

SUGARBABYONLINE

PRIVACY POLICY

Last updated: 24 August 2026

FINAL LEGAL-DRAFTING VERSION — FOR ATTORNEY APPROVAL BEFORE PUBLICATION

This document consolidates the wording supplied for the Sugar Baby Online website with the prior drafting work. The Privacy Policy has been expanded to match the same level of detail, structure and legal-protection approach as the Terms and Conditions. It should be reviewed by qualified counsel before publication.

1. Data Controller and Company Information

Sugar Baby Online ("Sugar Baby Online," "the Platform," "we," "us," "our," or the "Company") is operated by the entity responsible for processing personal data.

Legal entity name: [LEGAL ENTITY NAME]

Trade name: Sugar Baby Online

RFC: [RFC]

Address: [ADDRESS]

Privacy email: [PRIVACY EMAIL]

ARCO email: [ARCO EMAIL]

Legal matters email: [LEGAL EMAIL]

This Privacy Policy explains what information we collect, why we use it, how we share and protect it, how long we retain it, and the rights available to data subjects.

2. Scope of this Privacy Policy

This Privacy Policy applies to information collected through the Sugar Baby Online website, accounts, profiles, messaging, memberships, payment-related functions, customer support, security systems, age and identity verification, cookies, analytics, and other services operated by the Company.

3. Personal Data We May Collect

Depending on how the Platform is used, we may collect identification data such as name, username, date of birth, age, photographs, profile photographs, verification photographs or documents, and information necessary to verify legal age or identity. We may also collect contact information, account information, technical information, location information where permitted, and information voluntarily supplied by users.

4. Contact and Account Information

This may include email address, telephone number, username, password stored using appropriate security mechanisms, preferences, privacy settings, account history, and activity within the Platform. We may also maintain records associated with account security and support requests.

5. Technical, Device and Security Information

We may collect IP address, device type, operating system, browser, technical identifiers, access date and time, activity logs, authentication information, security events, and information used to detect fraud, abuse, unauthorized access, or attempts to circumvent Platform controls.

6. Location Information

We may collect approximate or precise location information when necessary for a particular functionality and when permitted by device settings and applicable law. Users may be able to control certain location permissions through their device or Platform settings.

7. User-Generated and Voluntarily Published Information

Users may voluntarily provide photographs, videos, audio recordings, descriptions, preferences, interests, lifestyle information, messages, comments, posts, links, and other profile content. Users are responsible for deciding what information they publish. We strongly recommend avoiding unnecessary sensitive information, home addresses, banking information, official documents, passwords, authentication codes, and information that could create unnecessary physical or financial risk.

8. Financial and Payment Information

When a user purchases a membership or other paid service, we may receive transaction-related information such as amount, date, currency, payment status and transaction identifiers. Complete card information may be processed directly by third-party payment providers. Sugar Baby Online does not intend to store complete card numbers when payment processing is performed directly by the applicable provider.

9. Sensitive Personal Data

Because Sugar Baby Online is an adult-oriented platform, information voluntarily provided by users may reveal information that is considered sensitive under applicable law, including information concerning sexual life, sexual orientation, intimate preferences, health information, or other legally sensitive characteristics.

Sugar Baby Online will not knowingly request sensitive information that is unnecessary for a legitimate purpose. We will limit the processing of sensitive personal data to disclosed purposes and applicable legal requirements. Where express consent is legally required, we will use an electronic mechanism capable of demonstrating the data subject's consent.

10. Primary Purposes of Processing

Personal data may be processed to create and manage accounts; provide Platform functionality; enable communication; display profiles according to selected settings; process payments; manage memberships; verify age and identity; prevent fraud and fake accounts; protect user safety; investigate reports; moderate content; respond to support requests; comply with legal obligations; respond to competent authorities; resolve disputes; enforce the Terms and Conditions; maintain security records; prevent abuse; and operate, maintain and improve the Platform.

11. Secondary Purposes

Where permitted and where the required consent is obtained, certain information may be used for promotional communications, information about new features, promotions, internal studies, personalization, usage analysis, and improvement of products and services. Users may object to secondary purposes through the mechanisms provided by Sugar Baby Online.

12. Cookies and Similar Technologies

Sugar Baby Online may use cookies, pixels, identifiers, local storage and similar technologies to maintain sessions, remember preferences, improve user experience, analyze traffic, detect fraud, protect security, measure advertising campaigns, and understand use of the Platform. Third-party analytics, advertising, security and measurement services may also use similar technologies. Where consent is required, appropriate controls will be provided.

13. Third-Party Service Providers

We may use third-party providers for hosting, storage, payments, email, analytics, security, age or identity verification, fraud prevention, customer support, moderation, and technology infrastructure. Providers should receive only information reasonably necessary for their services and should be subject to appropriate confidentiality, security and data-processing requirements.

14. Sharing and Disclosure of Personal Data

Sugar Baby Online may share information when necessary to provide the service, process payments, prevent fraud, protect security, comply with legal obligations, respond to a valid court order or lawful request from a competent authority, defend legal rights, or protect users or third parties from a serious threat.

We do not knowingly sell users' personal information as an independent database for purposes incompatible with those described in this Privacy Policy.

15. Information Visible to Other Users

Certain information that users voluntarily publish may be visible to other users, depending on Platform features and privacy settings. This may include username, photographs, age, description, approximate location, preferences and published content. Users should carefully review what they publish. Sugar Baby Online cannot guarantee that another user will respect the privacy of information voluntarily shared with that user.

