

# PRIVACY POLICY

**Last revised: January 4, 2026**

## 1. General

At Aleem Labs, we value your trust and are committed to protecting your personal information. We have prepared this Privacy Policy to transparently explain how we collect, use, store, and share your data.

This Privacy Policy applies to the Aleem iOS mobile application, our website, and any related AI-powered services (collectively, the "Service"). By accessing or using the Service, you acknowledge and agree to the practices described in this policy.

Please note that Aleem is a dynamic, AI-first platform. We are constantly testing new features, large language models (LLMs), and interactive learning modes to improve your experience. Consequently, certain features or data processing activities discussed in this policy may be experimental, may vary by region, or may not be available to all users at all times.

## 2. INFORMATION WE COLLECT

When you use the Service, Aleem Labs may collect the following personal information about you:

**a. Account Registration** To register for an Aleem account, you provide us with your email address and, where necessary to comply with local laws, your age. You may also provide a name or pseudonym. You may also register using third-party social logins, specifically "Sign in with Apple" or Google Account. If you use these services, we may receive limited information from the provider, such as your email address and a unique user token, consistent with your privacy settings on that service.

**b. Profile and Learning Progress** As you use the Service, we collect data about your educational journey. This includes the languages you are learning, your proficiency level, lesson scores, "streaks," achievements, etc. This data is essential to adapt the curriculum to your needs. Unlike social networks, your detailed learning progress and chat history are private by default, though your username and basic achievement stats (e.g., "Level 5") may be visible on leaderboards or profile if you choose to participate. Some data may be visible through profile, but you may limit the visibility.

**c. AI Features and Voice Inputs** The core of the Service is an AI-powered tutor. To provide this functionality, we collect:

- **Text Inputs:** The messages, prompts, essays, and translations you type into the chat interface.
- **Audio Inputs:** The voice recordings you submit when using speaking practice or voice chat features.
- **Interaction Data:** We record the corrections the AI gives you and how you respond to them.
- **Usage:** We collect and analyze these text and audio inputs to generate real-time feedback, transcribe your speech, and improve the accuracy of our artificial intelligence models. Please do not share sensitive personal information (financial data, addresses, etc.) during your AI conversations.

**d. Activity Data and Device Information** When you access the App, we automatically generate technical data about your use of the Service. This includes:

- **Device Data:** Your device model, operating system version (iOS version), device language, and time zone.
- **Log Data:** Information about how you navigate the App, feature usage time, and crash reports.
- **IP Address:** We collect your IP address to determine your general location (e.g., country) for localization purposes and to detect suspicious activity.

**e. Cookies and Local Storage** Since the Service is primarily an iOS app, we rely on local device storage and mobile identifiers rather than traditional browser cookies. However, if you visit our website, we may use cookies to manage your session. We do not use third-party advertising cookies to track you across the web for the purpose of selling your data to data brokers.

### 3. HOW WE PROCESS YOUR INFORMATION

Aleem Labs processes your personal information based on specific legal grounds: to fulfill our contract with you, to pursue our legitimate interests in improving the Service, to comply with legal obligations, and with your consent where required.

We use your information for the following purposes:

**3.1. Providing and Personalizing the Service** We use your data to operate the App and deliver a tailored educational experience. This includes:

- **Core Functionality:** Creating your account, syncing your progress across devices, and processing your payments (via Apple).
- **AI Tutor Operations:** Processing your text and voice inputs through our AI providers to generate real-time conversational responses, grammar corrections, and pronunciation feedback.
- **Adaptive Curriculum:** Analyzing your performance history (mistakes, speed, retention) to dynamically adjust the difficulty of lessons and suggest specific review topics.

**3.2. AI Research and Machine Learning** To ensure Aleem remains a state-of-the-art language tool, we use User Content and activity data to research and improve our technology. This is a vital part of our Service:

- **Model Training:** We use de-identified or aggregated text and audio data to train, fine-tune, and evaluate the artificial intelligence models that power our chat and speech recognition features.
- **Accuracy Refinement:** We analyze interaction logs to identify instances where the AI provided incorrect or unnatural feedback, allowing us to fix errors and reduce "hallucinations."
- **Voice Improvement:** We may use audio recordings to improve the accuracy of our speech recognition engines for different accents and dialects.

