

# Privacy Policy

*Last Updated: 11 November 2024*

By accepting Lumipic Pro's Terms of Service, you also acknowledge and agree with this Privacy Policy. Lumipic Pro respects the privacy of its online visitors and customers of its products and services and complies with applicable laws for the protection of your privacy, including, without limitation, the European Union General Data Protection Regulation ("GDPR") and the California Consumer Privacy Act ("CCPA").

## 1. Introduction

This Privacy Policy explains what personal data we collect from users, for what reasons we collect it, and how we utilize it. Before using our website or any of the services affiliated with Lumipic Pro, please read this Privacy Policy carefully.

Please note that this Privacy Policy constitutes an agreement between you and **Astrid Ecosystems LLC**, the owner of Lumipic Pro.

## 2. Information We Collect

### 2.1 Personal Information

The personal information we may request to use and process includes, but is not limited to:

- **Account Information:** Email address and password required for account registration. If you register via the Telegram mini app, necessary data provided by Telegram is collected automatically.
- **Contact Information:** Correspondence made via lumipic.pro, affiliated Telegram bots, support emails, and other means of communication.
- **Payment Information:** While we do not collect payment data such as credit card numbers, transaction history through our payment providers may be recorded.
- **Usage Data:** Website logins, traffic data, GeoIP location data, activity logs, and other traffic information recorded on our system.
- **User Behavior:** Information about your interactions with Lumipic Pro, including preferred language and usage patterns.

### 2.2 Source Images and Prompts

When you use Lumipic Pro's services, you may be asked to submit various forms of media, such as images and source photos. This data is used to create AI-driven images based on your prompts.

### 2.3 Face Embeddings and Age Estimates

We process your submitted images through our server's face API to:

- **Estimate Age:** Determine the estimated age of individuals in the submitted images.
- **Create Face IDs and Embeddings:** Generate unique face identifiers based on facial embeddings for recognition and restriction purposes.

### 2.4 Technical Data

We use third-party services such as Firebase Analytics, Google Analytics, Facebook Pixel, and Twitter/X Pixel to collect data on your usage patterns, device information, and other technical details to improve our Service.

### 3. How We Use Your Information

#### 3.1 Service Provision

To create AI-driven images based on your prompts and source photos.

#### 3.2 Account Management

To manage your account, authenticate your access, and ensure the security of your account.

#### 3.3 Data Analysis

To analyze usage trends and improve our Service through the use of analytics tools.

#### 3.4 Data Monetization

We may monetize your data as we see fit, including using it for any purpose if we decide to do so in the future. This may include selling aggregated data, using data for targeted advertising, or other commercial purposes. We will ensure that any monetization efforts comply with applicable laws, including GDPR and CCPA, and that appropriate user consent is obtained where required.

#### 3.5 Legal Obligations

To comply with applicable laws, regulations, and legal processes, including handling DMCA takedown requests.

### 4. Data Sharing

#### 4.1 Third-Party Services

We share your data with third-party service providers to facilitate the functionality and improvement of our Service. These providers include:

1. **Firestore:** Used for authentication and analytics.
2. **Google Cloud:** Utilized for data storage and processing.
3. **Google Analytics:** Employed to track and report website traffic.
4. **Facebook Pixel:** Used for tracking conversions and building targeted audiences.
5. **Twitter/X Pixel:** Utilized for tracking user interactions and advertising effectiveness.

These third-party services are bound by their own privacy policies and are not permitted to use your information for any other purpose.

#### 4.2 Data Monetization

In the event we choose to monetize your data, it will be done in a manner compliant with GDPR, CCPA, and other relevant privacy laws. This may involve:

- **Aggregated Data Sales:** Selling anonymized and aggregated data that does not personally identify you.

- **Targeted Advertising:** Using your data to serve personalized ads, ensuring compliance with opt-in requirements under GDPR and opt-out provisions under CCPA.
- **Research and Development:** Utilizing data to improve our AI algorithms and service offerings.

### **4.3 Legal Requirements**

We may disclose your information if required to do so by law or in response to valid requests by public authorities, such as a court or government agency.

### **4.4 Protection of Rights**

We may disclose your information to protect our rights, privacy, safety, or property, and that of our users or others.

## **5. Data Security**

We implement industry-standard security measures to protect your information from unauthorized access, alteration, disclosure, or destruction. These measures include the use of HTTPS protocol for data transmission and secure storage practices.

However, no method of transmission over the Internet or electronic storage is 100% secure. Therefore, we cannot guarantee absolute security.

## **6. User Rights**

### **6.1 Access and Correction**

You have the right to access and update your personal information by logging into your account or contacting us directly at [info@lumipic.pro](mailto:info@lumipic.pro).

### **6.2 Deletion**

You may request the deletion of your personal data by contacting us. We will respond to your request in accordance with applicable laws.

### **6.3 Opt-Out**

You can opt-out of receiving marketing communications from us by following the unsubscribe instructions provided in our emails or by contacting us directly.

### **6.4 Data Portability**

You have the right to request a copy of your personal data in a structured, commonly used, and machine-readable format.

### **6.5 Consent Withdrawal**

Where processing is based on your consent, you have the right to withdraw that consent at any time, without affecting the lawfulness of processing based on consent before its withdrawal.

## **7. Cookies and Tracking Technologies**

We use cookies and similar tracking technologies (e.g., web beacons, pixels) provided by third-party services like Google Analytics, Facebook Pixel, and Twitter/X Pixel to collect information about your interactions with our Service. These technologies help us analyze usage patterns and improve the Service. You can manage your cookie preferences through your browser settings. Please note that disabling cookies may affect the functionality of the Service.

## **8. Third-Party Privacy Policies**

By using Lumipic Pro, you acknowledge that the processing and storage of your media and data by third-party services are governed by their respective privacy policies and terms of service. We ensure that all third-party service providers are compliant with GDPR, CCPA, and other relevant privacy regulations to protect your personal data.

## **9. Children's Privacy**

Lumipic Pro is not intended for use by individuals under the age of 21. We do not knowingly collect personal information from anyone under 21. If we become aware that we have inadvertently received personal information from a user under 21, we will delete such information from our records.

## **10. Data Retention**

We retain your personal information only for as long as necessary to fulfill the purposes outlined in this Privacy Policy, unless a longer retention period is required or permitted by law.

## **11. Data Breach Policy**

In the event of a data breach that compromises your personal information, we will notify you promptly via email and take necessary measures to mitigate the breach and prevent future occurrences.

## **12. Compliance with Laws**

We comply with applicable data protection laws, including the General Data Protection Regulation (GDPR) and the California Consumer Privacy Act (CCPA), ensuring that your personal information is handled lawfully and transparently.

## **13. Changes to Privacy Policy**

We may update this Privacy Policy from time to time. Any changes will be posted on this page, and the revised policy will be effective immediately upon posting. Your continued use of Lumipic Pro after such changes constitutes your acceptance of the updated Privacy Policy.

**By using Lumipic Pro's services, you agree to this Privacy Policy and confirm your understanding and acceptance of how we manage and protect your personal data in compliance with GDPR, CCPA, and other privacy regulations.**