

ClearCue – Privacy Policy (v1.2)

Last updated: 02 February 2026

ClearCue Ltd (“ClearCue”, “we”, “us”, “our”) is committed to protecting your privacy.

This Privacy Policy explains how we collect, use, store, and protect your personal data when you use ClearCue or visit our website.

By creating an account, using the Service, or accessing the website, you agree to this Policy.

1. Who We Are

ClearCue Ltd

Hawarden, United Kingdom

Email: support@clearcue.pro

ClearCue Ltd is the data controller for your personal data under UK GDPR and EU GDPR.

2. Data We Collect

We collect **only the minimum data required** to operate ClearCue.

2.1 Account Data (Provided by You)

- Name
 - Email address
 - Authentication credentials (managed via Clerk – passwords are not stored by ClearCue)
 - Subscription plan (Free, Rhythm, Flow, Studio)
 - Account status and billing state
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2.2 Payment Data (Processed by Stripe)

ClearCue does **not** receive or store full payment card details.

Stripe may provide us with:

- last four digits of card
 - expiry month/year
 - billing address (when required)
 - subscription status
 - payment success or failure notifications
 - invoices and receipts
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2.3 Service Usage Data

To operate the Service, we store:

- cue generation parameters (e.g. BPM, duration, mode)
- timestamps of generation
- remaining daily or monthly quota
- download events
- basic, non-identifying device and browser metadata

We do **not** profile users or analyse creative content.

2.4 Uploaded Media

ClearCue does **not** store or retain user-uploaded audio or video files.

If upload functionality is introduced:

- files will be processed transiently in memory

- files will not be stored, logged, or retained
 - files will not be used for training, analytics, or secondary purposes
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2.5 Cookies

We use **strictly necessary cookies only**, including for:

- authentication (Clerk)
- session management
- security
- essential, privacy-safe analytics

We do **not** use:

- advertising cookies
 - cross-site tracking
 - behavioural profiling
 - third-party ad networks
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3. How We Use Your Data

3.1 To Provide the ClearCue Service

- authenticate accounts
- generate timing cue files
- enforce usage limits
- display account dashboards
- maintain platform security

3.2 To Process Payments

- subscription billing
- invoices and receipts
- fraud prevention
- financial reconciliation

3.3 To Improve the Service

- diagnose bugs or failures
- monitor system performance
- detect abuse or anomalous behaviour

All analytics are **aggregate and privacy-safe**.

3.4 Communications

We send only:

- transactional emails (account, billing, security)
- critical service or legal updates

We do **not** send marketing emails without explicit consent.

4. Legal Bases for Processing

Under GDPR, we process data under the following lawful bases:

- **Contract** – to deliver the Service you requested

- **Legitimate Interest** – security, abuse prevention, service reliability
 - **Legal Obligation** – accounting and tax compliance
 - **Consent** – where explicitly required
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5. Data Sharing

ClearCue **never sells** personal data.

We share data only with essential, GDPR-compliant service providers.

5.1 Service Providers

- **Clerk** – authentication and identity management
 - **Stripe** – payment processing
 - **Google Cloud Platform / Firestore** – secure data storage and processing
 - Optional analytics provider – aggregated, non-identifying metrics
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5.2 Legal Requirements

We may disclose data if required to:

- comply with applicable law
 - respond to lawful requests
 - protect our rights, users, or infrastructure
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6. Data Storage & Security

We protect data using:

- encrypted transport (HTTPS/TLS)

- encrypted storage
- role-based, least-privilege access
- audit logging
- periodic security reviews

If a personal data breach occurs, we will notify affected users and authorities in accordance with GDPR timelines.

7. International Data Transfers

Some service providers may process data outside the UK or EU.

All international transfers are protected using:

- Standard Contractual Clauses (SCCs)
 - UK GDPR Addendum
 - equivalent GDPR safeguards
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8. Data Retention

We retain data only as long as necessary:

- **Account data:** while your account is active
 - **Generation history:**
 - Free Plan: up to 60 days
 - Paid Plans: retained while the account remains active
 - **Billing records:** 6 years (UK tax law)
 - **Deleted accounts:** removed within 30 days, except where legal obligations apply
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9. Your Rights

You have the right to:

- access your personal data
- correct inaccurate data
- request deletion
- export your data
- object to certain processing
- withdraw consent where applicable

To exercise your rights, contact: **support@clearcue.pro**

We respond within 30 days.

10. Children

ClearCue is not intended for users under 18.

We do not knowingly collect data from minors.

11. Changes to This Policy

We may update this Policy periodically.

Material changes will be communicated via email or in-app notice.

Continued use of ClearCue constitutes acceptance.

12. Contact

ClearCue Ltd

Hawarden, United Kingdom

Email: **support@clearcue.pro**
