

# Privacy Policy of Shotcut

Last Updated: 2025/12/24

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## 1. Introduction

This Privacy Policy (“Policy”) explains how **FOP Lapshyk Yevhen Pavlovych**, a sole proprietor registered in Ukraine (Tax Identification Number: **3302509119**), operating under the brand name **Shotcut** (“we”, “our”, or “us”), collects, uses, stores, and protects personal and non-personal information of users.

This Policy applies to all services provided under the Shotcut brand, including:

- the **Shotcut mobile application** for Android devices (the “App”), distributed via Google Play; and
- the **Shotcut website** available at <https://www.shotcut.club> (the “Website”).

By downloading, installing, or using the App, or by accessing the Website (collectively, the “Services”), you acknowledge that you have read and understood this Privacy Policy and agree to the collection and processing of information in accordance with its terms. If you do not agree with this Policy, you must discontinue use of the Services immediately.

Shotcut is committed to protecting user privacy, ensuring transparency in data processing, and complying with applicable data protection laws, including the laws of Ukraine and the **General Data Protection Regulation (EU) 2016/679 (“GDPR”)**, where applicable. We process only the minimum amount of data necessary to operate the Services and respect user rights at all stages of data handling.

If you have any questions regarding this Policy or our data practices, you may contact us using the details provided in the **Contact Information** section of this document.

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## 2. Information We Collect

To operate and maintain the Services effectively, Shotcut collects certain categories of information. We limit data collection to what is relevant, necessary, and proportionate for the purposes described in this Policy.

### 2.1 Information You Provide Directly

When you use Shotcut, you may voluntarily provide us with certain information, including:

- **Account Information:** such as your email address or other identifiers used to create or access an account, where applicable;

- **Support Communications:** information you provide when contacting us via email or other support channels, including the content of your messages and any attachments you choose to share;
- **User-Generated Content:** photos, images, or other media files that you upload, edit, or process within the App. Such content is handled solely to provide the requested functionality and is not used for marketing purposes.

Shotcut does not require users to provide sensitive personal data to use the core features of the App.

## 2.2 Information Collected Automatically

When you access or use the Services, certain technical information may be collected automatically, including:

- **Device Information:** device model, operating system version, application version, language settings, and unique technical identifiers generated by the operating system;
- **Usage Data:** information about how you interact with the App, such as feature usage, session duration, and performance metrics;
- **Log and Diagnostic Data:** crash reports, error logs, and technical diagnostics used to identify and fix issues and improve stability.

This information is processed in aggregated or pseudonymized form whenever possible and is not used to directly identify individual users.

## 2.3 Information from Third Parties

Shotcut may receive limited information from trusted third-party service providers that are necessary for the operation of the Services, including:

- **Google Play Services:** confirmation of app installation, updates, and subscription status (where applicable);
- **Technical and Infrastructure Providers:** services related to hosting, content delivery, or app stability monitoring.

We do not purchase personal data from third parties and do not allow third parties to use user data for their own marketing or profiling purposes.

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## 3. How We Use Your Information

Shotcut uses the collected information solely for legitimate, clearly defined purposes related to the operation, maintenance, and improvement of the Services. We do not use personal data for advertising profiling or unrelated activities.

### 3.1 Operation of the Services

We process information to ensure the proper functioning of the App and Website, including:

- enabling core photo editing and processing features;
- maintaining application stability, performance, and compatibility across Android devices;
- ensuring secure access to the Services and preventing unauthorized or abusive use;
- managing user requests and providing technical or customer support.

Without processing certain technical and account-related data, the Services would not function correctly.

### **3.2 Service Improvement and Quality Assurance**

Shotcut may use aggregated and technical information to:

- analyze overall usage trends and feature performance;
- detect errors, crashes, and compatibility issues;
- improve usability, interface design, and application reliability;
- test updates and maintain long-term service quality.

All such analysis is conducted on a non-identifying basis wherever possible and is focused on improving the product rather than profiling individual users.

### **3.3 Communication and Support**

We use contact and correspondence information to:

- respond to user inquiries and support requests;
- provide information related to service updates, technical issues, or policy changes;
- fulfill user-initiated requests regarding data access, correction, or deletion.

Shotcut does not send promotional or marketing communications unless explicitly required for service-related notifications.

