

Privacy Policy

Effective Date: February 12, 2026 **Last Updated:** February 12, 2026

Passerim ("we," "our," or "us") operates the Birdwhistle (쩍쩍이) mobile application (the "App"). This Privacy Policy explains how we collect, use, disclose, and protect your personal information when you use the App.

This English-language Privacy Policy governs for users outside the Republic of Korea. If you are located in the Republic of Korea, please refer to our Korean-language Privacy Policy (개인정보처리방침), which is the legally controlling version under Korean law.

If you have questions about this Privacy Policy, contact us at **sarangmaker0218@gmail.com**.

1. Information We Collect

We collect the following categories of personal information:

1.1 Account Information

When you create an account, we collect your email address and display name. If you sign in through a third-party service (e.g., Apple Sign In), we receive the information you authorize that service to share.

1.2 User-Generated Content

The App allows you to create and store journal entries, to-do lists, timetables, and group feed posts. This content is stored on our servers to provide the App's core functionality.

1.3 AI Conversation Data

When you interact with Murmur, our AI assistant, we collect and temporarily store your messages (prompts) and the AI-generated responses. We also maintain a limited conversation memory ("Bird Memories") to improve the relevance of Murmur's responses within the App.

1.4 Usage and Analytics Data

We collect information about how you use the App, including token consumption (API usage metrics), feature usage patterns, session duration, and device information (device model, operating system version, app version, and language settings).

1.5 Purchase Information

We record your in-app purchase history (items purchased, timestamps, and transaction identifiers) to manage your account status and deliver purchased features. We do not collect or store your payment card details — all payment processing is handled by Apple.

1.6 Push Notification Tokens

If you enable push notifications, we collect your device push notification token to deliver notifications.

What We Do NOT Collect

We do not collect precise geolocation data, contact lists, photos or media (unless you explicitly upload them), biometric data, or government-issued identification numbers.

2. How We Use Your Information

We use your personal information for the following purposes:

- **Providing core App features:** Storing and syncing your journal entries, to-do lists, timetables, and group feed content across sessions.
- **AI-powered assistance:** Transmitting your prompts to third-party AI model providers through OpenRouter (see Section 3) to generate Murmur's responses, and maintaining conversation memory to improve response quality.
- **Processing purchases:** Recording in-app purchase transactions and activating purchased features (e.g., virtual food and water for Murmur).
- **Push notifications:** Sending you reminders and updates if you have opted in.
- **App improvement:** Analyzing aggregated, de-identified usage data to identify bugs, improve features, and optimize performance.
- **Customer support:** Responding to your inquiries and resolving issues.
- **Legal compliance:** Meeting applicable legal obligations, responding to lawful requests, and protecting our rights.

We do not use your personal information for targeted advertising, behavioral profiling for third-party advertisers, or selling your data.

3. Third-Party Services and Data Sharing

3.1 AI Processing

Your messages to Murmur are processed by third-party AI services to generate responses. We use two separate pathways depending on the AI model selected:

(a) Anthropic (Direct API)

For Claude models, your messages are transmitted directly to **Anthropic, PBC** (San Francisco, CA, USA) via Anthropic's API.

- Anthropic retains API inputs and outputs for up to **30 days** solely for trust and safety purposes (abuse monitoring).
- Anthropic does **not** use API data to train its models.
- For details, see Anthropic's privacy policy: <https://www.anthropic.com/privacy>
- For details on API data usage: <https://privacy.anthropic.com>

(b) OpenRouter (API Routing for Non-Claude Models)

For non-Claude models, your messages are transmitted through **OpenRouter, Inc.** (New York, USA), an API routing service that connects to various AI model providers.

- OpenRouter does not store your prompts or responses by default (Zero Data Retention policy).
- OpenRouter logs basic request metadata (timestamps, model used, token counts) for operational purposes.
- We have configured our OpenRouter integration to disable prompt logging and to exclude providers that use input data for model training.
- Downstream model providers process your messages solely to generate AI responses. We enforce Zero Data Retention routing where available.
- For details, see OpenRouter's privacy policy: <https://openrouter.ai/privacy>

Your data is not used to train AI models. Neither Anthropic nor OpenRouter (or its downstream providers, under our configuration) use your data for model training. We contractually require that all processors do not use your data for training purposes.

3.2 Payment Processing (Apple)

All in-app purchases are processed by Apple through the App Store. Apple collects and processes your payment information according to its own privacy policy. We receive only a transaction confirmation and receipt — we never receive or store your credit card number, bank account, or other financial details.

3.3 Other Disclosures

We may disclose your personal information in the following limited circumstances: - **Legal requirements:** When required by applicable law, regulation, legal process, or governmental request. - **Safety and rights protection:** To protect the rights, safety, or property of Passerim, our users, or the public. - **Business transfers:** In connection with a merger, acquisition, or sale of assets, with advance notice to you.

We do not sell or share your personal information with third parties for their own marketing or advertising purposes.

4. Data Retention

We retain your personal information for as long as necessary to fulfill the purposes described in this Privacy Policy, unless a longer retention period is required by law.

- **Account information:** Retained while your account is active and for 30 days after account deletion to process the deletion request.
- **User-generated content (journals, to-dos, timetables, group feeds):** Retained while your account is active. Deleted within 30 days of account deletion.
- **AI conversation data (prompts and responses):** Your messages are transmitted to AI providers in real time. Anthropic retains API data for up to 30 days for trust and safety monitoring before automatic deletion. OpenRouter does not retain prompts or responses under our

Zero Data Retention configuration. Bird Memories (conversation context) are retained on our servers while your account is active and deleted within 30 days of account deletion.

