

Privacy Policy

Magic 8 Ball: Talking Oracle · Version 1.0 · Effective 15 August 2026

Magic 8 Ball: Talking Oracle answers a question with a prediction, and speaks it aloud. It does that entirely on your device. It has no networking code of any kind, so there is nothing for it to send and nowhere to send it — and we, the developer, receive nothing at all.

At a glance

- **The app is completely offline.** Every prediction and quote is built into it; it makes no connection to any server, ours or anyone else's.
- **We collect no personal data.** None. We operate no servers that could receive any.
- **Your question is never captured.** You think it, or say it out loud to the room — the app never hears it, because it never uses the microphone.
- **There is no account,** no sign-in, and no email address to give.
- **No analytics, no advertising, no tracking** — no third-party software development kits of any kind.
- **The only thing stored is your settings,** on your device.

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SECTION 1

Who we are

Magic 8 Ball: Talking Oracle is published under the name **Lustig Fairchild** ("we", "us", "the developer"), an independent app developer established in Bulgaria, in the European Union. We are not a company; the app is made and published by a single individual trading under that name, whose identity is held by Apple Inc. as part of the Apple Developer Program and is available to any competent authority on request.

For every purpose of the EU General Data Protection Regulation (Regulation (EU) 2016/679, "GDPR"), Lustig Fairchild is the **controller**. Because we are established within the European Union, no representative under Article 27 GDPR is required, and our activities do not require a Data Protection Officer under Article 37.

Contact: lustigfairchild@abv.bg. Section 17 explains what to expect.

SECTION 2

What this policy covers

This policy covers **Magic 8 Ball: Talking Oracle** in all the forms it is delivered:

- the app on iPhone and iPad;
- the **Apple Watch app**, which runs independently of the iPhone;
- the app on **Mac** and **Apple Vision Pro**;
- the **App Clip**, the small instant version of the app.

Every one of them behaves the same way for the purposes of this document: offline, and collecting nothing.

SECTION 3

The app is offline, and collects nothing

Most privacy policies describe the data a company gathers. This one cannot, because there is no mechanism by which anything could be gathered:

- The app contains **no networking code** — no *NSURLSession*, no web view, no request to any server. Every prediction and every quote, in all fourteen languages, is built into the app and read from disk.
- The app contains **no third-party libraries or SDKs**: no analytics, no crash reporting service, no advertising network, no attribution provider, no consent management platform.
- We therefore hold **no database of users**, no identifiers, no device fingerprints, no usage logs and no email addresses.

A consequence follows that Article 11 GDPR requires us to state plainly: **we cannot identify you**. We have no means of connecting any request to any data, because we hold none. Section 11 explains what that means for your rights.

SECTION 4

What the app stores on your device

The app saves your preferences — your chosen language, whether answers are spoken, the speech volume, whether sound effects play, whether it asks for your question, whether it answers on launch — using the operating system's standard preferences mechanism (*UserDefaults*). It also keeps a small count of how many times the app has been opened, which is what governs the rating prompt described in Section 7. This data:

- stays on the device that wrote it;
- is protected by the operating system's app sandbox and by device encryption;
- is deleted when you delete the app.

The app keeps no history. It does not record the questions you ask, the answers you were given, or when you asked. There is no synchronisation of any kind — not even through your own iCloud.

SECTION 5

Speech, sound and shaking

Your question is never captured. The app may invite you to ask a question out loud — that is theatre, not input. It has no way to hear you: it requests no microphone permission and cannot record audio, and the operating system would not permit it to without a permission your device has never been asked for.

The app speaks; it does not listen. Answers are read aloud by **the speech synthesizer built into your device** (*AVSpeechSynthesizer*), using the voices already installed on it. The synthesis happens on your device; no text is sent to any cloud voice service. The app also configures the shared audio session so that speech and sound effects behave properly alongside music — a playback setting, involving no data about you.

Shaking to ask uses the standard shake gesture that the operating system reports to any app. The app is told "a shake happened" and nothing more. It does not read the accelerometer or gyroscope, does not collect motion data, and stores nothing about how or when you moved your device.

SECTION 6

The Watch app and the App Clip

The Apple Watch app runs independently of your iPhone, stores its own settings in the same way, and is equally offline.

The App Clip is a small instant version of the app. It is explicitly configured to request **no ephemeral notifications and no location confirmation**, and it collects nothing. Apple governs how an App Clip is invoked and how long it stays on your device; that is described in Apple's own privacy policy.

SECTION 7

The rating prompt

After you have used the app a number of times, it may ask the operating system to show Apple's standard "rate this app" prompt. The request goes through Apple's *StoreKit* framework, and **the operating system decides whether to show it** — the app cannot force it, and cannot tell whether it appeared.

The launch count that governs this lives on your device, in the preferences described in Section 4. If you rate the app, that rating goes to Apple, not to us, and we see only what any developer sees on the App Store: the public review, under whatever name you chose to publish it.

SECTION 8

What we never do

- We never require an account, a sign-in, a registration or an email address.
- We never collect, store or transmit your personal data to ourselves or anyone else.
- We never record, transcribe or transmit anything you say.
- We never show advertising and never embed advertising or attribution software.
- We never track you across apps, websites or over time; we do not use the Apple Advertising Identifier (IDFA) and never present an App Tracking Transparency request, because there is nothing to request.
- We never sell, rent, share or trade personal information. We could not, having none.
- We never send anything to any artificial intelligence service, for any purpose including model training. The predictions are written by hand, not generated.
- We never access your location, contacts, calendar, microphone, camera, photos, motion or health data.
- We never use cookies or similar technologies.
- We never profile you or take automated decisions about you within the meaning of Article 22 GDPR.

