

PRIVACY POLICY

Effective Date: 16.04.2026 **Company:** Moonlight Agents Ltd, registered in the United Kingdom.

1. Information We Collect and Security

- **Account Data:** Email address and profile name.
- **User Content:** Family tree structures, text inputs, and photos.
- **Audio Data:** Voice recordings submitted for Speech-to-Text.

All personal data and audio recordings are encrypted in transit (using HTTPS/TLS) to ensure data security.

2. Tracking Technologies and Device Data (UK PECR) In compliance with the Privacy and Electronic Communications Regulations (PECR), we collect specific device data necessary for the app to function. This includes push notification tokens (to alert you of tree updates) and crash reports via Google Firebase to monitor app stability. We use local device storage to cache family tree data for offline access. We do not use cross-site tracking technologies for targeted advertising.

3. Legal Basis for Processing (UK GDPR) We process your data on the following legal bases: (a) **Contract:** To provide the core Service; (b) **Consent:** For push notifications; (c) **Legitimate Interest:** For monitoring app stability and preventing fraud/abuse.

4. Data Storage and Cross-Border Transfers Your personal data is stored on DigitalOcean servers in Frankfurt, Germany. To provide AI transcription, audio and text are temporarily transmitted via API to third-party AI providers (e.g., OpenAI, Google, Anthropic), which may process data in the US. These transfers are executed under Standard Contractual Clauses (SCCs).

5. Voice Data and Biometrics We do not use voice data for biometric identification or authentication. Audio is processed strictly for transcription and is permanently deleted from our servers immediately afterward. We strictly prohibit the use of your data to train our own or our partners' foundational AI models.

6. Third-Party Data and Right to be Forgotten Users may add information about living relatives. If your personal data was added without your consent, you have the right to request its removal. Contact our DPO at moonlightagents@gmail.com.

7. Your Data Protection Rights (UK GDPR) If you reside in the UK or EEA, you have the right to: access your data, request rectification, request erasure, restrict processing, and request data portability. To exercise these rights, contact moonlightagents@gmail.com.

8. CCPA and US State Privacy Laws For residents of California and applicable US States: **We do not sell your personal information.** We do not share your personal information with

third parties for their direct marketing purposes. You may request access to or deletion of your data by contacting us.

9. Law Enforcement Disclosure We reserve the right to disclose your personal information if required by law, court orders, or government requests, or to protect the rights, property, or safety of the Service, our users, or the public.

10. Data Breach Notification We implement industry-standard security measures. However, no method of transmission is 100% secure. In the event of a personal data breach posing a high risk to your rights, we will notify you and the relevant supervisory authority (such as the UK ICO) without undue delay, typically within 72 hours, in compliance with UK GDPR.

11. Data Retention and Account Deletion You may delete your account within the App settings. Upon deletion, your profile and solely administered trees are permanently deleted within 30 days. We reserve the right to delete accounts after two (2) years of inactivity.

12. Contact Us For privacy-related inquiries, contact our Data Protection Officer at moonlightagents@gmail.com.