

Privacy Policy

Effective: [TO COMPLETE: effective date] · Last updated: 18 October 2026

This is a draft, not a policy in force. The bracketed details are for the operator to fill in, and the document should be reviewed by a data protection professional before publication. The substance describes what the application actually does, as implemented in the code.

1. Who controls your data

The controller is the operator of the Sippa application:

Name: Györkös Balázs e.v. (sole trader)

Registered seat: 7634 Pécs, Bajmi dűlő 28., Hungary

Sole trader registration number: 6143550

Tax number: 63368101-1-22

Email: hello@sippa.io

Data protection officer: [TO COMPLETE if one has been appointed — otherwise: "none appointed"].

2. Why this policy matters more than most

Sippa tracks your alcohol consumption. What you record about it — together with your height, weight and sex — is **health data** under Article 9 GDPR, a special category of personal data. The law sets a stricter condition for processing it than for ordinary data.

We therefore process this data **solely on your explicit consent** (Article 9(2)(a) GDPR). You may withdraw that consent at any time, without affecting the lawfulness of processing carried out before the withdrawal.

3. What we process

3.1 Account data

- first and last name

- email address
- password — stored only as a one-way hash; we neither know nor can recover your password
- chosen language
- date of birth — to enforce the minimum age of 18
- country — after you register we pre-fill it from where you connect (Cloudflare derives the country from your IP address; we do not store the IP address for this), and you confirm or change it during setup or in your profile. We also store whether the value was pre-filled by us or set by you.
- profile picture, if you upload one
- the nickname you give the Sippa character, if you set one

3.2 Health data (special category)

- sex
- height and weight
- drink entries: type, name, quantity, unit, alcohol content, time of consumption, and any note you attach
- day closes: whether the day was alcohol-free or you drank, the "alcohol-free tomorrow?" intention, and the day's note if you write one
- if you add them: who you drank with (alone or with others) and the mood behind it (for example stress, celebration)
- if you turn it on: the fact that you are pregnant or planning a pregnancy, and since when (pregnancy mode)
- values derived from the above: alcohol units, daily and weekly totals, streaks, total alcohol-free days

3.3 Usage data

- experience points, level, unlocked badges, personal records

- the ledger of points awarded

3.4 Technical data

- session cookie and sign-in token, so you are not asked to sign in on every page
- IP address and user agent in server logs, for operation and security
- days of use: on which days you used the app, on which platform (web, iOS, Android) and which version — one entry a day, saying nothing about your drinking

4. Purposes and legal bases

Purpose	Data	Legal basis
Creating and running your account, signing in	account data, technical data	Performance of a contract — Art. 6(1)(b)
The core service: recording consumption, totalling it, reflecting it back	health data	Explicit consent — Art. 9(2)(a)
Motivational features: points, levels, badges	usage data	Performance of a contract — Art. 6(1)(b)
The written part of the weekly recap (Sippa+; can be switched off in Profile → Weekly recap → "Include the written summary")	the week's aggregate figures (see Anthropic's row in section 5)	Explicit consent — Art. 9(2)(a)
Enforcing the minimum age	date of birth, country	Performance of a contract — Art. 6(1)(b)
Country-specific content: support lines, the national drink unit and minimum age	country	Performance of a contract — Art. 6(1)(b)
Aggregate statistics to improve the service (for example users per country), never traceable to individuals	country, account and usage data	Legitimate interest — Art. 6(1)(f)

Purpose	Data	Legal basis
Pregnancy mode: adjusting goals and messages (any alcohol counts as over the limit)	the fact of pregnancy and its start date	Separate explicit consent — Art. 9(2)(a); asked when you turn it on, and you can turn it off at any time
Blocking abuse and automated sign-ups	IP address, challenge token	Legitimate interest — Art. 6(1)(f)
Security, debugging, operations	technical data	Legitimate interest — Art. 6(1)(f)
Running the service and support: in the operator's admin interface, viewing account data (name, email, country, language, subscription, last day of use) when you ask for help; nobody sees your health data there, only aggregates that cannot be traced to individuals	account data, days of use	Legitimate interest — Art. 6(1)(f)

