

# Consent to international transfer of personal data

Edition 5 of 25 September 2026. A separate document because the transfer rests on its own legal basis: GDPR Chapter V governs transfers to a third country, and where no adequacy decision applies the transfer is made on your explicit consent (Art. 49(1)(a)). Accepted together with the two other Lunar Oracle documents by a single tick on the consent screen; the box is not pre-ticked.

## 1. Controller

Controller: PT. TECHNO CAPITAL INDONESIA.

Registered address: Jalan Sunset Road No. 99D, Desa/Kelurahan Kuta, Kec. Kuta, Kab. Badung, Provinsi Bali, 80361, Indonesia.

Tax identification number (NPWP): 40.174.113.7-905.000.

Contact for data protection matters — e-mail: support@woomoon.app, Telegram: @lunnaya\_care, or by post to the registered address above.

## 2. Who receives the data

The recipients are named below with their names, addresses and the terms on which they process the data. The primary recipient is kie.ai with the DeepSeek model; Google is the reserve, used when the primary is unavailable. The controller passes the data only to produce the reply. There is no data processing contract with kie.ai or DeepSeek, so they may process the data they receive for their own purposes as independent controllers; what each of them may do with the data is governed by its own terms, set out for each.

Recipients as of edition 5 (2026-09-25): primary recipient — kie.ai → DeepSeek; reserve, used when the primary is unavailable — Google. Within this list and on these terms the model provider may change without a new consent; a new recipient or new processing terms require a new consent.

- NEXUSAI SERVICES LLC (kie.ai) — the kie.ai API aggregator: receives the request, processes it with the DeepSeek model and returns the reply. Address: 118 Krameria St, Denver, CO 80220, USA. Country of processing: the United States of America — kie.ai does not disclose where exactly the model runs; by its public statements, on servers in the USA. Training on data: the kie.ai privacy policy does not say whether the content of API requests is used to train models. Retention: not disclosed — the kie.ai privacy policy does not state how long request content is kept. Data processing agreement: not confirmed — we have no separate agreement with kie.ai. Capacity: if it uses the data beyond relaying it to the model, it processes it for its own purposes as an independent controller, not on the controller's behalf; there is no contract with kie.ai.
- Hangzhou DeepSeek Artificial Intelligence Co., Ltd. (DeepSeek) — developer of the DeepSeek model that writes the primary recipient's reply; a possible recipient: kie.ai does not disclose where exactly the model runs, and it cannot be ruled out that request content is passed to DeepSeek in the PRC, so the controller assumes the worst case. Address: Room 1201, Building West 1, Huijin International Mansion, No. 169 Huancheng North Road, Gongshu District, Hangzhou, Zhejiang, People's Republic of China. Country of processing: possibly the People's Republic of China — if request content is passed to DeepSeek. Training on data: DeepSeek's Open Platform terms do not describe the use of data received for training; the controller assumes that DeepSeek may use it to train its models, and this cannot be opted out of through the app. Retention: not disclosed — DeepSeek's Open Platform terms do not describe how long data is kept. Data

processing agreement: not confirmed — we have no separate agreement with DeepSeek. Capacity: may process the data it receives for its own purposes as an independent controller, not only on the controller's behalf; there is no contract with DeepSeek.

- Google LLC (Google) — owner of the Gemini model that writes the reply (paid Gemini API tier). Address: 1600 Amphitheatre Parkway, Mountain View, CA 94043, USA. Country of processing: the United States of America and any other country where Google operates capacity: Google processes and may temporarily cache data wherever its infrastructure runs. Training on data: under the paid Gemini API terms Google does not use prompts and replies to train models or improve its products, and does not have them reviewed by people for that purpose. Retention: prompts and replies are logged for a limited period — solely to detect policy violations and for legally required disclosures. Data processing agreement: confirmed by the controller on 19 September 2026 (Gemini API Paid Services terms). Capacity: processes the data on the controller's behalf under the paid Gemini API terms.

The history of this list is on the AI recipients page.

### **3. Which countries the data goes to**

- The United States of America — kie.ai, the primary recipient: it does not disclose where exactly the model runs, and by its public statements it runs on servers in the USA; and Google, the reserve, which may also temporarily cache data in any other country where it operates capacity.
- Possibly the People's Republic of China — it cannot be ruled out that kie.ai passes request content to DeepSeek in the PRC; the controller assumes this worst case.

The legal bases differ by recipient. For Google LLC the transfer relies on the EU-US Data Privacy Framework, under which Google LLC is certified. For kie.ai and DeepSeek there is no adequacy decision and no standard contractual clauses or data processing agreement, so the transfer to them rests on your explicit consent under Art. 49(1)(a), given after being informed of these risks. The level of protection there may differ from the one you are used to, and your ability to enforce your rights abroad may be more limited.

### **4. What is transferred**

Exactly what the main Lunar Oracle consent and the special-categories consent list: the text of your message, the reply, the recent turns of the conversation, the personalising context, the positions of your natal chart and, when you yourself ask for a reading, further calculations on it, and cycle data, body signals from Apple Health (if you allowed the app to read them) and intimacy marks — all covered by the same indivisible consent. There is deliberately no separate list here: two lists of the same thing drift apart.

### **5. Purpose**

To produce the Lunar Oracle's reply to your message. The controller does not transfer the data for advertising or profiling. Please note: DeepSeek's Open Platform terms describe neither how long data is kept nor whether data received is used for training, so the controller assumes that DeepSeek may use it to train its models, and this cannot be opted out of through the app; kie.ai likewise does not disclose how long it keeps request content or whether it is used for training. If you do not accept this, do not give this consent.

## **6. The risk you should know about**

The transfer to kie.ai and DeepSeek, made on explicit consent under Art. 49(1)(a), is not backed by an adequacy decision or by standard contractual clauses. Public authorities in the recipient country may have powers of access that the controller cannot refuse; in the People's Republic of China the authorities may require companies to give them access to the data they hold. Neither DeepSeek nor kie.ai has signed a data processing agreement with the controller; they may process the data for their own purposes as independent controllers, and their obligations to you are limited to their own published terms.

## **7. Duration and withdrawal**

This consent lasts while you use the Lunar Oracle and ends when you withdraw it: Settings → Consents (in the iPhone app and in the web app). Withdrawal closes the Lunar Oracle — the consent is indivisible — and touches nothing else: cycle, moon, recommendations and calendar keep working exactly as before. Withdrawal applies to future transfers; what has already left cannot be recalled — including where a recipient has already used it to train its model. You also have the right to lodge a complaint with a supervisory authority — in the EU/EEA, in the member state of your habitual residence, place of work or place of the alleged infringement (GDPR Art. 77); in the United Kingdom, with the Information Commissioner's Office.

The full description of processing is in the privacy policy. This document covers the international transfer only.