



MAGGIE'S ADVENTURES UNIVERSE

Privacy Policy

Entity **Maggie's Adventures Universe Holdings Ltd (incorporated in England and Wales, 9 June 2026, Company No. 17271239)**

App **Maggie's Adventures Universe — www.maggiesadventuresuniverse.online**

Contact **hello@maggiesadventuresuniverse.com**

Effective **September 2026**

Version **1.3**

This Privacy Policy explains what personal data we collect about you and your child, why we collect it, how we use it, and your rights. Please read it before creating an account.

1. Who We Are

Maggie's Adventures Universe Holdings Ltd ("we", "us", "our") is the operator of Maggie's Adventures Universe, a family travel companion app for children aged 8–13 and their parents. We are a company limited by shares incorporated in England and Wales on 9 June 2026 (Company No. 17271239). Our registered address is Centenary House, Peninsula Park, Rydon Lane, Exeter EX2 7XE, United Kingdom.

Our approach to data protection sits within the wider MAU Family Promise, our published standard for how Maggie's Adventures Universe operates, available to everyone at <https://www.maggiesadventuresuniverse.com>. The MAU Family Promise requires us to comply with the law of England and Wales as a baseline, and with any other law genuinely triggered by our fully remote, work-from-anywhere operations — including the data protection laws described throughout this Policy.

For all privacy-related enquiries, including data access, correction, or deletion requests, please contact our Privacy Lead at hello@maggiesadventuresuniverse.com. We do not currently have a formally designated Data Protection Officer (DPO); our Privacy Lead fulfils this function and is responsible for all data protection matters. We will appoint a formal DPO if and when our processing activities require one under Article 37 of the UK/EU GDPR.

2. The Data We Collect

2.1 Parent account data

- Email address (used for account creation, verification, and service communications)
- Password (stored as a salted hash — we never store your password in plain text)
- IP address (recorded at the time of parental consent for legal audit purposes)

- Consent timestamp and consent text version (required by COPPA, UK Children's Code, and GDPR)

2.2 Child profile data

- Child's first name or chosen nickname
- Approximate age (used to tailor content — we do not ask for date of birth)
- Interests selected during onboarding (e.g. animals, history, food)
- In-app activity: stories read, quiz scores, badges earned, destinations explored

2.3 Usage and technical data

- Pages and features visited within the app
- Device type and browser type (not linked to your identity unless you are logged in)
- Error logs (captured via Sentry for the purpose of fixing bugs and improving reliability)

We do not collect: real names of children, photographs, location data, biometric data, or any data we do not need to deliver the service.

3. Why We Collect It — Legal Bases

We only process personal data where we have a lawful basis to do so. The bases we rely on are:

- Contract performance: to create and manage your account and deliver the app features you have signed up for.
- Legal obligation: to comply with COPPA (US), the UK Children's Code, GDPR (EU/UK), China's PIPL, and Australia's Children's Online Privacy Code. This includes recording verifiable parental consent before processing any child data.
- Legitimate interests: to monitor app errors and reliability via Sentry, and to send service communications about your account. We do not use legitimate interests to override your privacy rights.
- Consent: for non-essential cookies and analytics. You can withdraw this consent at any time via the cookie settings in the app.

4. How We Use the Data

- To create your parent account and verify your identity via email
- To obtain and record verifiable parental consent before creating a child profile
- To personalise your child's experience — story destinations, quiz content, and badge progression are tailored to their age and interests
- To process your subscription via Stripe and manage access to premium features
- To send transactional emails: consent verification, trial reminders, and account notifications. We do not send marketing emails without your explicit opt-in.
- To monitor and fix errors in the app using anonymised Sentry error logs
- To comply with legal obligations including responding to lawful requests from regulators

We do not use your or your child's data for advertising, profiling for commercial purposes, or any purpose not listed above.

5. Children's Data — Special Protections

We take our obligations regarding children's data extremely seriously. This section explains the specific protections we apply.

Before creating any child profile, we require verifiable parental consent via email verification. No child data is collected, stored, or processed until this consent is confirmed.

We do not allow children to create their own accounts. All accounts are created by a parent or legal guardian aged 18 or over.

We do not share, sell, or disclose children's data to third parties for commercial or advertising purposes under any circumstances.

We do not build advertising profiles of children. We do not target children with advertising within the app.

We retain child profile data only as long as the parent account remains active, plus a 30-day grace period following account deletion. If you request deletion, all child profile data is permanently erased.

We design all app features with the best interests of the child as our primary consideration. We prioritise your child's safety, wellbeing, and privacy over commercial interests at every stage of product development.

5.1 COPPA (United States)

If you are located in the United States, our collection and use of children's data under the age of 13 complies with the Children's Online Privacy Protection Act (COPPA). Verifiable parental consent is obtained via email verification before any data is collected from or about a child. Parents may review, correct, or delete their child's data at any time by contacting hello@maggiesadventuresuniverse.com.

