

21 QUEENS

Privacy Policy

How 21 QUEENS collects, uses, shares and protects personal data

This Policy applies to the 21 QUEENS mobile application, account-creation service and related official web pages operated by BETHEGEN S.L. It is written for a 16+ social platform in which every eligible profile is public to eligible signed-in users.

Operator	BETHEGEN S.L.
VAT number	ESB23978646
Registered address	Avenida Diagonal 534, 08006 Barcelona, Spain
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Service	21 QUEENS

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1. Who controls your data

BETHEGEN S.L., VAT number ESB23978646, with its registered address at Avenida Diagonal 534, 08006 Barcelona, Spain, is the controller of personal data processed for 21 QUEENS, unless a specific notice says otherwise. In this Policy, "BETHEGEN", "we", "us" and "our" refer to BETHEGEN S.L..

Privacy and legal requests may be submitted through the official contact form published with this Policy or by post to the registered address above. Where required, the official website also provides the contact details of BETHEGEN's data protection representative or Data Protection Officer.

2. Scope, eligibility and public profiles

This Policy covers the mobile app, the separate account-creation website, official support pages and the systems used to operate the service. The service is intended only for people aged 16 or older. We do not permit accounts for users under 16.

All eligible 21 QUEENS accounts are public within the service. A profile cannot be made private. An eligible signed-in user may see another user's username, display name, profile image, biography, public counts, ranking information and content made available to the relevant audience. Profiles are not intentionally exposed through an anonymous public database API.

Individual content may still have audience or safety restrictions. Blocking, muting, restrictions, moderation status, account eligibility and legal requirements can limit visibility. Users should never include a home address, school, live location, government identifier, financial details or other sensitive information in a profile or post.

3. Data we collect

Category	Examples	Why we use it
Account and eligibility	Email or phone login data, authentication identifiers, date of birth or age result, country or region, language, acceptance records.	Create and secure an eligible 16+ account; apply legal and safety rules; remember policy versions.
Public profile	Username, display name, profile image, biography, links, verification and public account statistics.	Display the public profile and enable discovery, follows and ranking.
User content	Photos, videos, captions, stories, polls, comments, profile changes, reports and content metadata.	Publish, display, moderate, rank and manage content.
Social activity	Follows, Crowns, favourites, votes, comments, mentions, tags, challenges, event participation and notification choices.	Provide social features, recommendations, counts and user controls.
Communications	Direct and group messages, message requests, reactions, delivery state, reports and safety evidence.	Deliver communications, prevent abuse, investigate reports and support users.
Meet and location	Coarse area labels, selected public meeting point, coordinates where enabled, event time and attendance information.	Create and display Meet plans, calculate approximate distance and enforce location safety.

Media and music	Upload files, technical metadata, selected owned-music fragment, processing status and playback identifiers.	Transcode and publish media, combine optional music and provide secure playback.
Device and security	IP address, device and app information, session tokens, timestamps, rate-limit and security events, crash or diagnostic data.	Authenticate users, prevent fraud, protect systems and diagnose failures.
Support and moderation	Reports, appeals, reason codes, correspondence, moderation decisions and evidence required to review abuse.	Enforce policies, protect users, respond to complaints and meet legal duties.

4. Purposes and legal bases

Where world wide data protection law applies, we rely on the following legal bases:

- **Contract:** to create the account, deliver the service, publish requested content, provide messaging, process account controls and respond to support requests.
- **Legitimate interests:** to secure the service, prevent fraud, moderate harmful content, improve reliability, measure performance and defend legal claims, after balancing those interests against user rights.
- **Legal obligation:** to respond to lawful requests, protect children, preserve legally required evidence, maintain records and comply with tax, consumer, platform-safety or regulatory duties.
- **Consent:** where required for optional device permissions, optional location access, marketing communications, non-essential tracking or another clearly identified purpose. Consent can be withdrawn without affecting earlier lawful processing.
- **Vital interests:** in exceptional situations involving a credible and immediate threat to life or safety.

We do not use acceptance of this Privacy Policy as blanket consent for every processing activity. The account-creation flow records that the Policy was presented and records any separate consent where consent is the appropriate legal basis.

5. Visibility and user-generated content

Content submitted for publication may be visible to other eligible users and may be copied, captured or reshared by them outside our control. Public profile and engagement information may be used to order feeds, display Crown counts, calculate rankings, identify trending posts and show Rising Queens. Users remain responsible for deciding what they publish.

