

Turing Game Mobile App Privacy Policy

May 13, 2026

1 Introduction

Welcome to the Turing Game Mobile App (the "App")!

At Turing Game Mobile App ("we", "us", "our"), we place a high priority on your privacy and security of your personal data. We will process your data in full compliance with the applicable legislation, including General Data Protection Regulation (EU) 2016/679 (GDPR), Austrian Data Protection Act (Datenschutzgesetz – DSG) and Austrian Research Organisation Act (Forschungsorganisationsgesetz – FOG).

This Privacy Policy applies to our processing of personal data and provides you with the information that you are entitled to receive under applicable data protection legislation.

2 Who is the data controller?

Software Competence Center Hagenberg GmbH (SCCH), registered with Regional Court of Linz (Landesgericht Linz), company register number 184145b, with registered office at Softwarepark 32a, 4232 Hagenberg, Austria, is the data controller, i.e. the person that decides how and why your personal data is processed.

If you have questions about the processing of your personal data or would like to exercise your rights (see Section 8 "Your rights" of this Privacy Policy), you can contact us at datenschutz@scch.at.

3 What data do we collect?

We collect the following data through the App:

1. Technical data collected automatically

Each time you open the App on your device, the App automatically records technical information, which includes:

- IP address
- model and manufacturer of your device
- operating system used by your device
- date and time of access
- amount of data transferred and duration of transmission
- data on how long you spend on the App

2. Automatically generated identifier

When you create an account, the App assigns you a unique user ID, that is stored locally on your device and on the backend server.

3. Usage data

The data generated through your interaction with the App ("Usage data") will be collected and stored on our server.

4 How do we use the data that we collect?

We process the data that we collect for the following purposes:

1. **Technical data collected automatically:** this data is used to operate and maintain the App, ensuring its functionality and performance, to statistically analyse usage to optimise the App.
2. **Automatically generated identifier:** this data is used for account creation in the App.
3. **Usage data:** this data will be used for the purposes of scientific research (research area of data science and artificial intelligence).

Additionally, both technical data collected automatically and the automatically generated identifier may be further used by us for the purposes of scientific research (research area of data science and artificial intelligence).

5 Lawful basis for processing

We process your data on the following legal bases:

1. **Technical data collected automatically:** legitimate interest (Art. 6(1)(f) GDPR). We base the processing of your data on our legitimate interests in operating a secure, functional, and optimised App.
2. **Automatically generated identifier:** performance of a contract (Art. 6(1)(b) GDPR). We need this data to provide the service to you, namely to enable you to create an account and to play the Turing Game through your account.
3. **Usage data:** legitimate interest (Art. 6(1)(f) GDPR). We base the processing of your data on our legitimate interests in conducting scientific research.

For technical data collected automatically and the automatically generated identifier that may be further used for the purposes of scientific research, we rely on legitimate interest (Art. 6(1)(f) GDPR).

6 Who will process your data?

Your data will be processed by SCCH and by SCCH staff specifically instructed and authorised to carry out such processing activities.

We do not sell or rent your data. We interact with a limited number of external service providers, primarily for functionalities such as sending push notifications. No unnecessary or excessive data is shared during these interactions.

We may share your information with the following actor(s):

- **Hetzner Online GmbH** for the provision of hosting services.
Hetzner Online GmbH is acting as a data processor under Article 28 GDPR under the data processing agreement. The data protection information is available at <https://docs.hetzner.com/general/company-and-policy/data-protection-at-hetzner/>.
- **Google** (an entity that directly or indirectly controls, is controlled by, or is under common control with Google LLC) for the provision of Firebase Cloud Messaging (FCM) service.
The Firebase Cloud Messaging service is governed by the Google APIs Terms of Service, available at <https://developers.google.com/terms/>. Google LLC is operating as a data processor under Article 28 GDPR, in accordance with the Firebase Data Processing and Security Terms available at <https://firebase.google.com/terms/data-processing-terms>. The Google privacy policy is available at <https://policies.google.com/privacy>.
Google LLC is certified under the EU-U.S. Data Privacy Framework (<https://www.dataprivacyframework.gov/list>), which has been recognised by the Commission Implementing Decision EU 2023/1795 of 10 July 2023 as providing adequate level of protection of personal data under Article 45 GDPR.

7 How long will your data be stored for?

We will store your data for a limited period, the duration of which will depend on the purposes for which your data is being processed. At the end of this period, your data will be permanently erased or irreversibly anonymised, except in cases where the data must be retained for a longer period due to disputes, requests from the competent authorities, or pursuant to applicable legislation.

Your data will be stored by us in line with the following conditions and criteria:

1. **Technical data collected automatically:** this data will be stored for a maximum period of eight (8) days for security and error detection purposes, after which it may be permanently deleted or anonymised.
2. **Automatically generated identifier:** this data will be stored for as long as the App is installed on your device, and for two (2) years after you have uninstalled the App.
3. **Usage data:** this data will be stored for the duration of the scientific research and for additional ten (10) years after the completion of the research project.

