

PRIVACY POLICY — Bunsy

This Privacy Policy explains how QUICK AI SOFTWARE SOLUTIONS HUB - FZCO ("Company", "we", "us", "our") collects, uses, shares, and protects personal data when you use the Bunsy app, website, and related services (the "Service"). It is designed to comply with the UAE Federal Personal Data Protection Law (Federal Decree-Law No. 45 of 2021, "PDPL") and with the disclosure requirements of the Apple App Store and Google Play.

By using the Service, you acknowledge this Policy. Where the law requires consent, we obtain it as described below.

Last updated: August 1, 2026 · **Effective date:** August 1, 2026 · **Version:** 1.2

0. Summary of key points

Convenience summary only; the full Policy controls.

- We process account, transaction, content, and device/usage data, plus the photographs you choose to upload to create an avatar.
- **We do not collect biometric data and we do not run face recognition.** We store the photograph you upload as an ordinary image. We do not create, derive, or store faceprints, face templates, facial geometry, or face embeddings, and we never use a photograph to identify or authenticate anyone.
- We send your prompts and uploads to third-party AI providers to generate results; this can involve transfers outside the UAE.
- Our own servers and storage are located in the **European Union**.
- We do not sell your personal data. We do not use your content to train AI models except with your opt-in consent (see Terms 6A).
- Photographs containing a real person's face are handled with extra care and are subject to the deletion rules in Section 7.
- You have rights to access, correct, delete, and withdraw consent. Contact [**privacy@bunsy.io**](mailto:privacy@bunsy.io).

1. Data Controller

QUICK AI SOFTWARE SOLUTIONS HUB - FZCO · Trade License No. 80532 · Registration No. 78782 · Registered office: IFZA Business Park, DDP, PO Box 342001, Dubai, United Arab Emirates. Privacy / data-protection contact: [**privacy@bunsy.io**](mailto:privacy@bunsy.io).

For most personal data processed through the Service we act as the controller. For content transmitted to Third-Party Providers to fulfill your requests, those providers may act as processors, sub-processors, or independent controllers depending on the integration (see Sections 8 and 16).

2. Scope

This Policy applies to all users, visitors, guest users, account holders, and purchasers of the Service, across the mobile apps and the website.

3. Categories of Personal Data We Collect

- **Account data:** name, email, phone number, login identifiers. For guest users, a device-linked anonymous identifier.
- **Transaction data:** subscription status, token ("credit") purchases, billing metadata (payment card details are handled by our payment processor, Stripe, and are not stored by us).
- **Content data:** prompts, uploads, generated Output, feed interactions.
- **Facial images:** photographs you choose to upload to create an avatar, and the images our AI providers generate from them. We store the photograph itself as an ordinary image; **we do not extract or store facial geometry, faceprints, biometric templates, or face embeddings from it, and we do not process it to identify anyone** — see Section 7. Because we do not carry out that technical processing, these photographs are personal data but not biometric data.
- **Device and usage data:** IP address, device identifiers, operating system, app logs, crash and performance data, analytics.
- **Support and moderation data.**
- **Eligibility data:** information confirming you meet the minimum age requirement.
- **Communications data:** your marketing and push-notification preferences.

4. Sources of Data

Directly from you; automatically from your device and use of the App; and from third parties such as payment processors, analytics providers, app stores, and Third-Party AI Providers, as applicable.

5. Purposes of Processing

Create and authenticate your account (including guest sessions); generate avatars, images, video, and audio in response to your Inputs; deliver, maintain, and moderate the Service; process subscriptions, tokens, purchases, refunds, and fraud prevention; provide analytics, debugging, security, and product improvement; send transactional and (with consent) marketing communications; comply with legal obligations and enforce our Terms.

We do not use your prompts, uploads, or generated content to train AI models except with your opt-in consent (see Terms Section 6A).

6. Legal Bases for Processing (PDPL)

- **Performance of a contract** — to create your account, and to generate the avatars, images, video, and audio you ask us for, including from photographs you upload. This is the basis on which we process your uploads: you provide them so that we can produce the Output you requested.
- **Consent** — for optional analytics/marketing and push notifications where applicable; for cross-border transfers where required; and for any use of content for model training.
- **Legal obligation** — to comply with applicable law, including breach notification and record-keeping.
- **Legitimate interests** — for security, fraud prevention, debugging, and service improvement, where not overridden by your rights.

We do not process special categories of personal data. In particular, we do not process biometric data: a photograph becomes biometric data only when it is put through specific technical processing that allows a person to be uniquely identified, and we do not carry out any such processing (see Section 7.1). Withdrawal of consent, where consent is the basis, does not affect processing carried out before withdrawal.

7. Photographs You Upload to Create an Avatar

7.1. What we collect, and what we do not

Bunsy lets you upload photographs to create an avatar — a stylized AI character. The only facial data we collect is the photograph you choose and upload yourself, through the standard photo picker or camera, on the "Create avatar" screen. You may upload up to five images per avatar.

