

# LUNA BASE PRIVACY POLICY

**Effective Date:** August 1, 2025

**Last Updated:** August 1, 2025

## 1. INTRODUCTION

Luna Base Inc. ("Luna," "we," "us," or "our") is committed to protecting your privacy and handling your data responsibly. This Privacy Policy explains how we collect, use, disclose, and safeguard your personal information when you interact with the Luna AI software development platform, including our cloud-based service and downloadable developer IDE, and all related services (collectively, the "Service" or "Services").

This Privacy Policy is incorporated by reference into our Terms of Service. By accessing, downloading, installing, or using the Service, you agree to the terms of this Privacy Policy. If you do not agree, you must not use our Services. Capitalized terms not defined in this Privacy Policy have the meanings given in our Terms of Service.

Enterprise customers who have executed separate Enterprise Agreements may have modified privacy terms as explicitly stated in such agreements. Where Enterprise Agreements exist, their privacy provisions prevail only to the extent explicitly stated therein.

## 2. INFORMATION WE COLLECT

We collect and process various categories of information depending on how you interact with our Services, whether through the cloud platform, downloadable IDE, or both.

### 2.1 Information You Provide Directly

**Account and Registration Data:** When you create an Account, we collect your name, email address, username, password, company name (if applicable), billing address, phone number, subscription tier selection, and intended use declarations (commercial or non-commercial).

**Payment Information:** When you purchase subscriptions or Credits, we collect payment card information, billing addresses, and transaction history. Payment card data is processed by secure third-party payment processors; we do not store complete payment card numbers.

**Project Content and Code:** We collect all content you create, generate, publish, fork, or remix through the Service, including:

- Natural language prompts and specifications provided to AI agents
- Code generated by our multi-agent AI system
- Projects published to our community repository
- Modifications to forked or remixed projects
- Documentation, comments, and metadata
- File uploads and associated data

**Communications:** We collect information from your support requests, feedback submissions, survey responses, community forum posts, and other communications with Luna.

**Enterprise Information:** For Enterprise customers, we may collect additional organizational data, compliance certifications, authorized user lists, and custom configuration preferences.

## **2.2 Information We Collect Automatically**

### **Usage Data from Cloud Platform:**

- API call history and endpoints accessed
- Credit and Token consumption patterns
- AI agent interactions and model selections
- Project creation, publishing, and forking activities
- Feature usage and interaction timestamps
- Error logs and debugging information
- Session duration and frequency

### **Usage Data from Downloadable IDE:**

- IDE version and installation identifier
- Feature usage within the IDE environment
- AI service requests and responses
- Local project synchronization data
- Phone-home authentication verification
- Crash reports and performance metrics
- Offline/online mode transitions

### **Device and Technical Information:**

- IP addresses and approximate geographic location
- Browser type and version
- Operating system and version
- Device type and hardware specifications
- Network connection information
- Referral URLs and navigation paths

**Cookies and Tracking Technologies:** We use cookies, local storage, pixel tags, and similar technologies to maintain sessions, remember preferences, analyze usage patterns, and improve Services. For details, see Section 9.

## **2.3 Information from Third Parties**

We may receive information about you from third-party services including:

- Payment processors (transaction confirmations, fraud scores)
- Authentication providers (if using SSO)
- Partner marketplace participants (for referred users)
- Public sources (for Enterprise verification)

## **3. HOW WE USE YOUR INFORMATION**

We use collected information for the following purposes:

### **3.1 Service Delivery and Operation**

- Providing access to the cloud platform and enabling IDE functionality
- Processing AI requests through our multi-agent system
- Managing Credit allocations and Token conversions
- Executing project publishing, forking, and remixing operations
- Enforcing the Luna Platform License based on subscription status
- Synchronizing data between cloud and IDE platforms
- Providing customer support and technical assistance

### **3.2 Account and Subscription Management**

- Creating and maintaining your Account
- Processing payments and managing subscriptions
- Enforcing subscription tier limitations and benefits
- Managing the transition between subscription statuses
- Verifying eligibility and compliance with Terms of Service
- Preventing unauthorized commercial use by free tier users

### **3.3 Platform Improvement and Development**

- Training and improving our AI models (with restrictions for private projects)
- Analyzing usage patterns to optimize performance

- Developing new features and capabilities
- Conducting research on AI-assisted development
- Creating aggregated analytics and benchmarks
- Debugging and resolving technical issues

### **3.4 Security and Compliance**

- Detecting and preventing fraud, abuse, and unauthorized access
- Monitoring for violations of Terms of Service and Acceptable Use Policy
- Investigating security incidents and suspicious activities
- Complying with legal obligations and law enforcement requests
- Enforcing our rights and protecting intellectual property
- Maintaining platform integrity and availability