### **3.4 Legal, Security, and Compliance Purposes**

Information may also be processed to:

- comply with applicable laws, regulations, and lawful requests from authorities;
- enforce our Terms of Service and protect our legal rights;
- detect, prevent, and address fraud, security incidents, or technical abuse;
- ensure compliance with Google Play policies and platform requirements.

We process only the minimum data necessary to achieve these purposes and apply appropriate safeguards at all times.

## **4. Legal Basis for Processing Personal Data**

Shotcut processes personal data in accordance with applicable data protection laws, including Ukrainian legislation and the **GDPR**, where applicable. Each processing activity is based on at least one lawful ground.

### **4.1 Performance of a Contract**

We process personal data when it is necessary to perform our contractual obligations toward users. This includes enabling access to the App's features, providing requested functionality, processing subscriptions (if applicable), and delivering customer support. Without this data, we would be unable to provide the Services effectively.

### **4.2 User Consent**

In certain situations, Shotcut relies on user consent, including when:

- users voluntarily provide information through support communications;
- the App requests access to device features required for editing functionality (such as photos or storage);
- optional data collection is enabled through system permissions.

You may withdraw your consent at any time through your device settings or by contacting us. Withdrawal of consent does not affect the lawfulness of processing carried out before such withdrawal.

### **4.3 Legitimate Interests**

We may process limited data where it is necessary for our legitimate interests, provided that such interests do not override user rights and freedoms. Legitimate interests include:

- maintaining application security and preventing misuse;
- improving performance and reliability of the Services;
- ensuring operational continuity and technical integrity.

We carefully balance our legitimate interests against the privacy expectations of users.

### **4.4 Legal Obligations**

Certain data may be processed to comply with legal or regulatory obligations, including accounting, tax reporting, or responding to lawful requests from public authorities. In such cases, data is processed strictly within the limits imposed by law.

### **4.5 Protection of Vital Interests**

In rare and exceptional circumstances, data may be processed to protect the vital interests of users or other individuals, such as in the event of serious security threats or suspected unlawful activity requiring immediate action.

## **5. Data Sharing and Disclosure**

Shotcut respects user privacy and does not sell, rent, or trade personal data to third parties. We share information only in limited circumstances and solely to the extent necessary to operate the Services, comply with legal obligations, or protect our rights.

### **5.1 Service Providers and Technical Partners**

We may share certain information with trusted third-party service providers that perform services on our behalf, such as:

- application hosting and infrastructure services;
- error monitoring and performance diagnostics;
- customer support and communication tools;
- payment and subscription verification through Google Play (where applicable).

These providers are contractually bound to process data only in accordance with our instructions and to apply appropriate security and confidentiality measures. They are not permitted to use user data for their own purposes.

### **5.2 Legal Requirements and Protection of Rights**

We may disclose information if we believe, in good faith, that such disclosure is necessary to:

- comply with applicable laws, regulations, court orders, or lawful requests from public authorities;
- enforce our Terms of Service or other agreements;
- investigate, prevent, or address suspected fraud, security incidents, or unlawful activities;
- protect the rights, property, or safety of Shotcut, our users, or others.

Any disclosure under this section is limited to what is legally required and proportionate to the purpose.

### **5.3 Business Transfers**

In the event of a merger, acquisition, reorganization, or sale of assets, user information may be transferred as part of that transaction. If such a transfer occurs, we will ensure that personal data remains subject to appropriate confidentiality safeguards and, where required by law, we will notify users of any material changes.

### **5.4 Aggregated and Anonymized Data**

Shotcut may use and share aggregated or anonymized data that cannot reasonably be used to identify individual users. Such data may be used for analytical, statistical, or service improvement purposes and does not constitute personal data under applicable law.

## **6. Data Retention**

Shotcut retains personal data only for as long as it is necessary to fulfill the purposes outlined in this Privacy Policy, unless a longer retention period is required or permitted by law.

### **6.1 General Retention Principles**

We apply the following principles when determining data retention periods:

- data is retained only while there is a legitimate business or legal need;
- retention periods are proportionate to the purpose of processing;
- data that is no longer required is securely deleted or anonymized.

### **6.2 Account and Contact Data**

Account-related and contact information is retained for as long as the user maintains an active relationship with the Services. If an account is deleted or becomes inactive, such data may be removed or anonymized within a reasonable period, unless retention is required for legal or compliance purposes.

