

Privacy Policy

Effective date: August 9, 2026 · Last updated: August 9, 2026

This Privacy Policy explains what information Cologne collects, how we use it, who we share it with, how long we keep it, and how you can ask us to delete it.

"**Cologne**," "**we**," "**us**," and "**our**" mean Cologne, a general partnership, which operates the Cologne service at cologneagent.com and the Cologne WhatsApp business account.

"**Service**" means the Cologne WhatsApp business account, the Cologne website at cologneagent.com, every split page we generate, and everything we provide through them. This Policy uses the same defined terms as the Cologne Terms of Service.

If you do not agree with this Policy, do not send receipts to Cologne and do not open a Cologne split page.

1. Three kinds of people use Cologne

This Policy applies to all three. We collect different information from each, and where a section applies to only one, we say so.

Sender. Someone who sends a message or an image to the Cologne WhatsApp business account — typically the person who paid a bill and wants to split it.

Participant. Someone who opens a Cologne split page and interacts with it — chooses a name or alias, claims an item, or adjusts an allocation.

Viewer. Anyone who opens or loads a Cologne split page, whether or not they interact with it. Every Sender and Participant is also a Viewer while a page is open.

2. Information we collect

2.1 From Senders

CATEGORY	EXAMPLES	SOURCE
Contact identifier	Your WhatsApp phone number, and your WhatsApp profile name as WhatsApp provides it to us	You, via WhatsApp
Message content	The images you send us, the text you send us, and our replies	You, via WhatsApp
Receipt content	Merchant or venue name, date and time, line items, item prices, subtotals, taxes, tips, service charges, covers, discounts, and totals extracted from the image you send	Derived by us from your image
Payment handle	A Venmo username or other peer-to-peer payment handle you choose to give us	You
Service records	Timestamps, message and processing status, software version identifiers, error and diagnostic logs	Generated by us

2.2 From Viewers, including Participants

CATEGORY	EXAMPLES	SOURCE	WHO
Technical data	IP address, browser type and version, device type, operating system, language, referring page, pages and screens viewed, and interactions with the page	Automatically, from your browser	Every Viewer
Claim data	The display name or alias you choose, which items or fractions of items you claim, and any adjustments you make to tax, tip, or fee allocations	You	Participants
Optional contact information	An email address or phone number, if you choose to give one so we can send you a copy of your own share	You	Participants

Technical data is collected as soon as a split page loads. Where we use analytics or similar technologies that are not strictly necessary to display the page, we do not activate them before you have been given notice and, where required, an opportunity to consent.

2.3 What we do not collect

- We do not ask for or knowingly store payment card numbers, bank account numbers, passwords, government identification numbers, or Social Security numbers.
- We do not ask for or knowingly store precise geolocation.
- We do not have access to your Venmo, PayPal, or other payment account, and we never see your payment credentials or balances.
- We do not access your WhatsApp contacts, your other WhatsApp conversations, or any message you do not send directly to the Cologne business account.

A note on receipt images. A photograph of a receipt may contain information beyond line items — for example, a cardholder name, digits of a payment card, an authorization code, a server's name, or a table number. We screen images for payment card numbers **before the image is stored and before it is sent to any processing provider**, and we screen for other sensitive details before a split page is published. Screening is automated and may not catch everything, and we do not publish the receipt image itself. Please do not send us a receipt image showing a full payment card number, and please look at what you are sending before you send it.

3. How we use information

We use the information described above to:

1. Determine whether an image you sent is a receipt, and read its contents.
2. Create a split page and a link or QR code for it, and send those back to you.
3. Display the parsed line items on the split page so Participants can claim their items.
4. Calculate each person's share, including proportional tax, tip, service charges, and fees.
5. Generate a peer-to-peer payment link (for example, a Venmo deep link) pre-filled with the amount owed and, where you have provided one, the Sender's payment handle.
6. Respond to your messages and answer follow-up questions about tax, tip, or your payment handle.
7. Send a copy of your own share to an email address or phone number you asked us to send it to.
8. Operate, secure, debug, test, and improve the Service, including diagnosing incorrect parses and calculation errors.

