

PRIVACY POLICY

Last Updated: October 16, 2025

1. INTRODUCTION

This Privacy Policy describes how Pluto E-commerce & Marketing Inc, a Delaware corporation ("Company," "we," "us," or "our"), collects, uses, discloses, and protects your personal information when you interact with our website located at <https://ois.gold> (the "Site"), use our AI-powered image generation software (the "Software"), and access our services (collectively, the "Services").

By using the Site, Software, or Services, you acknowledge that you have read and understood this Privacy Policy and consent to the collection, use, and disclosure of your personal information as described herein.

Contact Information:

Pluto E-commerce & Marketing Inc
30 N Gould St Ste R, Sheridan, Wyoming 82801
Email: hello@ois.gold

2. INFORMATION WE COLLECT

2.1 Information You Provide Directly

When you create an account, make a purchase, or interact with our Services, we collect:

Account Registration Information:

- Email address
- Password (encrypted and not viewable by our personnel)
- Full name (first and last name)
- Country of residence
- Optional: Phone number (for two-factor authentication)

Third-Party Account Information:

If you choose to register or sign in using a third-party service (Google, Facebook, Apple, etc.), we may receive:

- Your name
- Email address

- Profile picture
- Unique identifier from the third-party service

Note: We do NOT collect or store passwords used for third-party service logins.

Payment Information:

- Credit card type and last four digits (for your records)
- Billing address and zip/postal code
- Country
- Payment currency and amount
- Payment date and time
- Transaction ID
- Applicable taxes

Important: Full credit card numbers, CVV codes, and expiration dates are NOT stored on our servers. All payment processing is handled by certified third-party payment processors (Stripe, PayPal) using industry-standard encryption.

Customer Support Information:

- Support ticket details
- Email correspondence
- Any information you provide when seeking assistance

2.2 Content You Upload or Create

Input Content:

When you use our Services, you may upload or input:

- Images for AI processing
- Text prompts for image generation
- Style references and parameters
- Project files and saved presets

Generated Content:

The Service creates AI-generated images based on your inputs. This content is associated with your account.

Storage and Processing:

- Content may be temporarily or permanently stored on our secure cloud servers (AWS/Azure)

- Content uploaded for processing may be retained to provide ongoing service features
- You can request deletion of your content at any time by contacting hello@ois.gold

2.3 Automatically Collected Information

Usage Data:

We automatically collect information about how you use the Services:

- Pages visited and features used
- Time spent on different sections
- Date and time of access
- Frequency of use
- Click patterns and interaction data
- Feature adoption and usage statistics

Device Information:

- IP address
- Browser type and version
- Operating system and version
- Device type (desktop, mobile, tablet)
- Screen resolution
- Language preferences
- Time zone settings

Log Information:

Our servers automatically record:

- API requests and responses
- Error logs and crash reports
- Performance metrics
- Critical operation paths
- Software version information

Note: Log information is used to improve the Services and is NOT used to identify individual users.

Cookies and Similar Technologies:

We use cookies, web beacons, and similar tracking technologies. Please see our Cookie Policy for detailed information.

2.4 Mobile Application Permissions (iOS/Android)

If you use our mobile application, we may request the following permissions:

Photo Library Access:

To allow you to upload images for editing and save generated images to your device.

Camera Access:

To enable taking photos directly within the app for immediate processing (optional feature).

Notifications:

To send you alerts about completed image generation, account updates, and service announcements (you can disable these in your device settings).

Storage Access:

To save exported images and cache data for offline functionality.

Device Identifiers:

- **IDFA (iOS) / Advertising ID (Android):** Used for analytics and advertising attribution (you can opt-out via device settings)
- **Device ID:** Used to associate your account with your device and prevent unauthorized access

3. HOW WE USE YOUR INFORMATION

We use your personal information for the following purposes:

3.1 Provide and Maintain Services

- Create and manage your user account
- Process payments and maintain billing records
- Generate AI images based on your inputs
- Store and retrieve your projects and content
- Provide customer support and respond to inquiries
- Authenticate your identity and prevent unauthorized access
- Enable account recovery and password reset functions

3.2 Improve and Develop Services

- Analyze usage patterns to improve user experience
- Develop new features and enhance existing functionality
- Conduct research and development for AI model improvements
- Perform quality assurance and testing

- Monitor and analyze performance metrics
- Identify and fix bugs and technical issues

3.3 AI Model Training and Improvement

Content Analysis:

With your consent (which you can withdraw at any time), we may analyze your Input Content and Generated Content to:

- Train and improve our AI models
- Enhance generation quality and accuracy
- Develop new AI capabilities and features
- Improve content filtering and safety mechanisms

Privacy Protections:

- Content is aggregated and anonymized before being used for training
- We do not use your content to recreate your specific images
- Analysis does not lead to identifying your personal information
- Manual review (when necessary) is conducted by personnel subject to strict confidentiality requirements

Opt-Out:

You can opt-out of content analysis for model training at any time in your account settings. Opting out does NOT affect your ability to use the Services.

