

Privacy Policy — Piccolo

Effective date: July 17, 2026

Controller: FABBRICA DIGITALE - FZCO

Registered address: IFZA Properties, DSO-IFZA, Dubai Silicon Oasis, Dubai, United Arab Emirates

This Privacy Policy explains how FABBRICA DIGITALE - FZCO ("Piccolo", "we", "us", "our") collects, uses, stores, and shares personal data when you use the Piccolo mobile application (the "App").

Piccolo is an AI entertainment app that generates hypothetical baby photos/videos from two uploaded parent photos.

1) Important Entertainment Disclaimer

Piccolo outputs are AI-generated entertainment content only. They are not medical, scientific, genetic, or factual predictions.

2) Data We Process

Depending on your use of the App, we may process: - **Account/transaction data:** subscription status, purchases, receipts, refund status. - **User content:** uploaded images and features extracted from the uploaded files to run generations and generated outputs. - **Device/usage data:** app events, device identifiers, diagnostics, crash logs, approximate region, IP-based metadata. - **Notification data:** push token and push preferences (if enabled).

3) Purposes and Legal Bases (GDPR)

We process data for these purposes and legal bases: - **Provide the service (Art. 6(1)(b), contract):** run generation, deliver outputs, maintain subscriptions. - **Billing/compliance (Art. 6(1)(c), legal obligation):** accounting, tax, fraud/refund records where required. - **Product/security operations (Art. 6(1)(f), legitimate interests):** reliability, abuse prevention, service quality. - **Tracking/marketing where applicable (Art. 6(1)(a), consent):** ATT-based advertising attribution and similar optional tracking. - **Push notifications (Art. 6(1)(a), consent):** generation-ready alerts and app updates.

Special-category / biometric note

Where local law treats facial geometry as biometric/sensitive data, we rely on **explicit consent** and process image features only to provide requested generation features.

4) Facial Data Handling and Retention

- Uploaded photos are processed to create requested outputs.
- Image features are processed only for generation functionality.
- We do not sell any user image data.
- Original uploads and derived image data are deleted from our servers **within 1 month** after upload, except where longer retention is required by law (e.g., security/legal hold).

5) Generated Outputs Retention

- Generated outputs (images/videos) are stored **for as long as your subscription is active**, so you can access them in-app.
- If you cancel or your subscription ends, generated outputs are retained for **1 additional month** and then permanently deleted.
- You can request deletion of any generated output at any time by email.

6) Other Retention Periods

- **Account and billing records:** retained for the period required by applicable tax/accounting law (typically up to 7 years from the relevant transaction).
- **Diagnostics, crash logs, security/abuse logs:** retained for up to **6 months**, unless a longer period is required for legal, security, or fraud-defense reasons.
- **Push tokens:** retained while push is enabled; removed within 1 month of disablement or app uninstall signal.

7) Payments and Subscriptions

Payments are processed by platform/payment partners (e.g., Apple, RevenueCat-enabled subscription workflows). We do not store full payment card details.

8) Analytics and Attribution

We use service providers such as analytics, attribution, and crash-reporting tools (e.g., Amplitude, AppsFlyer, Firebase/Crashlytics) to operate and improve the App. These providers process data under their own terms and data processing agreements.

If we add, change, or remove material service providers (subprocessors) that process your personal data, **we will update this Privacy Policy and notify users via in-app notice or on our website** with a reasonable advance notice where practicable.

9) Third-Party AI Models Used for Generation

To produce your generations, we can send your uploaded photos and derived data to third-party AI model providers via their APIs. These providers run the underlying generation models that produce your outputs. We only send your data to these third-party AI providers with your explicit consent which you give in-app before generation. If you do not consent, generation cannot be performed. These third-party AI providers operate under their own terms and privacy policies, and we do not control how they process data on their side once it is sent via their APIs.

10) Sharing Data

We share data only when necessary: - With processors/subprocessors that provide hosting, analytics, attribution, payments, support, and security. - With authorities where legally required. - During corporate transactions (merger, acquisition, asset sale), subject to safeguards.

We do not sell personal data for money.

11) International Transfers

Your data may be processed outside your country. For EEA/UK transfers, we use appropriate safeguards (including **Standard Contractual Clauses** where required) or other lawful transfer mechanisms.

12) Security

We use reasonable technical and organizational safeguards (access controls, encryption in transit, scoped access, monitoring).

13) Your Rights

Depending on your jurisdiction, you may have rights to access, correct, delete, restrict, object, port data, and withdraw consent.

EEA/UK rights

You may also lodge a complaint with your local data protection authority.

US state rights

Where applicable (e.g., CCPA/CPRA and similar state laws), you may request disclosure/deletion/correction and exercise opt-out rights where available.

To exercise rights, contact us at piccolo@lafabbrica.me.

14) Children

Piccolo is **not directed to anyone under 13**. You must be at least 13 years old to use the App. If you believe a person under 13 has submitted personal data, contact us and we will take appropriate deletion steps.

15) Data Deletion Requests

You may request deletion via in-app settings (if available) or by email. We may retain limited records where required by law or for fraud/security defense.

16) Third-Party Services and Links

If you share content to third-party platforms (e.g., social apps), their privacy policies apply to that downstream processing.

17) Changes to This Policy

We may update this policy. Material changes will be posted in-app or on our site with an updated effective date.

18) Contact

- **Email:** piccolo@lafabbrica.me

- **Website:** <https://lafabbrica.me>
- **Registered address:** IFZA Properties, DSO-IFZA, Dubai Silicon Oasis, Dubai, United Arab Emirates