

PRIVACY POLICY

rafcolm_ Software
Effective Date: March 28, 2026
Last Updated: March 28, 2026

1. Introduction

This Privacy Policy describes how rafcolm_ Software ("we," "us," or "our"), operated by Rafael J. Colón Méndez and located in Caguas, Puerto Rico, collects, uses, and protects your personal information when you use our websites, mobile applications, and digital services (collectively, "Services").

By using our Services, you agree to the collection and use of information in accordance with this policy. If you do not agree, please do not use our Services.

2. Information We Collect

We may collect the following types of information:

2.1 Information You Provide

- Name, email address, and phone number (via contact forms or account registration)
- Payment information (processed securely through third-party providers such as Stripe)
- Messages, feedback, or other content you submit through our Services

2.2 Information Collected Automatically

- Device information (device type, operating system, browser type)
- Usage data (pages visited, features used, session duration)
- IP address and approximate geographic location
- Cookies and similar tracking technologies

2.3 Information from Third Parties

- Authentication data from third-party sign-in providers (Google, Apple)
- Purchase and subscription data from app stores and payment processors

3. How We Use Your Information

We use the information we collect to:

- Provide, maintain, and improve our Services
- Process transactions and send related communications
- Respond to your inquiries and provide customer support
- Send service-related notices and updates
- Analyze usage patterns to improve user experience
- Comply with legal obligations and enforce our terms

4. Cookies and Tracking Technologies

Our websites may use cookies and similar technologies to enhance your experience. Types of cookies we use include:

- Essential cookies: Required for basic site functionality
- Analytics cookies: Help us understand how visitors interact with our site

You can control cookies through your browser settings. Disabling cookies may affect the functionality of our Services.

5. Third-Party Services

We may use the following third-party services that collect and process data on our behalf:

- Google Firebase (authentication, hosting, analytics, cloud functions)
- Google Analytics (website traffic analysis)
- Stripe (payment processing)
- PayPal (payment processing)
- ATH Móvil (payment processing, Puerto Rico)
- RevenueCat (in-app purchase and subscription management)
- OpenAI / Anthropic (AI features in applications)
- Sentry (error tracking and performance monitoring)

These services have their own privacy policies. We encourage you to review them.

6. Data Retention

We retain your personal information only for as long as necessary to fulfill the purposes outlined in this policy, or as required by law. When data is no longer needed, we securely delete or anonymize it.

7. Data Security

We implement reasonable technical and organizational measures to protect your personal information, including encryption in transit (TLS/SSL), secure cloud hosting, and access controls. However, no method of electronic transmission or storage is 100% secure.

8. Your Rights

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

- Access the personal information we hold about you
- Request correction of inaccurate information
- Request deletion of your personal information
- Opt out of marketing communications
- Request a copy of your data in a portable format

To exercise any of these rights, contact us at rafcolmsoftware@gmail.com. We will respond within 30 days.

9. California Consumer Privacy Act (CCPA)

If you are a California resident, you have additional rights under the CCPA:

- Right to Know: You may request details about the personal information we collect and how it is used
- Right to Delete: You may request deletion of your personal information
- Right to Opt-Out: You may opt out of the sale of your personal information
- Non-Discrimination: We will not discriminate against you for exercising your CCPA rights

We do not sell personal information to third parties. We do not use or disclose sensitive personal information for purposes other than those permitted by the CCPA.

10. Children's Privacy (COPPA)

Our general Services are not directed to children under the age of 13. We do not knowingly collect personal information from children under 13 without verifiable parental consent.

For applications specifically designed for children (such as Santa AI), we implement additional safeguards including content moderation, parental controls, and minimal data collection. These applications have their own supplemental privacy policies.

If you believe we have inadvertently collected information from a child under 13, please contact us immediately and we will delete it.

11. CAN-SPAM Act Compliance

When sending commercial email communications, we comply with the CAN-SPAM Act by:

- Including our company name and contact information in all emails
- Using honest and non-deceptive subject lines
- Identifying messages as advertisements where applicable
- Providing a clear mechanism to unsubscribe
- Honoring opt-out requests within 10 business days

12. Puerto Rico Compliance

As a company based in Puerto Rico, we comply with applicable local data protection regulations. Puerto Rico residents are entitled to the same privacy protections as outlined in this policy, including data access, correction, and deletion rights.

13. International Data Transfers

Your information may be transferred to and processed in the United States or other countries where our service providers operate. By using our Services, you consent to such transfers. We ensure appropriate safeguards are in place for all data transfers.

14. Changes to This Policy

We may update this Privacy Policy from time to time. Changes will be posted on this page with an updated "Last Updated" date. We encourage you to review this policy periodically. Continued use of our Services after changes constitutes acceptance of the updated policy.

15. Contact Us

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

rafcolm_ Software

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Caguas, Puerto Rico

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