Additionally, with regard to the technical data collected automatically and the automatically generated identifier that may be further used for the purposes of scientific research, as well as with regard to the Usage data, should research results give rise to future research projects that require additional processing of personal data in future research projects, we may store the mentioned categories of personal data for such projects in accordance with Article 5(1)(e)lit 2 GDPR. In processing such data, we adhere to the principles of purpose limitation and data minimisation, pursuant to Article 5(1)(b) and (c) GDPR and adopt appropriate safeguards pursuant to Article 89(1) GDPR.

8 Your rights

Subject to applicable legislation, you may exercise your rights described above related to the specific processing of your personal data by us:

- **Right of access (Art. 15 GDPR):** You have the right to request confirmation of whether we process your personal data, access to that data, and information on the purposes of processing, categories of data, recipients (including those in third countries), storage duration, your data subject rights.
- **Right to rectification (Art. 16 GDPR):** You have the right to request the correction of your personal data if it is inaccurate or incomplete.
- **Right to erasure ('Right to be forgotten') (Art. 17 GDPR):** You have the right to request the erasure of your personal data. Once we have received and assessed your request, if it is legitimate, we shall promptly cease the processing and erase your personal data. We may however need to reject your request in case erasure of your data is likely to render impossible or seriously impair the achievement of the scientific research purposes, based on Article 17(3)(d) GDPR.
- **Right to restriction of processing (Art. 18 GDPR):** You have the right to request us to restrict the processing of your personal data (e.g., while its accuracy or the legitimacy of an objection is verified).
- **Right to object (Art. 21 GDPR):** You have the right to object to the processing of your personal data that is based on our legitimate interests, explaining the reasons on which your request is founded. We will cease processing unless we demonstrate compelling legitimate grounds which override your interests. We may however need to reject your request if the processing of your data is carried out for scientific research purposes for reasons of public interest (or it is a legitimate interest that coincides with a public interest), under Article 21(6) GDPR.

9 Cookies

A cookie is a file created by a web server and placed on your device, allowing the App to function efficiently.

The App uses only first-party cookies, provided and managed by us. No third-party cookies are used in the App.

In particular, the App uses the following types of cookies:

- strictly necessary cookies: these cookies are essential for you to use the App and its features
- functionality cookies: these cookies allow the App to remember your user ID
- statistics cookies: these cookies collect information, in aggregated and anonymised form, about how you use the App, with the sole purpose of improving the App functions.

When you open the App for the first time on your device, a banner is displayed to inform you about the categories of cookies that are used and to give you a possibility of accepting or rejecting functionality and statistics cookies. You can click “Accept all” to give us your consent to use cookies for all the above mentioned purposes. You can also use the checkboxes to consent to specific purposes, or reject all cookies, except for the strictly necessary cookies. You can also disable or delete cookies in the settings of your device at any time. However, rejecting or deleting the cookies will prevent the App from functioning properly.

10 Push notifications

With your express consent, some of your personal data will be used in order to send notifications to your device (“push notifications”). In order to send you such notifications, we use a third-party service to collect device tokens and send notifications, namely Google Firebase Cloud Messaging (FCM). You can choose to agree or disagree to push notifications at the first launching of the App on your device.

The FCM service processes the following data:

- **Firestore installation IDs**

Purpose: to determine which devices to deliver messages to

Retention period: Firestore retains Firestore installation IDs until the Firestore customer makes an API call to delete the ID. After the call, data is removed from live and backup systems within 180 days.

For information on data protection related to FCM service, see Section 6 “Who will process your data?” of this Privacy Policy.

11 International Data Transfers

As mentioned in Section 6 “Who will process your data?” of this Privacy Policy, the use of FCM service provided by Google LLC may involve transferring personal data to the United States. We ensure that such transfers are carried out under the appropriate safeguards required by the GDPR (see more details in Section 6). Other main processing activities take place within the European Economic Area (Austria and Germany).

12 Changes to the Privacy Policy

We may update this Privacy Policy from time to time to reflect changes in our practices or legal requirements. We will notify you of any material changes by posting the new policy on this page and updating the effective date. We encourage you to review this Privacy Policy periodically.

13 Questions and complaints

If you have any questions about this Privacy Policy or if you want to complain about the way we processes your personal data, you are welcome to contact us:

Software Competence Center Hagenberg GmbH
Softwarepark 32a, 4232 Hagenberg, Austria
Telephone: +43 50 343
E-Mail: datenschutz@scch.at
Web: www.scch.at

If your complaint is not resolved by us and you want to proceed with the case, you can complain to the Austrian Data Protection Authority:

The Austrian Data Protection Authority (Österreichische Datenschutzbehörde)
Address: Barichgasse 40-42, 1030 Vienna, Austria/Europe
Email: dsb@dsb.gv.at
Telephone: +43 1 52 152-0