

Apturo Privacy Policy

Effective date: 7 October 2026 · Replaces the CoachCam Privacy Policy dated December 2025

This policy explains what personal information Apturo collects when you use apturo.app, the web app at go.appturo.app and the Apturo apps for iOS and Android, why we collect it, who can see it, and the choices you have.

Apturo is based in New Zealand and handles personal information in line with the **Privacy Act 2020**. Where the **EU or UK General Data Protection Regulation (GDPR)** applies to you, we also meet its requirements, and Apturo is the controller of your information.

The short version

- Your training videos are private unless you share them, coach with someone, or list them on the marketplace.
- We never sell your personal information, and we do not use advertising trackers.
- Card details go straight to Stripe, Apple or Google. We never see them.
- Footage of an athlete is only sold with their consent, and footage of under 18s is never sold.

1. What we collect

Information you give us

- **Account and profile:** your name, email address, date of birth, the sports and disciplines you play or coach, and whether you are using Apturo as a coach or an athlete. Coaches may add a profile photo, a bio and an intro video. Your password is stored only in hashed form.
- **Your content:** videos and photos you upload, clips, comparisons, drawings and notes on footage, comments, written feedback, development plans and the work you submit for them, review requests and proposals, and ratings.
- **Payout details (coaches):** when you link PayPal, PayPal tells us your PayPal account ID and email address. We pay that account and nothing else.
- **Messages to us:** anything you send to info@apturo.app.

Information created when you use Apturo

- **Analysis:** body-position (pose) data and equipment tracking that we compute from your videos, and AI-written summaries of training sessions.
- **Purchases and earnings:** CAM you buy, spend and earn, sales, payouts, and your wallet balance. This is a permanent ledger.
- **Consent records:** when an athlete is asked whether footage of them can be sold, and what they decided.
- **Safety records:** the outcome of content reviews and any reports made about content or accounts.

- **Usage and device:** IP address, device and browser type, app version, server logs, and product analytics events about which features signed-in users use.

Information from others

- **Identity checks (coaches):** if you choose to verify your identity with Stripe Identity, Stripe collects a photo of your ID document and tells us whether the check passed. We do not receive or keep the document.
- **Payments:** Stripe, Apple and Google tell us whether a payment succeeded, was refunded or was disputed. We never see or store full card numbers.
- **Other users:** a coach may upload footage of you, tag you in a review request, or name you in a plan or package.

2. Why we use it

- To run your account and deliver the coaching you buy or sell: storing and playing your videos, analysis, feedback, packages, plans and review requests.
- To run the marketplace: showing coach profiles and listings, processing CAM purchases and sales, splitting proceeds, and paying coaches.
- To keep Apturo safe: reviewing videos before they are shared or listed, applying the age and consent rules, verifying coaches, and preventing fraud, chargebacks and money laundering.
- To send you the emails and in-app notifications the service needs, such as a renewal reminder, a consent request, a payout that came back, or a password reset.
- To understand how Apturo is used, fix problems and improve it, including training Apturo's own analysis models on de-identified data. You can opt out of model training by emailing us.
- To meet our legal obligations, including tax and financial record-keeping.

Where the GDPR applies, we rely on performing our contract with you, our legitimate interests in running a safe marketplace, your consent (for example, to selling footage of you, which you can withdraw), and our legal obligations.

3. Who can see your information

- **Your uploads are private by default.** They are visible to you, and to a coach you have a coaching relationship with. Others see them only if you share them or list them on the marketplace.
- **Coach profiles are public:** name, photo, bio, intro video, sports, the coach's sales and ratings, and whether they are Vetted by Apturo. We never show how a coach was vetted.
- **Marketplace listings are public,** including previews and the coach's name. Buyers can view what they have bought.
- If footage of you is going to be sold, you are asked first and told who is asking.
- Apturo staff can see what they need to support you, review content and keep the marketplace safe.

4. Service providers

We use these providers to run Apturo. They handle your information on our behalf and only for the purpose described.

