

Privacy Policy

THELXEANO | EN | 26 October 2026 | 2026-10-26.1

This Privacy Policy explains how Thelxeano processes personal data in the current iPhone and Apple Watch release architecture. It distinguishes information processed only on your devices from information that may be sent to Apple or Google. Jurisdiction-specific information is included where applicable.

1. Who is responsible for your data

Controller: Anthony Noah Thomsen, sole proprietor trading as Thelxeano, Italy.

Privacy contact: use the public Thelxeano contact route at <https://www.noahthomsencomposer.com/#Contact>. For Québec, Anthony Noah Thomsen is the person in charge of the protection of personal information and can be contacted through the same route.

Privacy email and postal address: contact@noahthomsencomposer.com | Via Karl Grabmayr 13, 39012 Merano (BZ), Italy.

This Policy applies to the Thelxeano iPhone app, the paired Apple Watch app, purchases and entitlements handled through Apple StoreKit, and the advertising and privacy-message components used in the free tier. A website or support interaction that you start outside the app can involve additional information that you choose to provide.

2. What Thelxeano does not do

The current public release does not require a Thelxeano user account and does not ask for your exact date of birth or a government identity document for its local 18+ gate.

Thelxeano does not send heart-rate values, motion/cadence values, LiDAR/depth control values, precise-location/speed values or paired-device spatial-control values to a Thelxeano server in the current public release.

Thelxeano does not use HealthKit, motion, LiDAR/depth, precise-location, speed or music-control data as publisher-supplied advertising-targeting inputs.

Thelxeano does not integrate a separate analytics SDK in the current public release.

Thelxeano does not request App Tracking Transparency permission or intentionally request the IDFA for its advertising design.

The current public Release configuration does not activate remote Creator Track catalog or download-authorization endpoints. If that changes, this Policy and App Store privacy disclosures must be updated before activation.

3. Information processed on your devices

Adult-access decision: Whether you confirmed that you are 18 or older or stated that you are under 18; declaration version; local timestamp. No exact birth date. Purpose/retention: Local access control. Stored on the iPhone until replaced/reset or app data is removed.

Privacy-policy review state: The version of this Privacy Policy reviewed on this installation. Purpose/retention: Local version/update flow. Reviewing the Policy is not consent to Heart Rate or advertising.

App settings and local content state: Preferences, playback/control settings, locally available entitlements and installed-content state needed to operate the app. Purpose/retention: Primarily on device; retained until changed, removed or app data is deleted.

Motion, cadence and gestures: Pedometer cadence, motion activity, device rotation and supported Watch/accessory gestures. Purpose/retention: Adaptive music control; transient/session processing on device.

Location and speed: Precise location may be used while SteepFit measures distance and SteepRide derives vehicle speed, including background operation when enabled. Purpose/retention: On-device feature control. The current release does not intentionally create a route-history service or send route history to Thelxeano.

Camera / LiDAR depth: Rear-camera/depth sensor data and derived control values for supported spatial music interaction. Purpose/retention: Transient on-device processing. Thelxeano does not record or store photos or videos for this purpose.

Heart rate: Live heart-rate samples from Apple Health/HealthKit for a compatible SteepFit track, only after separate Thelxeano consent and Apple permission. Purpose/retention: Apple Watch/iPhone only; transient session state. See section 5.

SonicDome: When you use this mode, the iPhone rear camera and Apple Vision can derive body pose, joint and arm-height controls locally to shape the music. Where supported and enabled, Nearby Interaction/UWB may provide relative device distance or direction. Sensor frames and derived body-position controls are not intentionally sent to Thelxeano's servers or to Google for ad targeting. Thelxeano does not record photos or video for this purpose.

4. Apple permissions and feature activation

Thelxeano asks for Apple system permissions only when a feature needs them. Depending on the feature and device, these can include Motion & Fitness, Location (including background location for ongoing adaptive playback), Camera/depth and HealthKit. Denying a permission prevents or limits the affected feature but should not disable unrelated features.

