bring Your Own Key).
- Data storage: The API key is stored end-to-end encrypted in the iCloud Keychain and can therefore be securely synchronised across the user's own devices (Apple has no technical access to the plaintext). POI data is only transmitted for the duration of the request.
- Legal basis: Art. 6(1)(a) GDPR (explicit consent through activation).
- Privacy policies: Mistral AI | OpenAI | Anthropic | Google | OpenRouter

## 4. App Permissions

- **Location:** To provide location-based weather features and PoI display via MapKit. Granting permission is voluntary and can be revoked at any time in the system settings. If revoked, weather features may be limited.
- **Motion & Fitness/Sensors:** To determine tilt/motion data for leveling. Processing is carried out exclusively locally.
- **Camera:** To capture photos directly for saved parking locations. Granting permission is voluntary and can be revoked at any time in the system settings; if revoked, the app shows a notice with a direct link to Settings.
- **Photos from your library:** To add existing photos to saved parking locations. Selection happens via the system's native photo picker (PHPickerViewController); the app only receives the specific photos you select and has no access to the rest of your library. No separate system permission is required for this — this feature always works regardless of the "Photos" permission status in system settings. Photos are then stored exclusively locally on the device and in the user's private iCloud — no access by us. In the "Smart Gallery" feature, added photos are additionally analyzed locally by Apple Intelligence (see the "Apple Intelligence" section). When picking an existing photo, its GPS coordinate and capture date are read from its EXIF metadata (see the "AI Photo Captioning with Nearby Attraction Detection" section) before that metadata is stripped for storage.
- **Microphone:** For the optional voice input in the activity planning feature ("Activity"). Audio data is processed exclusively locally on the device and is not stored. Granting permission is voluntary and can be revoked at any time in the system settings. If revoked, voice input is unavailable; text input remains fully functional.
- **Speech Recognition:** To convert spoken activity requests into text (Activity feature). Processing is carried out locally on the device via Apple's Speech framework. No voice recordings are stored or transmitted. Granting permission is voluntary and can be revoked at any time in the system settings.

## 5. Storage Duration

- **App (local):** Personal data is generally not stored on servers. Location and sensor data are only processed temporarily on the device.
- **App (MapKit/Apple Intelligence):** Apple stores requests in accordance with https://www.apple.com/privacy/.
- **Website log files (camprio.de):** Server log files are stored for 14 days and then deleted or anonymised.
  - Categories: IP address, date/time, pages/files accessed, user agent, referring URL, error messages where applicable.
  - Purposes: Operation, security and error analysis of the website.
  - Legal basis: Art. 6(1)(f) GDPR (legitimate interest in stability/security).

## 6. Disclosure to Third Parties and Processors

**App:** Disclosure of personal data to Apple Inc. for:

- MapKit and WeatherKit queries (location data for PoI display and weather information, respectively, including the brief attraction search for AI photo captions)
- Apple Intelligence features (if enabled)
- Private Cloud Compute (optional, if selected as AI provider, iOS/iPadOS 27 and later)
- CloudKit (synchronisation of parking locations, vehicle profiles, tags, and activity templates between the user's own devices)
- iCloud Key-Value Store (synchronisation of travel notes and AI provider selection between the user's own devices)
- iCloud Keychain (end-to-end encrypted synchronisation of API keys for AI providers)

Legal basis: Art. 28 GDPR (processor).

Apple as processor: Apple Inc. has published its privacy policy at https://www.apple.com/privacy/. Transfer to a third country (USA) is carried out with Standard Contractual Clauses (SCCs).

**OpenStreetMap Foundation (OSMF):** For POI searches (e.g. dive schools), anonymous GPS coordinates are transmitted to the Overpass API operated by the OpenStreetMap Foundation, St John's Innovation Centre, Cowley Road, Cambridge, CB4 0WS, United Kingdom. No personal data, user accounts or cookies are involved.

- Legal basis: Art. 6(1)(f) GDPR (legitimate interest).
- OSMF Privacy Policy: https://osmfoundation.org/wiki/Privacy_Policy
- Data license: Open Data Commons Open Database License (ODbL).
- Transfer: United Kingdom – EU adequacy decision in place; no additional safeguards required.

**Umweltbundesamt (UBA) and OpenMeteo GmbH (Air Quality & Pollen):** Location data is processed to display current air quality and pollen values. Within Germany, only a locally determined station code is sent to the Umweltbundesamt (no GPS coordinates); outside Germany, and for pollen data, GPS coordinates are sent directly to Open-Meteo.

- **Umweltbundesamt**, Wörlitzer Platz 1, 06844 Dessau-Roßlau, Germany. Privacy policy: https://www.umweltbundesamt.de/en/disclaimer-privacy-policy-copyright
- **OpenMeteo GmbH**, Hintere Schilligmatte 6, 6463 Bürglen (UR), Switzerland. Privacy policy: https://open-meteo.com/en/terms
- Legal basis: Art. 6(1)(a) GDPR (consent via location permission).
- Transfer: Switzerland (Open-Meteo) – EU adequacy decision in place; no additional safeguards required.

