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 also sends the limited usage statistics described in Section 12: outside the European Union (EU) and European Economic Area (EEA) it does so by default unless you switch that off, and in the EU and EEA it does so only if you agree. Those statistics include app and device configuration information, usage durations, counts of feature or action use, coarse time and screen-position buckets, each click, with its time rounded to the minute, which button or control in the application's own windows was clicked, and roughly where the mouse was (a coarse grid position, never exact coordinates), and stability events, and they are not linked to your Musuno account.

Local application logs are generally stored on your device unless you choose to provide them to us or a feature expressly transmits information needed to provide, secure, or troubleshoot 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.
- Promotional submissions: videos, social handles, video links and view counts you submit for promotion or bounty programmes.
- Agency information: where an agency manages your Creator account, the agency's role and the account your earnings are paid to.

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, where applicable):** preventing fraud and abuse, securing accounts, fixing bugs, understanding how the Service is used (including, outside the EU and EEA, the desktop application usage statistics described in Section 12), 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 and use another lawful basis where applicable law requires one.
- **To relay Discord messages (Section 6):** for Creators and purchasers, to provide the Service (contract); for other people posting in linked channels, our and the Creator's legitimate interest in letting the companion respond to the channel. We do not keep the message content.
- **With your consent:** sending you marketing emails, using optional website cookies or analytics that require consent, and, if you are in the EU or EEA, desktop application usage statistics (Section 12). 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 and PayPal)** 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 (when a buyer chooses PayPal at Stripe checkout, or a Creator chooses PayPal for payouts), Cloudflare (security and Turnstile), Google (OAuth and optional consent-based analytics), Microsoft (optional consent-based website analytics through Microsoft Clarity), Discord (OAuth, integrations, support conversations, and limited private moderator or operational alerts where used), Teramont Host (hosting for Musuno Bot, which relays messages from linked Discord channels in transit without keeping them), 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.
- **Agencies and collaborators:** where a Creator is managed by an agency or adds collaborators to a model, the agency's account holders and the collaborators can see that model, and agency roles can also see the Creator's earnings and payout information.
- **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. Discord Integration and Message Relay

Where a Creator connects a Musuno model to a Discord server, our Discord application ("Musuno Bot") processes limited Discord data from that server so that the companion application can respond to activity in authorised linked channels.

What we process. Discord's gateway may deliver message events to Musuno Bot. For channels a Creator has linked to one of their models, the bot transiently receives the message text, the URL for any attached audio file, and source-channel information so that it can relay the content to the connected Musuno desktop application. Messages from channels that have not been linked to a model are discarded on receipt: they are not forwarded to a Musuno desktop application and are not stored by Musuno. The bot passes Discord's own file URL for attached audio and does not copy or store the audio file itself.

Why we process it. A linked channel is how a companion responds in real time. Message text can be spoken by the avatar in the purchaser's desktop application, and attached audio can be played there. The bot also recognises limited administrator-only text commands so that a server administrator can check and repair the server's Musuno setup from within Discord.

How long we keep message content and who can access it. Musuno does not keep the message content. Message content is relayed in transit to the connected desktop applications subscribed to that channel. It is not written to our database, is not recorded in message-content logs, and is not retained by us after delivery. Musuno personnel do not have a Musuno dashboard, database record, or message-content log through which to view the relayed message content. We do not use Discord message content to train machine-learning or artificial-intelligence models, we do not sell it, and we do not use it for advertising.

Transient relay metadata. For a relayed message, the sender's Discord username and the source channel name and/or channel identifier may be handled transiently as part of the relay process, but Musuno does not retain that message-related metadata after forwarding. The relayed message text itself is also not retained or exposed through Musuno's administrative systems.

Other Discord data. Where a Creator has configured a purchaser role, we use the Discord account identifier associated with a purchaser's Musuno account to grant that role in the Creator's server following a purchase. Where a Creator adds Musuno Bot to a server through Musuno, we record the identifier and name of that server so that the website can offer the relevant server, channel, and role options in its configuration tools.

Your controls. A Discord server administrator controls whether the bot can access a channel, and the Creator who owns the relevant model controls which accessible channels are linked to it. Messages from a channel that is not linked are discarded on receipt and are not forwarded or stored by Musuno. Removing Musuno Bot from a server stops future processing by the bot for that server. You may unlink your Discord account from Musuno at any time in your account settings; unlinking ends Musuno's use of that account link for current and future purchaser-role assignment activity, but it does not automatically revoke a Discord role that was already granted. You may also exercise the data rights described in Section 9.