Unpublished uploads and media awaiting moderation are stored in protected systems and are not intended to be visible until publication checks succeed. Deleted content may remain briefly in backups, safety evidence or legal records where retention is necessary and lawful.

6. Moderation and automated tools

We use automated and human review to identify sexual content, child sexual abuse material, violence, harassment, hate, spam, copyright concerns and other policy violations. Images, videos, captions, comments and profile material may be checked before or after publication. Automated signals can quarantine, delay or restrict content for human review.

Moderation may affect content visibility or account functionality. Where required, we provide notice and a way to challenge a decision. We do not intend to make decisions producing legal or similarly significant effects solely by automated processing without an appropriate legal basis and safeguards.

7. Recipients and service providers

We disclose data only as needed to operate, secure and lawfully govern the service. Recipient categories include:

- Hosting, database, authentication, storage and server-function providers, including the Supabase infrastructure used by the service.
- Video upload, transcoding and playback providers, including Mux where enabled.
- Content-safety and moderation providers, including Sightengine where enabled.
- Cloud compute and media-processing infrastructure used for protected FFmpeg jobs and operational workloads.
- Push-notification, email, SMS, customer-support, security, fraud-prevention and diagnostic providers where configured.
- Apple, Google and other distribution or platform providers when users install, authenticate, pay or interact through their services.
- Professional advisers, auditors, insurers, regulators, courts, law enforcement and child-protection organisations where disclosure is lawful and necessary.
- A buyer or successor in a merger, financing, reorganisation or sale, subject to appropriate safeguards and notice where required.

BETHEGEN maintains and publishes or links a current list of material production subprocessors through the official website. We do not sell personal data for money. If future advertising or data-sharing practices trigger an opt-out right, this Policy and the service will be updated before that processing begins.

8. International transfers

Service providers may process data outside Spain or the European Economic Area. Where required, we use an adequacy decision, the European Commission's Standard Contractual Clauses, the EU-US Data Privacy Framework for participating organisations, or another lawful transfer mechanism, together with supplementary safeguards where appropriate.

9. Retention and deletion

We keep personal data only as long as necessary for the purposes described above, considering account status, feature requirements, safety, legal limitation periods and statutory obligations. Retention periods are reviewed regularly and applied according to the following principles:

- Account and profile information is generally retained while the account is active and removed or anonymised after a valid deletion request, subject to lawful exceptions.
- Published posts, comments, messages and media remain until deleted, expired, removed by moderation or deleted with the account, unless limited retention is required for safety, reports or law.
- Palace Stories ordinarily expire from active display after 24 hours, although selected highlights, backups or safety evidence may follow different periods.
- Temporary upload and typing-state data uses short expiries designed for the relevant operation.
- Security logs, moderation records, acceptance records, transaction evidence and legal-hold material are kept for periods proportionate to fraud prevention, child safety, disputes and legal obligations.
- Backups are overwritten on a controlled schedule and are not used to restore an individually deleted account except where necessary for disaster recovery or law.

10. Your privacy rights

Depending on location, users may have rights to access, correct, delete or receive their personal data; restrict or object to processing; withdraw consent; opt out of covered sale, sharing or targeted advertising; and complain to a supervisory authority.

Users can update selected profile and privacy controls in the service, request an export and initiate account deletion. We may verify identity before fulfilling a request. Rights can be limited where an exemption applies, including the rights and safety of others, legal claims or statutory retention. We will explain any refusal where legally required.

11. Users aged 16 and 17

Users aged 16 and 17 receive the same public-account functionality as other eligible users. We nevertheless apply age-aware safety measures to communications, mixed-age interactions and Meet features. We use clear notices, minimise age data, prohibit profiling-based advertising to known minors, and do not knowingly permit users under 16.

If we learn that an ineligible person created an account, we may restrict the account, remove content, request age assurance and delete data, while retaining only what is legally required for safety or compliance. A parent or guardian who believes an ineligible minor supplied data should use the official contact channel.

12. Security, changes and contact

We use access controls, encryption in transit, protected storage, signed media access, rate limits, least-privilege database rules, staff authentication, audit records and moderation controls. No service can guarantee absolute security. Users must protect credentials and report suspected compromise promptly.

We may update this Policy as the service, providers or law changes. The website will show the effective date. Material changes will be communicated in the account-creation flow, in the app or by another appropriate channel, and renewed acceptance or consent will be obtained where required.

Controller contact by post: BETHEGEN S.L., Avenida Diagonal 534, 08006 Barcelona, Spain. Privacy and legal electronic contact channels are available through the official 21 QUEENS website.