

Privacy Policy — 7labs Audio Product Pitch

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This Privacy Policy explains how **Seven Digits Media Zrt.** (“7digits”, “we”, “us”, or “our”) collects, uses, shares, and protects information in connection with the **7labs Audio Product Pitch** application (the “App”) for the Shopify platform.

We are the **data controller** for the personal data we process to operate the App, as described below. For the personal data that a merchant enters into the App (for example, a speaker’s name or photo, or audio content), the **merchant is the controller** and we act as a **data processor** on the merchant’s behalf.

- **Company:** Seven Digits Media Zrt. (“Seven Digits Media”)
- **Registered address:** 1064 Budapest, Podmaniczky utca 57. 2. emelet 14.
- **Company / VAT number:** 01 10 140139 / 26616708242
- **Privacy contact:** support@7digits.net
- **Canonical URL of this policy:** <https://7digits.net/app-privacy-policy/>

Because we are established in the European Union (Hungary), we process personal data in accordance with the EU General Data Protection Regulation (GDPR) and applicable Hungarian data protection law.

1. Who this policy is for

This policy addresses three groups:

Group	Who they are
Merchants	Shopify store owners and their staff who install and use the App in the Shopify admin.
Speakers / content subjects	Individuals whose voice, name, role, photo, or biography a merchant chooses to include in a widget.
Storefront visitors (“customers”)	People who browse a merchant’s online store where an audio widget is displayed.

A short summary for storefront visitors is in **§6**.

2. Summary of what the App does with data

- The App lets merchants attach branded **audio players** (with optional transcripts and speaker profiles) to their Shopify product and collection pages.
- **We do not collect, store, or sell storefront-shopper personal profiles.** The App stores widget *configuration and content*, not records about individual shoppers.

- We use a small number of trusted **subprocessors** (see §7), most notably Google, which performs the optional speech-to-text transcription and serves optional web fonts.
- We do **not** use advertising trackers, and the storefront widget sets **no cookies**.

3. Data we collect from merchants and store staff

When a merchant installs and uses the App, we process the following, sourced from Shopify via the merchant's authorization:

Data	Examples	Why we process it
Store identifiers	The store's <code>myshopify.com</code> domain	To identify the store, scope its data, and serve the correct widgets
Shopify access credentials	OAuth offline access token and refresh token	To make authorized calls to the Shopify Admin API on the store's behalf
Store-staff identity <i>(when Shopify provides it for a signed-in user)</i>	Shopify user ID, first and last name, email address, account-owner/collaborator status, locale	Provided by Shopify as part of the app session; used to authenticate the session and operate the embedded admin
App account record	Subscription plan, install/uninstall status and timestamps, monthly transcription-usage counter, admin-interface language, app-wide widget default settings	To enforce plan entitlements, provide support, and keep basic business records

Legal bases (GDPR Art. 6): performance of our contract with the merchant (providing the App) and our legitimate interests in securing, supporting, and administering the service.

4. Content that merchants put into the App

To build widgets, a merchant may enter or reference:

- **Audio files** (as public URLs, or drawn from a Shopify product file metafield), and the audio's duration.
- **Transcripts** (generated automatically — see §5 — or edited by the merchant).
- **Speaker profile details**: name, role/title, a short biography, and a profile photo (URL).
- **Widget appearance and text**, and **assignments** to specific Shopify products or collections (stored as Shopify resource IDs plus a cached title for display in the admin).

Some of this content **may contain personal data of a third party** — for example, a speaker's recorded voice, name, or photograph. For that content the **merchant is the controller** and we are the merchant's

processor. Merchants are responsible for having a lawful basis to include such content and for providing any notices required to the individuals concerned (see §11).

Legal basis: processing on behalf of, and under the instructions of, the merchant (GDPR Art. 28).

5. Automatic transcription (audio sent to a subprocessor)

When a merchant chooses to generate a transcript, the App retrieves the associated audio file and sends the **audio content** to a third-party speech-to-text provider — **Google (Google Gemini API)** — which returns the transcribed text. The transcript is then stored with the widget.

- The audio may contain an individual's **voice**, which can be personal data.
- Transcription happens **only when a merchant initiates it**; it is not automatic or continuous.
- Google processes the audio to provide the transcription service. See Google's own terms and privacy documentation for how it handles data submitted to its APIs.

Legal basis: performance of the merchant's requested feature (contract), and the merchant's instruction as controller of the audio content.

6. Storefront visitors ("customers") — what we do and do not collect

When a shopper views a page on a merchant's store that displays an audio widget:

We do NOT: - Set cookies from the widget. - Use advertising, analytics, or cross-site tracking technologies. - Build profiles of individual shoppers, or store shoppers' names, emails, contact details, or browsing history. - Track or store individual playback/listening behaviour.

We DO process the following, minimally:

1. **IP address (transient).** The widget requests its configuration from our storefront API. As part of handling that request, the visitor's IP address is used **only** to apply rate limiting and prevent abuse. It is **not stored in a database** by the App for this purpose. *(Standard web-server/proxy access logs maintained by our hosting provider, Hetzner Online GmbH (Germany), may record IP addresses for security and operational purposes; see Hetzner's privacy policy at <https://www.hetzner.com/legal/privacy-policy/>.)*
2. **Web fonts (only if the merchant selects a non-default font).** If a merchant configures a widget to use a specific font, the visitor's browser loads that font from **Google Fonts** (fonts.googleapis.com), which necessarily discloses the visitor's IP address and user-agent to Google. If the widget uses the store's default font (the default setting), **no external font request is made.**
3. **Audio and image media.** Audio and profile images are delivered from the URL the merchant configured (for example, the Shopify CDN or another host the merchant chose). Loading that media may involve a request to the host serving it.