People without a Musuno account. If you post in a Discord channel a Creator has linked to Musuno, your message text and Discord username pass through Musuno Bot in transit even if you have no Musuno account. The server’s administrators can tell you which channels are linked, and you can contact us at admin@musuno.com.

7. International Transfers

MUSUNO LTD is a UK company. Our team works from Taiwan and Thailand and accesses personal data there to run the Service; our founder also handles payment data from Taiwan as Xavier Yi Yu Luo d/b/a Musuno for purchases on the Musuno US route. 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, Microsoft, Discord, and GitHub may process data in the United States or through global infrastructure. Teramont Host, which hosts Musuno Bot, operates from Mexico and runs its servers in the United States. 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.

8. 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.
- **Usage and device data:** kept only for as long as reasonably necessary for security, troubleshooting, product improvement, and analytics purposes, after which it is deleted, aggregated, or de-identified unless a longer period is required by law. Desktop application usage statistics are covered by the next item instead.

Desktop application usage statistics: kept for thirteen (13) months from the day or launch they describe, then deleted automatically. Aggregate figures produced from them, which do not identify anyone, may be kept longer. Because these statistics are not linked to your account, closing your account does not delete them sooner; the thirteen-month limit applies instead.
Website analytics recordings (Microsoft Clarity): recordings are kept by Microsoft for thirty (30) days and heatmap data for up to thirteen (13) months (Section 11).

- **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.

9. 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). Desktop application usage statistics are not linked to your account and carry only a random installation identifier that is not shown to you, so we may not be able to tell which records relate to you; switching usage statistics off in the application (Section 12) stops further collection and deletes anything not yet sent. 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.

10. 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.

11. Cookies & Analytics

Our website uses:

- **Essential cookies** required for the Service to function (such as login sessions and security). These do not require consent.
- **Optional website analytics:** these help us understand how the website is used, including Google Analytics, Vercel Analytics and Microsoft Clarity where enabled. Microsoft Clarity records how visitors move, click and scroll on our pages, which we use to produce heatmaps and replays of visits so we can find and fix parts of the website that are confusing or broken. Text typed into forms is never recorded, and numbers, email addresses and pages containing sensitive information (such as account settings, content reports, support tickets, and Creator earnings and payout pages) are hidden before anything leaves your browser. Microsoft keeps Clarity recordings for 30 days and heatmap data for up to 13 months. 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. Desktop application usage statistics are separate and are described in Section 12.

12. Desktop Application Usage Statistics

Collection and controls. The Musuno desktop application can send limited usage statistics to Musuno to help us understand how the application is used, identify usability or reliability issues, and improve the Service. Whether it does so by default depends on where you are:
Outside the EU and EEA, including the UK: usage statistics are on by default. You can switch them off at any time, free of charge, in Settings → Account → Terms & Privacy → Usage data.
In the EU and EEA: the application does not collect or send usage statistics unless you agree. It asks you once when you open it, and you can use the application whichever answer you give. You can change your answer at any time in the same place in Settings.
To tell which applies, each time it starts the application asks our website which country your internet connection appears to come from. The website works this out from your IP address, uses it only to give that answer, and does not store it; the application keeps the answer on your device. Until the application has an answer, it does not collect usage statistics. If you have not agreed and the application finds that you are now in the EU or EEA, it stops collecting, and deletes any statistics not yet sent, until you answer.

Switching usage statistics off stops new collection and transmission, deletes statistics that have not yet been sent, and deletes the installation identifier described below. Your choice is kept when the application updates. The app sends three kinds of records: one when the app launches, one daily record for each companion model used, and one record for each click. The records use counts, minutes, coarse buckets, times rounded to the minute and grid positions rather than recordings of what you type or view.

Launch information. Each reported launch may include the Musuno app version; operating system, operating-system release, and CPU architecture; the app language; the number of screens and the primary screen size and scale; the device's offset from UTC (not a time-zone name or place); how long startup takes until sign-in, excluding time spent typing a password; whether this is the first reported launch from that installation; and a limited settings snapshot. The settings snapshot may include whether launch at startup, Discord messages, idle commands, and timed popups are enabled, together with button shape, DLC mode, chatbox font, and avatar size.

