

MOMUS DEV PRIVACY POLICY

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Version: 1.0

Publisher: MOMUS DEV, LLC ("MOMUS DEV," "we," "us," or "our")

1. WHO WE ARE

MOMUS DEV, LLC is a Missouri limited liability company (converting to a Missouri corporation) with its principal place of business at 4404 Pike 441, Vandalia, Missouri 63382. We develop and license Kulla, an agent memory and behavioral framework for enterprise artificial-intelligence deployments. This Privacy Policy describes how we collect, use, share, and protect personal information in connection with the MOMUS DEV website (www.momusdev.com), the Kulla Software products (Kulla Studio, Kulla Local, and Kulla Enterprise), and our other business operations.

2. WHAT THIS POLICY COVERS — AND WHAT IT DOES NOT

This Policy covers:

- Personal information collected through the MOMUS DEV website and marketing channels
- Personal information collected when you create a Kulla account, purchase a subscription, or communicate with us for support, sales, or other purposes
- Anonymous telemetry the Kulla Software may transmit to us

This Policy does NOT cover:

- **Your Customer Data processed by the Kulla Software on your own infrastructure.** The Kulla Software is designed to run on infrastructure you or your organization owns and controls. MOMUS DEV does not host, access, copy, transmit to itself, or store Customer Data in the ordinary operation of the Kulla Software. Please refer to your organization's own privacy policies with respect to how Customer Data is handled.
- **Prompts and outputs exchanged with third-party AI services.** The Kulla Software interoperates with third-party AI services (e.g., Anthropic, OpenAI, Google) using credentials you provide. The privacy practices of those services are governed by their own privacy policies, not by MOMUS DEV.
- **Personal information you provide directly to an enterprise customer's deployment of the Kulla Software.** In an enterprise deployment, the enterprise customer is the controller of any personal information processed within their deployment; MOMUS DEV is at most a processor, and any such processing is governed by a separately negotiated Data Processing Agreement (DPA) between MOMUS DEV and that enterprise customer.

3. WHAT WE COLLECT

We collect personal information in the following categories. In each case, we collect only what is necessary for the stated purpose.

3.1 Information you provide directly

- **Account information.** When you create a Kulla account or contact us, we collect your name, email address, and (where applicable) company name, job title, and phone number.
- **Payment information.** When you purchase a Kulla subscription, our third-party payment processor (Stripe, Inc.) collects and processes your payment information (card number, expiration, billing address). We do not store your full payment-card number on MOMUS DEV systems. We receive from Stripe only summary information (last four digits, brand, expiration, billing city and country) sufficient to identify your payment method.
- **Support communications.** If you contact us for support, sales, or other inquiries, we collect the content of your communication and any information you choose to include.
- **Marketing preferences.** If you sign up for our newsletter, follow us on social media, or engage with our marketing content, we collect the associated preferences and interaction history.
- **Employment / contractor inquiries.** If you apply for employment or a contracting role, we collect your resume and any information you submit through the application.
- **Investor communications.** If you engage with us in connection with our fundraising activities, we collect your name, contact information, entity information, and accredited-investor status information sufficient to verify eligibility for private securities offerings under applicable law.

3.2 Information collected automatically

- **Website analytics.** When you visit www.momusdev.com, we may collect standard log data including your IP address, browser type and version, operating system, referring URL, pages viewed, and timestamps. This information is used in aggregated form to understand and improve our website.
- **Cookies.** We use a minimal set of first-party cookies necessary for website functionality (e.g., preserving your language preference). We do not use tracking cookies or third-party advertising cookies. If we ever introduce optional analytics or marketing cookies, we will present a cookie consent banner permitting you to accept or decline.
- **Product telemetry.** The Kulla Software may collect anonymous, aggregated telemetry regarding how the software is used (e.g., feature usage counts, crash reports, performance metrics). Telemetry does not include Customer Data or personally identifying content. You may opt out of telemetry in the Kulla Studio settings, subject to any features that require telemetry to function.

3.3 Information collected from third parties

- **Payment processor.** Stripe provides us with the summary payment information described in Section 3.1.
- **Sales-enablement providers.** We may use sales-enablement tools that enrich contact records with publicly available business information (e.g., job title, company size, industry) about individuals who have made themselves known to us through legitimate business contact.

