

sharp — Privacy Policy

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The short version. This notice explains, in plain terms, what personal data we collect when you use Sharp, why we collect it, and the choices and rights you have.

In brief: we ask only for an **email address** and a **display name** to create your account (your display name need not be your real name). We store your **learning progress** and any **friends you add inside the app**. We rely on trusted providers — **Microsoft Azure, Apple and Google** — to run the Service, we host data in **Canada**, and we **never sell your data or track you for advertising**.

This Privacy Policy (the "Policy") describes how BrightEdge Digital Ltd processes personal data in connection with the Sharp mobile application (the "App"), the website at <https://sharp-app.com> (the "Website"), and the services provided through them (together, the "Service"). By using the Service you confirm that you have read and understood this Policy. If you do not agree, please do not use the Service.

"UK GDPR" means the retained EU General Data Protection Regulation as it forms part of the law of England and Wales, Scotland and Northern Ireland, read together with the Data Protection Act 2018. "EEA" means the European Economic Area. "Process" means any operation performed on personal data, such as collecting, storing, using or disclosing it.

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1. Data controller

BrightEdge Digital Ltd, a company registered in England and Wales with its registered office at 1 St. Paul's Mews, London, NW1 9TZ, United Kingdom, is the controller of your personal data ("we", "us", "our"). You can reach us at support@sharp-app.com.

2. Personal data we collect

2.1 Information you give us

To create an account we ask for your **email address** and a **display name**. Your display name does not have to be your real name — you are free to use a nickname or pseudonym.

2.2 Information from sign-in providers

If you choose Sign in with Apple or Sign in with Google, we receive basic account information from them (such as your name and email address) in line with the permissions and settings you approve. Apple lets you hide your real email address using its private email relay.

2.3 Learning activity

As you use the Service we store your learning activity — for example lessons completed, XP earned, streaks, courses started, and your standing on leaderboards.

2.4 Social connections

If you use the social features, we store the friend connections you create **inside the App** (for example, friend requests you send and accept). We only hold connections made within Sharp. We do not import your contacts and we do not build a picture of your relationships outside the Service.

3. How and why we use your data

We process your personal data to:

- provide the Service and keep your progress in sync across your devices;
- create and manage your account and respond to your support requests;
- operate social features such as friends and leaderboards;
- enable and manage your subscription and purchases;
- keep the Service secure and prevent fraud, abuse and misuse;
- understand how the Service is used so we can improve it and build new courses;
- send you service messages (for example, important account, security or policy notices) and, only if you opt in, product updates; and
- comply with our legal obligations.

4. Legal bases for processing

Where the UK GDPR or the EU GDPR applies, we rely on the following legal bases:

- **Performance of a contract.** To provide the Service, manage your account, offer support and process your subscription in accordance with our Terms.
- **Our legitimate interests.** To keep the Service secure, prevent fraud and abuse, and analyse and improve the Service — provided these interests are not overridden by your rights.
- **Your consent.** To send you optional marketing emails or push notifications. You can withdraw consent at any time (see Section 9).
- **Legal obligation.** To comply with applicable laws.

5. Cookies, tracking and "Do Not Track"

We do not use advertising or analytics cookies, and we do not track you across other websites or apps or serve targeted advertising. Our Website uses only what is necessary to display the site (for example, loading web fonts). Because we do not track you, there is nothing for us to disable in response to a browser "Do Not Track" signal.

6. Who we share your data with

We do not sell your personal data and we do not share it for advertising. We share data only in the following limited circumstances:

- **Service providers** that operate the Service on our behalf and under our instructions, namely **Microsoft Azure** (cloud infrastructure that hosts the Service) and **Apple** and **Google** (account sign-in and, through their app stores, subscription billing).
- **Authorities and to protect rights.** We may disclose personal data where required by law, to comply with a lawful request from a court or public authority, or where necessary to protect the rights, safety or property of BrightEdge Digital Ltd, our users or others.
- **Business transfers.** If we are involved in a merger, acquisition, reorganisation or sale of assets, your personal data may be transferred to the successor entity, which will continue to be bound by this Policy or a policy at least as protective.

7. Subscriptions and payments

Sharp is offered as a paid subscription. Subscriptions are purchased and billed through the **Apple App Store** or **Google Play**, not directly by us. Those stores process your payment; we never see or store your payment card details. We receive only limited confirmation from the store — for example, whether a subscription is active, its type, its renewal or expiry date, and refund status — so that we can unlock the corresponding features.

You can manage or cancel your subscription at any time in your Apple App Store or Google Play account settings. Deleting the App does not automatically cancel your subscription. Refunds are handled by Apple or Google in accordance with their respective policies.