Daily per-model usage. For each companion model, the app may report the number of minutes the avatar was on screen and, within that time, the number of minutes the user was active at the computer. Active time is determined only from whether keyboard or mouse activity occurred within the previous five minutes; we do not record which keys were pressed, what was typed, or the content of mouse interactions. The daily record also contains counts of the actions and coarse breakdowns described below.

Feature and action counts. The app may count how often particular features or events occur, including: equipping or removing a model or DLC and opening the companion chooser; opening menus, pressing menu buttons, and opening Settings; sending a chatbox message (count only), including whether it matched a Creator-configured keyword or used the fallback; clicking or moving the avatar, entering move/resize mode, and resizing the chatbox; opening an external or support/contact link; showing a relayed Discord message or playing relayed audio, applying or refusing an idle command, and encountering a Discord connection fault; a Creator's scheduled popup firing; changing a settings category; signing out, cancelling or reversing cancellation of a subscription, being shown updated terms, or accepting terms; and stability events such as the avatar window freezing, going blank, reloading, crashing, or an update window being shown. For settings-change events, we record that the relevant setting category changed, not the new value entered or selected.

Coarse breakdowns. The app may group usage by weekday and hour; record the avatar's approximate on-screen position using a rough 6 × 4 grid; record which idle commands were used or refused and the reason for refusal; identify a Creator menu button by its position and its label; record which Creator-configured chat keyword responded and how often the fallback responded; record which scheduled Creator popup fired; record the window from which an external link was opened (never the URL); record the app's own Discord fault code; and group session length into duration buckets ranging from under five minutes to six hours or more.

Clicks. The app sends one record for each click, with the time rounded to the minute and roughly where the mouse was, as a cell in a rough 6 × 4 grid of the window or the avatar. For clicks in the application’s own windows (such as the menu, settings and chat windows), the record names the control clicked, by the application’s own internal name or, for a button a Creator adds to the menu, by its position and its label; clicks that do not land on any control are recorded too. For clicks on the avatar, the record holds only the time and the grid position. We never record what you type, other text on the screen, or exact click coordinates.

What these statistics do not record. The desktop usage-statistics records do not contain your name, email address, or Musuno account identifier, chat or message text, Discord message content, anything you type, keybind values, file paths, URLs, images, exact screen coordinates, time-zone names, geographic location, or the values that settings are changed to. An IP address is not included as a field in the usage-statistics record; ordinary network, security, or server infrastructure may nevertheless process an IP address as described in Section 2.1.

Not linked to your account. Usage-statistics records are not linked to your Musuno account. The application has to be signed in to send them, but your account identifier is not stored with them, and we do not combine them with your account, purchase, or subscription information. Each record carries a random installation identifier, which the application creates on your device and deletes when you switch usage statistics off (switching them back on creates a new one), and a daily record also carries the identifier of the companion model concerned.

How we use them, and who can see them. We use these statistics only to produce aggregate figures about how the application is used, so that we can improve it and keep it reliable. We do not use them to monitor, track, or profile individual users, or to make decisions about any individual. Within Musuno, access is limited to authorised personnel who need the information for product improvement and reliability. Supabase stores them for us as our processor, as described in Section 5. We do not provide these desktop usage statistics to Creators or anyone else, sell them, or use them for advertising.

How long we keep them. Thirteen (13) months from the day or launch they describe, after which they are deleted automatically (Section 8).

Legal basis. In the UK, storing the installation identifier on your device and reading the device information described above relies on the exception for statistical purposes in the Privacy and Electronic Communications (EC Directive) Regulations 2003 (Schedule A1, paragraph 5), and we process the statistics under the UK GDPR on the basis of our legitimate interests in understanding and improving the application. Elsewhere outside the EU and EEA we rely on the same legitimate interests, subject to local law. In the EU and EEA we rely on your consent, which you can withdraw at any time as described above.

13. 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.

14. Changes to This Policy

We may update this Policy from time to time. This version was published on 2 November 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. You do not need to accept this Policy; where we rely on your consent, such as for optional analytics, we ask for it separately. We may provide notice by email, website notice, in-app notice, or account notice as appropriate.