

Effective Date: August 12th, 2024

We at shūshū Holdings, Ltd. (“**shūshū**,” “**we**,” “**us**,” or “**our**”) created this Privacy Policy (“Privacy Policy”) because we know that you care about how information you provide to us is used and shared. This Privacy Policy relates to the information collection and use practices of shūshū in connection with our App and Website.

The terms of this Privacy Policy are incorporated by reference in the Terms of Use that you accept upon registering to use the App (the “**Terms of Use**”). By accepting the Terms of Use, you accept the terms of this Privacy Policy. Capitalized terms not defined in this Privacy Policy shall have the meaning set forth in our Terms of Use.

Information We Collect

In the course of providing the App, shūshū will collect (and/or receive) the following types of information. You authorize us to collect and/or receive such information.

1. Personal Information

We do not collect any personal information from you unless you voluntarily provide it to us.

If you would like to use the App, you will have to download the App from the App Store using your App Store credentials. Such information may include your e-mail address, password, phone number, and age (to ensure compliance with legal and contractual obligations). In this

Privacy Policy, we refer to this information as **“Personal Information.”**

2. Other Information

In addition to the Personal Information, we may collect or receive additional information (collectively, the **“Other Information“**, and together with Personal Information, **“Your Information“**). Such Other Information may include:

1. **From Your Activity.** Information that we automatically collect when you use the App, including, without limitation:
 - IP address, which may consist of a static or dynamic IP address and will sometimes point to a specific identifiable computer or device; browser type and language; referring and exit pages and URLs; date and time; amount of time spent on particular pages and other performance and usage data; and
 - Information about your device, including the type of device; universally unique ID (**“UUID“**); advertising identifier (**“IDFA“**); MAC address; operating system and version (e.g., iOS, Android or Windows); carrier and country location; hardware and processor information (e.g., storage, chip speed, camera resolution, NFC enabled); network type (WiFi, 3G, 4G, LTE); and similar data
 - You may give us permission to collect your information in other services. For example, you may connect a social networking service such as Facebook to your discord account. When you do this, it allows us to obtain information from those accounts.
2. **From Cookies.** We may use both session cookies, which expire once you close your web browser, and persistent cookies, which stay on your mobile device until you delete them and other technologies to help us collect Other Information and to enhance your experience using the App. Cookies are small text files a

website can use to recognize a repeat visitor to the website. We may use cookies for various purposes, including to:

- facilitate the sign in process for the App;
- authenticate users;
- personalize your experience
- analyze which portions of the App are visited and used most frequently; and
- measure and optimize advertising and promotional effectiveness.

If you do not want us to deploy cookies in your browser, you can opt out by setting your browser to reject cookies or to notify you when a website tries to put a cookie in your browser software. If you choose to disable cookies in your browser, you can still use the App, although your ability to use some of the features may be affected.

Third-Party Analytics

We use third-party analytics services to evaluate your use of the App, compile reports on activity, collect demographic data, analyze performance metrics, and collect and evaluate other information relating to the App and mobile and Internet usage. These third parties use cookies and other technologies to help analyze and provide us the data. By accessing and using the App, you consent to the processing of data about you by these analytics providers in the manner and for the purposes set out in this Privacy Policy.

The Information Collected by or Through Third-Party Companies

You authorize us to share Personal Information or Other Information about your activity on the App with third parties for the purpose of

providing advertisements you see on the App. These third parties may use cookies, pixel tags (also called web beacons or clear gifs), and/or other technologies to collect Other Information for such purposes.

How We Use Your Information

We will use your Personal Information and Other Information for the following purposes:

- To respond to your requests and to provide you with the App;
- To respond to your inquiries and contact you about changes to the App;
- To send you notices (for example, in the form of e-mails, mailings, and the like) regarding products or services you are receiving;
- To improve the App;
- To contact you regarding other products or services we offer;
- For any other purposes disclosed at the time the information is collected or to which you consent;
- Analyzing and improving our business, e.g. collecting information about how you use our App to optimize design and placement of certain features;
- Customer service;
- To protect users, personnel and property;
- To enforce legal obligations around where content can be sold;
- With your consent as provided through the Favorite Tool (as described below), to our third party vendors; and
- As otherwise specifically described in this Privacy Policy

We may also use your information to improve our App, and may use cookies and other information to enable us to customize your user experience.

Your User Generated Content and your Username is viewable by other users of the App, including your social media contacts who are

also users of the App. We are not responsible for any user's use of such information and their use of the information is not subject to this Privacy Policy. Please take care with the information, particularly any Personal Information, which you include in your User Generated Content.

We, like many businesses, sometimes hire other companies to perform certain business-related functions. Examples include mailing information, maintaining databases, hosting services, and processing payments. When we employ another company to perform a function of this nature, we provide them with the information that they need to perform their specific function, which may include Personal Information. If we or all or substantially all of our assets are acquired, we expect that the information that we have collected, including Personal Information, would be transferred along with our other business assets.

We may disclose your information, including Personal Information, to government authorities, and to other third parties when compelled to do so by government authorities, at our discretion, or otherwise as required by law, including but not limited to in response to court orders and subpoenas. We also may disclose such information when we have reason to believe that someone is or may be causing injury to or interference with our rights or property, other users of the App, or anyone else that could be harmed by such activities.

How We Protect Your Information

We take commercially reasonable steps to protect your information from loss, misuse, and unauthorized access, disclosure, alteration, or destruction. Please understand, however, that no security system is impenetrable. We cannot guarantee the security of our databases, nor can we guarantee that the information you supply will not be intercepted while being transmitted to and from us over the Internet. In particular, e-mail sent to or from us may not be secure, and you should therefore take special care in deciding what information you send to us via e-mail.