We do not perform face recognition, face matching, face detection, liveness detection, or face tracking. The app contains no face-analysis technology: it does not use ARKit, the Apple Vision framework, Core ML, ML Kit, or any comparable API, on your device or on our servers. **We do not create, derive, store, or use a faceprint, face template, facial geometry, or face embedding**, and we never use a facial image to identify, verify, or authenticate any person. A facial image is never collected in the background, from a camera stream, or anywhere else in the Service; uploading one is entirely optional, and every other feature works without it.

Because we do not carry out the technical processing that turns a photograph into a means of identifying someone, an uploaded photograph is personal data but **not biometric data** under the PDPL, the GDPR, or US state biometric statutes. Where the image does contain the face of a real person, we nevertheless apply the extra safeguards set out in this Section and in Section 13.2. Uploads that do not depict a real person (fictional characters, animals, objects) are handled as ordinary Content data (Section 3).

7.2. Basis and notice

We process an uploaded photograph to perform the service you requested — creating the avatar you asked for — and for nothing else (Section 6). You choose each photograph yourself and upload it deliberately on the "Create avatar" screen; nothing is collected automatically. By accepting these terms and this Policy when you create your account, and by choosing to upload a photograph, you agree to the processing described in this Section. You can stop at any time: uploading is optional, and deleting the avatar or your account ends the processing.

7.3. Transfer to Third-Party AI Providers

Generating an avatar requires an external AI model. Your uploaded photograph is transmitted over TLS to the AI inference providers we use for this feature — currently **KIE (kie.ai)**, **WaveSpeed (wavespeed.ai)**, and **fal.ai** — solely to generate the avatar and the images or videos you request with it. These providers act as our processors and are located outside the UAE and outside the EU, including in the United States (see Section 9). The current list is maintained at <https://bunsy.io/sub-processors>, where every provider that may receive a photograph of a face is flagged as such.

We do not share facial images with advertisers, data brokers, or analytics providers. Our analytics and crash-reporting tools never receive your images.

7.4. Storage and retention

- (a) **Where.** Your uploaded photographs are stored in our object storage in the **European Union**, encrypted at rest, under randomly generated identifiers, and are served only over TLS. The related records are held in our database in the European Union.
- (b) **What for.** The photograph is stored as part of the avatar, used to generate that avatar's "character card", its "looks", and the Output you request, and is transmitted to Third-Party AI Providers for that generation. It is not used for any other purpose.
- (c) **How long.** The photograph is retained for as long as the avatar exists in your account, and no longer.
- (d) **Removing an avatar.** You may remove an individual avatar at any time from the avatar list in the app. Removal withdraws the avatar from your library and from any further generation. Its source photographs are erased from our database and our storage when you delete your account, or at any time on request to privacy@bunsy.io.
- (e) **Deleting your account.** Deleting your account in the app (Settings → Delete account) erases all of your avatars and their source photographs from our database and our storage after a **7-day** grace period, during which you can restore the account by logging in. After that period the deletion is permanent and irreversible.
- (f) **Third-Party Provider retention.** Once transmitted, a provider may temporarily retain your facial image under its own terms. We select, where available, provider modes with zero or minimal

retention and no model training, and require deletion by contract where feasible; however, we cannot fully control provider-side retention. Provider practices and links are on the sub-processor page (Section 16).

7.5. Erasure, sale, and your responsibilities

7.5.1. You may stop this processing and request erasure of your uploaded photographs at any time, in the app or via privacy@bunsy.io.

7.5.2. **We never sell, lease, trade, or otherwise profit from photographs you upload**, and we never use them for advertising, profiling, or to train our own or any third party's models.

7.5.3. Where your upload contains a real person's face, you must be that person or have their lawful authority and explicit consent. You give us that assurance under Section 5.3 of the Terms.

7.5.4. **US state biometric laws.** Illinois BIPA, Texas CUBI, Washington's My Health My Data Act and comparable statutes regulate biometric identifiers — scans of face geometry and similar templates — and expressly exclude photographs as such. **We do not collect, capture, generate, or store any biometric identifier**, so those obligations are not triggered. Should that ever change, we will obtain the written release those laws require before doing so. We do not sell, lease, or trade any facial data in any form.

8. Sharing and Disclosure

We share personal data with: Third-Party AI Providers (to generate Outputs); cloud hosting/infrastructure providers; analytics and crash-reporting providers; push-notification providers; payment processors and app stores; and legal/regulatory authorities where required by law. **We do not sell your personal data.** Named providers are listed in Section 16.

9. Cross-Border Transfers

9.1. Our own application servers, databases, and object storage are located in the **European Union**. Because the Service additionally relies on Third-Party AI Providers, support, analytics, and push infrastructure that may be located outside the UAE and outside the EU, your personal data (including prompts, uploads, and facial images where applicable) may be transferred to and processed in other countries, including the United States.

