



PRIVACY POLICY

Last revised: Jun 23, 2025

This Privacy Policy explains how Verba Creative Inc. (“**Verba**”, “**we**”, “**us**”, or “**our**”) collects, uses, shares, and protects your information when you use the Verba mobile application, available via the Apple App Store via the link: <https://apps.apple.com/ua/app/ai-captions-for-video-verba/id6467481048> (“**Verba app**”), and any related features or services.

This Policy applies to all users of the Verba app (“**you**” or “**user**”) and is designed in accordance with applicable data protection laws, including:

- the General Data Protection Regulation (GDPR) of the European Union;
- the California Consumer Privacy Act (CCPA), as amended by the California Privacy Rights Act (CPRA);
- the Children’s Online Privacy Protection Act (COPPA);
- and other applicable privacy regulations in the United States and internationally.

By downloading or using the Verba app, you agree to the collection and use of your information as described in this Policy. If you do not agree, please refrain from using the app.

Verba is operated by:

Verba Creative Inc.

A Delaware corporation

Registered office: 131 Continental Drive, Suite 301, Newark, New Castle County, DE 19713, USA

Email: privacy@verba.digital

Website: <https://verba.digital>

App Store listing: <https://apps.apple.com/ua/app/ai-captions-for-video-verba/id6467481048>

What Data We Collect

We collect only the minimum amount of data necessary to provide and improve the Verba app. The types of information we may collect include:

a) Content you provide:

- Audio and video files are uploaded to the app for processing (e.g., for generating captions or translations).
- These files are processed temporarily and are deleted automatically after processing unless you choose to save them.

b) Technical and device data:

- Device type and model (e.g., iPhone 16), operating system version, and language settings.
- App crash logs and diagnostics (used solely to fix bugs and improve performance).
- General usage data (e.g., how often you use a feature), collected in an anonymized form.

c) Subscription and payment data:

- If you purchase a subscription, Apple processes all payments directly through your Apple ID. We do not receive or store your payment details.
- We may receive anonymized information from Apple regarding your subscription status (e.g., active or expired) to manage feature access.

d) Customer support information (if you contact us):

- Your email address and any content you include in your message.
- We use this information only to respond to your inquiry.

e) Optional metadata:

- If you choose to save projects locally in the app, certain metadata (e.g., filename, language, duration) may be stored on your device.
- This information is never uploaded to our servers unless explicitly shared by you.

We do not collect or store:

- Names, email addresses (except when contacting support), phone numbers, or account credentials.
- Sensitive personal data (e.g., health, biometric, or financial data).
- Data from your Apple Photos, Microphone, or Camera without your explicit permission via iOS prompts.

How We Use Your Data

We use your data solely to operate, maintain, and improve the Verba app. Specifically, we may use the data we collect for the following purposes:

a) To provide core app functionality:

- Process your audio and video files to generate captions, translations, noise reduction, or other requested outputs.
- Save your projects locally on your device.

b) To ensure performance and security:

- Monitor technical errors, crashes, and performance issues to ensure the app works smoothly on your device.
- Protect against fraud, abuse, and unauthorized use.

c) To improve user experience:

- Analyze anonymized usage data to understand which features are most helpful.
- Identify areas where the app can be optimized or improved.

d) To manage subscriptions and feature access:

- Verify whether a user has an active subscription via Apple to unlock premium functionality.
- Provide appropriate in-app messaging or support based on subscription status.

e) To respond to user requests:

- Handle inquiries, bug reports, or feedback submitted to our support email.
- Follow up on deletion or data-related requests.

We do not use your data for advertising, profiling, or training AI systems. We do not sell your personal data.

How We Store and Protect Your Data

We are committed to protecting your privacy and securing your information. Here's how we do it:

a) Minimal storage by design

Most content (e.g., video or audio files) is processed in real-time and automatically saved locally on your device.