**3.3. Communications** We use your contact information to send you important messages:

- **Transactional:** Essential notifications such as subscription receipts, password resets, and updates to our Terms or Privacy Policy.
- **Learning Reminders:** Push notifications or emails to remind you to practice, maintain your "streak," or review missed concepts.
- **Marketing:** Information about new features, special offers, or surveys. You can opt out of non-essential marketing communications at any time in your Settings.

**3.4. Safety and Security** We process data to maintain a safe environment for all users:

- **Content Moderation:** We use automated systems to scan User Content for toxic language, harassment, or other violations of our Terms before it is processed by the AI.
- **Fraud Prevention:** We analyze device and network data to detect suspicious activity, spam, or attempts to abuse our API.

### **3.5. Personalized ads**

Aleem Labs reserves the right to process and share certain data (such as your device identifiers) to provide you with personalized advertisements that are relevant to your interests.

**a. How it Works** We may work with third-party advertising networks and marketing analytics partners (such as Google, Meta, or Unity). These partners collect information about your device and how you use the Service to serve you ads tailored to your preferences. For example, if you are learning English for business, you might see ads for professional productivity tools.

**b. Your Control (Opt-Out)** You have full control over whether you receive personalized ads:

- **In-App Settings:** You can toggle "Personalized Ads" off at any time in the **Settings** menu of the Aleem App.
- **Device Settings:** On your iOS device, you can limit ad tracking via **Settings > Privacy & Security > Tracking**. If you deny permission for tracking, Aleem will not share your advertising identifier (IDFA) with partners.

**c. Effect of Opt-Out** Please note that opting out of personalized advertising **does not mean you will stop seeing ads**. It simply means that the advertisements you see will be less relevant to you and will not be based on your behavioral data.

### 3.6. Communicating with you

Aleem Labs uses the email address, phone number, or device tokens you provide to send you messages that help you learn and keep you informed. We categorize these communications into three types:

**a. Essential Service Messages** These are messages necessary for the operation of the Service. You **cannot opt out** of these, as they are required for security and transactional purposes.

**b. Learning and Methodology** To support your language journey, we send automated messages designed to reinforce your habit. This is a core part of the Aleem methodology.

**c. Product News and Marketing** With your permission, we may send you announcements to help you get more out of Aleem.

## 4. HOW WE SHARE YOUR INFORMATION

To operate the Service, we share data with specific third-party partners who help us provide, improve, and secure Aleem.

**4.1. Third-Party Service Providers** We share your information with trusted vendors who perform services on our behalf. These partners are bound by confidentiality agreements and data protection obligations:

- **AI and LLM Providers:** We transmit text prompts and audio inputs to third-party AI providers to generate conversational responses and corrections. We configure these services to minimize data retention, but processing on their servers is necessary for the AI features to function.
- **Cloud Infrastructure:** We use providers to host our servers, databases, and store user content securely.
- **Analytics and Performance:** We use tools to understand usage trends and debug app crashes. These tools typically process pseudonymized or aggregated data.
- **Customer Support:** If you contact us for help, we may use third-party ticketing systems to manage and respond to your inquiries.

**4.2. Legal Compliance and Harm Prevention** We may disclose your information if we believe in good faith that such disclosure is necessary to:

- Comply with a valid legal process, such as a subpoena, court order, or search warrant (including those from jurisdictions outside your country of residence if required by international law).
- Protect the safety of any person, including preventing suicide or self-harm.
- Enforce our Terms of Service or investigate potential fraud, security breaches, or violations.

**4.3. Business Transfers** If Aleem Labs is involved in a merger, acquisition, reorganization, or sale of assets, your user data (including account information and learning history) would likely be one of the transferred assets. In such an event, we will notify you via email or an in-app notice before your personal information becomes subject to a different privacy policy.

**4.4. Aggregated Data** We may share aggregated, anonymized data (which cannot be used to identify you) with partners, researchers, or the public. For example, we might publish a blog post stating, "Aleem users have practiced 1 million minutes of English conversation this year."

## 5. YOUR RIGHTS AND CHOICES

Aleem Labs believes you should have control over your data. Depending on your location (including the European Union, UK, or California), you may have specific rights regarding your personal information.

**5.1. General Privacy Rights** You have the right to:

- **Access and Portability:** Request a copy of the personal information we hold about you in a structured, machine-readable format.
- **Correction:** Request that we fix inaccurate or incomplete personal information in your profile.
- **Deletion ("Right to be Forgotten"):** Request the permanent deletion of your account and associated personal data, subject to certain legal exceptions (see Section 6).
- **Withdraw Consent:** If we process your data based on consent (e.g., marketing emails), you may withdraw that consent at any time.

