Goome - Privacy Policy

Version: 1.0 **Last updated:** 31-05-2026

What you need to know

Goome detects your posture through your webcam and gives you real-time on-screen corrections. The most important thing about how we built it:

Your webcam feed never leaves your device. Video frames, images, and facial data are processed entirely on your own computer. We do not store them, we do not transmit them, and no one at Goome, or anywhere else, ever sees what your camera sees.

What we *do* receive is a small set of numerical scores: how long your session was, how often your posture was good or bad, account information, and basic technical data needed to run the service. That's it.

---

1. Who we are

Goome (eenmanszaak), KvK 42005126, VAT NL005427719B93. Postbus 134, 7900 AC Hoogeveen, The Netherlands. Contact: support@goome.app

We are the **data controller** for the personal data described in this policy.

---

2. What we collect

What stays on your device, always

- Raw webcam frames
- Facial landmarks and skeletal keypoints used to detect your posture
- Real-time posture classifications

None of this is ever transmitted, stored, or shared. It exists only in your computer's memory while Goome is running.

What we receive from your device

- **Account data:** name, email, hashed password, language preference, account creation date
- **Session metrics:** session start and end times, total active minutes, number of sessions, posture-quality scores, number and type of on-screen corrections, your response to them, app version
- **Technical and security data:** IP address, operating system, app version, login timestamps, an app instance identifier, failed login attempts
- **Support communication:** anything you send us when contacting support
- **Payment metadata:** subscription plan, invoice history. Card and bank details are handled directly by Stripe and never visible to us
- **Marketing engagement** (only if you opt in): opens and clicks on emails

What we don't collect, ever

- Webcam images or video
- Audio or voice
- Location data
- Contacts or address book
- Financial details (handled by Stripe)
- Anything you do outside of Goome

---

3. Why we use this data

Purpose	Legal basis (GDPR Art. 6)
Running the service and your account	Performance of contract
Processing payments and keeping financial records	Contract / legal obligation
Customer support	Performance of contract

Security, fraud prevention, abuse detection	Legitimate interest
Improving the product based on aggregated metrics	Legitimate interest
Sending marketing about Goome	Consent (or "soft opt-in" for existing customers, Art. 11.7 Telecommunicatiewet)

You can object to processing based on legitimate interests at any time (see section 7).

---

4. A note on webcam data

Goome uses your webcam, but it doesn't try to identify you. Our on-device processing extracts skeletal keypoints and facial landmarks (the geometric position of features such as eyes and nose, used to estimate head orientation) to detect posture in real time. We don't match these against any database, don't generate a biometric template that could re-identify you elsewhere, and don't store or transmit them.

Because this data is processed only on your own device, only for posture detection, and never with the purpose of uniquely identifying you, it falls outside the scope of Article 9 GDPR, which applies to biometric data *"for the purpose of uniquely identifying a natural person"*.

We have applied a privacy-by-design approach to this processing: webcam analysis happens entirely on your own device, we collect only the minimum data needed to provide the service, and we keep what we do receive as long as needed and no longer.

---

5. Who else processes your data

Provider	Purpose	Location	Transfer mechanism

Stripe	Payments and billing	Ireland / US	DPF + SCCs
Amazon Web Services (AWS)	App hosting, database, storage	Frankfurt, Germany (eu-central-1)	Within EU/EEA
Squarespace	Website hosting	US	DPF / SCCs
Loops.so (Astrodon Corporation)	Email delivery (transactional and marketing)	United States (Oregon)	EU–U.S. Data Privacy Framework + SCCs
Web3forms.com	Website contact form submissions	United States	Standard Contractual Clauses
Google Workspace	Internal email and documents	EU (with possible US sub-processing)	Adequacy + SCCs
Cookiebot (Cybot A/S)	Cookie consent management on our website	Denmark	Within EU/EEA
Capisoft B.V.	Software development and production operations	Netherlands	Within EU/EEA; ISO 27001 certified

If we add or replace a sub-processor, we update this list and notify affected users where required.

---

6. International transfers

We aim to keep your data inside the EU/EEA. Where we use providers based outside the EU (Stripe, Squarespace, Loops.so, Web3forms.com), we rely on the EU–US Data Privacy Framework where the provider is certified, and on the European Commission's Standard Contractual Clauses with supplementary measures where appropriate.

---

7. How long we keep your data

Data	Retention
Account info while subscribed	Duration of subscription
Account info after cancellation	12 months, then deleted or fully anonymised
Usage metrics tied to your account	Subscription + 12 months
Aggregated, anonymised metrics	Up to 24 months for product improvement
Invoices and tax records	7 years (Dutch statutory obligation)
Customer support messages	24 months after the conversation closes
Marketing data	Until you unsubscribe; we then keep a suppression record
Security and access logs	90 days

System backups	90 days rolling

---

8. Your rights

Under the GDPR you can ask us to:

- Show you the data we hold about you (access)
- Correct anything that's wrong (rectification)
- Delete your data (erasure), subject to legal exceptions
- Restrict how we process it
- Hand your data over in a machine-readable format (portability)
- Object to processing based on legitimate interests, including marketing
- Withdraw consent at any time, where consent was the basis

To exercise any of these rights, email support@goome.app. We respond within one month.

You also have the right to lodge a complaint with the Autoriteit Persoonsgegevens (Dutch Data Protection Authority, autoriteitpersoonsgegevens.nl) or the supervisory authority in your country of residence.

---

9. Security

Privacy by design starts with not collecting what we don't need. The single biggest measure: webcam processing never leaves your device.

In addition:

- TLS encryption for all data in transit
- Encryption at rest for databases and backups
- Strict access controls and least-privilege access for our team and development partner
- ISO 27001-certified development partner (Capisoft)
- Documented incident response, we notify the Dutch DPA within 72 hours where required (Art. 33 GDPR), and affected users where a breach is likely to result in high risk to them (Art. 34 GDPR)

---

10. Automated decisions, children, and changes

Automated decisions. Goome decides automatically when to show you a posture correction. These are visual notifications shown directly to you, they don't produce legal or similarly significant effects, and don't fall under Article 22 GDPR.

Children. Goome is for adults. We don't knowingly collect data from anyone under 18. If you believe we have, contact support@goome.app and we'll delete it.

Changes to this policy. The current version is always at goome.app/legal/privacy. We notify active customers of material changes by email or in-app notice before they take effect.

---

11. Contact

Email: support@goome.app **Post:** Goome, Postbus 134, 7900 AC Hoogeveen, the Netherlands

Regulator: Autoriteit Persoonsgegevens, autoriteitpersoonsgegevens.nl