**External AI Providers (optional, only when activated by the user):** If the user activates an external AI provider in the settings and enters their own API key, the following data is transmitted to the chosen provider: (a) *POI summaries:* POI data (name, opening hours, category), location context (place name, region, GPS coordinates, current weather, month), relevant travel notes where applicable. (b) *Activity planning:* User intent (free text), location name, GPS coordinates, address/region, time of day, weather, geography context, travel notes, and optional vehicle name. (c) *Travel report* and (d) *Health advisory:* the location's air quality/pollen values and selected allergy profile where available, or where at least one allergy is selected.

- **Mistral AI SAS**, 4 Rue de Rivoli, 75004 Paris, France (EU). Privacy policy: https://mistral.ai/terms/ — Data processing within the EU.
- **OpenAI, Inc.**, 3180 18th Street, San Francisco, CA 94110, USA. Privacy policy: https://openai.com/privacy/
- **Anthropic, PBC**, 548 Market Street, San Francisco, CA 94104, USA. Privacy policy: https://www.anthropic.com/privacy
- **Google LLC**, 1600 Amphitheatre Parkway, Mountain View, CA 94043, USA. Privacy policy: https://policies.google.com/privacy
- **OpenRouter, Inc.**, 865 Market Street, Suite 440, San Francisco, CA 94103, USA. Privacy policy: https://openrouter.ai/privacy
- Legal basis: Art. 6(1)(a) GDPR (consent through active configuration).
- Third-country transfer (USA): With Standard Contractual Clauses (SCCs) pursuant to Art. 46 GDPR. Mistral AI (EU) does not require a third-country transfer.

## 7. Data Security

We take appropriate technical and organisational measures to protect data against loss, misuse and unauthorised access (including encryption, access controls, data minimisation).

## 8. Children and Minors

Our app is not specifically aimed at children under 16 years of age. We do not knowingly process data of children below this age without the consent of a parent or guardian.

## 9. Rights of Data Subjects

Under the GDPR you have the following rights:

- Right of access (Art. 15 GDPR)
- Right to rectification (Art. 16 GDPR)
- Right to erasure (Art. 17 GDPR)
- Right to restriction of processing (Art. 18 GDPR)
- Right to data portability (Art. 20 GDPR)
- Right to object (Art. 21 GDPR)
- Right to withdraw consent (Art. 7(3) GDPR)

To exercise your rights, please contact us using the contact details above. You also have the right to lodge a complaint with a supervisory authority.

## 10. Automated Decision-Making/Profiling

We do not use automated decision-making or profiling within the meaning of Art. 22 GDPR.

## 11. Transfers to Third Countries

In connection with the app, data is transferred to the following third parties:

- **MapKit & WeatherKit:** Location data to Apple Inc. (USA) for PoI display and weather information, respectively.
- **Apple Intelligence:** Contextual data to Apple Inc. (USA).
- **Private Cloud Compute (optional):** POI, activity, travel-report, or health-advisory context, possibly including photos, air quality/pollen values, and allergy profile, to Apple Inc. (USA), if selected as AI provider (iOS/iPadOS 27 and later). End-to-end encrypted, not logged.
- **CloudKit:** Saved parking locations (name, address, GPS, dates, notes, photos), vehicle profiles (name, dimensions, calibration data), custom tags, and saved activity prompt templates (including free text) to Apple Inc. (USA) for synchronisation between the user's own devices.
- **iCloud Key-Value Store:** Encrypted travel notes and AI provider selection to Apple Inc. (USA) for synchronisation between the user's own devices.
- **iCloud Keychain:** End-to-end encrypted API keys to Apple Inc. (USA) – Apple has no technical access to the plaintext.
- **Overpass API:** Anonymous GPS coordinates to OpenStreetMap Foundation (United Kingdom). The UK has an EU adequacy decision; no additional safeguards are required. No personal data is transferred.
- **Open-Meteo (Air Quality & Pollen):** GPS coordinates to OpenMeteo GmbH (Switzerland) to display current air quality/pollen values, when no UBA measuring station is used. Switzerland has an EU adequacy decision; no additional safeguards are required.
- **External AI Services (optional):** POI data, activity descriptions, location context, and possibly air quality/pollen values and selected allergy profile, to Mistral AI SAS (EU, no third-country transfer), OpenAI, Inc., Anthropic, PBC, Google LLC or OpenRouter, Inc. (USA), if enabled by the user. Third-country transfer (USA) with SCCs.

Third-country transfer (USA): With Standard Contractual Clauses (SCCs) pursuant to Art. 46 GDPR.

For the website: Transfer to third countries only takes place where appropriate safeguards are in place (e.g. EU Standard Contractual Clauses) and in compliance with legal requirements.

## 12. App Store Data Processing

When downloading the app, the app store provider (Apple) processes its own data (e.g. Apple ID, payment information). We have no influence over this processing. The provider's privacy policy applies.

MapKit and Apple Intelligence: Apple processes location data and, where applicable, texts in accordance with its privacy policy.

## 13. Changes to this Privacy Policy

We may update this privacy policy if app features or legal requirements change. The current version in the app or on our website shall apply.

## 14. Contact


- Controller: Norbert Weiß
- Address: Alt Nowawes 83 b, 14482 Potsdam, Germany
- Email: info@camprio.de
- Website: https://www.camprio.de