8. International data transfers

We store and process personal data on servers located in **Canada**. If you use the Service from the United Kingdom, the EEA or elsewhere, your personal data will be transferred to and stored in Canada. Canada benefits from a UK and EU adequacy decision for commercial organisations, which recognises that it provides an adequate level of protection for personal data. Where a transfer requires additional safeguards, we rely on the Standard Contractual Clauses together with the UK International Data Transfer Addendum.

9. Your privacy rights

Depending on where you live, you have some or all of the following rights over your personal data:

- **Access** — obtain a copy of the personal data we hold about you.
- **Rectification** — have inaccurate or incomplete data corrected.
- **Erasure** — ask us to delete your personal data.
- **Restriction** — ask us to limit how we use your data.
- **Objection** — object to processing based on our legitimate interests.
- **Portability** — receive your data in a portable, machine-readable format.
- **Withdraw consent** — where we rely on consent, withdraw it at any time.

To exercise any of these rights, email support@sharp-app.com. We may need to verify your identity before acting on a request. If you are in the UK or EEA and believe we have not handled your data properly, you also have the right to lodge a complaint with a supervisory authority — in the UK, the Information Commissioner's Office (ico.org.uk).

10. Age limitation

Sharp is not directed to young children. You must be at least 16 years old to create an account, or at least 13 with the consent of a parent or guardian. We do not knowingly collect personal data from anyone below these ages. If you believe a child has provided us with personal data, please contact us and we will delete it.

11. How we keep your data secure

We use appropriate technical and organisational measures designed to protect your personal data, including encryption of data in transit, access controls, and the use of reputable infrastructure providers. No method of transmission or storage is completely secure, but we work to protect your data and to address any issues promptly.

12. Data retention

We keep your personal data only for as long as your account is active. When you delete your account it is deactivated immediately and then permanently deleted after a 14-day grace period; if you sign back in within those 14 days your account and data are restored. If you do not, we delete your personal data at the end of the grace period and do not retain it afterwards, except where the law requires us to keep limited records.

13. Account deletion

You can delete your account at any time using the functionality in the App's settings, or by contacting us at support@sharp-app.com. When you delete your account it is deactivated straight away and permanently deleted after a **14-day grace period**. During that time your account is hidden from other

users and your connections to other users (friends, followers and pending requests) are removed immediately. If you sign back in within the 14 days your account is restored together with your saved progress, streak and XP, though your previous connections are not restored. If you do not sign back in, your account and its associated personal data are permanently deleted at the end of the grace period.

Your store subscription is separate from your Sharp account. To avoid further charges, cancel your subscription through the Apple App Store or Google Play *before* deleting your account.

14. Changes to this Policy

We may update this Policy from time to time. If we make material changes, we will notify you by email. By continuing to use the Service after the changes take effect, you agree to the updated Policy. The date at the top of this document shows when it was last revised.

15. Supplemental notice for US residents

15.1 California (CCPA/CPRA)

This section applies to California residents. In the past 12 months we have collected the following categories of personal information:

Category	Examples	Disclosed to
Identifiers	Name, email address, account identifier	Service providers
Internet or other electronic network activity	Learning activity within the Service	Service providers
Commercial information	Subscription and purchase status	Payment/app-store providers

We collect this information from you and from your chosen sign-in provider, for the purposes described in Section 3. We **do not "sell"** personal information and we **do not "share"** it for cross-context behavioural advertising, as those terms are defined under the CCPA/CPRA. California residents have the right to know, delete, and correct their personal information, and the right not to receive discriminatory treatment for exercising these rights. Only you or someone you authorise may make a request; we will take reasonable steps to verify your identity. To make a request, email support@sharp-app.com.

15.2 Virginia (VCDPA)

Virginia residents have the right to access, correct, delete and obtain a portable copy of their personal data, and to opt out of the sale of personal data, targeted advertising and certain profiling. We do not sell personal data, serve targeted advertising, or carry out profiling that produces legal or similarly significant effects. To exercise your rights, email support@sharp-app.com. If we decline a request, you may appeal by replying to our decision; if an appeal is denied you may contact the Office of the Virginia Attorney General.

15.3 Nevada

Nevada residents have the right to opt out of the sale of certain personal information. We do not sell personal information as "sale" is defined under Nevada law. If you would like to submit a request, email support@sharp-app.com with the subject line "Nevada Do Not Sell Request", including the email address associated with your account.

16. Contact us

If you have any questions about this Policy or how we handle your personal data, please contact us:

BrightEdge Digital Ltd

1 St. Paul's Mews, London, NW1 9TZ, United Kingdom

support@sharp-app.com

Sharp is a product of BrightEdge Digital Ltd. This document was last updated on 3 August 2026.