3.4 Communications

- Send transactional emails (account confirmations, password resets, payment receipts)
- Provide customer support and technical assistance
- Send service announcements and critical updates
- Notify you of important changes to our Terms or Privacy Policy
- With your consent, send marketing communications about new features, promotions, and updates (you can opt-out at any time)

3.5 Security and Compliance

- Detect, prevent, and respond to fraud, abuse, and security incidents
- Enforce our Terms of Use and other policies
- Comply with legal obligations and regulatory requirements
- Respond to law enforcement requests and legal processes
- Protect our rights, property, and the safety of our users

3.6 Analytics and Marketing

- Understand user demographics and preferences
- Measure the effectiveness of our marketing campaigns
- Display targeted advertisements on third-party platforms
- Conduct A/B testing and user research
- Generate aggregated statistics and reports (which do not identify individuals)

4. LEGAL BASIS FOR PROCESSING (GDPR/CCPA)

We process your personal information based on the following legal grounds:

Contract Performance:

Processing is necessary to provide the Services you have requested and fulfill our contractual obligations.

Consent:

You have given explicit consent for specific processing activities (e.g., marketing communications, content analysis for AI training).

Legitimate Interests:

Processing is necessary for our legitimate business interests, including:

- Improving and developing our Services
- Ensuring security and preventing fraud
- Analyzing usage to enhance user experience
- Conducting research and development

Legal Obligations:

Processing is required to comply with applicable laws and regulations.

5. HOW WE SHARE YOUR INFORMATION

We do NOT sell your personal information to third parties. We may share your information in the following circumstances:

5.1 Service Providers

We engage trusted third-party companies to perform functions on our behalf, including:

Payment Processing:

- Stripe (credit card processing)

- PayPal (alternative payment methods)

Cloud Infrastructure:

- Amazon Web Services (AWS) - Cloud storage and computing
- Microsoft Azure - Backup and redundancy

Analytics and Monitoring:

- Google Analytics - Website traffic analysis
- Mixpanel - User behavior analytics
- Amplitude - Product analytics

Marketing and Advertising:

- Google Ads - Advertising campaigns
- Facebook Pixel - Advertising attribution
- TikTok Pixel - Advertising attribution
- Twitter Ads - Advertising campaigns

Customer Support:

- Zendesk / Intercom - Support ticketing system
- Freshdesk - Help desk management

Email Communications:

- SendGrid / Mailchimp - Transactional and marketing emails

Identity Verification (if applicable):

- Infobip / Twilio - SMS verification services (phone numbers are deleted after verification)

Note: These service providers are contractually obligated to:

- Use your information only for the specific services they provide to us
- Implement appropriate security measures
- Comply with applicable privacy laws
- Not disclose your information to third parties without authorization

5.2 Business Transfers

If we are involved in a merger, acquisition, bankruptcy, or sale of all or a portion of our assets, your information may be transferred as part of that transaction.

We will notify you via email and/or prominent notice on our Site before your information is transferred and becomes subject to a different privacy policy.

5.3 Legal Requirements and Protection of Rights

We may disclose your information when required by law or when we believe in good faith that disclosure is necessary to:

- Comply with legal obligations, court orders, or legal processes
- Respond to lawful requests from law enforcement or government authorities
- Enforce our Terms of Use and other agreements
- Protect the rights, property, or safety of the Company, our users, or the public
- Detect, prevent, or investigate fraud, security breaches, or illegal activities

5.4 With Your Consent

We may share your information with third parties when you explicitly consent to such sharing, such as when you:

- Participate in promotions or contests sponsored by third parties
- Choose to connect third-party applications to your account
- Share your generated content publicly (e.g., on social media via share features)

5.5 Aggregated and Anonymized Data

We may share aggregated, anonymized data that does not identify you personally with:

- Business partners for research and analysis
- Investors and stakeholders for reporting purposes
- The public through blog posts, reports, or presentations

6. DATA SECURITY AND RETENTION

6.1 Security Measures

We implement industry-standard security measures to protect your personal information:

Technical Safeguards:

- SSL/TLS encryption (HTTPS) for all data transmission
- Encryption at rest for stored data
- Secure authentication mechanisms (password hashing, two-factor authentication)
- Regular security audits and vulnerability assessments
- Firewall protection and intrusion detection systems
- Access controls and authentication protocols

Organizational Safeguards:

- Limited access to personal information (only authorized personnel)
- Employee training on data protection and privacy
- Confidentiality agreements with employees and contractors
- Regular security policy reviews and updates

Infrastructure Security:

- Secure data centers with physical access controls
- Regular backups and disaster recovery procedures
- Network segmentation and isolation
- Continuous monitoring for suspicious activity

Important Disclaimer:

While we strive to protect your personal information, no data transmission over the internet or electronic storage system can be guaranteed to be 100% secure. You transmit information to us at your own risk. If you have reason to believe that your interaction with us is no longer secure, please notify us immediately at [security@yourcompany.com].