9.2. We rely on: (a) contractual necessity — transfers necessary to provide the Service you request, including sending an uploaded photograph to the AI provider that generates your avatar (Section 7.3); (b) your explicit consent, where the law requires it; and (c) appropriate safeguards — where feasible, data processing agreements incorporating standard contractual clauses or equivalent.

9.3. Data-protection standards in other jurisdictions may differ from those in the UAE. You acknowledge and, where required, consent to these transfers as a condition of using generation features.

10. Retention

We retain personal data only as long as necessary:

- **Account data** — for the life of your account, then permanently deleted within **7 days** of your deletion request (self-service in-App, or via support). Deletion is automated: once the 7-day grace period lapses, a scheduled process physically deletes the account and cascading content; billing/ledger rows are detached (not deleted) for accounting and tax-retention purposes. During the 7-day window you may cancel the deletion and restore your account.
- **Guest data** — until the guest session is superseded, the app is uninstalled/cleared, or after **30 days** of inactivity (guest sessions are purged by an automated daily job once their refresh token expires — this figure reflects actual system behavior).
- **Billing records** — for the period required by UAE tax/commercial law (typically **5 years**).
- **Prompts / uploads / generated content** — while your account is active and the content exists in your account; deleted content is purged within **30 days**, subject to backups.
- **Support / moderation records** — **24 months**, or longer where needed to handle disputes or meet legal obligations.
- **Facial images** — as described in Section 7.4.

On account deletion, we delete or anonymize personal data where not legally required to retain it. Deletion covers both the database records and the underlying files in our object storage.

11. Your Rights (PDPL and, where applicable, other laws)

Subject to applicable law, you may access, correct, delete, restrict or stop certain processing, object to certain processing, request portability where applicable, and withdraw consent at any time.

Withdrawing consent is as easy as giving it. Contact privacy@bunsy.io; we respond within **30 days** (or the shorter period required by law). You may also lodge a complaint with the competent UAE data protection authority, and, where applicable, with your local data protection authority.

12. Cookies, SDKs, and Similar Technologies

12.1. The Service (including the website) may use cookies, SDKs, analytics, and device identifiers to authenticate you, remember preferences, and measure usage.

12.2. **Website consent.** On our website, where required by the EU ePrivacy Directive / GDPR or similar laws, we present a cookie-consent banner and set non-essential cookies (e.g., analytics, marketing) only after you consent. You can change your choices at any time via the cookie settings link.

12.3. You can also control device-level identifiers and tracking through your browser/device settings; disabling them may affect functionality.

13. Security

13.1. We apply technical and organizational measures including encryption of data in transit and at rest, access controls and authentication, monitoring, and contractual data-protection obligations on sub-processors. Our servers, databases, and object storage are hosted in the European Union.

13.2. Facial images are subject to enhanced measures: storage under randomly generated, non-enumerable identifiers with restricted and logged access, encryption at rest and during transmission to Third-Party Providers, and the deletion protocols in Section 7.4.

13.3. No method of transmission or storage is completely secure; we cannot guarantee absolute security.

13.4. **Breach notification.** In the event of a personal data breach likely to result in a risk to your rights, we will notify the competent UAE authority without undue delay and, where required, notify you, describing the nature of the breach, likely consequences, and mitigation measures.

14. Children

The Service is intended for users 18 and older (or the higher age of majority in your jurisdiction) and is not directed at children. We do not knowingly collect data from anyone below that age. If we learn we have done so without proper consent, we will delete it.

15. Automated Processing

We may use automated processing for content ranking (feed), recommendations, and moderation. Where such processing produces legal or similarly significant effects, you may contact us per Section 11 to request human review, where applicable law provides that right.

16. Third-Party AI Providers and Sub-Processors

16.1. Your prompts, uploads (including facial images where applicable), and related metadata are sent to external providers to deliver the Service. The specific provider depends on the feature and model you select.

16.2. We use a number of sub-processors and third-party recipients across categories including AI model / generation providers, analytics and crash reporting, push notifications, payments, authentication/identity, and social sharing. Rather than reproduce that list here, the authoritative, maintained list of current vendors (with links to their policies) is kept on our public sub-processor page at <https://bunsy.io/sub-processors> . Many of these providers are located outside the UAE (including the US and EU), which involves cross-border transfers (Section 9).

16.3. Depending on the integration, such providers act as our processors/sub-processors or as independent controllers under their own privacy policies. Links to independent-controller providers' policies are on the sub-processor page.

16.4. Such processing may occur outside the UAE (see Section 9). We update the sub-processor page when providers change; material changes are notified as described in Section 17.

17. Changes to this Policy

We may update this Policy; we will post the updated version, update the "Last updated" date, and, where required, notify you and/or obtain renewed consent.

18. Contact and Complaints

QUICK AI SOFTWARE SOLUTIONS HUB - FZCO, IFZA Business Park, DDP, PO Box 342001, Dubai, UAE. Privacy requests and complaints: **privacy@bunsy.io**.