### **6.3 User-Generated Content**

User-generated content (such as photos or images processed within the App) is handled only to provide the requested functionality. Such content is not stored permanently by Shotcut unless necessary for technical reasons or explicitly initiated by the user. Temporary data is removed once processing is completed.

### **6.4 Technical and Diagnostic Data**

Log files, crash reports, and diagnostic information are retained for a limited period to ensure application stability, security, and improvement. This data is generally retained in aggregated or pseudonymized form and deleted once it is no longer needed for analysis or troubleshooting.

### **6.5 Legal and Accounting Obligations**

Certain data may be retained for longer periods where required by applicable laws, including tax, accounting, or compliance regulations. In such cases, access to the data is restricted and limited to lawful purposes only.

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## **7. International Data Transfers**

Personal data may be processed or stored in countries other than the user's country of residence, including jurisdictions within the **European Economic Area (EEA)** or other locations where our service providers maintain infrastructure. Such transfers occur only when necessary to operate the Services or provide technical support.

## 7.2 Legal Safeguards

Where personal data is transferred internationally, Shotcut ensures that appropriate legal safeguards are in place, including:

- reliance on countries recognized as providing an adequate level of data protection; or
- the use of **Standard Contractual Clauses (SCCs)** or equivalent legal mechanisms approved under applicable data protection laws;
- contractual data protection obligations imposed on service providers and partners.

These measures are designed to ensure that personal data receives a level of protection equivalent to that required under Ukrainian law and, where applicable, the GDPR.

## 7.3 Security and Transparency

Regardless of where data is processed, Shotcut applies the same technical and organizational safeguards described in this Privacy Policy. Users may contact us for additional information about international data transfers or the safeguards applied.

By using the Services, you acknowledge that your information may be transferred and processed outside your country of residence in accordance with this Policy.

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## 8. Data Security

Shotcut takes reasonable and appropriate measures to protect personal data against unauthorized access, loss, misuse, alteration, or disclosure. Data security is treated as an essential component of service quality and user trust.

### 8.1 Technical Measures

We implement technical safeguards designed to protect information, including:

- encryption of data in transit using secure communication protocols (such as HTTPS/TLS);
- restricted access to systems and data based on role and necessity;
- secure hosting environments with monitoring and access controls;
- regular updates and maintenance to address known security vulnerabilities.

### 8.2 Organizational Measures

In addition to technical protections, we apply organizational measures, such as:

- limiting access to personal data to authorized individuals only;
- applying internal procedures for secure data handling and processing;

- ensuring that service providers adhere to confidentiality and data protection obligations.

### **8.3 Incident Response**

In the event of a suspected or confirmed data security incident, Shotcut will take appropriate steps to investigate, mitigate potential harm, and comply with applicable notification requirements under data protection law.

### **8.4 User Responsibility**

While we take reasonable steps to protect personal data, users are responsible for maintaining the security of their own devices and accounts. We recommend keeping devices updated, using secure access controls, and contacting us promptly if you suspect unauthorized access.

No system can guarantee absolute security. However, Shotcut continuously reviews and improves its safeguards to reduce risks and protect user information.

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## **9. Your Rights**

Shotcut respects and supports the rights of users regarding their personal data. Depending on your location, particularly if you reside in the European Union or a jurisdiction with similar data protection laws, you may have the following rights.

### **9.1 Right of Access**

You have the right to request confirmation as to whether we process your personal data. If so, you may request access to such data and receive information about how and why it is processed.

### **9.2 Right to Rectification**

You have the right to request correction of inaccurate, incomplete, or outdated personal data. We will take reasonable steps to update the information promptly upon verification.

### **9.3 Right to Erasure (“Right to Be Forgotten”)**

You may request deletion of your personal data where:

- it is no longer necessary for the purposes for which it was collected;
- you withdraw consent and no other legal basis applies;
- the data has been processed unlawfully.

This right is not absolute and may be subject to legal or contractual retention obligations.

### **9.4 Right to Restrict Processing**

You may request that we limit the processing of your personal data in certain circumstances, such as when the accuracy of the data is contested or when processing is no longer necessary but required for legal claims.