9. **Test, evaluate, and improve our receipt-reading systems.** We store the receipt images you send and may use them — together with their parsed results and any corrections — to measure accuracy and to fine-tune the recognition models we use exclusively to provide the Service. Members of our team may view individual receipt images for these purposes. We do not use your receipt images to train models for anyone else, and we do not allow our AI service providers to train their models on them.
10. Detect, prevent, and respond to fraud, abuse, spam, security incidents, and misuse of the Service.
11. Comply with law and enforce our Terms of Service.
12. Produce internal statistics about how the Service is used — for example, parsing accuracy, processing time, and typical party sizes.

We do not use your information for automated decision-making that produces legal or similarly significant effects about you.

4. The split page is accessible to anyone who has the link

This is the most important thing to understand about Cologne, so we are stating it plainly rather than burying it.

When a Sender asks us to create a split, we publish the parsed contents of that receipt — the venue name, the line items, the prices, the taxes and fees, the aliases Participants choose, and the Sender's payment handle if they gave us one — at a web address that:

- **is long and randomly generated**, so it is not practically guessable;
- **is marked so that search engines should not index or follow it**; and
- **requires no password, no account, and no sign-in.**

That means **anyone who obtains the link or photographs the QR code can view the split page.** A link forwarded to the wrong group chat, a QR code visible in the background of a photo someone posts, or a screenshot shared onward will let other people see the page. This is a deliberate design choice that keeps Cologne usable without accounts, and it is a real limitation.

The Sender controls this. We create the link and give it to the Sender. The Sender decides whether to share it, and with whom. When a Sender shares a link, the Sender is instructing us to make that split available to whoever holds it. If you are a Sender, share the link only with the people you want to see the

bill. If you are a Participant, remember that what you type on the page is visible to everyone else on it, in real time.

Do not use an alias on a split page that reveals anything about you that you would not want the rest of the table — or anyone they forward the link to — to see.

5. Who we share information with

We share information as described in this section.

With other people on the same split. Participants and Viewers on a split page see the parsed line items, the aliases other Participants have chosen, what each of them has claimed, and the Sender's payment handle if one was provided. This is the purpose of the Service.

With service providers. We use third parties to run the Service. They act on our instructions, for our purposes only, and are contractually restricted from using the information for their own purposes. As of the effective date these include:

- **Hosting and infrastructure** — to serve the website and split pages.
- **Database and storage** — to store receipt and claim data.
- **Artificial intelligence and image processing providers** — to read receipt images and extract line items. We select providers whose terms restrict retention of customer content and prohibit training on it, and we configure the Service to use those settings where they are available.
- **Messaging infrastructure** — WhatsApp, operated by Meta, which carries messages between you and Cologne.
- **Analytics providers** — where enabled and, where required, where you have consented, to understand how the Service is used.

With WhatsApp and Meta. When you message us on WhatsApp, WhatsApp carries and processes that message under Meta's own terms and privacy policy, which we do not control. Cologne is not affiliated with, endorsed by, or sponsored by Meta Platforms, Inc. or WhatsApp. Meta's handling of your WhatsApp data is governed by Meta's privacy policy, not by this one.

With payment applications, indirectly. When you tap a payment button on a split page, your device opens a third-party payment app such as Venmo. We do not transmit funds and we are not a party to

the payment. Anything that happens inside that app is governed by that provider's terms and privacy policy. Cologne is not affiliated with, endorsed by, or sponsored by PayPal, Inc. or Venmo.

As de-identified or aggregated information. We may disclose information that is de-identified or aggregated in accordance with Section 7. Information disclosed this way does not identify you and is not reasonably linkable to you.

For legal reasons. We may disclose information if we reasonably believe it is required by law, subpoena, court order, or other legal process, or where necessary to investigate or prevent fraud, security incidents, or harm to any person.

In a business transfer. If Cologne is acquired, merged, reorganized, contributed to a newly formed entity, or sells substantially all of its assets, information covered by this Policy may be transferred as part of that transaction. We will require the recipient to honor this Policy or provide notice and choice before materially different handling.

6. We do not currently sell or share your personal information

As of the effective date of this Policy, Cologne **does not sell your personal information for money, and does not share it for cross-context behavioral advertising** as those terms are used in the California Consumer Privacy Act.

We are telling you what is true today rather than making a permanent promise. If that ever changes, we will update this Policy, change its effective date, describe what is being sold or shared and to whom, and provide the notices and opt-out mechanisms that the law then requires **before** we do it. Where the law requires an opt-out, you will get one.