### **3.5 Communications**

- Sending service notifications and system alerts
- Providing subscription and billing updates
- Delivering marketing communications (with consent where required)
- Announcing new features and platform updates
- Facilitating community interactions and collaboration

## **4. HOW WE SHARE YOUR INFORMATION**

We do not sell, rent, or trade your personal information. We share information only in the following circumstances:

### **4.1 Service Providers**

We engage third-party vendors who process data on our behalf for:

- Cloud infrastructure and hosting (AWS, Google Cloud)
- Payment processing (Stripe, PayPal)
- Email and communication services
- Analytics and monitoring tools
- Customer support platforms
- Security and fraud prevention services

These providers are contractually bound to protect your data and use it only for providing services to Luna.

#### **4.2 Public Projects and Community Sharing**

Projects published as public (including all free tier projects) are visible to all Service users and may be:

- Indexed by search engines
- Forked and remixed by other users per the Luna Platform License
- Used to train and improve our AI models
- Featured in platform showcases or tutorials
- Cached or archived by third parties

Private projects (paid subscribers only) remain confidential unless you explicitly share them or your subscription lapses and projects convert to public status.

#### **4.3 Legal Compliance and Protection**

We may disclose information to:

- Respond to subpoenas, court orders, or legal process
- Cooperate with law enforcement or regulatory authorities
- Enforce our Terms of Service and other agreements
- Protect the rights, property, or safety of Luna, our users, or others
- Investigate potential violations or illegal activities

#### **4.4 Business Transfers**

In connection with any merger, acquisition, reorganization, sale of assets, or bankruptcy, your information may be transferred to successor entities or purchasers.

#### **4.5 Aggregated and Anonymized Data**

We may share aggregated or de-identified data that cannot reasonably identify you for industry research, benchmarking, or marketing purposes.

#### **4.6 With Your Consent**

We may share information for other purposes with your explicit consent.

### **5. YOUR RIGHTS AND CHOICES**

#### **5.1 Access and Portability**

You may request a copy of your personal data in a structured, machine-readable format through your Account settings or by contacting [privacy@lunabase.ai](mailto:privacy@lunabase.ai).

## **5.2 Correction and Update**

You can update most Account information directly through the Service. For other corrections, contact us at [privacy@lunabase.ai](mailto:privacy@lunabase.ai).

## **5.3 Deletion**

You may request deletion of your personal data, subject to the following limitations:

- We may retain data as required by law or legitimate business purposes
- Public projects and their forks remain available under the Luna Platform License
- Deletion requests cannot revoke licenses already granted for published code
- Aggregated or anonymized data derived from your information may be retained

## **5.4 Restriction and Objection**

You may request that we restrict processing of your data or object to certain uses. Note that restricting processing may limit Service functionality.

## **5.5 Marketing Communications**

You can opt-out of marketing emails via the unsubscribe link in messages or through Account settings. Service-related communications cannot be opted out of while maintaining an Account.

## **5.6 Cookie Preferences**

You can manage cookie preferences through your browser settings or our cookie consent tool. Disabling certain cookies may impact Service functionality.

## **5.7 California Privacy Rights (CCPA)**

California residents have additional rights including:

- Right to know categories and specific pieces of personal information collected
- Right to know purposes for collection and categories of third parties with whom we share data
- Right to request deletion (subject to exceptions)
- Right to non-discrimination for exercising privacy rights
- Right to opt-out of "sales" (though we do not sell personal information)

## **5.8 European Privacy Rights (GDPR)**

If you are in the EEA, UK, or Switzerland, you have rights under GDPR including:

- Right to access, rectification, and erasure
- Right to data portability
- Right to restrict processing

- Right to object to processing based on legitimate interests
- Right to withdraw consent (where processing is based on consent)
- Right to lodge a complaint with supervisory authorities

To exercise any rights, contact [privacy@lunabase.ai](mailto:privacy@lunabase.ai). We may verify your identity before processing requests.

## **6. INTERNATIONAL DATA TRANSFERS**

Luna operates globally with primary data processing in the United States. Your information may be transferred to and processed in countries other than your country of residence, which may have different data protection laws.

We implement appropriate safeguards for international transfers including:

- Standard Contractual Clauses approved by the European Commission
- Data Processing Agreements with sub-processors
- Technical measures including encryption and access controls
- Compliance with Privacy Shield principles (where applicable)

By using the Service, you consent to the transfer of your information to the United States and other jurisdictions where we or our service providers operate.