Control of Your Information

You may update the information that is stored in your user account via the profile and settings pages on the App.

Individuals who are residents of the European Union and some other jurisdictions outside the United States have certain legal rights to obtain confirmation of whether we hold personal data about them, to access personal data we hold about them (including, in some cases, in portable form), and to obtain its correction, update, amendment or deletion in appropriate circumstances. They may also object to our uses or disclosures of personal data, to request a restriction on its processing, or withdraw any consent, though such actions typically will not have retroactive effect. They also will not affect our ability to continue processing data in lawful ways.

Some questions you may have, if these rights apply to you may include:

How can I access the personal data you have about me?

If you would like to submit a data access request, you can do so from the “Settings” page of the App, where there is a button to request your data by sending an e-mail to us. We will then start the process and provide you a link to access the personal data that we have on you within 30 days. We do have the right to ask that you confirm your identity, which may be done on a case by case basis.

How can I correct, update, amend or delete personal data you have about me?

In addition to the functionality available through the “Settings” of the App, in which you can correct, update, amend or delete certain personal data, you can also request other modifications from us directly. Please write to us at contact@onshushu.com with the words “Personal Data Request” in the subject of your messages, along with an explanation of what data subject right you are seeking to exercise. For your protection, we may take steps to verify identity before responding to your request.

How do I object or restrict the manner in which shūshū processes my personal data?

You have a right to ask us to stop using or limit our use of your personal data in certain circumstances – for example, if we have no lawful basis to keep using your data, or if you think your personal data is inaccurate.

The rights and options described above are subject to limitations and exceptions under applicable law. You may choose to unsubscribe from our emails by following the instructions in the bottom of the email. In addition to those rights, you have the right to lodge a complaint with the relevant supervisory authority. However, we encourage you to contact us first, and we will do our very best to resolve your concern.

External Links

The App may contain links to External Sites. We do not endorse such External Sites and we are not responsible for the privacy practices of such sites. Please refer to the privacy policies of those sites for more information on how the operators of those sites collect and use your Personal Information.

Important Notice to Non-U.S. Residents

Our IP partner's company, Pop Culture, Inc., is located in the United States. If you are located outside of the United States, please be aware that any Personal Information and other information that you provide to us will be transferred to the United States. By providing us with this information, you consent to this transfer.

Children

We do not knowingly collect Personal Information from children under the age of 13. If you are under 13, please do not give us any Personal Information. We encourage parents and legal guardians to monitor their children's Internet usage and to help enforce our Privacy Policy by instructing their children to never provide Personal Information through the internet without their permission. If you have reason to believe that a child under the age of 13 has provided Personal Information to us, please contact us, and we will endeavor to delete that information from our databases. For residents of the European Union, where processing of personal information is based on consent, we will not knowingly engage in that processing for users under the age of consent established by applicable data protection law.

As children's privacy is important to us at shūshū, we have incorporated special measures (described below) to help children protect their privacy while using the App:

- There may be portions of the App that children can participate in. To enable participation, the Personal Information we collect upon registration will either allow or deny users the ability to participate in features of the App.
- To participate in certain features of the App, we may ask a user to register. When users who attempt to register indicate that they are children, we restrict access to content and features that is appropriate for them. Generally, we either attempt to not collect personally

identifiable information from them or direct them to the parent's center in the App.

- Unless we obtain consent, personally identifiable information collected from Children is generally used by shūshū or shūshū's agents and contractors for internal purposes, such as providing customer services and/or for the purposes for which the information was provided. We do not share personally identifiable information with outside third parties not bound by this Policy for their own marketing purposes.
- We may share children's personally identifiable information with third parties to the extent reasonably necessary to (i) protect the security or integrity of our App; (ii) take precautions against liability, (iii) respond to judicial process or law enforcement agency request or investigation, (iv) or to the extent permitted by law or consistent with this policy or legal requirements.
- If you would like to review any personally identifiable information that we have collected through the App from your child, have this information deleted, and/or request that there be no further collection or use of your child's information, you may email us at contact@onshushu.com or write to us at Pop Culture, Inc, 25 Quarterdeck St, Marina del Rey, CA 90292.

California Privacy Rights

Under California Civil Code Section 1798.83, California residents who have an established business relationship with shūshū may choose to opt out of our sharing your Personal Information with third parties for direct marketing purposes. If you are a California resident and (1) you wish to opt out; or (2) you wish to request certain information regarding our disclosure of your Personal Information to third parties for the direct marketing purposes, please send an e-mail to contact@onshushu.com with "Privacy Policy" in the subject line or write to us at:

c/o Pop Culture, Inc.
25 Quarterdeck St.

Marina del Rey, CA 90292

USA

In addition, shūshū does not monitor, recognize, or honor any opt-out or do not track mechanisms, including general web browser “Do Not Track” settings and/or signals.

Data Retention

We generally retain personal data for so long as it may be relevant to the purposes defined herein. To dispose of personal data, we may anonymize it, delete it or take other appropriate steps. Data may persist in copies made for backup and business continuity purposes for additional time.

Communications

shūshū has the right to email its users regardless of consent in relations to tax related, product maintenance window, and mission critical communications.

Changes to This Privacy Policy

This Privacy Policy is effective as of the date stated at the top of this Privacy Policy. We may change this Privacy Policy from time to time, and will post any changes on the App as soon as they go into effect.

By accessing and using the App after we make any such changes to this Privacy Policy, you are deemed to have accepted such changes. Please refer back to this Privacy Policy on a regular basis.

How to Contact Us

If you have questions about this Privacy Policy, please e-mail us at contact@onshushu.com and write “PRIVACY POLICY” in the subject line or mail us at the following address:

c/o Pop Culture, Inc.
25 Quarterdeck St.

Marina del Rey, CA 90292

USA