### **9.5 Right to Data Portability**

Where applicable, you have the right to receive your personal data in a structured, commonly used, and machine-readable format, or to request its transfer to another controller, where technically feasible.

### **9.6 Right to Object**

You may object to the processing of your personal data based on legitimate interests, including where processing is related to security, analytics, or service improvement. We will consider such objections unless compelling legitimate grounds override your interests or the processing is required by law.

### **9.7 Right to Withdraw Consent**

Where processing is based on your consent, you may withdraw that consent at any time. Withdrawal does not affect the lawfulness of processing carried out before consent was withdrawn.

### **9.8 Rights Related to Automated Decision-Making**

Shotcut does not use automated decision-making or profiling that produces legal or similarly significant effects on users. If this changes in the future, appropriate safeguards and user rights will be provided in accordance with applicable law.

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## **10. Exercising Your Rights**

Shotcut provides clear and accessible methods for users to exercise their data protection rights.

### **10.1 How to Submit a Request**

To exercise any of the rights described above, you may contact us using the details provided in the **Contact Information** section of this Privacy Policy. Requests should include sufficient information to allow us to verify your identity and understand the nature of the request.

For security purposes, we may request additional verification before processing a request. Any verification data is used solely for identity confirmation and is deleted once verification is complete.

### **10.2 Response Time**

We aim to respond to all valid requests within **30 calendar days**. If a request is complex or involves extensive data retrieval, this period may be extended as permitted by law, in which case you will be informed of the reason for the delay.

### 10.3 Limitations

We may refuse or partially comply with a request where permitted by law, including where fulfilling the request would:

- infringe on the rights or freedoms of others;
- conflict with legal obligations or regulatory requirements;
- be manifestly unfounded or excessive.

In such cases, we will provide a clear explanation of our decision.

### 10.4 Complaints

If you believe that your data protection rights have been violated, you have the right to lodge a complaint with the relevant data protection authority in your country of residence. We encourage users to contact us first so that we can address concerns promptly and fairly.

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## 11. Cookies and Similar Technologies

Shotcut uses limited cookies and similar technologies on the Website to ensure proper functionality and improve user experience. The mobile App itself does not use browser cookies.

### 11.1 What Are Cookies

Cookies are small text files stored on your device when you visit a website. They help websites function correctly, remember user preferences, and improve navigation and performance.

### 11.2 Cookies Used on the Website

The Shotcut Website may use the following categories of cookies:

- **Strictly Necessary Cookies:** required for basic website functionality, security, and proper page rendering. Without these cookies, certain parts of the Website may not function correctly.
- **Functional Cookies:** used to remember basic preferences, such as language or session settings, to enhance usability.

Shotcut does not use advertising cookies or third-party marketing trackers.

### 11.3 Cookie Management

You may manage or disable cookies through your browser settings at any time. Please note that disabling certain cookies may affect the functionality of the Website, but essential features will remain available.

### 11.4 Cookies in the Mobile Application

The Shotcut App does not use browser-based cookies. Instead, it relies on local storage mechanisms provided by the Android operating system to support essential functionality, such as temporary settings or session-related data. Such data is removed when the App is uninstalled.

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## **12. Tracking, Analytics, and Third-Party Tools**

Shotcut uses limited analytics and diagnostic tools strictly for technical and operational purposes. We do not use advertising SDKs, behavioral tracking, or user profiling technologies.

### **12.1 Purpose of Analytics**

Analytics and diagnostics are used solely to:

- monitor application stability and performance;
- detect and resolve crashes, errors, and compatibility issues;
- understand aggregated usage patterns to improve functionality and usability.

Analytics data is processed in an aggregated or pseudonymized form and is not used to identify individual users.

### **12.2 Types of Data Collected for Analytics**

Depending on the technical tool used, analytics data may include:

- device type and operating system version;
- application version and basic performance metrics;
- anonymized identifiers generated by the operating system;
- crash logs and error reports.

No sensitive personal data, such as names, email addresses, or user-generated content, is collected for analytics purposes.

### **12.3 Third-Party Analytics Providers**

Shotcut may rely on trusted third-party service providers to assist with diagnostics and performance monitoring. Such providers process data only on our behalf, under contractual data protection obligations, and solely for the purposes described in this Policy.

### **12.4 User Control**

Users may limit certain analytics collection by adjusting system-level privacy settings on their Android devices, where supported by the operating system. However, disabling diagnostics may affect our ability to detect and resolve technical issues.