If you want to be sure, check this section for changes — it is where any change will appear first.

7. De-identified, aggregated, and derived information

We generate statistics and other information from how the Service is used — for example, parsing accuracy rates, how often a category of item appears on receipts, average party sizes, and error rates by receipt type. We refer to this as **Derived Data**.

Derived Data means information generated by us from operation of the Service, **in each case in a form that does not identify you and is not reasonably linkable to you**. Cologne owns Derived Data, and we may create, use, and retain it, including after you delete your own data.

Where we characterize information as **de-identified or aggregated**, we commit to the following, and we hold ourselves to it:

1. We take reasonable measures to ensure the information cannot be associated with, or reasonably linked to, any individual, household, or device.
2. **We publicly commit to maintain and use that information only in de-identified or aggregated form, and not to attempt to re-identify it**, except that we may attempt re-identification solely to test whether our de-identification measures are working.
3. We contractually require any recipient of such information to comply with the same restrictions, and prohibit any recipient from combining it with other information to identify an individual.

We are not making a claim that information is anonymous simply because names have been removed. Small groups can be re-identified. **Where information could reasonably be linked back to a person, we treat it as personal information, it is not Derived Data, and it is covered by Section 6.**

8. How long we keep information

WHAT	HOW LONG
Receipt data and split pages	Up to 12 months from creation, unless you ask us to delete it sooner
Receipt images	Up to 12 months from when you send them, unless you ask us to delete them sooner. Images in use for the testing and fine-tuning described in Section 3 are kept only as long as needed for that purpose, and are always deleted on request
Sender phone number and payment handle	Until you ask us to delete it, or 24 months after your last interaction with the Service, whichever comes first
Participant claim data and aliases	With the split page it belongs to

WHAT	HOW LONG
Participant email address or phone number given to receive a copy of a share	Up to 90 days after the copy is sent
Technical logs and diagnostic records	Up to 24 months
Derived Data as described in Section 7	Indefinitely
Records we must keep for legal, tax, security, or dispute-resolution reasons	As long as required

We may keep information longer where necessary to investigate a security incident, respond to a legal claim, or comply with law.

9. Your choices and your rights

9.1 Everyone

- **Ask what we have.** Email info@cologneagent.com and we will tell you what information we hold about you.
- **Ask us to correct it.** If something is wrong, tell us and we will fix it or tell you why we cannot.
- **Ask us to delete it.** See Section 10.
- **Ask for a copy.** We will provide a portable copy of information you gave us.
- **Stop using the Service.** Senders can stop messaging the Cologne WhatsApp account at any time, and can reply **STOP** to stop receiving messages from us. Participants and Viewers can close the split page.

9.2 State privacy rights

Some US states give residents rights to access, correct, delete, and obtain a portable copy of their personal information, to opt out of sale, sharing, targeted advertising, and certain profiling, and to be free from discrimination for exercising those rights. **We extend the rights in Section 9.1 to everyone who asks, regardless of where they live**, and we do not discriminate against anyone for exercising them.

To exercise a right, email info@cologneagent.com with enough detail to identify the information at issue — for a split page, the link is the most useful thing you can send us. **We will respond within 45 days**, and will tell you if we need a one-time extension of up to another 45 days. We may need to verify that a request actually comes from you; for Senders we will typically verify by asking you to confirm from the WhatsApp number on file.

Authorized agents. You may use an authorized agent to make a request. We will ask the agent for written permission signed by you, and we may ask you to confirm directly that you authorized the request.

Appeals. If we deny a request, you may appeal by replying to our response with the word "appeal." We will respond within 45 days.

9.3 Nevada

Nevada residents may direct us not to sell certain covered information as defined in Nevada Revised Statutes Chapter 603A. We do not currently sell covered information. To submit a Nevada opt-out request, email info@cologneagent.com with the subject line "Nevada Opt-Out."

9.4 Do Not Track and opt-out preference signals

Some browsers transmit a "Do Not Track" (DNT) signal. There is no common industry standard for how to respond to DNT signals. **Cologne does not currently respond to DNT signals.**

Where we deploy analytics or other technologies that a US state law treats as a sale or share, we will honor opt-out preference signals such as **Global Privacy Control (GPC)** that we detect in your browser, and we will treat a detected signal as a valid opt-out request for that browser and device.