5.2 UK Children's Code

We apply the UK ICO's Age Appropriate Design Code (Children's Code) across our service. We default to high privacy settings for child profiles, do not use nudge techniques or design patterns that encourage children to share more data than necessary, and apply a best-interests-of-the-child standard to all product decisions. A Data Protection Impact Assessment (DPIA) will be conducted before any new processing activity that is reasonably likely to affect children.

5.3 China PIPL

For users located in mainland China, children's data (under age 14) is classified as sensitive personal information under China's Personal Information Protection Law (PIPL). We obtain explicit parental consent and flag all affected accounts accordingly. Parents may exercise their rights under PIPL by contacting hello@maggiesadventuresuniverse.com.

5.4 Australia

We comply with the Australian Privacy Act 1988 and the Australian Children's Online Privacy Code. Parental consent is required before any child profile is created. In line with emerging 2026 Australian standards, we recognise the child's own developing right to request destruction of their personal data as they mature. Parents may exercise this right on behalf of their child at any time by contacting hello@maggiesadventuresuniverse.com.

6. Data Sharing

We share data only with the following categories of third-party service providers, and only to the extent necessary to deliver the service:

- Supabase (database and authentication infrastructure) — hosted in the EU
- Stripe (payment processing) — your card details are processed directly by Stripe and are never stored on our servers
- Resend (transactional email delivery) — used to send account and consent emails
- Sentry (error monitoring) — anonymised technical error logs only

We do not sell data to third parties. We do not share data with advertisers. We do not use data brokers. All third-party providers are bound by data processing agreements.

7. Data Retention

- Parent account data: retained for the duration of your account, then deleted within 30 days of account deletion

- Child profile data: retained for the duration of the parent account, then deleted within 30 days of account deletion
- Parental consent records: retained for 7 years from the date of consent (required by law)
- Stripe payment data: retained by Stripe per their own retention policy; we retain only a Stripe customer ID
- Sentry error logs: retained for 90 days then automatically deleted
- Email send logs: retained for 12 months

A 24-month inactivity clock runs on child profiles. If a child profile has had no activity for 24 months, you will receive an email notification before the profile is scheduled for deletion.

8. Your Rights

Depending on your location, you have the following rights over your personal data. To exercise any of these rights, email hello@maggiesadventuresuniverse.com. We will respond within 30 days.

- Right of access: request a copy of all personal data we hold about you and your child
- Right to rectification: ask us to correct inaccurate data
- Right to erasure: ask us to delete your account and all associated data. Available in the app via Settings → Privacy Controls.
- Right to data portability: request a machine-readable export of your data. Available in the app via Settings → Privacy Controls → Export my data.
- Right to object: object to processing based on legitimate interests
- Right to restrict processing: ask us to pause processing while a dispute is resolved
- Right to withdraw consent: withdraw cookie consent at any time via the cookie banner in the app
- Child's right to erasure: as children mature, they may request destruction of their own personal data directly. We will verify such requests and action them within 30 days.

If you are located in the UK or EU, you have the right to lodge a complaint with your local supervisory authority. In the UK, this is the Information Commissioner's Office (ico.org.uk).

9. Cookies

- Essential cookies: required for the app to function (authentication, session management). These cannot be disabled.
- Functional cookies: remember your preferences between sessions.
- Analytics cookies: help us understand how the app is used in aggregate. No personal data is shared with analytics providers. These are optional.

You can manage your cookie preferences at any time via the cookie banner displayed when you first visit the app.

10. Security

- Passwords stored as salted hashes — never in plain text
- All data in transit encrypted via TLS
- Database access controlled by Row Level Security (RLS) policies
- Payment data handled exclusively by Stripe — never stored on our servers
- Error monitoring via Sentry to detect and respond to anomalies

No system is entirely secure. If you believe your account has been compromised, contact hello@maggiesadventuresuniverse.com immediately.

11. International Data Transfers

Our infrastructure is primarily hosted in the EU (Supabase). Where data is transferred outside the UK or EU, we ensure appropriate safeguards are in place, including Standard Contractual Clauses (SCCs) approved by the European Commission and the UK ICO.

12. Changes to This Policy

We may update this Privacy Policy from time to time. Where changes are material, we will notify you by email before the changes take effect. Continued use of the app after a policy update constitutes acceptance of the revised terms.

13. Contact

Email: hello@maggiesadventuresuniverse.com

Maggie's Adventures Universe Holdings Ltd · Centenary House, Peninsula Park, Rydon Lane, Exeter EX2 7XE, United Kingdom

If you are a parent or guardian and have concerns about your child's data, please contact us directly. We take all such requests seriously and will respond within 30 days.

Approved and authorised
2 September 2026

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Nicolas F. S. Zaslavoglou
Founder • Storyteller • Adventurer
Maggie's Adventures Universe Holdings Ltd