For technologies that can locate you or derive movement characteristics, activation is controlled by your use of the relevant feature and the corresponding Apple permission. Thelxeano does not use these signals to build a server-side advertising or behavioural profile.

5. Heart rate and HealthKit

Heart rate is sensitive health information. Thelxeano processes it only for compatible SteepFit music after a separate, explicit Thelxeano consent and the required Apple HealthKit authorization. The current consent screen explains that live heart rate comes from Apple Health / HealthKit, is used only to adapt compatible SteepFit music, remains on the paired Apple Watch and iPhone, is not sent to a Thelxeano server, is not used for advertising, profiling or marketing, and that the temporary workout session is discarded when SteepFit ends.

The local consent record contains the decision (granted or refused), the consent-text version, the full recorded consent/refusal text and a timestamp. Withdrawing consent records a refusal, immediately stops further Thelxeano heart-rate processing for the current feature path and clears the current heart-rate state. You can also manage Apple Health permissions in the Health app or System Settings.

For users in the EEA, the legal bases are GDPR Article 6(1)(a) and, because heart rate is health data, Article 9(2)(a). Consent can be withdrawn at any time without affecting unrelated motion/cadence features or the lawfulness of processing before withdrawal.

For U.S. users where consumer-health-data laws apply, Thelxeano also provides the separate Thelxeano U.S. Consumer Health Data Privacy Notice. That notice gives the current Washington/Nevada health-data categories, no-sharing/no-sale rule, rights/request route and state-specific controls. The heart-rate consent screen links to that notice before current-version consent is recorded.

6. Advertising and Google privacy choices

The free tier can display banner and interstitial advertising through Google Mobile Ads. Google User Messaging Platform (UMP) is the authoritative privacy-message and ad-request gate. Thelxeano requests updated UMP consent information and does not request an ad unless the adult-access gate and the applicable UMP state permit an ad request. Where UMP requires a privacy-options entry point, Thelxeano provides one.

Thelxeano disables publisher-enabled ad personalization.

Publisher First-Party ID is disabled.

Thelxeano does not request ATT permission or intentionally request the IDFA.

Google Mobile Ads SDK crash reporting is disabled by Thelxeano at runtime.

The controlled release configuration requires AdMob mediation to be disabled, the ad-technology-partner list to be reviewed/minimized, and the current privacy message to be reviewed before release.

Premium stops Thelxeano advertising requests, including banner/interstitial requests and preloads.

Even with Thelxeano's privacy-first settings, Google Mobile Ads may process information needed for advertising, measurement, fraud prevention and SDK operation. Google states that its Mobile Ads SDK may collect information such as IP address (which can be used to estimate general location), device/app identifiers, advertising data, product interactions and performance/diagnostic information. The exact Google processing depends on the SDK, device, consent state, region and ad-serving mode. Thelxeano therefore does not represent Google ad delivery as anonymous or data-free.

Thelxeano does not add Heart Rate, Motion & Fitness, precise location, speed, LiDAR/depth or music-control parameters to its ad requests. Google and any ad-technology partners disclosed through the UMP message process data under their own applicable privacy terms and choices. Google describes AdMob publisher products as involving independent-controller processing for relevant advertising data.

EEA/UK advertising storage/access and personal-data processing follow the choices and legal bases presented through the configured UMP message and applicable law. Where consent is required, an ad request is not made until the UMP state allows it. You can revisit advertising privacy choices where the UMP privacy-options control is available.

Google and its disclosed advertising partners may use IP addresses, SDK/device identifiers and other permitted technical means, including similar technologies for advertising delivery and measurement, as described in the applicable Google/UMP notices. Disabling publisher personalization does not mean that no personal data is processed by Google.

7. Purchases and Apple StoreKit

Premium is a one-time non-consumable Apple in-app purchase. Paid Composer Tracks, when offered, are separate Apple StoreKit products. Apple processes the payment and payment-card information under Apple's terms. Thelxeano receives only the StoreKit product, transaction and entitlement information needed to determine access and restore purchases; Thelxeano does not receive your payment-card number.