**5.2. Your Rights Regarding AI Training (Opt-Out)** We value your contribution to the improvement of our AI, but we respect your choice to abstain.

- **AI Training Opt-Out:** You may choose to exclude your future voice recordings and text chats from being used to train or fine-tune our artificial intelligence models. You can toggle this setting in the App under **Settings > Privacy > Data Controls**.
- **Effect of Opt-Out:** If you opt out, your data will still be processed to provide the service (e.g., to generate a chat response), but it will be discarded from our training datasets after the session is complete.

**5.3. How to Exercise Your Rights** To exercise any of these rights, you can:

- Use the automated tools in the **Settings** menu of the Aleem App.

- Contact our Data Protection Officer at [support@aleem.io](mailto:support@aleem.io).

## 6. DATA RETENTION

We retain your personal information only for as long as necessary to fulfill the purposes for which it was collected, or as required by law.

### 6.1. Retention Periods

- **Active Accounts:** We keep your profile, learning history, and settings for as long as your account remains active to ensure a continuous learning experience.
- **Inactive Accounts:** If you have not logged into the Service for twenty-four (24) consecutive months, we reserve the right to delete your account and personal data.
- **Audio Data:** Raw voice recordings are typically retained for a shorter period (e.g., up to 12 months) for quality assurance and model evaluation before being deleted or permanently anonymized.

### 6.2. Effect of Deletion When you request account deletion:

- **Immediate Action:** Your account is deactivated, and your profile is removed from public view immediately.
- **Permanent Erasure:** Your personal identifiers (name, email, IP logs) are permanently deleted from our active databases within 30 days.
- **Backups:** Residual copies of your data may remain in our encrypted backup systems for up to 90 days due to technical constraints, after which they are overwritten.

**6.3. Anonymized Data and AI Models** You acknowledge that data which has been **aggregated, anonymized, or fully integrated into our AI models** (such that it can no longer be linked back to you) is not considered "Personal Information."

- **Irreversibility:** Once a machine learning model has been trained on data, it is generally impossible to "extract" or "delete" the specific influence of a single data point (e.g., a specific grammar correction you made). Therefore, while we delete the raw data logs upon your request, the learned patterns embedded in the AI model weights will remain.

## 7. CHILDREN'S PRIVACY

Aleem Labs prioritizes the safety of our youngest learners. We recognize that children require specific privacy protections that go beyond standard measures. For this reason, we identify users under the age of 13 (in the United States) or the relevant age of digital consent in their country of residence (e.g., 16 in parts of the EEA) as "**Child Users.**"

For Child Users, we provide a specialized, restricted experience designed to keep parents in control and minimize data collection.

### 7.1. Registration and Parental Control

- **Account Setup:** Child Users may create an account, but we require them to provide a parent or guardian's email address instead of their own. We strictly prohibit the use of real legal names for usernames.
- **Parental Notification:** Upon registration, we send an email to the provided parent address detailing our privacy practices. This email informs parents of their right to review, update, or delete their child's data at any time.

**7.2. "Safe Mode" Restrictions** To ensure a safe learning environment, all Child Users are automatically placed in a restricted mode subject to the following limitations:

- **No Targeted Ads:** We do not display personalized or behavioral advertising to Child Users. Any advertisements shown will be contextual (e.g., related to language learning) and strictly family-safe.
- **Anonymity:** Child Users cannot upload real photographs as profile pictures. They must use illustrative avatars or preset images.
- **Content Filtering:** Our curriculum is automatically filtered to remove mature vocabulary or complex themes unsuitable for younger audiences.
- **No Marketing:** We do not send promotional emails or marketing notifications to Child Users.

### 7.3. AI and Data Privacy for Children (Crucial)

- **No Model Training:** We strictly exclude text and audio data generated by Child Users from our machine learning training datasets. While a Child User may interact with our AI tutor for the purpose of the lesson, this data is processed ephemerally and is never used to improve or "teach" our AI models.
- **Speech Data:** Voice recordings made by Child Users are processed solely to provide pronunciation feedback and are not stored for product improvement analysis.

**7.4. Restrictions on Social Features** To prevent unwanted contact, social interactions for Child Users are severely limited:

- **Privacy by Default:** Child User profiles are hidden from public search. They cannot be found by strangers via email or phone number lookup.
- **No Direct Messaging:** Child Users cannot send or receive free-text messages to/from other users.
- **Restricted Leaderboards:** If a Child User participates in a leaderboard, their identity is masked. Other users will see only an anonymized alias (e.g., "Student") and a generic avatar. Child Users cannot view the full profiles of other participants.

