Privacy Policy

Date of Public Notice: November 6, 2026

Effective Date: November 13, 2026

Worldos Holdings Limited (hereinafter "the Company") is committed to protecting the personal data of users of the AI character conversation platform pogee (hereinafter "the Service"). This Privacy Policy describes how we collect, use, store, share, and protect your personal data in compliance with applicable data protection laws, including the General Data Protection Regulation (GDPR), the UK Data Protection Act 2018, the California Consumer Privacy Act (CCPA), the Children's Online Privacy Protection Act (COPPA), and other relevant legislation.

The Company provides and manages the Service based on an integrated login and data management system.

Users understand and agree that content entered during use of this Service may contain personal information or third-party information. Users should avoid submitting any unauthorized third-party sensitive personal data to this Service. The Company is not responsible for unauthorized third-party information submitted by users.

Pseudonymous data may still constitute personal data, and the Company will protect and process it in accordance with applicable laws. Pseudonymization does not mean non-identifiability. Related data may be used for AI model training and optimization of the Company or its related services.

Table of Contents

1. Collection and Use of Personal Data
2. Processing of Pseudonymized Data
3. Children's Privacy
4. Cookies and Automatic Data Collection
5. Data Retention and Deletion
6. Data Processing Partners
7. International Data Transfers
8. Data Security
9. Your Rights
10. Changes to This Policy
11. Data Protection Officer and Contact Information

Article 1. Collection and Use of Personal Data

The Company collects only the minimum personal data necessary to provide the Service. For detailed information on specific data items collected, please refer to the "Consent to Collection

and Use of Personal Data" section in our Terms of Service.

Data Retained Under Legal Obligations

Legal Basis	Data Items	Retention Period
Contract and subscription withdrawal records	Transaction/cancellation records	5 years
Payment and delivery records	Payment and supply records	5 years
Consumer complaint and dispute records	Complaint/dispute records	3 years
Advertising records	Marketing/advertising records	6 months
Access logs (where required by law)	Server access logs	3 months
Fraud prevention	Unique identifiers, misuse records	6 months from account termination

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Article 2. Processing of Pseudonymized Data

The Company processes pseudonymized data for the following purposes:

Purpose	Data Items	Retention Period
AI algorithm improvement and R&D	AI conversation data (text, images, video, voice), usage behavior data	Up to 5 years from pseudonymization
Statistical analysis	Usage behavior data	Up to 5 years from pseudonymization

Safeguards for pseudonymized data:

- Pseudonymized data and re-identification keys are stored separately
- Access to re-identification keys is restricted by technical controls
- Regular assessment of re-identification risk
- Immediate cessation of processing and deletion if an individual is re-identified

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Article 3. Children's Privacy

1. The Service is not directed at children under the age of 13, and the Company does not knowingly collect personal data from children under 13.
2. If the Company becomes aware that it has collected personal data from a child under 13, such data will be deleted promptly.

3. Users between the ages of 13 and 18 (minors) may use the Service with the consent of a parent or legal guardian.
4. Parents or legal guardians may contact us at hello@pogee.ai to request access to, correction of, or deletion of their child's personal data.

Age-Based Service Restrictions

Age Group	Service Access	Conditions
Under 13	Not available	Registration blocked
13 to under 18	General content only (adult content excluded)	Parental/guardian consent required for paid services
18 and above	Full access (including adult content)	Adult content accessible upon age verification

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Article 4. Cookies and Automatic Data Collection

The Company uses cookies and similar technologies to provide personalized services.

Data Automatically Collected

Data Items	Method	Purpose	Retention Period
Access data, usage records, Cookie ID	Collected automatically upon web access	Web analytics, service performance improvement	Up to 5 years
Advertising identifier (Ad ID)	Collected automatically upon app access	Personalized advertising and service improvement	3 months

By accepting this Privacy Policy, you consent to our use of cookies and Microsoft Clarity on our websites and mobile applications. Microsoft Clarity uses cookies and similar technologies to provide usage analytics, heatmaps, and session recordings so that we can understand how users interact with the Service and improve it. You may opt out of Microsoft Clarity analytics and session recording at any time by contacting us at hello@pogee.ai.

Managing Your Cookie Preferences

Web browsers:

- Microsoft Edge: Settings →Privacy, Search, and Services →Cookies
- Chrome: Settings →Privacy and Security →Cookies and Other Site Data

Mobile devices:

- Android: Settings →Privacy →Advertising →Reset/Delete Ad ID
- iOS: Settings →Privacy & Security →Tracking

Disabling cookies may limit your access to personalized features.