9.5 Third-party tracking across sites

We do not permit third parties to collect personal information about your online activities across different websites over time through the Cologne website or split pages, other than through analytics services we

deploy for our own purposes as described in Section 5. Where we use such services, we do so subject to any consent mechanism presented to you.

10. How to delete your data

You can ask us to delete your information at any time, and we will do it.

If you are a Sender:

- Email info@cologneagent.com and tell us the phone number you used.

If you are a Participant or Viewer:

- Email info@cologneagent.com with the link to the split page and, if you claimed items, the alias you used. If you do not have the link, describe what you can and we will try to locate it.

What deletion does. We will delete the information covered by your request from our production systems. For Senders, this includes your receipt images — including any copies in use for the testing and fine-tuning described in Section 3. Deletion from backups occurs on our normal backup rotation, within 90 days.

When one person's deletion affects others. A split page is shared, so deletion is not always private to the person who asks:

- **If a Sender deletes**, the entire split page comes down, the link stops working, and the claim data and aliases of everyone on that page are deleted with it. We do not notify the other people on the page.
- **If a Participant deletes**, we remove that person's alias and claims. The split page and everyone else's claims remain, and the items that person had claimed become unclaimed and visible as such to the others.
- A deletion request from one person does not delete anyone else's information beyond what is described above.

What deletion does not do. It does not remove information from Derived Data as described in Section 7, from records we are legally required to keep, or from a screenshot or copy that another person made while the page was live. It does not delete anything held by WhatsApp or Meta about your use of WhatsApp — for that, use Meta's own tools. **It does not reverse a payment you already made.**

We aim to complete deletion requests within 30 days, and in any event within 45 days, and we will confirm when it is done.

11. Reporting a problem with a split page

If a split page shows information about you that you did not put there — for example, your name appearing on a receipt or typed by someone else — email info@cologneagent.com with the link, or use the report link on the page itself. Tell us what is on the page and why it should not be. We will review it and, where appropriate, remove the information or take the page down. You do not need to be a Cologne user to make this request.

12. Security

We use reasonable administrative, technical, and physical safeguards appropriate to the size of our operation and the nature of the information, including encryption in transit, access controls, and randomly generated split-page identifiers with high entropy.

No system is perfectly secure, and we do not promise that ours is. In particular, and as explained in Section 4, split pages are accessible to anyone holding the link — that is a property of the design, not a security failure. Do not send us anything you would not want disclosed.

If we learn of a breach affecting your information, we will notify you and any regulator to the extent required by law.

13. Children

Cologne is not directed to children and is **intended for people 18 and older**. We do not knowingly collect personal information from anyone under 18. We do not ask for age, and we have no way to verify it.

If you believe someone under 18 has provided us information, email info@cologneagent.com and we will delete it.

14. Where the Service is offered

Cologne is offered in and intended for the **United States**, and information is stored and processed in the United States. We do not target or market the Service to residents of the European Economic Area, the United Kingdom, or Switzerland.

Because a split page is shared by link, we cannot control where one is opened. If you open a split page from outside the United States, you understand that your information will be processed in the United States under United States law.

15. Electronic communications and changes to this Policy

Electronic communications. By using the Service you consent to receive notices and disclosures from us electronically — by message to the WhatsApp number we have on file for you, by email where you have given us an address, and by posting on the Cologne website. You may withdraw this consent by emailing us, but doing so means you can no longer use the Service.

Changes. We may update this Policy. When we do, we will change the "Last updated" date at the top and post the new version at this address.

If a change is material — for example, if we begin selling or sharing personal information, or begin using information for a materially different purpose — we will post a prominent notice on the Cologne website and on split pages **before the change takes effect**, and will also notify anyone we have a way to reach directly. Because most Participants and Viewers give us no contact details, **posting is the only notice we can give them**, and material changes apply to them only going forward, not to information collected before the change.

Your continued use of the Service after a change takes effect means you accept the updated Policy.

16. Contact

Questions, requests, and complaints:

Cologne, a general partnership Email: info@cologneagent.com Web: cologneagent.com

This Policy should be read together with the Cologne Terms of Service.