6.2 Data Retention

We retain your personal information for as long as necessary to fulfill the purposes outlined in this Privacy Policy, unless a longer retention period is required or permitted by law.

Account Information:

Retained as long as your account is active, plus a reasonable period thereafter for backup and legal compliance purposes.

Payment Information:

Retained for the duration required by tax, accounting, and legal requirements (typically 7 years).

Content (Input and Generated Images):

- Active users: Retained for the duration of your subscription or account activity
- Deleted content: Removed from active systems within 30 days; may remain in backups for up to 90 days
- Archived content: May be retained in anonymized form for AI model improvement (if you have not opted out)

Usage Data and Logs:

Retained for up to 2 years for analytics, security monitoring, and service improvement purposes.

Marketing Communications:

Retained until you unsubscribe or request deletion.

Account Deletion:

When you delete your account:

- Your personal information is removed from active systems within 30 days
- Backups may retain data for up to 90 days
- Certain information may be retained as required by law (e.g., transaction records for tax purposes)
- Anonymized data may be retained indefinitely for research and analytics

To request deletion of your account and data, email hello@ois.gold].

7. YOUR PRIVACY RIGHTS

Depending on your location, you may have certain rights regarding your personal information.

7.1 General Rights (All Users)

Access and Portability:

You can request a copy of the personal information we hold about you in a structured, commonly used, machine-readable format.

Correction:

You can update or correct your personal information through your account settings or by contacting us.

Deletion:

You can request deletion of your personal information, subject to legal retention requirements.

Opt-Out of Marketing:

You can unsubscribe from marketing emails using the link in any marketing message or by updating your preferences in your account settings.

Opt-Out of Content Analysis:

You can disable content analysis for AI training purposes in your account settings.

7.2 California Residents (CCPA/CPRA Rights)

If you are a California resident, you have the following rights under the California Consumer Privacy Act (CCPA) and California Privacy Rights Act (CPRA):

Right to Know:

You can request information about the categories and specific pieces of personal information we have collected, the sources, purposes, and third parties with whom we share it.

Right to Delete:

You can request deletion of your personal information, subject to certain exceptions.

Right to Opt-Out of Sale/Sharing:

We do NOT sell your personal information. However, certain data sharing for targeted advertising may be considered "sharing" under CCPA. You can opt-out of such sharing by:

- Disabling cookies via our Cookie Settings
- Using the "Do Not Sell or Share My Personal Information" link on our website
- Contacting us at [privacy@yourcompany.com]

Right to Correct:

You can request correction of inaccurate personal information.

Right to Limit Use of Sensitive Personal Information:

If we collect sensitive personal information (as defined by CPRA), you can limit our use of such information.

Right to Non-Discrimination:

We will not discriminate against you for exercising your CCPA/CPRA rights.

Authorized Agents:

You may designate an authorized agent to make requests on your behalf. The agent must provide proof of authorization.

Verification:

To protect your privacy, we will verify your identity before fulfilling requests by asking for information that matches records in our systems.

How to Exercise Your Rights:

Email: [privacy@yourcompany.com]

Subject: "California Privacy Rights Request"

Include: Your name, email address, and specific request

We will respond within 45 days (extendable by 45 days if necessary).

7.3 European Economic Area (EEA) Residents (GDPR Rights)

If you are located in the EEA, United Kingdom, or Switzerland, you have the following rights under the General Data Protection Regulation (GDPR):

Right of Access:

You can request confirmation of whether we process your personal data and access to such data.

Right to Rectification:

You can request correction of inaccurate or incomplete personal data.

Right to Erasure ("Right to Be Forgotten"):

You can request deletion of your personal data in certain circumstances.

Right to Restrict Processing:

You can request restriction of processing in certain circumstances (e.g., while we verify the accuracy of data).

Right to Data Portability:

You can receive your personal data in a structured, machine-readable format and transmit it to another controller.

Right to Object:

You can object to processing based on legitimate interests, direct marketing, or processing for research/statistical purposes.

Right to Withdraw Consent:

Where processing is based on consent, you can withdraw consent at any time

without affecting the lawfulness of processing based on consent before withdrawal.

Right to Lodge a Complaint:

You can lodge a complaint with a supervisory authority in your country if you believe we have violated your privacy rights.

