

# LemonsLemons

## Privacy Policy

Effective date: 29 March 2026

Platform: lemonslemons.ai

Controller: Godomodo Ltd. ("Godomodo" EOOD), UIC 206394015

Registered address: Apt. 16, Floor 3, 12 Naroden Pevets Str., Pavlovo, Sofia 1618, Bulgaria

Data protection contact: [privacy@lemonslemons.ai](mailto:privacy@lemonslemons.ai)

## 1. Introduction

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Godomodo Ltd., operating as LemonsLemons ("we", "us", "our"), is committed to protecting your personal data. This Privacy Policy explains what data we collect, why we collect it, how we use it, and your rights under applicable data protection law, including the EU General Data Protection Regulation (GDPR) and Bulgarian data protection legislation.

This policy applies to all users of the LemonsLemons platform at [lemonslemons.ai](https://lemonslemons.ai), including Audience Owners and Buyers. Please read it carefully before using the platform.

If you have any questions about this policy or how we handle your data, contact us at [privacy@lemonslemons.ai](mailto:privacy@lemonslemons.ai).

## 2. Who We Are

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Godomodo Ltd. ("Godomodo" EOOD) is the data controller for personal data processed through the LemonsLemons platform. We are registered in Bulgaria under UIC 206394015 with our registered office at Apt. 16, Floor 3, 12 Naroden Pevets Str., Pavlovo, Sofia 1618, Bulgaria.

As an EU-based company, we are subject to the GDPR and the Bulgarian Personal Data Protection Act. We take these obligations seriously.

## 3. What Data We Collect

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### 3.1 Data you provide directly

- Account registration data: name, email address, country of residence, and business name (if applicable)
- Profile information: for Audience Owners, this includes audience size, channel type, engagement metrics, pricing, and sponsorship slot details you choose to publish
- Payment information: billing details processed securely through our third-party payment provider (we do not store full card details)
- Communications: messages you send through the platform, support requests, and emails to our team
- Identity verification: where required for payout processing, we may collect business registration documents or tax identification numbers

### 3.2 Data collected automatically

- Usage data: pages visited, features used, time spent, clicks, and navigation patterns
- Device and browser data: IP address, browser type, operating system, and device identifiers
- Cookies and similar technologies: see our Cookie Policy at [lemonslemons.ai/cookies](https://lemonslemons.ai/cookies) for details
- Transaction data: booking history, payment amounts, commission records, and payout history

### 3.3 Data from third parties

- Payment processors: transaction confirmation and fraud signals
- Analytics providers: aggregated usage insights
- If you connect a third-party account (e.g. LinkedIn), we receive only the data you explicitly authorize

## 4. Legal Bases for Processing

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We process your personal data only where we have a valid legal basis under the GDPR:

- **Contract performance (Art. 6(1)(b)):** Processing necessary to provide the platform services, process bookings, and manage payouts.
- **Legal obligation (Art. 6(1)(c)):** Processing required to comply with EU and Bulgarian law, including tax, accounting, and anti-money laundering obligations.
- **Legitimate interests (Art. 6(1)(f)):** Processing for platform security, fraud prevention, product improvement, and business analytics — where these interests are not overridden by your rights.
- **Consent (Art. 6(1)(a)):** Processing based on your explicit consent, such as for marketing emails and non-essential cookies. You may withdraw consent at any time.

## 5. How We Use Your Data

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### 5.1 To provide the platform

- Create and manage your account
- Display Audience Owner listings to Buyers
- Process bookings and payments
- Calculate and transfer payouts to Audience Owners
- Send transactional emails (booking confirmations, payout notifications, account alerts)

### 5.2 To operate and improve the platform

- Monitor platform performance and fix technical issues
- Analyse usage patterns to improve features and user experience
- Detect and prevent fraud, abuse, and policy violations
- Conduct internal research and reporting

### 5.3 To communicate with you

- Respond to your support requests
- Send platform updates, policy changes, and important account notices
- Send marketing communications about LemonsLemons features and updates — only where you have consented or where permitted by applicable law

### 5.4 To comply with legal obligations

- Maintain financial records as required by Bulgarian and EU law
- Respond to lawful requests from regulators or law enforcement
- Enforce our Terms and Conditions

## 6. How We Share Your Data

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We do not sell your personal data. We share data only in the following circumstances:

- **Between users:** When a Booking is made, we share the relevant Audience Owner's listing details with the Buyer and vice versa, to the extent necessary to complete the transaction.
- **Payment processors:** We share billing data with our third-party payment processor(s) to process transactions. These processors are contractually bound to protect your data and process it only on our instructions.
- **Service providers:** We use carefully selected third-party providers for hosting, analytics, email delivery, and customer support tools. All providers are bound by data processing agreements.
- **Legal requirements:** We may disclose data to competent authorities where required by law, court order, or regulatory obligation.
- **Business transfers:** In the event of a merger, acquisition, or sale of the company, your data may be transferred to the successor entity, subject to the same privacy protections.