The current public Release configuration does not activate Thelxeano remote catalog/download-authorization endpoints. If remote paid-content delivery is activated in a later release, Thelxeano will re-evaluate the server recipients, transaction evidence, retention, international transfers and App Store privacy disclosures before activation and will update this Policy where required.

8. Support and information you choose to provide

The app may open Thelxeano's website/contact route in Safari. If you contact Thelxeano, you may choose to provide an email address, message text or attachments. Thelxeano uses that information to answer the request, handle safety or rights issues, prevent abuse and establish or defend legal claims where necessary. The information is kept only as long as needed for those purposes or for an applicable legal/claims retention period, then deleted or securely archived where law requires.

Public Composer participation is handled under a separate Composer Privacy Notice. For end users, published Composer Tracks may show artwork, track titles and publicly approved Composer information. The Report Content action supplies a track reference to the reporting page; it does not automatically attach your email address, device ID, precise location, HealthKit data or sensor data. Information you choose to enter on that page is processed to review and address the report. Opening the page alone does not submit a report.

The public website and its contact/report form are delivered by Webflow. When you use them, Webflow may process ordinary service and security information (such as IP address, browser/device details and request time),

while Thelxeano receives the information you submit. This is separate from local music-control sensor processing. The website's own necessary technologies and any additional optional cookies must be covered by the website's actual configuration and applicable consent controls.

9. Legal bases in the EEA / Italy

GDPR Article 6(1)(b): processing objectively necessary to provide a feature you request, including local adult-access control, feature-specific sensor processing and StoreKit entitlement handling.

GDPR Articles 6(1)(a) and 9(2)(a): explicit Heart Rate consent.

GDPR Article 6(1)(a) where advertising-related consent is required and collected through the applicable privacy flow; applicable ePrivacy/local-storage rules are handled separately where required.

GDPR Article 6(1)(f): proportionate security, fraud/abuse prevention, service reliability, support and legal-claim handling where these interests are not overridden by your rights.

GDPR Article 6(1)(c): processing required to comply with a binding legal obligation.

10. Recipients and international processing

Most Thelxeano feature data described in sections 3-5 is processed only on your devices. Where external services are used, the main current recipient categories are Apple for platform services such as StoreKit and HealthKit/system permissions, and Google for UMP and free-tier advertising. Google may process advertising-related information on servers in multiple countries and provides contractual/data-transfer frameworks for its advertising services.

Thelxeano is operated from Italy. If you are in Québec, direct processing by Thelxeano can therefore involve processing outside Québec. Before activating a material communication or outsourced processing route outside Québec, Thelxeano applies the assessment and safeguard process described in section 14. New remote hosting, analytics, advertising mediation or similar recipient routes are not treated as automatically approved merely because this Policy exists.

Public Composer submissions do not by themselves activate a consumer remote-track catalogue. Where a remote track store or download is actually available, delivering files may entail network information such as IP address, requested track/package identifier, timestamp, download/integrity status and, for paid content, the minimum authorization state needed to fulfil the request. Thelxeano does not supply sensitive sensor or HealthKit readings for this purpose. Provider-specific recipients and retention must be verified against the actual deployed service before it is activated.

11. Retention, deletion and security

Transient sensor values are kept only for the active feature/session or operating-system lifecycle unless you deliberately create an export in an internal/test build; internal diagnostics are not a public-release user feature.

The adult-access record is stored locally until it is replaced/reset or app data is removed. A superseded declaration version is not treated as current eligibility evidence.

The Heart Rate consent/refusal record remains locally available until replaced by a later choice/version or app data is removed; live heart-rate values are cleared when processing stops.

The privacy-policy review version and ordinary app preferences remain local until changed/reset or app data is removed.

StoreKit transaction/entitlement history is governed by Apple and the StoreKit lifecycle; Thelxeano maintains only the local access state needed by the app in the current release.

Advertising information held by Google is subject to Google's retention and privacy controls. Thelxeano does not control every provider-side retention period.