SECTION 9

The role of Apple

Magic Ball is distributed exclusively through the Apple App Store. In that transaction **Apple acts on its own account, as an independent controller**, under Apple's privacy policy, which you can read at apple.com/legal/privacy.

Apple therefore handles, without our involvement, your App Store download and your Apple Account. Apple provides us with commercial reporting — units downloaded, territories, aggregate usage — **in anonymised and aggregated form only**. We cannot identify an individual from it, and we do not try.

SECTION 10

Legal bases for processing

Article 13(1)(c) GDPR requires us to state the lawful basis for each processing operation. Since the app runs on your device and we receive nothing, there is very little to state:

Operation	Lawful basis	Note
Storing your settings and launch count on your device	Article 6(1)(b) — performance of a contract	The app cannot remember your language or your preferences without saving them.
Correspondence you send us by email	Article 6(1)(f) — legitimate interests	Our interest in answering the message you chose to send.
Anonymised, aggregated App Store reporting from Apple	Outside the GDPR	Not personal data; no individual can be identified.

Providing your data to us is never a statutory or contractual requirement, because we ask for none.

SECTION 11

Your rights, and how to exercise them

Under the GDPR you have the rights of access (Art. 15), rectification (Art. 16), erasure (Art. 17), restriction (Art. 18), portability (Art. 20), objection (Art. 21) and complaint to a supervisory authority (Art. 77).

Because we hold nothing about you, these are satisfied directly, by you, without asking anyone:

- **Access and portability.** There is nothing held about you to request. Your settings are visible in the app.
- **Rectification.** Change any setting in the app at any time.
- **Erasure.** Delete the app. Its settings go with it. We hold no copy, no backup and no archive to be deleted afterwards.
- **Restriction and objection.** Stop using the app. No processing continues anywhere else, because none ever happened anywhere else.

Article 11 GDPR applies squarely here: **we cannot identify you**, because we hold no data by which anyone could be identified. If you write to us about a request concerning data we do not hold, we will say so plainly and explain why we are unable to act, as Articles 11(2) and 12(4) require. We respond within one month.

SECTION 12

Children

Magic 8 Ball: Talking Oracle is safe for children to use: it collects nothing from anybody, of any age. There is no sign-in, no chat, no user-generated content visible to others, no advertising, and no links to unmoderated material.

Because we knowingly collect no personal information from any user, we collect none from children under 13 (for the purposes of the United States Children's Online Privacy Protection Act) or under 16, or such lower age as a Member State has set (Article 8 GDPR).

SECTION 13

Retention, security and international transfers

We retain no personal data, so we have no retention schedule for it. Your settings live on your device until you change them or delete the app.

The strongest security measure available to a small developer is to hold nothing worth attacking, and that is the measure we have taken: there is no server of ours to breach and no database of ours to leak. On your device, the app's settings are protected by the operating system's app sandbox and by device encryption.

We transfer no personal data anywhere, internationally or otherwise, because we receive none. Should a personal data breach ever occur within our responsibility, we would notify the competent supervisory authority within 72 hours as Article 33 GDPR requires.

SECTION 14

Notice for residents of the United States

For the purposes of the California Consumer Privacy Act as amended by the California Privacy Rights Act, and the comparable statutes of Virginia, Colorado, Connecticut, Utah, Texas and other states:

- **Categories of personal information collected in the past 12 months: none.** This includes identifiers, commercial information, biometric information, internet activity, geolocation, sensory data, inferences and sensitive personal information.
- **We have not sold or shared personal information**, and never have. We do not process personal information for targeted advertising or for profiling.
- Because we collect nothing, there is nothing to opt out of. We honour Global Privacy Control signals by construction — we run no tracking to which such a signal could apply.
- You keep the rights to know, delete, correct and to non-discrimination. The app behaves identically for everyone.

SECTION 15

Other jurisdictions

The position described here — no collection, no transmission, no sharing — satisfies and generally exceeds the requirements of the **UK GDPR** and Data Protection Act 2018, the **Swiss FADP**, Brazil's **LGPD**, Canada's **PIPEDA**, Australia's **Privacy Act 1988**, Japan's **APPI** and South Korea's **PIPA**.

SECTION 16

Changes to this policy

We may update this policy to reflect new functionality or changes in law. The version number and date at the top identify the current text. Any change to the "no collection" position in Section 4 would be announced in the release notes of the version that introduced it, and would never be applied retroactively.

SECTION 17

Contact, and how to complain

Lustig Fairchild

Bulgaria, European Union

lustigfairchild@abv.bg

Please put the app's name in the subject line. We answer within a few days, and within one month at the outside for data protection requests, as Article 12(3) GDPR requires.

You have the right to complain to a supervisory authority — in the EU Member State of your residence, your place of work, or the alleged infringement (Article 77 GDPR). Ours is the **Commission for Personal Data Protection of the Republic of Bulgaria**, 2 Prof. Tsvetan Lazarov Blvd., Sofia 1592 — cpdp.bg. In the United Kingdom, the Information Commissioner's Office, ico.org.uk. We would rather you wrote to us first.

ANNEX

App Store privacy declaration

Apple requires every app to declare its data practices, shown on the App Store as a privacy label before you download. For Magic 8 Ball: Talking Oracle that declaration is, and is intended to remain:

Data Not Collected — The developer does not collect any data from this app.

If the label ever contradicts this document, treat it as an error and write to us; we will correct it.

Lustig Fairchild — Privacy Policy for Magic 8 Ball: Talking Oracle. Version 1.0, effective 15 August 2026. Written to satisfy Articles 12–14 GDPR, the CCPA/CPRA notice-at-collection requirements, and Apple App Store Review Guideline 5.1.1. Provided for the information of users of the app; it does not constitute legal advice to any other party.