Legal basis: our and the merchant’s legitimate interests in delivering, securing, and rendering the widget (GDPR Art. 6(1)(f)). Merchants are responsible for reflecting the above in their own store’s privacy disclosures to their customers.

7. Who we share data with (subprocessors & third parties)

We do not sell personal data. We share data only with the service providers needed to run the App:

Recipient	Purpose	Data involved
Shopify	The platform the App runs on; source of store and session data	Store domain, session/authorization data, and any data exchanged via the Shopify Admin API
Google LLC	(a) Speech-to-text transcription via the Gemini API; (b) Google Fonts on the storefront when a non-default font is selected	(a) Audio content submitted for transcription; (b) storefront visitor IP + user-agent
Hetzner Online GmbH (Germany)	Hosts the App server and its PostgreSQL database	All data described in this policy, at rest and in transit

We may also disclose data where required by law, to protect our rights, or in connection with a corporate transaction, in each case subject to appropriate safeguards.

International transfers. Our application server and database are hosted within the European Economic Area (Germany). Where a subprocessor processes personal data outside the EEA — for example, Google — such transfers are made under an appropriate GDPR transfer mechanism, such as the European Commission’s Standard Contractual Clauses or an adequacy decision (including the EU–U.S. Data Privacy Framework).

8. Data retention

Data	Retention
Shopify session and access/refresh tokens	Deleted when the merchant uninstalls the App (<code>app/uninstalled</code>).
Widget content and configuration (audio URLs, transcripts, speaker details, assignments, appearance)	Retained while the App is installed; deleted when the merchant deletes the widget, and on request.
App account record (plan, usage counters, install history)	Retained after uninstall for legitimate business and record-keeping purposes; contains no storefront-shopper personal data. Deleted on request where no overriding legal obligation applies.
Transient IP data used for rate limiting	Not persisted by the App beyond the short rate-limiting window; server/proxy logs follow the hosting provider's retention.

We keep personal data only as long as necessary for the purposes described here or as required by law.

9. How we protect data

- All traffic to the App is served over **HTTPS/TLS**.
- Shopify webhook requests are verified by **HMAC signature** before processing.
- Access to the store's data via our public storefront endpoint is validated against an active, installed session and is **rate-limited**.
- Merchant-supplied URLs are validated before we fetch them (protection against server-side request forgery).
- Access to production systems is restricted to authorized personnel.

No method of transmission or storage is perfectly secure, but we take appropriate technical and organizational measures to protect personal data.

10. Your rights (GDPR)

Subject to applicable law, individuals have the right to: **access** their personal data; request **rectification** or **erasure**; **restrict** or **object** to processing; **data portability**; and to **withdraw consent** where processing is based on consent. You also have the right to lodge a complaint with a supervisory authority — in Hungary, the **Nemzeti Adatvédelmi és Információszabadság Hatóság (NAIH)**.

- If you are a **storefront visitor**, please contact the **merchant** whose store you visited first, as they are the controller of their store's data.

- To exercise rights regarding data we control, contact us at **support@7digits.net**. We will respond within the time limits required by law.

We honour Shopify's mandatory privacy webhooks (`customers/data_request` , `customers/redact` , `shop/redact`). Because the App does **not** store storefront-shopper personal data, there is typically no shopper data for us to return or erase in response to these requests; we will confirm this and act on any data we do hold.

11. Merchant responsibilities

If you are a merchant using the App, you are the controller of the content you put into it and of your store's relationship with your customers. You are responsible for:

- Having a lawful basis to include any personal data (e.g. a speaker's voice, name, or photo) and to send audio for transcription.
 - Providing required notices to, and obtaining any required consent from, the individuals whose data you include.
 - Maintaining your own store privacy policy, and disclosing to your customers the storefront behaviours described in §6 (transient IP processing for rate-limiting and, where you select a non-default font, Google Fonts loading).
 - Using the App in compliance with applicable law and the Shopify terms.
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12. Cookies and similar technologies

- **Admin app:** The embedded admin authenticates using Shopify **session tokens**; the App does not set its own advertising or analytics cookies for merchants.
- **Storefront widget:** sets **no cookies** and uses no local storage for tracking.

See §6 regarding Google Fonts, which is a network request rather than a cookie.

13. Children's data

The App is a business tool for merchants and is not directed at children. We do not knowingly collect personal data from children.

14. Changes to this policy

We may update this policy from time to time. Material changes will be reflected by updating the "Last updated" date at the top and, where appropriate, by notifying merchants. The current version is always available at <https://7digits.net/app-privacy-policy/>.

15. Contact us

Questions or requests regarding this policy or your personal data:

- **Email:** support@7digits.net
- **Post:** Seven Digits Media Zrt., 1064 Budapest, Podmaniczky utca 57. 2. emelet 14.