Support information is deleted or archived when no longer needed for the request, security, compliance or legal claims.

Security measures include data minimisation, local processing for sensitive sensor controls, fail-closed access and consent gates, restricted operator access to private records, controlled release checks, and the security protections provided by Apple platforms. No security measure can eliminate every risk.

12. Your choices and rights

You can deny or later change Apple permissions for Motion, Location, Camera/depth and HealthKit in iOS/watchOS settings, subject to Apple's available controls.

You can refuse or withdraw Thelxeano Heart Rate consent without disabling unrelated features.

You can revisit Google/UMP advertising privacy choices when a privacy-options control is required/available; Premium stops Thelxeano ad requests.

You can use Restore Purchases for StoreKit entitlements.

You can delete local Thelxeano data by using any available in-app reset controls or by deleting app data/the app, subject to Apple platform behaviour and information held independently by Apple or Google.

Depending on applicable law and the processing involved, you may have rights of access, rectification, erasure, restriction, portability, objection and withdrawal of consent. Because much of Thelxeano's sensor/state data never leaves your device, Thelxeano may not possess a server copy that it can retrieve for you. To exercise rights concerning data actually held by Thelxeano, use <https://www.noahthomsencomposer.com/#Contact>.

13. Adult audience

Thelxeano is intended only for people aged 18 or older. The current public release uses a local declaration: you can confirm that you are 18 or older or state that you are under 18. Thelxeano stores only the decision, declaration version and timestamp; it does not request an exact birth date or identity document for this gate. Under-18 and unresolved states do not proceed to protected app use. If Thelxeano later activates an Apple or statutory age-assurance route, it will update the processing disclosure before using any materially different data flow.

14. Canada and Québec

For Canadian users, Thelxeano applies applicable federal and provincial private-sector privacy rules according to the actual processing and connection, including PIPEDA where it applies. A Canadian storefront selection by itself is not used to invent a province of residence.

For Québec, Anthony Noah Thomsen is the person in charge of the protection of personal information and is reachable through <https://www.noahthomsencomposer.com/#Contact>. Thelxeano maintains privacy-governance rules covering data lifecycle, access, retention/destruction, complaints and confidentiality incidents. Thelxeano performs a privacy impact assessment for the electronic service and before a material communication of personal information outside Québec. A route is activated only when the assessment supports adequate protection and the required written safeguards/terms are in place.

The current design uses the highest-confidentiality practical defaults: sensitive music-control sensors are local, Heart Rate is off unless separately consented to, publisher ad personalization and Publisher First-Party ID are off, no ATT/IDFA path is requested by Thelxeano, and remote Creator Track delivery endpoints are not active in the current public Release configuration. When precise location or another locating/profile-capable function is used, the feature and the means to activate it are disclosed before or at activation through the feature interface and Apple permission flow.

Québec users may request access or rectification and may withdraw consent where consent is the basis. Complaints can be sent to the privacy contact above and, where applicable, to the Commission d'accès à l'information du Québec. Thelxeano keeps a confidentiality-incident register and follows applicable notification duties if an incident presents a risk of serious injury.

15. Complaints and supervisory authorities

You may contact Thelxeano first through <https://www.noahthomsencomposer.com/#Contact>. In the EEA you may also complain to the competent data-protection authority, including the Italian Garante per la protezione dei dati personali. In Québec, the competent authority is the Commission d'accès à l'information. Where PIPEDA applies, you may also contact the Office of the Privacy Commissioner of Canada.

16. Changes to this Policy

Thelxeano versions this Policy. The app can require review of a new policy version before protected use continues. Recording that a policy version was reviewed is not a substitute for a separate consent where consent is legally required. Material changes to data categories, recipients, remote services or purposes will be reflected in an updated Policy and, where required, a new notice or consent before the new processing begins.

17. Third-party information

Google privacy information: <https://policies.google.com/privacy>

Apple privacy information: <https://www.apple.com/legal/privacy/>

Thelxeano contact: <https://www.noahthomsencomposer.com/#Contact>