

MUSUNO PRIVACY POLICY

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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 LTD 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. Certain Creators and products are assigned to a United States payment route using a United States Stripe account whose business type is Individual (sole proprietorship), owned and operated by Xavier Yi Yu Luo (also known as Xavier Luo) under the business/trade name "Musuno" ("Musuno US"). Musuno US is not a separate company or legal entity.

MUSUNO LTD is the data controller for personal data used to operate the Service generally. For transactions sold or payment activity administered through Musuno US, Xavier Yi Yu Luo d/b/a Musuno acts as an independent controller for personal data he processes in his individual sole-proprietor seller/merchant capacity, including sale-side payment, refund, dispute, tax/accounting, and connected-account administration through the United States Stripe account. Because Musuno US is only a business/trade name, there is no separate United States Musuno legal entity acting as controller. MUSUNO LTD and Xavier Yi Yu Luo d/b/a Musuno may share the limited transaction, customer, Creator, connected-account, refund, dispute, and payout information reasonably necessary to administer those payment flows. Each processes that information only for the relevant Service, payment, compliance, accounting, support, or legal purposes 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. The desktop application does not currently use a general-purpose third-party crash-reporting or desktop-telemetry SDK; application logs are generally stored locally on the user's device unless the user chooses to provide them or a feature expressly transmits information needed to provide the Service.

- 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 may act as independent controllers of payment and identity data under their own privacy policies and terms.

United States Stripe processing: certain Creators and products are assigned to a United States payment route. Transactions on that route are processed through a United States Stripe account registered as an Individual (sole proprietorship), owned and operated by Xavier Yi Yu Luo under the business/trade name Musuno. For End User purchases routed through that account, Xavier Yi Yu Luo

d/b/a Musuno is the seller and merchant in his sole-proprietor capacity; the End User's location does not by itself determine the payment route. Stripe may identify Xavier Yi Yu Luo personally as the legal account holder while displaying Musuno or MUSUNO as the business/merchant name or statement descriptor, and may make transaction, customer, connected-account, refund, dispute, or payout information available through that account as necessary to administer those payment flows.

MUSUNO LTD and Xavier Yi Yu Luo d/b/a Musuno use and share that information only as reasonably necessary for Musuno payment administration, compliance, accounting, refunds, disputes, Creator payouts, and related support, and not for unrelated personal purposes.

Connected-account administration: where a Creator uses Stripe Connect or another connected-account service, we may send Creator-provided information to the payment processor and receive account identifiers, verification or capability status, balance or transfer status, and other information needed to administer Creator payouts, refunds, disputes, fraud controls, sanctions checks, and legal compliance.

- **Current infrastructure and support providers include Supabase (database, authentication, storage, and realtime services), Vercel (website hosting and optional analytics), Stripe (payments, Connect, and tax functions), PayPal and Wise where used for payments or payouts, Cloudflare (security and Turnstile), Google (OAuth and optional consent-based analytics), Discord (OAuth, integrations, and limited private moderator or operational alerts where used), and GitHub (desktop release and update distribution).** Content reports are submitted into Musuno's moderation process; where Discord is used to alert moderators, we aim to limit the Discord notification to information reasonably necessary to identify and route the matter rather than using a public Discord channel as the complaint record. Providers process data under their own terms and, where they act as processors for us, on our instructions.
- **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 some service providers process data outside the UK or European Economic Area. Our core Supabase project is currently hosted in the United States (AWS us-east-2, Ohio), and providers including Vercel, Stripe, Google, Discord, and GitHub may process data in the United States or through global infrastructure. Where international-transfer safeguards are required, we rely on mechanisms recognised by applicable UK and EU data-protection law, such as adequacy regulations/decisions, the UK International Data Transfer Agreement or UK Addendum, EU Standard Contractual Clauses, or other legally recognised safeguards applicable to the provider and transfer.

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). Automated systems may identify, flag, or prioritise content, transactions, or account activity for review and may apply temporary technical or safety holds where reasonably necessary. Musuno does not make final decisions to unpublish or hide Creator content, restrict Creator monetisation, suspend a Creator, or terminate a Creator relationship solely by automated processing; those decisions follow human review. More generally, we do not make decisions based solely on automated processing that produce legal or similarly significant effects about you, except where permitted by applicable law with the required safeguards. 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, including Google Analytics and Vercel Analytics where enabled. These analytics are loaded only after you give consent through our cookie settings; if you reject optional analytics, the optional analytics scripts and cookies are not loaded. You can withdraw consent 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. This version was published on 28 August 2026. For new users, it applies when they begin using the Service or accept the related Musuno terms on or after publication. For existing users, a material change will take effect only after any notice period required by applicable law or the Musuno terms governing that user has expired, unless the user affirmatively accepts the updated terms earlier where lawful. We may provide notice by email, website notice, in-app notice, or account notice as appropriate.