Where we transfer data outside the EU/EEA, we ensure appropriate safeguards are in place, including Standard Contractual Clauses approved by the European Commission.

## 7. Data Retention

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We retain your personal data for as long as necessary to provide the platform services and fulfil the purposes described in this policy.

- **Account data:** Retained for the duration of your account plus 3 years after closure, to handle any post-closure disputes or legal claims.
- **Transaction and financial records:** Retained for 7 years from the date of the transaction, as required by Bulgarian accounting and tax law.
- **Marketing consent records:** Retained until you withdraw consent, plus 1 year for compliance documentation.
- **Support communications:** Retained for 2 years from the date of the last communication.

When data is no longer required, we delete or anonymise it securely.

## 8. Your Rights Under GDPR

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As a data subject under the GDPR, you have the following rights:

- **Right of access (Art. 15):** You may request a copy of the personal data we hold about you.
- **Right to rectification (Art. 16):** You may ask us to correct inaccurate or incomplete data.
- **Right to erasure (Art. 17):** You may ask us to delete your data, subject to our legal retention obligations.
- **Right to restriction (Art. 18):** You may ask us to restrict processing of your data in certain circumstances.
- **Right to data portability (Art. 20):** Where processing is based on consent or contract, you may request your data in a structured, machine-readable format.
- **Right to object (Art. 21):** You may object to processing based on legitimate interests, including for direct marketing purposes.
- **Right to withdraw consent:** Where we process data based on your consent, you may withdraw it at any time without affecting prior processing.
- **Right to lodge a complaint:** You have the right to complain to the Bulgarian Commission for Personal Data Protection (CPDP) at [www.cdpd.bg](http://www.cdpd.bg), or to the supervisory authority in your EU member state.

To exercise any of these rights, contact us at [privacy@lemonslemons.ai](mailto:privacy@lemonslemons.ai). We will respond within 30 days. We may need to verify your identity before processing the request.

## 9. Cookies

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We use cookies and similar tracking technologies on the platform. For full details of the cookies we use, the purposes they serve, and how to manage your preferences, please see our Cookie Policy at [lemonslemons.ai/cookies](http://lemonslemons.ai/cookies).

## 10. Security

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We implement appropriate technical and organisational measures to protect your personal data against unauthorised access, loss, alteration, or disclosure. These include encryption in transit (TLS), access controls, and regular security reviews.

While we take security seriously, no system is completely secure. If you believe your account has been compromised, contact us immediately at [privacy@lemonslemons.ai](mailto:privacy@lemonslemons.ai).

In the event of a personal data breach that is likely to result in a risk to your rights and freedoms, we will notify you and the relevant supervisory authority in accordance with our GDPR obligations.

## 11. Children

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The LemonsLemons platform is not directed at or intended for use by individuals under the age of 18. We do not knowingly collect personal data from minors. If we become aware that

we have collected data from a minor without appropriate consent, we will delete it promptly. Contact us at [privacy@lemonslemons.ai](mailto:privacy@lemonslemons.ai) if you believe this has occurred.

## **12. Changes to This Policy**

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We may update this Privacy Policy from time to time. Where changes are material, we will notify you by email or via a prominent notice on the platform at least 14 days before the changes take effect. The effective date at the top of this page will always reflect the most recent version.

We encourage you to review this policy periodically.

## **13. Contact**

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For any questions, requests, or concerns about this Privacy Policy or the way we handle your data:

Godomodo Ltd. (LemonsLemons)  
Apt. 16, Floor 3, 12 Naroden Pevets Str.  
Pavlovo, Sofia 1618, Bulgaria  
Email: [privacy@lemonslemons.ai](mailto:privacy@lemonslemons.ai)  
Website: [lemonslemons.ai](https://lemonslemons.ai)