

Privacy Policy — AI FanSwap

Lunexa Tech & Apps Inc.

Federally Incorporated in Canada | Ontario, Canada | lunexatech.ca | info@lunexatech.ca

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Lunexa Tech & Apps Inc. ("we," "our," or "us") is committed to protecting your privacy. This Privacy Policy explains how we collect, use, store, and delete information when you use our AI-powered face-swap photo application (AI FanSwap) available at lunexatech.ca.

Lunexa Tech & Apps Inc. is federally incorporated in Canada under the Canada Business Corporations Act (CBCA) and operates from Ontario, Canada.

1. Information We Collect

We may collect the following categories of personal information:

- **Account Information:** Your name and email address, collected when you register or purchase credits.
- **Facial Image Data (Biometric Data):** When you use our face-swap feature, you upload a photo of your own face, or a photo of a minor child for whom you have explicit parental or legal guardian authority. This constitutes biometric data and is treated with the highest level of care.
- **Payment Information:** Processed securely by our third-party payment processor. We do not store full credit card numbers or banking details on our servers.
- **Usage and Technical Data:** Device type, browser type, IP address, and general usage patterns to maintain and improve our services.
- **Essential Technical Cookies:** We use only essential session cookies required for secure payment processing and maintaining your login session. We do not use any third-party advertising or tracking cookies.

2. Cookies Policy

Our website and application use only essential technical cookies. These cookies are strictly necessary to:

- Maintain your secure login session
- Process payments securely through our payment processor
- Remember your language and display preferences

We do not use third-party advertising cookies, behavioural tracking cookies, or any cookies that share your data with advertisers. No third-party advertising networks have access to your browsing behaviour on our platform.

3. How We Use Your Information

We use the information we collect to:

- Deliver and operate our AI face-swap photo service
- Process your credit purchases and manage your account
- Communicate with you regarding updates, support, and service-related notices
- Investigate complaints or quality issues if raised within the 14-day complaint window
- Improve and personalize your experience

We do not use your facial image data to train AI models, and we do not sell your personal data to third parties.

4. Facial Image Data — Special Handling

Because facial images constitute sensitive biometric data, we apply the following strict protections:

- Your uploaded face image is used solely to generate your requested AI photo.
- Within the 30-day retention window: Backend access to uploaded images is strictly restricted to authorized technical staff solely for quality control, support ticket resolution, system processing purposes, and investigating customer complaints raised within the 14-day refund window.
- All uploaded facial images and generated photos are permanently and automatically deleted from our systems 30 days after the date of creation, with no exceptions.
- After the 30-day deletion period, no record of your image exists on our servers or backup systems.
- You may request early deletion of your data at any time by contacting us at info@lunexatech.ca.

5. Data Retention Policy

- Facial images and generated photos: Permanently deleted 30 days after creation.
- Purchased credits: Expire automatically 30 days from the date of purchase, aligned with our image deletion cycle.
- Account and transaction data: Retained for the duration of your account and up to 7 years as required by Canadian federal tax and financial recordkeeping law.
- Payment records: Retained in accordance with applicable Canadian federal financial regulations.

After the 30-day window, we no longer have access to your images and no refund or complaint investigation can be processed.

6. Third-Party Services

We use trusted third-party services to operate our platform, including payment processors and cloud infrastructure providers. These parties are contractually bound to handle your data securely and only for the purposes we specify. We do not permit third parties to use your data for their own marketing or AI training purposes.

7. Children's Privacy

Our service is intended for users who are 18 years of age or older. However, a registered adult account holder (parent or legal guardian) may use our service to create AI face-swap photos of their minor children, provided they have the legal right to do so.

We do not knowingly collect personal information directly from children under 13. Contact us immediately at info@lunexatech.ca if you believe a child has submitted information without parental consent.

8. Your Privacy Rights (PIPEDA)

As a federally incorporated Canadian company, Lunexa Tech & Apps Inc. complies with PIPEDA. You have the right to:

- Access the personal information we hold about you
- Request correction of inaccurate information
- Withdraw consent to data processing (which may affect your ability to use our services)
- Request deletion of your data, subject to legal retention obligations

Contact us at info@lunexatech.ca to exercise any of these rights.

9. Data Security

We implement industry-standard security measures including encryption in transit and at rest, access controls, and regular security reviews to protect your personal information.

10. Contact Us

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