**7.5. Adolescents (Under 16)** In addition to the protections for Child Users, we apply specific safeguards for all users under the age of 16, regardless of location:

- **No Third-Party Tracking:** We disable third-party analytics trackers and behavioral data collection tools for these accounts.
- **Data Minimization:** We limit the retention of activity logs for users in this age bracket.

**7.6. COPPA Compliance** In accordance with the Children's Online Privacy Protection Act (COPPA), we collect personal information from children under 13 solely for the purpose of performing the internal operations of the Service. If we discover that we have unintentionally collected personal information outside of these strict permissions, we will delete it immediately. If you believe we have data from a child in error, please contact us at [support@aleem.io](mailto:support@aleem.io).

## **8. INTERNATIONAL DATA TRANSFERS & CORPORATE STRUCTURE**

Aleem Labs is legally registered and operates from the **Republic of Kazakhstan**. However, the Service is part of a global ecosystem owned and managed by our **Parent Company located in the United States of America**.

**8.1. Centralized US Infrastructure** To ensure the highest levels of security, reliability, and scalability, all user data—including account information, learning progress, and AI interaction logs—is centralized within our Parent Company's infrastructure.

- **Data Flow:** While you interact with Aleem Labs (Kazakhstan) to use the App, your data is immediately encrypted and transmitted to secure servers located in the **United States** for processing and storage.
- **Unified Protection:** Regardless of where you are located, your data is protected under the robust privacy standards and regulations enforced in the United States.

**8.2. Explicit Consent to Transfer (U.S. Storage) PLEASE READ CAREFULLY. BY CREATING AN ACCOUNT OR USING THE SERVICE, YOU EXPLICITLY ACKNOWLEDGE AND AGREE TO THE FOLLOWING:**

**1. ALTHOUGH ALEEM LABS OPERATES FROM KAZAKHSTAN, ALL YOUR PERSONAL DATA IS AUTOMATICALLY TRANSFERRED TO, STORED, AND PROCESSED BY OUR PARENT COMPANY ON SERVERS LOCATED EXCLUSIVELY IN THE UNITED STATES.**

**2. YOUR DATA IS STRICTLY CONFINED TO OUR US INFRASTRUCTURE AND IS NOT SHARED WITH ANY THIRD PARTIES FOR THEIR INDEPENDENT USE (EXCEPT FOR ESSENTIAL CLOUD AND AI PROVIDERS REQUIRED TO OPERATE THE APP).**

**3. BY CONTINUING TO USE THE APP, YOU PROVIDE YOUR UNAMBIGUOUS, INFORMED, AND EXPRESS CONSENT TO THIS CROSS-BORDER TRANSFER. YOU WAIVE ANY CLAIMS REGARDING DATA LOCALIZATION LAWS OF YOUR HOME JURISDICTION THAT WOULD PREVENT THIS TRANSFER.**

**8.3. Compliance with Global Standards** We operate in strict compliance with applicable US privacy laws and regulations. Even though our operational team is in Kazakhstan, we apply American data security protocols to ensure that your information remains safe, confidential, and inaccessible to unauthorized parties.

## **9. JURISDICTION-SPECIFIC PROVISIONS**



Because Aleem Labs offers the Service globally, we acknowledge that users in certain regions may have specific rights under their local laws.

**9.1. Conflict and Precedence** This Privacy Policy is designed to comply with United States regulations. However, if you reside in a jurisdiction with mandatory data protection laws (such as the **European Union, United Kingdom, or California**) that offer protections which cannot be waived by contract, those mandatory local provisions will take precedence over this Policy to the extent of any direct conflict.

**9.2. Supplemental Notices** We may provide additional privacy disclosures or "Just-in-Time" notices within the App for users in specific regions to comply with local requirements (e.g., a specific cookie banner for EU users). These supplemental notices should be read in conjunction with this Privacy Policy.

## **10. CONTACT US**

Aleem Labs welcomes your questions or comments regarding this Privacy Policy.

**Data Controller:** Aleem Labs, Inc. (US Parent Company) is the Data Controller for your personal information.

**For General Support & Inquiries: Email:** [support@aleem.io](mailto:support@aleem.io) **Operational Address:**  
Microdistrict Shugyla, Altyn Gasyr street, building 27 Shymkent City, Republic of Kazakhstan