

# SPIN

## Privacy Policy

Spin - Social Cycling Ride Planning App

Last Updated: 12 May 2025

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### 1. Introduction

This Privacy Policy explains how Ammar Ash Shiddiq trading as Spin ("we", "us", "our"), ABN 16 292 316 871, collects, uses, stores, and discloses your personal information when you use the Spin mobile application and the website heyspin.app (the "Platform").

We are committed to protecting your privacy and handling your personal information in accordance with the Privacy Act 1988 (Cth) and the Australian Privacy Principles (APPs).

By using the Platform, you consent to the collection, use, storage, and disclosure of your personal information as described in this Policy.

### 2. What Information We Collect

#### 2.1 Information you provide directly

- Name and profile photo – collected at account creation; visible to other users across the Platform (profiles, chat, community, explore).
- Email address – collected at account creation and via waitlist sign-up.
- City/location – manually set by you within the app to find local rides. You can change this at any time. This is not your precise GPS location.
- Ride details you create – title, pace, distance, route pins, café stop, group size, and other ride information you choose to post.
- Chat messages – messages sent through the Platform's in-app chat are stored encrypted in our database and retained indefinitely (see Section 8).
- Age declaration – you declare your age at sign-up. We do not collect your date of birth.

#### 2.2 Information collected automatically

- Device identifiers – collected for the purpose of sending push notifications via Expo.
- App usage data – screens visited, features used, and general interaction patterns, used to improve the Platform.
- Analytics and session data – we use PostHog to collect anonymous event data including screens visited, features used, ride creation and join actions, and general interaction patterns.

PostHog session replay is enabled; all text input fields are masked and no sensitive content is recorded. This data is used to improve the Platform and diagnose technical issues.

- API performance data – response times and status codes for backend requests are captured via PostHog for the purpose of monitoring service performance. No personal content from requests is included in these events.
- Location permission (optional) – if you grant location access, it is used only while the app is in the foreground to assist with finding local rides. We do not track your location in the background, record your cycling route, or store GPS coordinates.

### **2.3 What we do not collect**

- Precise real-time GPS location in the background
- Ride tracking data (Spin does not record your cycling routes)
- Strava data (Strava integration is planned for a future release but is not active)
- Payment information (the Platform is currently free)
- Biometric data
- Personal information from users under 18 years of age

## **3. How We Use Your Information**

We collect and use your personal information only for the purposes for which it was provided and for related purposes you would reasonably expect. Specifically, we use it to:

- create and manage your account;
- enable you to discover, create, and join rides;
- display your profile to other users as part of the Platform's social features;
- facilitate in-app communication between ride participants;
- send push notifications for ride updates, chat messages, and Platform announcements;
- send a one-time launch notification to waitlist members;
- analyse usage patterns and measure feature performance using PostHog analytics;
- monitor backend API performance and diagnose technical issues;
- review reports of harmful or abusive conduct and enforce our Terms;
- improve the Platform and diagnose technical issues; and
- comply with our legal obligations.

We do not use your personal information for automated profiling, targeted advertising, or sale to third parties.

## **4. Overseas Disclosure of Personal Information**

We are required under APP 8 to inform you that your personal information will be stored and processed by third-party infrastructure providers, the majority of which are based in the United States. This means your data will be disclosed to and stored in a country that does not have privacy laws equivalent to Australia's Privacy Act 1988.

The specific providers and their locations are:

- Supabase Inc. (USA) – database storage of your account data, ride posts, and chat messages
- Cloudflare Inc. (USA) – storage of your profile photo and any media you upload
- Google LLC / Firebase (USA) – authentication token processing and account data
- Railway Corp. (USA) – backend API hosting
- Mapbox Inc. (USA) – map rendering and location search
- Expo (USA) – push notification delivery
- PostHog Inc. (USA / EU) – analytics, session replay, and backend performance monitoring. PostHog collects anonymised event data and masked session recordings. All text input fields are masked before transmission. PostHog data is stored on PostHog's infrastructure and subject to PostHog's privacy policy ([posthog.com/privacy](https://posthog.com/privacy)).

By using the Platform and consenting to this Privacy Policy, you expressly consent to your personal information being disclosed to and stored by these overseas recipients under APP 8.3(b).

While we cannot control how these providers handle data under their own policies, we have selected providers with established security practices and, where available, we rely on their data processing agreements. Each provider's privacy policy is available on their respective websites.

