

MUSUNO PRIVACY POLICY

Version 1.2.0 — Effective Date: 20 August 2026

1. Who We Are

This Privacy Policy explains how **MUSUNO LTD** ("Musuno", "we", "us") collects and uses personal data when you use the Musuno platform, website, and desktop application (the "Service"). Musuno is a private limited company incorporated in England and Wales (company number 17276776), with its registered office at 71–75 Shelton Street, Covent Garden, London, WC2H 9JQ, United Kingdom.

Musuno is the data controller for the personal data described in this Policy. We process personal data in accordance with the UK General Data Protection Regulation (UK GDPR) and the Data Protection Act 2018 (as amended, including by the Data (Use and Access) Act 2025), and, where applicable, the EU GDPR and other local data protection laws.

You can contact us about privacy at admin@musuno.com, or in writing at our registered office above.

2. What We Collect

2.1 Everyone (End Users and Creators)

- **Account data:** email address, username, your login credentials (handled by our secure authentication infrastructure — we never see or store your password in readable form), and confirmation that you meet our minimum age requirement.
- **Transaction data:** your purchases, subscriptions, billing history, refunds, disputes, the country or billing information used for tax calculation, and transaction identifiers. Payment card details are collected and processed by our payment processors (such as Stripe or PayPal); we do not store your full card number.
- **Usage and device data:** how you interact with the Service, device and operating system information, IP address, and technical logs used for security and troubleshooting.
- **Communications, reports, and moderation data:** messages you send us, support requests, cancellation notices, complaints, content or intellectual-property reports, evidence you submit, appeals, and records of our review or enforcement response.

2.2 Creators Only

- **Identity and payout data:** legal name and the identity-verification, connected-account, payout-account, and tax information required to assess payout eligibility and pay you. Most identity documents and bank details are collected and held directly by our payment processors; we generally receive account identifiers, verification or capability status, and the details needed to administer Creator earnings and payouts.
- **Creator materials:** assets, listings, and information you provide for your companion and creator profile. Your public creator profile is visible to users of the Service.
- **Creator earnings data:** the Creator Rate applicable to you, transaction-level earnings calculations, pending and available balances, refunds or reversals, cash-out requests, processor fees associated with cash-out, and payout history.

3. Why We Use Your Data & Our Legal Bases

- To provide the Service (contract): creating and managing your account, delivering companions and updates, processing purchases and subscriptions, calculating Creator earnings, administering Creator cash-outs, and providing support.
- **To comply with the law (legal obligation):** keeping tax and accounting records, verifying Creator identity and payout eligibility, responding to lawful requests from authorities, and handling consumer rights requests.
- To keep the Service safe, enforce our rules, and improve it (legitimate interests): preventing fraud and abuse, securing accounts, fixing bugs, understanding how the Service is used, receiving and investigating reports, moderating content, handling appeals and intellectual-property complaints, and enforcing our Terms and Creator policies. We balance these interests against your rights.
- **With your consent:** sending you marketing emails and using optional cookies or analytics. You can withdraw consent at any time.

4. Children

The Service is not intended for children under thirteen (13), and we do not knowingly collect personal data from anyone under 13. If you are a parent or guardian and believe a child under 13 has created an account, contact us at admin@musuno.com and we will delete the account and its data. Purchases by users under 18 require parental or guardian consent, as described in our Terms of Service.

5. Who We Share Data With

- **Payment processors** (such as Stripe, PayPal, and Wise) to process payments and Creator payouts. They act as independent controllers of payment data under their own privacy policies.
- **Service providers** that host our infrastructure, deliver emails, and provide analytics or support tooling, acting on our instructions under data processing agreements.
- **Creators** receive aggregated sales and subscription statistics for their own companions. Creators do not receive your payment details, email address, or other account information unless you choose to share it with them directly.
- **Professional advisers and authorities** such as accountants, lawyers, tax authorities, and regulators, where necessary or legally required.
- Report and dispute participants where reasonably necessary to investigate a complaint, provide a fair opportunity to respond, resolve a rights dispute, or comply with law. We limit the information shared to what is reasonably necessary in the circumstances.
- **A buyer or successor** if Musuno is involved in a merger, acquisition, or sale of assets, in which case this Policy will continue to apply to your data.

We do not sell your personal data.

6. International Transfers

We are based in the UK, and our service providers may process data outside the UK or European Economic Area. Where personal data is transferred internationally, we rely on safeguards recognised by UK and EU law, such as adequacy decisions, the UK International Data Transfer Agreement, or EU Standard Contractual Clauses.

7. How Long We Keep Data

- **Account data:** kept while your account is active. If you close your account, we delete or anonymise account data within ninety (90) days, except where retention is required by law.
- **Transaction and accounting records:** kept for six (6) years, as required by UK tax and company law.
- **Backups:** residual copies in encrypted backups are purged in our ordinary backup rotation cycle (up to 90 days) and are not used for any other purpose.
- **Support communications:** kept for as long as reasonably necessary to handle the matter and any follow-up.
- Reports, moderation records, and disputes: kept for as long as reasonably necessary to investigate the matter, apply or defend our policies, prevent repeat abuse, meet legal obligations, or establish, exercise, or defend legal claims. We may retain a limited record after account deletion where this is reasonably necessary for those purposes.

8. Your Rights

Subject to conditions and exemptions in the law, you have the right to:

- access the personal data we hold about you;
- have inaccurate data corrected;
- have your data erased ("right to be forgotten");
- restrict or object to certain processing, including processing based on legitimate interests;
- receive your data in a portable format; and
- withdraw consent at any time, where processing is based on consent.

To exercise any of these rights, contact us at admin@musuno.com. We will respond within the timescales required by law (normally one month). We do not make decisions based solely on automated processing that produce legal or similarly significant effects about you. You also have the right to complain to the UK Information Commissioner's Office (ico.org.uk) or, if you live in the EU or elsewhere, to your local data protection authority.

9. Security

We use reasonable technical and organisational measures to protect personal data, including encryption in transit, secure authentication infrastructure, access controls, and encrypted backups. No system can guarantee absolute security; if a breach occurs that affects your rights, we will notify you and the relevant authorities as required by law.

10. Cookies & Analytics

Our website and application use:

- **Essential cookies** required for the Service to function (such as login sessions and security). These do not require consent.
- **Optional analytics** that help us understand how the Service is used. These are only set with your consent, which you can give or withdraw through our cookie settings.

11. Marketing

We only send marketing emails if you opt in, and marketing emails include an unsubscribe mechanism where required. Operational or legal notices - such as receipts, payout information, security alerts, policy-change notices, moderation decisions, or other service communications - are not marketing and may be delivered by email, through your account, in-app, or by another reasonable service-notice method.

12. Changes to This Policy

We may update this Policy from time to time. If we make a material change, we will provide reasonable direct notice by email, website notice, in-app notice, or account notice before it takes effect where required. The version number and effective date at the top of this Policy identify the current version.