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### **13. Third-Party APIs & Integrations**

Shotcut uses a limited number of third-party services and APIs strictly to support core functionality, technical stability, and platform distribution. We do not integrate advertising networks or third-party marketing tools.

#### **13.1 Purpose of Third-Party Integrations**

Third-party services may be used to:

- distribute and update the App through Google Play;
- verify app installations and subscription status, where applicable;
- support technical infrastructure, hosting, and content delivery;
- monitor application stability and diagnose technical issues.

All integrations are selected based on necessity, reliability, and compliance with applicable data protection standards.

#### **13.2 Data Minimization and Protection**

When interacting with third-party services:

- only the minimum amount of data required for functionality is transmitted;
- data transfers occur over secure, encrypted channels;
- third parties are contractually restricted from using data for any purpose other than providing services to Shotcut.

We do not authorize third parties to use personal data for independent purposes, including advertising, profiling, or resale.

#### **13.3 Google Play Services**

The Shotcut App is distributed via Google Play and may interact with Google Play Services for installation, updates, and subscription management. Such interactions are governed by Google's own privacy policies and terms. Shotcut does not receive or store users' full payment details.

#### **13.4 User Control and Consent**

Where third-party integrations require user action or system permissions, such access is clearly requested by the App and may be managed or revoked through Android system settings. Users remain in control of permissions granted to the App at all times.

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### **14. App Store & Google Play Compliance**

Shotcut is developed and maintained in compliance with the **Google Play Developer Program Policies**, including the User Data Policy and Data Safety requirements.

## **14.1 Data Transparency**

We provide clear and accurate disclosures regarding data collection, use, and sharing practices both in this Privacy Policy and in the Google Play listing. The information presented reflects the actual behavior of the App.

## **14.2 Permission Usage**

The Shotcut App requests access to device features (such as photos or storage) only when required to provide core editing functionality. Each permission is requested contextually and with a clear explanation of its purpose. Users may deny or revoke permissions without losing access to non-dependent features.

## **14.3 Platform Security Requirements**

Before release and updates, the App undergoes technical review to ensure:

- absence of malicious or hidden functionality;
- compliance with Google Play security standards;
- proper handling of user data and permissions.

Shotcut does not include hidden trackers, unauthorized SDKs, or code that circumvents platform safeguards.

## **14.4 Fair Representation**

All descriptions, screenshots, and functional claims related to the App accurately reflect its capabilities. We do not use misleading representations or deceptive practices in connection with the Services.

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## **15. Children's Privacy**

Shotcut is not intended for use by children under the age of **13**, or under **16** in jurisdictions where a higher minimum age of digital consent applies. We do not knowingly collect, store, or process personal data from children.

If we become aware that personal data of a child has been collected without appropriate legal consent, we will take reasonable steps to delete such information promptly and restrict further access to the Services.

Parents or legal guardians who believe that a child has used the Services in violation of this Policy may contact us using the details provided below so that we can investigate and take appropriate action.

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## **16. Amendments to This Privacy Policy**

Shotcut reserves the right to update or modify this Privacy Policy at any time to reflect changes in legal requirements, business practices, or the functionality of the Services.

When material changes are made, we will update the “Last Updated” date at the top of this document. Where required by law, users may be notified through the App, the Website, or other appropriate means.

Continued use of the Services after the effective date of an updated Privacy Policy constitutes acceptance of the revised terms. Users who do not agree with the updated Policy may discontinue use of the Services and request deletion of their personal data, subject to applicable legal obligations.

We encourage users to review this Privacy Policy periodically to remain informed about how their information is processed and protected.

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## **17. Contact Information**

If you have any questions, concerns, or requests regarding this Privacy Policy or the processing of personal data, you may contact us using the following details:

**Legal Entity:**

FOP Lapshyk Yevhen Pavlovych

**Tax Identification Number (TIN):**

3302509119

**Registered Address:**

vul. Shevchenka, bud. 54, apt. 22

Rivne, Rivne Oblast

33013, Ukraine

**Email:**

aceclime@gmail.com

**Phone:**

+380 99 257 5947

We aim to respond to all legitimate inquiries within a reasonable timeframe and in accordance with applicable data protection laws.