

# RingtoneAI | Privacy Policy

Effective as of 22 October 2024

Thank you for using our mobile application RingtoneAI, visiting our website at [ringtoneai.topmusetech.com](https://ringtoneai.topmusetech.com) and/or communicating with us via email or text or our social media accounts, if any (collectively, the “Services” ).

**TopMuse Pte Ltd** ("we or "us") is the data controller for the processing of your personal information. We are committed to protecting your privacy through our data practices described in this Privacy Policy.

This Privacy Policy describes:

- The ways we collect personal information about you and why we do so;
- How we or our Authorised Partners use your personal information;
- The choices you have about your personal information; and
- How we protect your personal information.

For the purposes of this Privacy Policy, the terms “personal information” and “personal data” are used synonymously. This Privacy Policy does not apply to our data collection activities offline or otherwise outside of the Services (unless otherwise stated below or at the time of collection).

Residents of certain U.S. states have privacy rights detailed in our [Privacy Notice to US Residents](#). To the extent that there is a conflict between this Privacy Policy and the Privacy Notice to US Residents, the latter will control.

**BY USING THE SERVICES, YOU CONSENT TO THE COLLECTION, USE AND TRANSFER OF YOUR PERSONAL DATA FOR PROCESSING AS DESCRIBED IN THIS PRIVACY POLICY.** We reserve the right to change and may periodically update this Privacy Policy prospectively effective upon the

posting of the revised Privacy Policy on our website. Where required, we endeavour to notify you of material changes to this Privacy Policy by posting a notice on RingtoneAI. Your continued use of our Services following the posting of changes to the Privacy Policy or any notification to you shall mean you accept those changes. To the extent any provision of this Privacy Policy is found by a competent tribunal to be invalid or unenforceable, such provision shall be severed to the extent necessary for the remainder to be valid and enforceable.

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# 1. Contact Us

If you have questions about how we collect, use, process or protect your personal information, or if you have any requests in respect of your personal information, we encourage you to contact us through the support features within the RingtoneAI app so we can respond more quickly. Alternatively, you may contact us:

**Name of data controller:** TopMuse Pte Ltd  
**Address:** 6 Shenton Way #37-03 OUE Downtown Singapore (068809)  
**Attn:** Data Protection Officer  
**Email:** [airingtone099@gmail.com](mailto:airingtone099@gmail.com)

We will respond to your requests in accordance with applicable laws and may take additional steps to verify your identity before fulfilling your request. These steps may include verifying your account details. You may also designate an authorized agent to act on your behalf but we reserve the right to verify the agent's identity and authority, and may deny any requests in appropriate circumstances.

We endeavour to respond to all requests in a timely manner. For more complex requests, we may charge a fee for processing your request. We will inform you of such fees before proceeding with your request. If you have any unresolved concerns about your privacy rights or personal data protection that we could not address adequately, you may contact your local privacy and personal data protection authority for further assistance.

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# 2. Collection of Personal Information

(I) Information you provide when you create or update your account

Category	Description

<b>User Data</b>	<p>You do not need to provide any personal identifiers (such as name or phone number) to start using RingtoneAI.</p> <p>When you use RingtoneAI, we will collect information such as your country, device language settings and subscription status in order to enable you to use the features. We collect some of this data from your device. For more information about how we collect and use this data, see ‘Your general (non-precise) location’ in the Usage Data category.</p> <p>When you send us feedback or request, we may collect your name and email address etc as well as the contents of those feedback or requests.</p>
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## (II) Information We Get When You Use Our Services

When you use our Services, we may automatically collect information about you and how you use our Services. We only use pseudonymized or anonymised data that have gone through a privacy-enhancement process to protect and improve the functionalities of the Services.

Category	Description
<b>User Content</b>	<p>All information, text, audio/sounds or any other materials whatsoever, whether input, entered, uploaded, transmitted or used by you in conjunction with RingtoneAI (collectively “Submitted Content” ) are collected by us.</p> <p>The outputs generated using your Submitted Content ("Output") are also collected by us.</p> <p>We may process your Submitted Content and Output for purposes of enabling you to use the mobile app, monitoring for and preventing abusive or harmful use of our Services or for analytics purposes.</p>
<b>Usage Data</b>	<p>These are personal information collected and processed when you’ re accessing or using the Services. They include:</p> <p><b>Information about how you use RingtoneAI.</b> They include information about your activities using the Services (including date and time), such as:</p> <ul style="list-style-type: none"> <li>• account settings</li> <li>• interactions with the Services and their features</li> </ul> <p><b>Your technical data.</b> They include:</p>

- online identifiers such as IP addresses
- information about the devices you use such as:
  - device type and IDs
  - network connection type (e.g. wifi, 4G, LTE, Bluetooth)
  - provider
  - network and device performance
  - language
  - operating system
  - RingtoneAI application version

**Your general (non-precise) location.** They include country, region, state or timezone. We may learn about this from technical data (e.g. network type, language setting of your device). We need this for:

- Load and network balancing
- Security services

**Optional data you may choose to share with us**

Category	Description
<b>Survey and User Research Data</b>	When you respond to a survey or take part in user research, we collect and use the personal data you provide.