Data Controller:

Pluto E-commerce & Marketing Inc is the data controller for your personal information.

Data Protection Officer:

Email: hello@ois.gold

International Data Transfers:

Your personal data may be transferred to and processed in the United States. We use Standard Contractual Clauses approved by the European Commission to ensure adequate protection.

How to Exercise Your Rights:

Email: hello@ois.gold

Subject: "GDPR Rights Request"

We will respond within 30 days.

7.4 Other Jurisdictions

If you are located in other jurisdictions with privacy laws (e.g., Virginia VCDPA, Colorado CPA, Connecticut CTDPA, Utah UCPA), you may have similar rights. Contact us at hello@ois.gold to exercise your rights.

8. INTERNATIONAL DATA TRANSFERS

8.1 Cross-Border Transfers

Our primary data processing location is the United States. If you access our Services from outside the United States, your information may be transferred to, stored in, and processed in the United States or other countries where we or our service providers operate.

The data protection laws in the United States and other countries may differ from those in your country of residence. By using our Services, you acknowledge and consent to the transfer of your information to the United States and other countries.

8.2 Safeguards for International Transfers

We implement appropriate safeguards to protect your personal information when it is transferred internationally:

Standard Contractual Clauses (SCCs):

For transfers from the EEA/UK to the U.S., we use Standard Contractual Clauses approved by the European Commission.

Adequacy Decisions:

Where applicable, we rely on adequacy decisions by relevant authorities recognizing certain countries as providing adequate data protection.

Other Transfer Mechanisms:

We may use other legally recognized transfer mechanisms as appropriate (e.g., binding corporate rules, consent).

8.3 Data Processing Locations

Your personal information may be processed in the following locations:

- **United States:** Primary data center (AWS Oregon region)
- **European Union:** Backup and redundancy (AWS Frankfurt region) - for EEA users
- **Other Locations:** As necessary for global service delivery and content delivery networks (CDNs)

9. CHILDREN'S PRIVACY

Our Services are NOT directed to individuals under the age of 18 (or the age of majority in their jurisdiction). We do not knowingly collect personal information from children.

Age Verification:

By using our Services, you represent that you are at least 18 years of age.

COPPA Compliance:

We comply with the Children's Online Privacy Protection Act (COPPA) and do not collect information from children under 13.

Content Depicting Minors:

Do not upload images depicting individuals under 18 without proper consent and authorization. Such content may be removed and your account may be suspended.

10. THIRD-PARTY LINKS AND SERVICES

Our Site and Services may contain links to third-party websites, applications, or services that are not operated or controlled by us.

No Control or Responsibility:

We have no control over and assume no responsibility for the content, privacy policies, or practices of any third-party websites or services.

Third-Party Privacy Policies:

We encourage you to review the privacy policies of any third-party websites or services you visit or use.

Third-Party Integrations:

If you connect your account to third-party services (e.g., social media platforms, cloud storage), those third parties may collect information about you according to their own privacy policies. We are not responsible for their data practices.

11. DO NOT TRACK SIGNALS

Some web browsers have a "Do Not Track" (DNT) feature that signals to websites you visit that you do not want to have your online activity tracked.

Currently, there is no industry standard for how to respond to DNT signals. As such, we do not currently respond to DNT signals. If a standard for responding to DNT signals is established, we will reassess our policy.

You can control tracking through cookie settings and opt-out mechanisms described in our Cookie Policy.

12. CHANGES TO THIS PRIVACY POLICY

We may update this Privacy Policy from time to time to reflect changes in our practices, technology, legal requirements, or other factors.

Notification of Changes:

When we make material changes, we will:

- Update the "Last Updated" date at the top of this Privacy Policy
- Post a prominent notice on our Site
- Send an email notification to your registered email address (for significant changes)

Your Continued Use:

Your continued use of the Services after the effective date of any changes constitutes your acceptance of the revised Privacy Policy.

Review Regularly:

We encourage you to review this Privacy Policy periodically to stay informed about how we protect your information.

13. CONTACT US

If you have questions, concerns, or requests regarding this Privacy Policy or our privacy practices, please contact us:

Pluto E-commerce & Marketing Inc
Address: 30 N Gould St Ste R, Sheridan,
Wyoming 82801

We will respond to your inquiry within a reasonable timeframe, typically within 30-45 days depending on the complexity of your request and applicable legal requirements.

ACKNOWLEDGMENT

BY USING OUR SERVICES, YOU ACKNOWLEDGE THAT YOU HAVE READ AND UNDERSTOOD THIS PRIVACY POLICY AND AGREE TO THE COLLECTION, USE, AND DISCLOSURE OF YOUR PERSONAL INFORMATION AS DESCRIBED HEREIN.

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