We do not maintain long-term copies of your content on our servers unless specifically required for support purposes and with your consent.

b) Data stored on your device

Projects you choose to save are stored locally on your device. We do not access or upload these unless you actively share them with us (e.g., for support).

c) Encrypted transmission

All data transmitted to and from Verba (such as uploaded media for processing) is encrypted using industry-standard protocols (e.g., HTTPS/TLS).

d) Infrastructure security

Any temporary processing (e.g., through cloud services) is performed using secure and reputable providers with strict access controls.

e) Internal access restrictions

Only authorized personnel may access technical or support-related data, and only to the extent necessary to provide assistance or troubleshoot issues.

f) No unnecessary retention

We retain technical data (such as crash logs or support emails) only for as long as needed to fulfill the purpose for which it was collected, or to comply with legal obligations.

Despite our efforts, no method of transmission or storage is 100% secure. However, we follow industry best practices to reduce risks and continuously improve our security systems.

Your Rights and Choices

Depending on your location and applicable law, you may have certain rights regarding your personal data. We respect and support your control over your information.

a) Access and correction

You have the right to request access to the personal data we hold about you and to request correction of inaccurate or incomplete data. Since we collect very limited information, in most cases, there is little or no personal data stored.

b) Deletion of your data

You may request that we delete any personal data we hold about you (e.g., support correspondence or diagnostic logs). To request deletion, email us at privacy@verba.digital.

c) Withdrawal of consent

If we rely on your consent to process your data (e.g., to reply to a support message), you may withdraw that consent at any time. This will not affect any processing that occurred before your withdrawal.

d) Subscription and account settings

You can manage or cancel your Verba subscription at any time via your Apple ID settings. We do not control or manage billing or cancellations directly.

e) Local rights

If you are located in the European Union, the UK, or California, you may have additional rights under GDPR or CCPA/CPRA, such as the right to data portability, objection to processing, or filing a complaint with a supervisory authority.

To exercise any of your rights, please contact us at:

Email: privacy@verba.digital.

We may ask you to verify your identity before fulfilling certain requests. We aim to respond within 30 days.

Children's Privacy

Verba is not intended for use by children under the age of 13, or under the minimum age required by local laws in your jurisdiction.

We do not knowingly collect, solicit, or store personal data from children. If we become aware that a child has provided us with personal information, we will take steps to delete it as soon as possible.

If you are a parent or guardian and believe that your child has submitted data to us, please contact us at privacy@verba.digital.

Third-Party Services

Verba relies on a limited number of trusted third-party services to support the functionality and performance of the app. We only share data with these services to the extent strictly necessary to operate and improve the app.

a) Apple (App Store & Payments)

All in-app purchases and subscriptions are handled by Apple.

We do not have access to your payment card details or Apple ID credentials.

We may receive anonymized information about your subscription status (e.g., active, expired) to manage access to features.

b) Cloud processing (for AI functionality)

Some AI-powered features (such as auto-captioning or translation) may temporarily upload your video or audio files to secure cloud infrastructure for processing.

These files are automatically deleted after processing is complete unless you choose to save them.

All transmissions are encrypted, and files are not used to train AI models.

c) Crash and performance monitoring

We may use analytics or crash reporting tools (e.g., Apple's native crash logs or similar SDKs) to understand app performance.

This data is anonymized and not linked to your identity or content.

We use it solely to fix bugs and improve the app experience.

d) Customer support

If you email us, we may temporarily store your message and contact information to respond to your request.

We do not share this information with third parties and delete it when no longer needed.

We do not allow any third-party advertising networks, social media SDKs, or trackers in the app.

For details about Apple's own privacy practices, please refer to: <https://www.apple.com/legal/privacy/>.

Data Retention

We retain your data only for as long as it is necessary to operate the Verba app, comply with legal obligations, or fulfill the purposes outlined in this Privacy Policy.

a) Temporary content

Audio and video files uploaded for AI processing are automatically deleted within one hour after the output (e.g., captions or translations) is generated.