**(III) Information We Collect from Third Parties**

Categories of Third Parties	Description	Data Categories
<b>Payment and transaction fulfillment providers</b>	When you pay subscription fees (where applicable) to access the features on RingtoneAI. The Apple App store (where you downloaded RingtoneAI) is responsible for handling any and all payments of In-App purchases. They will collect your payment information such as credit card details and other identification information such as name, billing address, email address. After you provide the requisite	Pseudonymised Payment Transaction Information

	<p>information and complete the transaction, a purchasing account will be created and maintained by Apple. Apple will use your personal information to process any purchases, to confirm your orders via email, to make future purchases more convenient for you and to handle, where applicable, refunds. We do not collect or process any personal information save that Apple will provide us with high-level records of non-sensitive transaction information and subscription data (such as order number, time of order, user ID, subscription type etc) so that we can activate the paid features for your use or improve the performance of our RingtoneAI app.</p>	
<p><b>Technical Service Partners</b></p>	<p>We work with technical service partners that give us certain data. This includes mapping IP addresses to non-precise location data (e.g. country or region, city, state). This makes it possible for RingtoneAI to provide the RingtoneAI Service, content, and features. We also work with security service providers who help us protect user accounts.</p>	<p>User Data Usage Data</p>
<p><b>Marketing partners</b></p>	<p>When you download RingtoneAI through our marketing partners, they provide information about their channel.</p>	<p>Usage Data</p>
<p><b>Law Enforcement Agencies</b></p>	<p>We may receive information from law enforcement about potential violations of our <a href="#">Terms of Use</a>.</p>	<p>User Data User Content</p>

### 3. How Do We Use Your Information

**DO NOT SELL.** We do not sell your personal information. We also do not transfer, disclose or share your personal information with third parties, except where the information is necessarily transferred, disclosed and shared with our authorised third-party partners who must use and process your information solely to provide you with the Services on our behalf.

We use your personal information for the following purposes only when it is necessary to do so for valid reasons (such as with your consent, to comply the law, to provide you with the Services, to protect your rights and interest or to fulfil our legitimate business interests) and in accordance with applicable laws:

Purpose	Legal basis
To allow you to use the Services and generally manage your account.	They are necessary to provide you the Services.
To deliver and facilitate the delivery of the Services and to allow you to use the RingtoneAI features	They are necessary to provide you the Services.  You have provided your consent when you take steps to provide us with certain information or continue to use the features.
To allow you to subscribe to the paid Services.	They are necessary to provide the paid Services.  You provide consent when you take steps to upgrade to the paid Services or take steps to provide us with certain information to use the premium features.
To provide you certain additional optional features of the RingtoneAI service. We will clearly ask for your consent	Consent
<p>To better understand how RingtoneAI users use and interact with the Services.</p> <p>To identify and work on areas for improvement.</p> <p>To optimize the user experience.</p>	We have legitimate interests to develop and improve our products and features for our users.
<p>We may synthesize user content to train &amp; improve our AI services.</p> <p>Synthetic Data being artificially generated and not linked to personally identifiable information (PII), does not contain any identifiable or sensitive personal information.</p>	We have legitimate interests to develop and improve our products and features for our users.

<p>To detect and prevent fraudulent activities, software and tools within the Services and/or employed by end users.</p> <p>To identify a banned account or a device.</p>	<p>It is in our legitimate interests to ensure the security of the environment of our Services and safety of our users.</p>
<p>To comply with our legal obligations, respond to legal requests, respond to requests from law enforcement authorities (such as police, prisons, courts) as well as exercise, establish or defend our legal rights.</p>	<p>Compliance with legal obligations</p>
<p>To take appropriate action in respect of intellectual property infringement claims or reports of inappropriate content or activity.</p>	<p>Legitimate interest to protect our legal rights</p>
<p>To diagnose, troubleshoot and fix issues with the service</p> <p>To discover error frequency and trends to ensure a high level of functionality for the Services.</p>	<p>They are necessary to provide you the Services.</p>
<p>To provide you with customer and technical support when you have enquiries, provide feedback, when you need troubleshooting, to fix bugs and to assist with any issues you might experience using the Services.</p>	<p>With your consent to resolve your questions.</p>
<p>When RingtonesAI users respond to a survey or take part in user research, we collect and use the personal information as described in the survey or user research.</p>	<p>You provide consent for processing personal information.</p>
<p>To conduct business planning, reporting, and forecasting. For example, when we look at aggregated user data like the number of new sign ups in a country in order to plan new locations to launch our products and features in.</p>	<p>Legitimate Interest Our legitimate interests here include researching and planning so that we can keep running our business successfully.</p>
<p>To evaluate and develop new features or technologies.</p>	<p>Legitimate interest to improve our products, improve user experience and develop new products for our users.</p>