3.4 What we do NOT collect

We do not collect, and the Kulla Software does not transmit to us:

- Your Kulla agent memory contents or graph-database contents
- Prompts you submit to third-party AI services
- Outputs generated by third-party AI services in response to your prompts
- Your third-party AI-vendor API keys or credentials
- Your Customer Data of any kind
- Precise geolocation data (beyond the approximate location derivable from IP address in server logs)
- Biometric information
- Health or medical information
- Government identifiers (Social Security numbers, driver's license numbers, passport numbers), except in the limited context of employment or investor onboarding where such information is required by applicable law

4. HOW WE USE PERSONAL INFORMATION

We use the personal information we collect for the following purposes:

- **To provide the Kulla Software and MOMUS DEV services** — including creating and maintaining your account, processing subscriptions and payments, delivering updates, and providing technical support.
- **To communicate with you** — including responding to your inquiries, sending service-related notifications (billing, security, product updates), and, where you have opted in, sending marketing communications.
- **To improve our products** — including using aggregated telemetry and analytics to understand how our products are used and where we can improve.
- **To secure our systems** — including detecting, investigating, and preventing fraud, abuse, and security incidents.
- **To comply with legal obligations** — including tax reporting, responding to lawful requests from government authorities, and complying with applicable securities laws in connection with our fundraising activities.
- **To evaluate employment and contracting inquiries.**
- **To evaluate investor eligibility** — under Rule 506(b) of Regulation D and other applicable exemptions.

We do **not** sell personal information for money. We do **not** share personal information for cross-context behavioral advertising. We do **not** train artificial-intelligence models on personal information.

5. HOW WE SHARE PERSONAL INFORMATION

We share personal information only in the following limited circumstances:

- **Service providers.** We share personal information with third-party service providers who help us operate our business, subject to written contractual obligations to use the information only for the

purposes we authorize and to protect it appropriately. Our primary service providers are:

- **Stripe, Inc.** — payment processing
- **Google Workspace** or **Microsoft 365** — email, document collaboration, and productivity
- **Cloud infrastructure providers** — hosting the MOMUS DEV website
- **Analytics providers** — aggregate website analytics (if any; we use minimal analytics)
 - **Legal and safety.** We may disclose personal information to comply with valid legal process, to protect our rights or the rights of others, to prevent fraud or abuse, or to respond to a bona fide emergency involving danger to any person.
 - **Corporate transactions.** In the event of a merger, acquisition, corporate reorganization, statutory conversion (including our planned conversion from a Missouri LLC to a Missouri corporation under §347.700 R.S.Mo.), sale of all or substantially all of our assets, or similar transaction, personal information may be transferred to the successor entity, subject to the terms of this Privacy Policy or a successor policy providing equivalent protection.
 - **With your consent.** We may share personal information for any other purpose with your express consent.

6. HOW LONG WE KEEP PERSONAL INFORMATION

We retain personal information for as long as necessary to fulfill the purposes for which it was collected, or as required by law. Specifically:

- **Account information** — for the duration of your active Kulla subscription, plus a reasonable period thereafter (typically not more than three years) to enable account reactivation and to satisfy legal, accounting, and audit obligations
- **Payment records** — for the period required by applicable tax and accounting laws (typically seven years)
- **Support communications** — for the period necessary to resolve your inquiry and to identify recurring issues, typically not more than three years
- **Website analytics logs** — for a rolling period not exceeding thirteen months
- **Marketing preferences** — until you unsubscribe or otherwise revoke consent
- **Investor communications** — for the period required by applicable securities laws (typically seven years following the last transaction or communication)

7. YOUR RIGHTS

Depending on your jurisdiction, you may have some or all of the following rights with respect to your personal information:

- **Access** — the right to obtain confirmation of whether we hold personal information about you, and to receive a copy
- **Correction** — the right to request that we correct inaccurate or incomplete information

