

FROY Privacy Policy

Last updated: April 15th 2026

1. Introduction

FROY B.V. (“FROY”, “we”, “us”) respects your privacy and is committed to protecting your personal data.

This Privacy Policy explains how we collect, use, store, and share your personal data when you use the FROY mobile application and related services (the “Service”).

FROY B.V. is registered in The Netherlands.

Contact: privacy@froy.app

2. Data We Collect

We may collect the following categories of personal data:

a) Account & Identity Data

- First name or nickname
- Date of birth or age
- Nationality
- Profile photo
- Gender

b) Contact Data

- Email address
- Phone number (optional)

c) Location Data

- Current city and nearby area
- Location data required to match Locals and Visitors

d) Usage & Interaction Data

- App activity
- Requests, matches, ratings
- Time, frequency, and duration of use

e) Communication Data

- Limited chat messages used for coordination

f) Technical Data

- Device type
 - Operating system
 - App version
 - IP address
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3. How We Use Your Data

We use personal data to:

- create and manage user accounts
 - enable connections between Locals and Visitors
 - provide core app functionality
 - ensure safety, trust, and moderation
 - prevent misuse and fraud
 - provide customer support
 - comply with legal obligations
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4. Commercial Use of Data

FROY may use personal data for **commercial purposes**, including but not limited to:

- improving and optimizing the Service
- analyzing user behavior and trends
- developing new features and offerings
- promoting FROY and its services
- offering premium features, partnerships, or sponsored experiences

Commercial use of data is always:

- proportionate and relevant

- compliant with GDPR / AVG
- based on legitimate interest and/or user consent

FROY does **not sell personally identifiable data** to third parties as a business model.

5. Data Sharing

We may share data with:

- service providers (hosting, analytics, verification)
- partners when necessary to deliver the Service
- authorities when legally required

All third parties are required to protect personal data in accordance with applicable laws.

6. Legal Basis (GDPR)

We process personal data based on:

- performance of a contract
 - legitimate interests
 - compliance with legal obligations
 - user consent (where applicable)
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7. Data Retention

We retain personal data only as long as necessary to provide the Service, fulfill legal obligations, or protect our legitimate interests. When data is no longer required, it will be securely deleted or anonymized.

8. Your Rights

You have the right to:

- access your personal data
- correct inaccurate data
- request deletion

- object to certain processing
- withdraw consent

Requests can be sent to **privacy@froy.app**.

9. Security

We take appropriate technical and organizational measures to protect your personal data against unauthorized access, loss, or misuse.

10. Changes

We may update this Privacy Policy from time to time. Material changes will be communicated via the app.

11. Contact

For questions about this Privacy Policy:

privacy@froy.app

12. Business transfers

In the event that FROY is involved in a merger, acquisition, reorganization, sale of assets, or bankruptcy, personal data may be transferred as part of such transactions. In such cases, we will ensure that the receiving party continues to protect personal data in accordance with applicable data protection laws and this Privacy Policy. Users will be informed of any material changes where required by law.