## 4. Who Else Can Use Your Information

We may share your information with other entities in the following situations:

**A) Our Related Entities:** We might share your personal information with our related entities in the same corporate group to assist us in technical processing operations (such as data hosting, analytics or maintenance), finance, legal, HR or accounting assistance, enhancing security against spam, abuse, fraud, infringement or other wrongdoings, and improve the Services; for corporate audit, analysis, strategic planning, research and development, corporate transactions (for example merger and acquisition, sale of company assets, financing etc); or compliance with applicable law. Each entity within the group may only use your personal information in accordance with this Privacy Policy.

**B) Our Authorised Partners:** We work with third party vendors to provide the RingtoneAI app ("Authorised Partners" or "Vendors"). We seek to update our list of Authorised Partners below as soon as practicable. These Authorised Partners process your information only at and according to our instructions. They perform tasks such as hosting, user support, analytics and fraud detection and prevention. For more information, please read the privacy policies of our Vendors.

Vendor	Purpose
<a href="#">Firebase</a>	Statistics and analytics
<a href="#">iShumei</a>	Risk Control
<a href="#">Appsflyer</a>	Statistics and analytics
<a href="#">OpenAI</a>	Prompt expansion and text elaboration
<a href="#">Suno</a>	Sound and image generation

**C) Government Agencies:** In order to combat fraud and illegal activity, we may process and disclose information to other organizations or provide information to government agencies in response to any lawful request. If required by any government authority or courts for any purposes such as the enforcement of any laws or to prevent their contravention, we may release your personal information as is legally required or permitted.

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## 5. Data Storage and Cross Border Data Transfers



By default, your personal data are stored in either the United States and/or Malaysia.

In order to provide you with the full range of Services efficiently, we work with authorised third party partners as well as related entities within the same corporate group around the world. Accordingly, your personal information may be accessed by our authorised personnel around the world and/or your personal information may be lawfully transferred at our instructions for limited access, use or processing by our authorised personnel around the world.

Because the data protection and privacy laws in other countries may be different from those of your home country, we will take steps to ensure that adequate safeguards are in place to protect your personal information, as explained in this Privacy Policy. Adequate safeguards that we may use include relying on contractual mechanisms and implementing other lawful safeguards.

We are entitled to do the above in order to perform our contractual obligations to you. By using our Services and providing information to us, you also consent to the storage, transfer and processing of the information to jurisdictions outside your home country and, unless otherwise stated in this Privacy Policy, we use this consent as one of the legal grounds for that data transfer.

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## 6. Your Rights and Choices

### A) Device Settings

We will ask for your permission to access your clipboard and apps by Apple (such as Garageband) so that you may use the features of the app. We will also ask for your permission to send you push notifications (if any). You may opt-out at any time by changing the settings on your mobile device.

### B) Access the personal information we hold about you

Upon your written request and successful verification of your identity, we will provide you with a copy of your personal information in an electronic format.

### C) Personal information rights

You may, at any time, withdraw your consent for us to collect, use, disclose or transfer your personal information to third parties. You also have the right to rectify or delete your personal

information, or limit the processing of your personal information. Upon receipt of your written request, we require reasonable time (depending on the complexity of the request and its impact on our relationship with you) for your request to be processed and for us to notify you of the consequences regarding the same. In general, we shall seek to process your request within thirty (30) calendar days of receiving it. Depending on the nature and scope of your request, you may not be able to access some or all features on RingtoneAI, and we may have to terminate the End-User License Agreement we have with you. We will notify you before completing the processing of your request. Should you decide to cancel your request, please inform us immediately.

