

Lumo - Privacy Policy

1. Introduction

Lumo Labs, Inc. ("**Lumo**," "**we**," "**us**" or "**our**") respects your privacy. This Privacy Policy explains how we collect, use, disclose and safeguard your information when you access or use our website, application, APIs, browser extensions, and related services (collectively, the "**Services**"). By using the Services, you agree to the collection and use of information in accordance with this Policy.

2. Information We Collect

Category	Examples	Source
Information you provide	Name, email, company, survey content, billing information, feedback	You
Automatically collected	IP address, device type, browser, pages visited, time stamps, usage metrics	Your device & cookies
From third parties	Payment processors, analytics vendors, authentication providers	Third-party services

We do **not** knowingly collect data that directly identifies protected classes, unless you voluntarily provide it as part of survey content.

3. How We Use Your Information

- Provide, operate and maintain the Services
- Create and manage your account and wait-list status
- Generate synthetic survey responses and analytics
- Process payments and send transactional messages
- Monitor and improve performance, security and user experience
- Conduct research and develop new features
- Send marketing communications (you may opt-out at any time)
- Comply with legal obligations and protect our rights

4. Legal Bases (EEA & UK Users)

We process personal data only when we have a valid legal basis, including contractual necessity, legitimate interests (e.g., Service improvement), consent (e.g., marketing emails) and compliance with legal obligations.

5. Sharing & Disclosure

We do **not** sell your personal information. We share it only:

1. **Service Providers** – cloud hosting, payment, analytics, support and AI-model vendors under strict confidentiality.
2. **Business Transfers** – if we merge, acquire, or sell assets.
3. **Legal Requirements** – to comply with law, court order or defend legal claims.
4. **With Consent** – for any other purpose you approve.

6. International Transfers

We operate globally. Where data is transferred outside your region, we rely on approved safeguards such as Standard Contractual Clauses.

7. Data Retention

We retain personal data as long as your account is active or as needed to provide the Services, comply with legal duties, resolve disputes, and enforce agreements. You may delete your account at any time.

8. Security

We employ industry-standard administrative, technical and physical safeguards, including encryption in transit and at rest, role-based access controls, and regular penetration testing. No system is 100 % secure; you use the Services at your own risk.

9. Your Rights & Choices

Depending on your jurisdiction, you may have rights to:

- Access, correct or delete personal data
- Object to or restrict processing
- Port your data
- Opt-out of marketing communications
- Lodge a complaint with a supervisory authority To exercise rights, email contact@joinlumo.com

10. Children's Privacy

The Services are not directed to children under 16. We do not knowingly collect data from minors. If you believe we have, contact us and we will delete it.

11. Changes to This Policy

We may update this Policy periodically. If changes are material, we will notify you (e.g., via email or prominent notice). Continued use after an update constitutes acceptance.

12. Contact Us

Questions? Email contact@joinlumo.com