We do not store or back up your files on our servers unless you explicitly request support and choose to share such content with us.

b) Locally stored projects

If you choose to save a project, it is stored locally on your device. We do not access or manage locally stored content.

You may delete projects at any time from within the app.

c) Subscription and diagnostics data

We retain anonymized subscription status data and crash reports for as long as necessary to manage access and improve performance.

This data is typically stored in an aggregated or de-identified form and cannot be used to identify you.

d) Customer support messages

If you contact us directly, we may retain your email and correspondence for a limited period (typically up to 6 months), solely for the purpose of resolving your inquiry.

When data is no longer needed, we securely delete or anonymize it. We do not archive your files or content for reuse, nor do we retain user profiles or historical behavior logs.

Legal Basis for Processing

If you are located in the European Economic Area (EEA), the United Kingdom, the United States, or other jurisdictions with similar data protection frameworks, we process your personal data based on one or more of the following legal grounds:

a) Performance of a contract

We process your data as necessary to provide the Verba app and its features (e.g., to generate captions or manage your subscription).

b) Legitimate interests

We may process certain anonymized technical data (such as crash logs or usage diagnostics) to improve app stability and user experience, provided such processing does not override your fundamental rights and freedoms.

c) Consent

In limited cases, such as when you contact us via email or choose to share data with support, we rely on your consent.

You may withdraw your consent at any time by contacting us at privacy@verba.digital.

d) Legal obligations

We may process and retain data where required to comply with applicable laws, tax or accounting requirements, or legal enforcement requests.

We do not process personal data for marketing purposes and do not engage in profiling or automated decision-making that produces legal effects.

Your Privacy Rights

Depending on your location, you may have specific rights under data protection laws such as the General Data Protection Regulation (GDPR), the UK GDPR, the California Consumer Privacy Act (CCPA), or other applicable privacy laws.

If you are a resident of the European Union, the United Kingdom, the United States, or other jurisdictions with similar protections, you may have the following rights:

a) Right to access

You can request a copy of the personal data we hold about you, if any.

b) Right to rectification

You may request correction of inaccurate or incomplete personal data.

c) Right to erasure

You can ask us to delete your personal data, for example, if it is no longer necessary for the purposes for which it was collected.

d) Right to restrict processing

You may request that we temporarily or permanently stop processing some or all of your personal data.

e) Right to object

Where we process your data on the basis of legitimate interests, you may object to such processing.

f) Right to withdraw consent

If processing is based on your consent (e.g., email support), you may withdraw it at any time.

g) Right to data portability

You may request to receive your data in a structured, commonly used, and machine-readable format and to have it transmitted to another service provider.

h) Right to lodge a complaint

You have the right to file a complaint with a data protection authority in your country of residence or where you believe your rights have been violated.

To exercise any of these rights, please contact us at: privacy@verba.digital.

We may request verification of your identity before processing your request. We will respond in accordance with applicable laws, typically within 30 days.

Governing Law

This Privacy Policy is governed by the laws of the State of Delaware, United States, without regard to conflict of laws principles.

If you are located in a jurisdiction that requires a different legal basis or venue for dispute resolution (such as within the EU), your local mandatory consumer protection laws and rights will apply.

Changes to This Privacy Policy

We may update this Privacy Policy from time to time to reflect changes in our practices, technologies, or legal obligations.

When we do, we will revise the “**Effective Date**” at the top of this document and, where appropriate, notify you via the app or on our website. We encourage you to review this Policy periodically.

By continuing to use Verba after an update becomes effective, you agree to the revised Policy. If you do not agree with the changes, you should stop using the app and delete any saved content.

Contact Us

If you have any questions, requests, or concerns regarding this Privacy Policy or how we handle your data, you can contact us at:

Verba Creative Inc.

131 Continental Drive, Suite 301

Newark, New Castle County, DE 19713, USA

Email: privacy@verba.digital

We aim to respond within 2 business days.