- **Usage and analytics data:** Retained in aggregated, de-identified form for up to 12 months for App improvement purposes.
 - **Purchase records:** Retained for 3 years after the transaction date, or longer if required by applicable tax or commercial law.
 - **Push notification tokens:** Deleted when you disable notifications or delete your account.
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5. Data Security

We implement industry-standard security measures to protect your personal information, including: - Encryption in transit using HTTPS/TLS for all data transmitted between your device, our servers, and third-party providers. - Encryption at rest for stored personal data. - Access controls limiting employee and contractor access to personal data on a need-to-know basis. - Regular security reviews of our infrastructure and third-party integrations.

No method of electronic transmission or storage is 100% secure. While we strive to protect your data, we cannot guarantee absolute security.

6. Your Rights

Depending on your jurisdiction, you may have some or all of the following rights regarding your personal information:

- **Access:** Request a copy of the personal information we hold about you.
- **Correction:** Request that we correct inaccurate or incomplete personal information.

- **Deletion:** Request that we delete your personal information, subject to certain legal exceptions.
- **Portability:** Request a copy of your data in a structured, commonly used, machine-readable format.
- **Opt-out of sale/sharing:** We do not sell or share your personal information, so there is nothing to opt out of. If this changes, we will provide a "Do Not Sell or Share My Personal Information" mechanism.
- **Non-discrimination:** We will not discriminate against you for exercising your privacy rights.

To exercise any of these rights, contact us at **sarangmaker0218@gmail.com**. We will respond within 45 days (or sooner if required by applicable law). We may need to verify your identity before processing your request.

6.1 Account Deletion

You may delete your account at any time through the App's settings. Upon account deletion, we will delete or de-identify your personal information within 30 days, except where retention is required by law. This includes deletion of your account information, user-generated content, AI conversation history, and Bird Memories.

7. Information for California Residents

If you are a California resident, the California Consumer Privacy Act (CCPA), as amended by the California Privacy Rights Act (CPRA), provides you with additional rights.

Categories of Personal Information Collected

CCPA Category	Data Types	Purpose
A. Identifiers	Email address, display name, device identifiers	Account management, App functionality

CCPA Category	Data Types	Purpose
B. Personal information per Cal. Civ. Code §1798.80(e)	Name, email address	Account management
D. Commercial information	In-app purchase history	Purchase fulfillment, account management
F. Internet/electronic network activity	Usage data, session information, feature interactions	App improvement, bug fixes
K. Inferences	AI conversation context (Bird Memories)	Improving AI response relevance

Sale and Sharing

We do not sell your personal information. We do not share your personal information for cross-context behavioral advertising.

Sensitive Personal Information

AI conversation logs may contain sensitive personal information you voluntarily provide. We use this data only to provide the AI assistant feature and do not use it for purposes beyond what is necessary to deliver the service.

Automated Decision-Making

Murmur generates AI responses based on your inputs and conversation history. These responses are informational and do not produce legal or similarly significant effects. You may request information about the logic involved in AI-generated responses by contacting us.

8. Information for Residents of Other US States

If you reside in a US state with a comprehensive privacy law (including but not limited to Virginia, Colorado, Connecticut, Oregon, Texas, Montana, Indiana, Iowa, Tennessee, Delaware, New Hampshire, New Jersey, Nebraska, Minnesota, Maryland, Rhode Island, or Kentucky), you generally have the right to access, correct, delete, and obtain a portable copy of your personal information, and to opt out of targeted advertising (which we do not engage in), the sale of personal data (which we do not do), and profiling with legal effects (which we do not perform).

Disclosure regarding large language models (for Connecticut residents and others where required): We do not collect, use, or sell your personal data for the purpose of training large language models.

To exercise your rights, contact us at **sarangmaker0218@gmail.com**.

9. Children's Privacy

Birdwhistle is not directed at children under 13. We do not knowingly collect personal information from children under 13 years of age.

We implement age verification at the time of account creation. If we learn that we have collected personal information from a child under 13 without verified parental consent, we will delete that information promptly.

If you are a parent or guardian and believe your child under 13 has provided us with personal information, please contact us immediately at **sarangmaker0218@gmail.com**, and we will take steps to delete the information.

Note: For users in the Republic of Korea, the age threshold is 14 under the Personal Information Protection Act (PIPA). Korean users under 14 require legal guardian consent. Please refer to our Korean-language Privacy Policy (개인정보처리방침) for details.

10. International Data Transfers

Passerim is based in the Republic of Korea. Your personal information may be transferred to and processed in: - **Republic of Korea** — where our servers are located. - **United States** — where Anthropic, PBC (San Francisco, CA) and OpenRouter, Inc. (New York) and downstream AI model providers are located.

These transfers are necessary to provide the App's core AI functionality. We take reasonable steps to ensure that your data is treated securely and in accordance with this Privacy Policy. By using the App, you acknowledge these transfers.

11. Changes to This Privacy Policy

We may update this Privacy Policy from time to time. When we make material changes, we will: - Update the "Last Updated" date at the top of this page. - Notify you through the App (via in-app notification or push notification) at least 7 days before the changes take effect. - For changes that affect how we use your existing data, we will seek your consent where required by law.

Your continued use of the App after the effective date of a revised Privacy Policy constitutes acceptance of the changes.

12. Contact Us

If you have questions, concerns, or requests regarding this Privacy Policy or our data practices, contact us at:

Passerim Seoul, Republic of Korea **Email:** sarangmaker0218@gmail.com

This Privacy Policy is provided in English for users outside the Republic of Korea. For users in Korea, the Korean-language version (개인정보처리방침) shall govern.