

# Privacy Policy

## Introduction

We highly value user privacy and the protection of personal information. We treat such information with diligence and care. When you use our services, we collect, use, store, process, and protect your personal information in accordance with the principles of legality, legitimacy, necessity, and good faith.

Through this Privacy Policy ( “ Policy ” ), we explain how we collect, use, store, share, transfer, and disclose your personal information when you use our products and services, and what rights you have regarding your personal information.

Important Notice: Before using our products and services, please read and fully understand this Policy, especially the provisions related to sensitive personal information, facial data, third-party services, protection of minors, and user rights. If you do not agree with this Policy, please stop using the service immediately. By using or continuing to use our services, you acknowledge that you have read and agreed to this Privacy Policy.

This Privacy Policy helps you understand the following:

### **1.Facial Information and AI Processing**

### **2.How We Collect and Use Personal Information**

### **3.How We Use Cookies or Similar Technologies**

### **4.How We Share, Transfer, and Disclose Personal Information**

### **5.How We Store and Protect Personal Information**

### **6.How You Manage Your Personal Information**

### **7.Third-Party Services**

### **8.Protection of Minors**

### **9.Updates and Revisions to This Privacy Policy**

#### 1. Facial Information and AI Processing

##### 1.1 What facial-related information we process

When you use face swap, image processing, video processing, background removal, beauty effects, special effects, or other AI-based features, we may process photos or videos that you upload and the facial information contained in them, including but not limited to:

- Photos, images, or videos uploaded by you
- Facial image information contained in those images or videos
- Facial key points, facial contours, feature vectors, or other facial analysis data required to perform face swap, effects generation, and similar AI processing
- Basic information required to generate processing results

This information is used only to provide the AI features you choose to use. It is not used to identify your real identity, build facial recognition databases, conduct targeted advertising, or create user profiles.

## 1.2 Purpose of processing such information

We process uploaded photos, videos, and facial information mainly for the following purposes:

- To provide AI functions such as face swap, image editing, video editing, effects generation, background removal, and beauty effects
- To improve processing quality, stability, and generation speed
- To perform troubleshooting, security protection, and service optimization
- To comply with applicable laws and regulations

## 1.3 How this information is processed

When you use AI features, the general process is as follows:

You upload photos, images, or videos

The system analyzes the content to extract facial key points or other necessary processing data

The data may be securely transmitted to our servers and/or third-party AI service providers for processing

After processing is completed, the result is returned and displayed in the app

## 1.4 What data may be sent to third-party AI services

When you use AI features, the following data may be transmitted:

- Photos, images, or videos uploaded by you
- Facial image information contained in them
- Facial analysis information required to perform face swap, effects generation, or other AI processing
- Technical information such as device parameters or request logs necessary to maintain service security

#### 1.5 Who the data may be sent to

To provide AI processing services, we may transmit relevant data to the following third-party AI service providers:

- Volcengine
- Alibaba Cloud
- Baidu AI Cloud, operated by Baidu Online Network Technology

These providers process data only to the extent necessary to provide the requested AI features and are not permitted to use such data for unrelated purposes. We require them to maintain security protections equivalent to those described in this Privacy Policy.

#### 1.6 User consent

Before you use any feature that requires transmitting photos, videos, or facial information to third-party AI service providers, we will inform you through pop-ups or similar notices about:

- What data will be transmitted
- Who the data will be sent to
- The purpose of processing
- Whether you agree to proceed

We will only transmit the data after obtaining your consent.

#### 1.7 Data storage and deletion

We follow the principle of data minimization. Photos, videos, and facial data uploaded for AI processing are not stored for long-term use and will be deleted or anonymized within a reasonable period after processing is completed, unless required by law or necessary for security purposes.

## 2. How We Collect and Use Personal Information

We collect personal information mainly to provide, maintain, and improve our services.

Information you provide

This may include:

- Photos, images, or videos uploaded by you
- Information submitted when contacting support
- Purchase and order information for in-app purchases
- Information related to device permissions

Information collected during service use

This may include:

- Device information (device model, OS version, app version, language, network status)
- Usage logs and crash data
- Purchase and subscription information
- Uploaded content and processing results
- Search records and related logs

### 3. How We Use Cookies or Similar Technologies

To ensure normal operation and improve user experience, we may use SDKs, local storage, and similar technologies to store necessary information, including:

- Remembering user preferences
- Ensuring the normal operation of purchases and subscriptions
- Analyzing service performance
- Maintaining service security

### 4. Sharing, Transfer, and Disclosure of Personal Information

We will not share your personal information with third parties without your consent, except in the following situations:

- To provide AI processing services
- To provide payment, analytics, or technical support services
- As required by law or regulatory authorities

### 5. Storage and Protection of Personal Information

We store personal information only for the time necessary to fulfill the purposes described in this Policy.

Security measures include:

- Encryption transmission
- Access control
- Data classification management
- Security audits and monitoring

## 6. Managing Your Personal Information

You have the right to:

- Access personal information
- Correct personal information
- Delete personal information
- Withdraw consent
- Stop using the service
- Submit complaints

You may manage permissions such as camera, photos, microphone, and notifications through your device settings.

## 7. Third-Party Services

We may integrate third-party services such as:

- AI service providers
- Payment services
- Cloud infrastructure providers
- Analytics and crash reporting services

These services are governed by their own privacy policies.

## 8. Protection of Minors

If you are a minor, please read this Privacy Policy with your guardian before using our services. Guardians should supervise minors' use of the app.

## 9. Updates to This Privacy Policy

We may update this Policy based on product changes or legal requirements. If major changes occur, we will notify users through in-app notices or announcements.

## 10. Contact Us

If you have any questions about this Privacy Policy, or wish to exercise the rights described in Section 6, you can reach us at:

Email: [digitalavatarservice@outlook.com](mailto:digitalavatarservice@outlook.com)

We will respond within 15 working days after we have verified your identity.