Provider	What for	Where
Amazon Web Services	Hosting, the database, video storage and delivery, and sending email	United States (Oregon)
Stripe	Card payments on the web, and identity checks for coaches who choose them	United States and others
PayPal	Paying coaches, and confirming which PayPal account is theirs	Various
Apple and Google	App distribution and in-app CAM purchases	United States and others
Anthropic and OpenAI	Writing AI training-session summaries. Only the session details needed for the summary are sent.	United States
PostHog	Product analytics for signed-in users. Session recording is switched off.	United States or EU
Better Stack	Server logs used to find and fix faults	Various

- **We never sell your personal information**, and we do not share it with advertisers.
- We may disclose information where the law requires it, to prevent serious harm, to report child exploitation, or to protect the rights and safety of our users and Apturo.
- If Apturo is sold or merged, your information may pass to the new owner, who must keep protecting it under this policy.

5. Storage outside New Zealand

- Your information is stored mainly in the United States, and some providers process it in other countries. Before we send personal information overseas we make sure it will be protected in a way that is comparable to the Privacy Act 2020, through the provider's contractual commitments. Where the GDPR applies, we use the standard contractual clauses approved for that purpose.

6. Children and young athletes

- You must be 13 or over to have an account. Users under 18 need a parent or guardian's agreement, and should use Apturo with their supervision.
- We use your date of birth to apply the age rules. Under 18s cannot sell or receive payouts.
- **Footage of athletes under 18 is never sold on the marketplace.** Where we do not know an athlete's age, we treat them as under 18.
- Coaches must have a parent's or guardian's permission before filming or uploading an athlete under 18.
- If you believe a child under 13 has an account, or that footage of a young person is on Apturo without permission, email info@apturo.app and we will act on it.

7. Automated decisions

- Uploaded videos are screened automatically before they can be shared or listed. Automated screening can approve a video, but a person reviews any video that is held back.
- The order coaches appear in search uses their sales, ratings and reliability on Apturo.
- Payouts are always reviewed by a person before release.

8. How long we keep it

- We keep your account information and content while your account is open. You can delete your own content at any time.
- You can delete your account yourself, in the app or at apturo.app/delete-account. It is deleted 14 days after you ask, and until then you can keep it.
- When you close your account, we delete or de-identify your personal information within a reasonable time, except for:
 - financial records of purchases, sales and payouts, which New Zealand tax law requires us to keep for 7 years;
 - consent, safety and fraud records we need to protect users or meet a legal obligation;
 - marketplace items other people have already bought, which may remain available to them;
 - coaching you gave other people, including written reviews, drawings and voice recordings, which stays on their coaching record.

Anything kept for these reasons no longer shows your name.

9. Security

- Information is encrypted in transit. Videos are kept in private storage and played back through short-lived links. Passwords are hashed and never stored in readable form.
- Access to personal information is limited to the people who need it to run Apturo.
- No system is perfectly secure. If a privacy breach is likely to cause you serious harm, we will tell you and the Privacy Commissioner as the law requires.

10. Cookies and analytics

- Apturo uses browser storage to keep you signed in and to remember your settings. These are needed for the service to work.
- We use PostHog to understand how signed-in users use features. We do not use advertising cookies or cross-site tracking.

11. Your rights

- You can ask to **see** the personal information we hold about you and to **correct** it. Much of it you can view and edit yourself in the app.
- You can ask us to **delete** your information or close your account, subject to the records in section 8.

- You can **withdraw consent** to footage of you being sold at any time, which takes it off sale, and opt out of model training.
- Where the GDPR applies, you can also ask for a copy of your information in a portable format, and object to or ask us to restrict some processing.
- Email info@apturo.app to make a request. We may need to confirm your identity, and we will respond within 20 working days.
- If you are not happy with our response, you can complain to the **Office of the Privacy Commissioner** at privacy.org.nz, or, where the GDPR applies, to your local data protection authority.

12. Changes to this policy

- We will update this policy when Apturo or the law changes, and tell you about significant changes by email or in the app before they take effect.

Questions, requests or complaints about privacy: contact Apturo's Privacy Officer at info@apturo.app.