5. Who we share it with

We do not sell your data and we do not use it for advertising. The service relies on these providers:

Provider	What it receives	Why
Vultr — The Constant Company, LLC (319 Clematis Street, Suite 900, West Palm Beach, FL 33401, USA); the server runs in Warsaw, Poland	all stored data	running the server and the database
Ploi (Amperestraat 16J, 3861 NC Nijkerk, the Netherlands; KvK: 94117233)	access to the server, and so technically to the data on it	managing the server and deploying new versions
Neon, LLC (part of the Databricks group, USA); the data is held in Frankfurt, Germany	a backup copy of the stored data	an off-site backup with a second provider

Provider	What it receives	Why
Cloudflare, Inc.	all traffic to sippa.io (IP address, technical request data); on registration, the challenge token your browser generates (Turnstile)	serving and protecting the traffic, deriving the country from the IP address, filtering out automated sign-ups
Anthropic, PBC (USA)	for Sippa+ subscribers with the written summary switched on: the week's aggregate figures — units this week and last week, your own weekly limit, the number of drinking and alcohol-free days, your goals, your streaks, and the week's heaviest day (its weekday and units). No name, email address, date or individual entry is sent.	writing the text of the weekly recap with artificial intelligence
Google Ireland Ltd. (Google Fonts)	IP address when fonts are fetched	rendering the site's typefaces

For the operator: Vultr, Neon, Cloudflare and Google belong to US companies, so — even though Vultr and Neon store the data in the EU — a transfer outside the EU may occur. Name the safeguard here explicitly: Neon, LLC is certified under the EU-US Data Privacy Framework; Vultr relies on standard contractual clauses. Google Fonts can also be self-hosted, which removes that transfer entirely.

Anthropic: the weekly aggregate figures belong to an identified user, so they are health data. Anthropic's data processing agreement is needed (part of its commercial terms, with EU SCCs); check its retention and model-training terms, and consider making the written summary off by default (today it is on by default).

A **data processing agreement** under Article 28 GDPR is required with all three hosting and operations providers: Vultr signs one on request, Neon's is part of its terms, and Ploi has to be asked.

6. How long we keep it

- **Account and health data:** for as long as your account exists. If you delete your account, we erase them permanently within [TO COMPLETE: e.g. 30] days.
- **Server logs:** [TO COMPLETE: e.g. 30] days.

- **The log of administrator actions** (who changed what on which account and when — for example granting a subscription or blocking an account): 2 years.
- **Billing records:** if a paid tier ever launches, 8 years under Hungarian accounting law.

7. Your rights

- **Access:** request a copy of the data we hold about you.
- **Rectification:** have inaccurate data corrected.
- **Erasure:** have your data deleted.
- **Restriction:** have processing restricted.
- **Portability:** receive your data in a machine-readable format.
- **Objection:** object to processing based on legitimate interest.
- **Withdraw consent:** at any time, as easily as you gave it.

Write to hello@sippa.io. We respond within one month at the latest.

8. Where to complain

Hungarian National Authority for Data Protection and Freedom of Information (NAIH)

Falk Miksa utca 9-11, 1055 Budapest, Hungary

Postal address: 1363 Budapest, Pf. 9

Phone: +36 1 391 1400

Email: ugyfelszolgalat@naih.hu

Web: naih.hu

You may also go to court, including the court with jurisdiction over your place of residence.

9. Security

Passwords are stored as one-way hashes. Connections are encrypted with HTTPS. Only the application can reach the database. No system is ever completely secure, and we

do not claim otherwise.

10. Cookies

The application uses a session cookie to keep you signed in. It is strictly necessary for the service to work, so it does not require separate consent. We use no analytics or advertising cookies.

11. Children

The service is intended solely for people aged 18 and over. We do not knowingly process data about anyone under 18. If we discover such data, we will delete it.

12. Changes to this policy

If we make a material change, we will tell you in the application or by email. Earlier versions remain available with their dates.