- **Deletion** — the right to request that we delete personal information about you, subject to exceptions provided by law (e.g., we may retain what we need to comply with tax or securities obligations)
- **Portability** — the right to receive certain personal information in a portable, machine-readable format
- **Objection to processing** — the right to object to certain uses of your personal information
- **Withdrawal of consent** — the right to withdraw consent for any processing that is based on your consent
- **Opt-out of marketing** — the right to unsubscribe from marketing communications at any time by clicking "unsubscribe" in any email or by contacting <privacy@momusdev.com>
- **Non-discrimination** — the right not to be discriminated against for exercising any of the above rights

To exercise any of these rights, contact <privacy@momusdev.com>. We will respond within the time required by applicable law (generally thirty (30) days). We may request additional information from you to verify your identity before fulfilling your request.

California, Colorado, Connecticut, Utah, Virginia, and similar state residents: you have the specific rights afforded by your state's privacy law. We honor those rights.

European Union / United Kingdom residents: we act as the "controller" of personal information covered by this Policy for purposes of the GDPR and UK GDPR. Where you have rights under those laws, we honor them. You also have the right to lodge a complaint with your national data-protection authority.

8. SECURITY

We implement reasonable administrative, technical, and physical measures designed to protect personal information from unauthorized access, use, disclosure, alteration, and destruction. These measures include:

- Encryption in transit for all traffic to and from the MOMUS DEV website and payment processor
- Encryption at rest for personal information stored in cloud-hosted services
- Multi-factor authentication on all accounts with access to personal information
- Access controls that limit personal-information access to authorized personnel with a business need
- Vendor management, including written contractual obligations for service providers
- Internal cyber-security awareness training and attestation (see the MOMUS DEV Cyber Security Awareness Program)

No security measure is perfect. If we become aware of a security incident that materially affects personal information about you, we will notify you and any applicable regulator as and when required by applicable law.

9. CHILDREN'S PRIVACY

The MOMUS DEV website and the Kulla Software are not directed to children under sixteen (16) years of age. We do not knowingly collect personal information from children. If you believe we have inadvertently collected personal information from a child, please contact us at <privacy@momusdev.com> and we will delete it promptly.

10. INTERNATIONAL DATA TRANSFERS

MOMUS DEV is based in the United States. If you access the MOMUS DEV website or use the Kulla Software from outside the United States, please be aware that personal information collected in connection with our services may be transferred to and processed in the United States. The privacy laws of the United States may differ from those of your country. Where applicable law requires, we will implement appropriate safeguards (e.g., Standard Contractual Clauses) for such transfers.

11. THIRD-PARTY LINKS AND SERVICES

The MOMUS DEV website may contain links to third-party websites or services. Those third-party sites operate under their own privacy policies. We are not responsible for the privacy practices of any third-party site or service to which we link.

12. AI-SPECIFIC DISCLOSURES

Because MOMUS DEV is an artificial-intelligence company, we call out the following specific practices:

- **We do not train AI models on your personal information.** MOMUS DEV does not use your personal information or Customer Data to train any AI model.
- **We do not sell your personal information to AI training data brokers.**
- **The Kulla Software passes your prompts to third-party AI services using credentials you provide.** The third-party service's own policies govern whether those prompts may be used for training.
- **MOMUS DEV does not itself operate an AI inference service.** We do not resell inference, do not host a model, and do not maintain a training pipeline.

13. CHANGES TO THIS POLICY

We may update this Privacy Policy from time to time. The "Effective Date" at the top of this Policy will reflect the date of the most recent update. If we make material changes, we will notify you by prominent posting on the MOMUS DEV website and, where required by law, by direct notice to you. Your continued use of the MOMUS DEV website or the Kulla Software after the effective date of any change constitutes acceptance of the updated Policy.

14. CONTACT

Questions, requests, or complaints regarding this Privacy Policy or our privacy practices should be directed to:

MOMUS DEV, LLC

Attention: Privacy

4404 Pike 441

Vandalia, Missouri 63382

Email: privacy@momusdev.com

If we cannot resolve a concern to your satisfaction, and you are a resident of the European Union, United Kingdom, or a jurisdiction that offers similar recourse, you have the right to contact your local data-protection authority.

End of MOMUS DEV Privacy Policy, Version 1.0, effective 2026-08-25.