## **7. DATA SECURITY**

We implement technical and organizational security measures to protect your information including:

### **Technical Safeguards:**

- TLS encryption for data in transit
- Encryption at rest for sensitive data
- Multi-factor authentication options
- Regular security audits and penetration testing
- Intrusion detection and prevention systems
- Secure development practices and code reviews

### **Organizational Safeguards:**

- Role-based access controls with principle of least privilege
- Employee training on data protection
- Incident response procedures
- Vendor security assessments

- Business continuity and disaster recovery planning

#### **IDE-Specific Security:**

- Local encryption for private projects in the downloadable IDE
- Secure authentication for IDE-to-cloud synchronization
- Sandboxed execution environments
- Regular security updates and patches

While we strive to protect your data, no system is completely secure. In case of a data breach affecting your personal information, we will notify you and relevant authorities as required by law.

### **8. DATA RETENTION**

We retain personal information for as long as necessary to:

- Provide Services and maintain your Account
- Comply with legal, tax, and accounting obligations
- Resolve disputes and enforce agreements
- Maintain security and prevent fraud
- Support legitimate business interests

Specific retention periods:

- **Account Data:** Duration of account plus 90 days after closure
- **Payment Records:** 7 years for tax and accounting purposes
- **Public Projects:** Indefinitely under the Luna Platform License
- **Private Projects:** 90 days after account termination
- **Support Communications:** 3 years after resolution
- **Usage Analytics:** 2 years in identifiable form, then aggregated
- **Security Logs:** 1 year for incident investigation

After retention periods expire, we delete or anonymize personal data unless longer retention is required by law.

### **9. COOKIES AND TRACKING TECHNOLOGIES**

We use cookies and similar technologies for:

**Essential Cookies:** Required for Service functionality including authentication, security, and session management.

**Functional Cookies:** Remember preferences, settings, and choices to improve your experience.



**Analytics Cookies:** Understand usage patterns, measure performance, and identify issues.

**Marketing Cookies:** Deliver relevant advertisements and measure campaign effectiveness (with consent where required).

The downloadable IDE may use local storage for caching and performance optimization. You can manage cookie preferences through browser settings, though disabling essential cookies will prevent Service access.

## **10. CHILDREN'S PRIVACY**

The Service is not intended for individuals under 18 years of age. We do not knowingly collect personal information from children. If we discover we have collected information from a child without verified parental consent, we will promptly delete it. If you believe we have information from or about a child, contact [privacy@lunabase.ai](mailto:privacy@lunabase.ai).

## **11. AI MODEL TRAINING AND YOUR DATA**

**Public Projects:** Content from public projects (including all free tier projects) may be used to train and improve our AI models and Service. This helps enhance code generation quality and platform capabilities and outputs for all users.

**Private Projects:** Content from private projects (paid subscribers only) is excluded from AI training unless you explicitly opt-in. Enterprise Agreements may include complete opt-out provisions.

**Usage Patterns:** We analyze aggregated usage patterns across all users to improve AI agent collaboration, optimize model selection, and enhance Service performance.

**Prompts and Interactions:** Natural language prompts and AI interactions may be analyzed to improve understanding and response quality, subject to privacy settings based on project visibility.

## **12. THIRD-PARTY LINKS AND SERVICES**

The Service may contain links to third-party websites, integrations with external tools, or partner marketplace offerings. We are not responsible for the privacy practices of these third parties. Review their privacy policies before providing them with personal information.

## **13. CHANGES TO THIS PRIVACY POLICY**

We may update this Privacy Policy to reflect changes in our practices, technology, legal requirements, or business operations. When we make material changes, we will:

- Update the "Last Updated" date
- Notify you via email or prominent platform notice
- Obtain consent where required by law

Continued use of the Service after changes constitutes acceptance of the updated Privacy Policy.

## **14. DATA PROTECTION OFFICER**

For privacy inquiries or to exercise your rights, our Data Protection Officer can be reached at:

**Email:** [privacy@lunabase.ai](mailto:privacy@lunabase.ai)

**Mail:** Luna Base Inc., Data Protection Officer, 2501 North Harwood Street Suite 1900, Dallas, TX 75201-1664

## **15. SUPERVISORY AUTHORITY**

If you are in the EEA or UK and believe we have not adequately addressed your privacy concerns, you have the right to lodge a complaint with your local data protection supervisory authority.

## **16. CONTACT US**

For questions about this Privacy Policy or our privacy practices:

**Email:** [privacy@lunabase.ai](mailto:privacy@lunabase.ai)

**Legal Inquiries:** [legal@lunabase.ai](mailto:legal@lunabase.ai)

**General Support:** [support@lunabase.ai](mailto:support@lunabase.ai)

**Mail:** Luna Base Inc., Legal Department, 2501 North Harwood Street Suite 1900, Dallas, TX 75201-1664

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**BY USING THE SERVICE, YOU ACKNOWLEDGE THAT YOU HAVE READ AND UNDERSTOOD THIS PRIVACY POLICY AND AGREE TO ITS TERMS.**