



PRIVACY POLICY

Effective Date: December 25, 2025

I. Identity of the Controller

XPE Group s.r.o., a private limited company established under the laws of the Czech Republic, ID (IČO): **17179173**, with its registered office in Prague, Czech Republic, Ve smečkách 595/28, 110 00, registered in the Commercial Register maintained by the Municipal Court in Prague, Section C, File 367791 (hereinafter "we", "us", or the "Controller"), informs you about how we process personal data in connection with the web application **LEAI** (www.leai.app). We process personal data in accordance with Regulation (EU) 2016/679 (**GDPR**) and applicable international standards, including **COPPA** where applicable.

II. Purpose and Scope of Processing

LEAI is an educational platform designed for children aged 8–14. To provide this service, we must collect and process certain data:

1. What data do we collect?

- **Account Information (Parent/Guardian):** Email address and payment records processed via Stripe. Authentication and credentials are managed securely through Auth0, and we do not store your password on our systems.
- **User Profile (Child):** Name, age, and about me section, where users can share what they want us to reference while providing our service. The about me section is optional.
- **Educational Content:** Chat history with the AI, completed challenges, progress statistics.
- **Technical Data:** IP address, device type, browser information, and error logs collected via Sentry for stability monitoring.

2. Why do we process this data?

- **Service Provision:** To create accounts, enable the interactive AI chat, track educational progress, and unlock premium content.
 - **Billing:** To process subscription payments.
 - **Improvement & Security:** To train our prompt engineering (ensuring the AI answers age-appropriately), fix bugs, and prevent misuse (Legitimate interest).
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III. Processing of Children's Data

Unlike general websites, LEAI is explicitly built for children. However, children under 15 cannot legally consent to data processing on their own.

- **Parental Role:** The user account must be created and managed by a parent or legal guardian. By registering, you confirm that you are the legal guardian of the child using the App and you consent to the processing of their data for educational purposes.
- **Safety:** We do not use children's data for behavioral advertising or sell it to third-party data brokers.

IV. Data Recipients (Sub-processors)

We act as the Controller. To provide the Service, we use verified third-party processors that adhere to high security standards:

Processor	Purpose	Location
Auth0	Identity management & secure login	EU / USA
OpenAI	LLM API (generating AI responses)	USA
Stripe	Payment processing	Global
Sevalla	Web hosting & Database	Global
Sentry	Error monitoring & debugging	USA

International Transfers: Transfers to partners in the USA are protected by standard contractual clauses (SCCs) or the EU-U.S. Data Privacy Framework.



V. Data Retention

We retain personal data only for as long as necessary:

- **Active Accounts:** For the duration of the Service usage.
- **Legal Obligations:** Billing data is archived for 10 years as required by Czech tax laws.
- **Deletion:** If you delete your account, your personal data is removed or anonymized within 30 days.

VI. Your Rights (and How to Exercise Them)

Under GDPR, you have the following rights regarding your (and your child's) data:

- **Right of Access & Portability:** You can download a copy of your personal data immediately via the "Export data" button at <https://www.leai.app/settings>.
- **Right to Erasure:** You can permanently delete your account and all associated data via the "Delete account" button at <https://www.leai.app/settings>.
- **Right to Rectification:** You can update your newsletter consent or password directly in the app settings at <https://www.leai.app/settings>. You can update your payment details on a secure Stripe customer portal, which you can access with the "Manage subscription" button at <https://www.leai.app/settings>.
- **Right to Object:** You may object to processing based on legitimate interest by clicking the "unsubscribe" link in any marketing email.

VII. Security

We take technical and organizational measures to secure your data (encryption in transit and at rest). You are responsible for keeping your login credentials confidential.

VIII. Cookies

We use essential cookies to keep you logged in and functional cookies to remember your preferences (e.g., language settings). We do not use third-party tracking cookies without your explicit consent via our cookie banner.



IX. Final Provisions

We reserve the right to update this Privacy Policy. The current version is always available on our website.

Contact:

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Represented by Daniel Izák

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