## 5. How We Protect Your Information

We take reasonable technical and organisational steps to protect your personal information from misuse, interference, loss, unauthorised access, modification, and disclosure. These measures include:

- encrypted storage of chat messages in our database;
- authentication handled via Firebase with industry-standard token security;
- access controls on our backend infrastructure limiting who can query the database;
- session replay via PostHog with all text input fields masked prior to capture, ensuring no passwords, messages, or personal text is recorded;
- use of established third-party providers with their own security certifications; and
- profile and ride data accessible only to authenticated users of the Platform.

No method of transmission or storage is 100% secure. In the event of a data breach that is likely to result in serious harm, we will notify affected users and the Office of the Australian Information Commissioner (OAIC) as required under the Notifiable Data Breaches scheme.

## 6. Who Can See Your Information

The following information is visible to other authenticated users of the Platform as part of normal functionality:

- Your name and profile photo – visible on your profile, in ride participant lists, in chat, in community pages, and in the explore section.
- Your manually set city/location – visible on your profile.
- Rides you create – visible to your friends, or to community members if posted to a community.
- Chat messages – visible to other participants in the same ride chat.

Your ride history and participation is visible to your connected friends and relevant community members. The Platform uses a friends-based access model: rides are only visible to friends or friends-of-friends who have joined. There is no public ride discovery by strangers.

Analytics data collected by PostHog is accessible only to Spin administrators and is not shared with or visible to other users.

## **7. Data Retention**

### **7.1 Account data**

Your account data is retained for as long as your account remains active. You can delete your account at any time (see Section 9).

### **7.2 Chat messages**

Chat messages are retained indefinitely. This is because ride chats often continue after a ride ends and form part of the ongoing social relationship between participants. If you delete your account, your messages will also be deleted within 30 days.

### **7.3 Waitlist data**

Your email and city collected via the waitlist will be used only to notify you of the Platform launch. After the launch notification is sent, waitlist data will be deleted unless you have registered an account.

### **7.4 Analytics data**

Event and session data collected by PostHog is retained in accordance with PostHog's data retention policies. Analytics data is anonymised where possible and does not include the content of chat messages or private ride details.

### **7.5 Anonymised data**

After account deletion, we may retain anonymised, non-identifiable aggregate data (e.g. ride counts by city) for analytics and service improvement.

## **8. Location Information**

Location in Spin works differently to most apps. Your "location" is a city you manually select and can change at any time – it is not a GPS reading. It is used only to surface relevant rides in the selected

area.

If you grant the app foreground location permission on your device, this may be used while the app is open to suggest your current city. We do not access or store your location when the app is not in use. You can revoke location permission at any time via your device settings without affecting your ability to use the Platform.

## 9. Your Rights

You have the right to:

- access the personal information we hold about you – contact us at [lemmalabs@gmail.com](mailto:lemmalabs@gmail.com);
- request correction of inaccurate or outdated information;
- request deletion of your account and all associated personal data (see below);
- withdraw consent to receiving marketing communications at any time; and
- make a complaint about our privacy practices (see Section 11).

## 10. Account & Data Deletion

You can request full deletion of your account through the in-app settings at any time. Upon a valid deletion request, we will permanently delete your personal data from Supabase and Cloudflare R2 within 30 days.

This includes your profile, ride posts, chat messages, profile photo, and all other personal data linked to your account. Some anonymised aggregate data may be retained as described in Section 7.5.

## 11. Complaints

If you believe we have handled your personal information in a way that breaches the Australian Privacy Principles, please contact us first:

Email: [lemmalabs@gmail.com](mailto:lemmalabs@gmail.com)

We will acknowledge your complaint within 5 business days and aim to resolve it within 30 days.

If you are not satisfied with our response, you may lodge a complaint with the Office of the Australian Information Commissioner (OAIC):

Website: [www.oaic.gov.au](http://www.oaic.gov.au)

Phone: 1300 363 992

## 12. Children's Privacy

Spin is not intended for use by anyone under the age of 18. We enforce this through an age declaration at account creation. We do not implement technical age verification beyond this

declaration.

We do not knowingly collect personal information from individuals under 18. If you believe we have done so, contact us immediately at [lemmalabs@gmail.com](mailto:lemmalabs@gmail.com) and we will delete the data promptly.

## **13. Cookies**

The Spin mobile application does not use cookies. The [heyspin.app](https://heyspin.app) website may use minimal functional cookies necessary for basic site operation. We do not use advertising cookies, tracking pixels, or third-party analytics on the website.

## **14. Changes to This Policy**

We may update this Privacy Policy from time to time. When we make material changes, we will notify you via the app or email. The effective date at the top of this Policy will be updated. Your continued use of the Platform after the updated Policy takes effect constitutes your acceptance.

## **15. Contact**

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