Please note that

- a. If you choose not to provide us with all the personal information as required to (i) register a user account, (ii) use the Services, (iii) process your personal information requests or (iv) assist you on other feedback, queries or requests, we may (x) be unable to, or refuse to, process your personal information for any of the purposes stated herein, (y) be unable to (or continue to) perform our contractual obligations owed to you (if any), and/or (z) have to terminate the End User Licensing Agreement, without any liability on our part.
- b. You may withdraw your consent to using or disclosing your personal information at any time by adjusting the relevant settings on the App or by contacting us, but withdrawing does not affect the lawfulness of the processing before the withdrawal nor our rights to collect such information where (i) such use or disclosure is required by law, (ii) the personal data in question was collected from publicly available sources or (iii) such use or disclosure is necessary in an emergency where the life or health of a person is at risk.
- c. You may, by providing us with a notice in writing, limit the processing of your personal information (including to request us to cease or not begin processing your personal information for purposes of direct marketing). If you limit the processing of your personal information, we may not be in a position to continue to administer any arrangement or contractual relationship in place, which in turn may result in: (i) us being unable to (or continue to) process your personal information for any of the purposes stipulated in this Privacy Policy; (ii) unable to (or continue to) perform our contractual obligations owed to you (if any); and/or (iii) the termination of any arrangements/agreements/contracts you have with us, without any liability on our part.
- d. Even if you ask us to delete all or some of your personal information, we may still retain some of your data to the extent necessary to serve our legitimate business interests, such as to comply with our legal obligations, resolve disputes, and enforce our agreements. Where required under applicable laws or if you reside in Japan, we will explain to you in greater detail about why we cannot delete your personal data when we receive such requests.

Under applicable laws, you may have the right to obtain a transferable version of your personal information to transfer to another provider.

To exercise your personal information rights, please contact us according to Section 1 "Contact Us" above. You will not be subject to discriminatory treatment for exercising your rights.

#### **D) Cancelling your subscription plan (if any)**

You may cancel your paid subscription plan (when it becomes available) any time. If you decide to cancel your paid subscription, you will enjoy the paid features as per the full billing cycle. If you decide to delete the RingtoneAI app from your mobile device before the paid subscription expires, you may lose your subscription status, your personal information or other related information associated with the account. You will be informed and required to acknowledge the consequences of deleting your account. However, we may retain some information to the extent necessary to prevent fraud, troubleshoot problems, assist with any investigations, enforce our [Terms of Use](#) and/or comply with applicable legal requirements.

#### **E) Deleting your RingtoneAI app**

You may delete your RingtoneAI account at any time by logging to your account settings on the app. If you decide to delete your RingtoneAI account, we will deactivate your account and your information from our active databases. You may lose your personal information or other related information associated with the account. You will be informed and required to acknowledge the consequences of deleting your account. However, we may retain some information to the extent necessary to serve our legitimate business interests such as to prevent fraud, troubleshoot problems, assist with any investigations, enforce our [Terms of Use](#) and/or comply with applicable legal requirements.

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## **7. How Do We Protect Your Personal Information**

### **A) Security**

In order to help ensure a secure environment for the Services and safe experience for our users, we are continuously developing and implementing reasonable administrative, technical and physical security measures to protect your personal information from unauthorized use or access and against loss, misuse or alteration.

While we try our best, we cannot warrant the security of any information transmitted to us through or in connection with the Services, that we store on our or our authorised partners' systems.

Any improper collection or misuse of personal information is a violation of this Privacy Policy and our [Terms of Use](#) and should be reported to [airingtone099@gmail.com](mailto:airingtone099@gmail.com)

## **B) Pseudonymisation, anonymisation and aggregation techniques**

These privacy-enhancing techniques involve modifying or removing certain identifying information from your personal data and information to make it more difficult to link the data or information to you. We only use information that has gone through this privacy-enhancement process if we are using them to improve functionalities of the Services.

## **C) Personal information retention**

Generally, we will store your personal information only for the time period necessary:

- a. to fulfil the purposes for which such personal information was collected;
- b. for as long as you have an active subscription or active account or as needed to provide you the Services; or
- c. as required or permitted by applicable laws (such as tax, accounting, or other legal requirements).

Once we determine that the retention of your personal information is no longer necessary for the above purposes, or that retention is no longer necessary for any legal or business purpose, we will cease to retain your personal information, or anonymise the personal information so that it can no longer be used to identify any particular individual.

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## **8. Protecting Children's Privacy**

The RingtoneAI app is not meant for use by persons under the age of 18 years old. We do not knowingly collect personal information and data from anyone under the age of 18 and the RingtoneAI app is not directed at anyone under the age of 18. If you are under the age of 18, please do not use our RingtoneAI app in any manner. Any person who provides their personal information to us through our Services explicitly represents that they are 18 years of age or older.

If we become aware that someone under 18 years of age provided us with their personal information, we will close the account of that person and promptly delete their information or remove their information to the extent required by law, save when we are under a legal obligation to keep certain information.

If you are a parent or legal guardian of a minor, and wish to review any personal data that may have been unknowingly collected by us about your child or ward, or request that their RingtoneAI account or personal information be deleted, you may contact us at [airingtone099@gmail.com](mailto:airingtone099@gmail.com). We will respond to your requests after verifying the identities of the relevant users and their parents or legal guardians, and obtaining consent (if required under the laws) from the relevant users.

## 9. Notice to US Residents

Residents of certain U.S. states have privacy rights detailed in our [Privacy Notice to US Residents](#). To the extent that there is a conflict between this Privacy Policy and the Privacy Notice to US Residents, the latter will control.