16. Private Messages and Communications

Sugar Baby Online may process, store, moderate or review private communications through automated or human mechanisms when reasonably necessary for security, fraud prevention, moderation, investigation of reports, enforcement of the Terms, legal compliance, or protection of users. Users should not assume that a private communication is absolutely inaccessible to Sugar Baby Online under every circumstance.

17. Moderation and Automated Decision-Support

We may use automated tools and human review to detect spam, fraud, fake accounts, abusive behavior, threats, extortion, prohibited content, suspicious activity, and security risks. Automated tools may contribute to decisions to restrict content or accounts, but applicable legal rights and review mechanisms will be respected where required.

18. Age and Identity Verification

When Sugar Baby Online requests information to verify age or identity, that information will be used for the disclosed verification purposes. Where reasonably possible, we will minimize the information retained. Specialized verification providers may process certain information under their own privacy policies and applicable agreements.

19. Security Measures

Sugar Baby Online will implement reasonable administrative, technical and physical safeguards designed to protect personal data against unauthorized access, use, alteration, disclosure, loss or destruction. Measures may include encryption, access controls, authentication, monitoring, security logs, backups, internal controls and fraud-prevention measures. However, no Internet-connected system can guarantee absolute security.

20. Data Retention

We may retain personal data for as long as necessary to provide the service, comply with legal obligations, resolve disputes, prevent fraud, protect the Platform, enforce agreements, satisfy tax or accounting obligations, investigate security incidents, and respond to authorities. When information is no longer necessary, it will be deleted, blocked, or anonymized where legally and technically appropriate.

21. ARCO Rights

Where Mexican data-protection law applies, data subjects may exercise Access, Rectification, Cancellation and Objection rights. Requests should be sent to **[ARCO EMAIL]** and contain sufficient information to verify identity and locate the relevant data. The Company will process requests according to applicable legal requirements and deadlines.

22. Withdrawal of Consent

Where processing depends on consent, the data subject may request withdrawal through **[PRIVACY EMAIL]**. Withdrawal does not retroactively invalidate processing that was lawful before withdrawal and does not prevent processing that is required or otherwise permitted by law.

23. Limitation of Use or Disclosure

Users may request applicable limitations on the use or disclosure of their personal data, including limitations on certain promotional communications, through the mechanisms made available by Sugar Baby Online and subject to applicable law.

24. Minors

Sugar Baby Online is strictly intended for persons 18 years of age or older. We do not knowingly collect information from minors for the purpose of allowing them to use the Platform. If we identify an account belonging to a minor, we may suspend the account and delete corresponding information, subject to legal retention obligations and any required reporting or preservation measures.

25. Fraud Prevention and Account Security

We may use personal and technical information to detect fake accounts, fraud, multiple accounts, suspicious access, account theft, abuse, spam, extortion, threats, and attempts to circumvent security measures. These activities may involve automated systems and human review.

26. Requests from Authorities and Legal Proceedings

Sugar Baby Online may disclose information when there is a legal obligation, valid court order, lawful request from a competent authority, or when disclosure is reasonably necessary to exercise or defend legal rights, in accordance with applicable law.

27. International Data Transfers

Certain technology providers may be located outside Mexico, meaning information may be processed or stored in other countries. Where applicable, Sugar Baby Online will implement the notices, safeguards, consents, contractual mechanisms and other measures required by applicable law.

28. Data Breach and Security Incidents

If a security incident involving personal data occurs, Sugar Baby Online will evaluate the incident and, where notification is legally required, provide the notices and take the measures required by applicable law. We may also take additional steps to contain, investigate and remediate the incident.

29. Changes to this Privacy Policy

We may update this Privacy Policy to reflect legal changes, technological changes, new features, provider changes, or changes in processing purposes. The current version will remain available on the Platform and will state its effective date. Where legally required, applicable consent will be obtained again.

30. Contact Information

Privacy email: [PRIVACY EMAIL]

ARCO email: [ARCO EMAIL]

Legal matters email: [LEGAL EMAIL]

Address: [ADDRESS]

Telephone: [PHONE]

31. Consent to Processing of Sensitive Personal Data

Where legally required, the user expressly consents to Sugar Baby Online processing the sensitive personal data the user has provided, exclusively for the purposes described in this Privacy Policy and in accordance with applicable law. The electronic consent record may include the account identifier, date and time, version of the Privacy Policy, and authentication mechanism used.

PRIVACY ACKNOWLEDGMENT AND CONSENT RECORD

The following section is intended to document acceptance electronically or by written signature, as permitted by applicable law.

- I acknowledge that I have read and understood the Privacy Policy.
- I understand the categories of personal data that may be processed and the purposes described in the Privacy Policy.
- Where separate consent is legally required, I provide that consent through the applicable electronic mechanism.
- I understand that certain information I voluntarily publish in my profile may be visible to other users.
- I understand that Sugar Baby Online may process information for security, fraud prevention, moderation, legal compliance, and other purposes described in this Privacy Policy.

Full legal name	
Username / Account ID	
Email address	
Electronic signature / typed name	
Date	
Time	
Document version	

For electronic acceptance, the Platform should automatically record the acceptance event, account identifier, document version, date and time, and other lawful technical evidence. A typed name may constitute an electronic signature only to the extent recognized by applicable law.