Third-Party Data Sharing for Advertising

Recipient	Data Shared	Retention
Not applicable (no current advertising partners)	Ad identifier, usage records	Duration of service use or advertising contract

For inquiries about personalized advertising, contact: hello@pogee.ai

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Article 5. Data Retention and Deletion

User Data

You can delete your account by going to **Profile > About Pogee > Delete Account**.

After your account is deleted, the Company will retain your data for six months for fraud prevention purposes. After this period, the data will be irreversibly anonymized or securely deleted.

Where retention is required by law, the data will be retained in accordance with applicable legal requirements.

Deletion Procedures

- Electronic data: Deleted using methods that render recovery impossible
- Physical documents: Shredded or incinerated

Article 6. Data Processing Partners

The Company engages the following service providers to process personal data:

Partner	Processing Activity
Stripe, Inc. / Apple Inc.	Payment processing
Google Firebase (FCM)	Push notification delivery
Mixpanel, Inc.	Web/app analytics and service improvement
Google LLC	Web/app analytics and service improvement
Microsoft Corporation (Microsoft Clarity)	Usage analytics, heatmaps, session recording, and service improvement

All data processing partners are bound by contractual obligations to process data securely and in accordance with applicable data protection laws.

Third parties commissioned by the Company process personal data only within the scope of the Company's instructions and for the purposes stated in this policy, and may not use personal data for their own independent commercial purposes.

Article 7. International Data Transfers

The Company transfers personal data to the following recipients outside of your country of residence:

Recipient	Purpose	Data Items	Destination	Retention
Alibaba Cloud (Japan) Services Co., Ltd.	Core service provision (AI text computation/inference), personalized experience optimization, system security maintenance	Basic account information (avatar, nickname, account identifier), AI interaction data (chat text, voice messages, images), personalization data (AI settings, preference tags, memory data), technical data (app logs, device identifier, IP address)	Japan	Core business data: retained during account period, deleted within 30 days after cancellation. System logs: 6 months from collection date
Google Firebase (FCM)	Push notifications	Device tokens	United States	Duration of service use

Where personal data is transferred outside the EEA/UK, the Company ensures appropriate safeguards are in place, including Standard Contractual Clauses (SCCs) or equivalent mechanisms.

For cross-border transfer inquiries: hello@pogee.ai

Article 8. Data Security

The Company implements the following measures to protect personal data:

1. **Organizational measures**: Internal data governance policies, regular staff training

2. **Technical measures**: Access control systems, encryption of identifiers, security software, encrypted data transmission (TLS/SSL), access logging
3. **Physical measures**: Restricted access to server rooms and data storage facilities

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Article 9. Your Rights

Depending on your jurisdiction, you may have the following rights regarding your personal data:

- **Right of access**: Request a copy of your personal data
- **Right to rectification**: Correct inaccurate or incomplete data
- **Right to erasure** ("right to be forgotten"): Request deletion of your data
- **Right to restrict processing**: Request limitation of how your data is processed
- **Right to data portability**: Receive your data in a structured, machine-readable format
- **Right to object**: Object to processing based on legitimate interests or direct marketing
- **Right to withdraw consent**: Withdraw previously given consent at any time

How to Exercise Your Rights

- Access/Modify: Profile > Settings > Personal Information
- Account Deletion: Please contact support@pogee.ai
- Withdrawal of Consent: Please contact support@pogee.ai
- Contact us: support@pogee.ai

The Company will respond to rights requests within 30 days (or such shorter period as required by applicable law).

Article 10. Changes to This Policy

This Privacy Policy is effective from the date stated above. We may update it from time to time to reflect changes in law or our practices.

- Non-material changes: Announced 7 days in advance via in-app notice.
- Material changes: Announced 30 days in advance.
- If you do not agree to a revised policy, you may terminate your account.

Article 11. Data Protection Officer and Contact Information

Data Protection Officer

- Department: Privacy Protection Team
- Contact: hello@pogee.ai

Complaints and Inquiries

If you have concerns about how your personal data is handled, please contact our Data Protection Officer. We will respond without undue delay.

Supervisory Authorities

You may also lodge a complaint with your local data protection authority:

- **EU/EEA**: Your local supervisory authority under the GDPR
- **United Kingdom**: Information Commissioner's Office (ICO) —ico.org.uk
- **Hong Kong**: Office of the Privacy Commissioner for Personal Data —www.pcpd.org.hk
- **Taiwan**: National Development Council, Personal Data Protection Office
- **United States (California)**: California Attorney General —oag.ca.gov

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