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# Privacy Policy Version 1.1

**Psychic Chat POC**
**Effective Date**: January 1, 2026
**Last Updated**: January 1, 2026
**Jurisdiction**: Global (US, Mexico, Canada, Brazil)

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## 1. Introduction

Welcome to Psychic Chat POC ("**we**," "**us**," "**our**," or the "Service"). We are committed to protecting your privacy and ensuring you have a positive experience on our platform. This Privacy Policy explains how we collect, use, disclose, and otherwise process your personal information.

This Privacy Policy applies to our website, mobile applications, and all services offered through these platforms. We comply with:
- **GDPR** (General Data Protection Regulation) - EU/EEA residents
- **CCPA** (California Consumer Privacy Act) - California residents
- **PIPEDA** (Personal Information Protection and Electronic Documents Act) - Canadian residents
- **LGPD** (Lei Geral de Proteção de Dados) - Brazilian residents

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## 2. What Personal Information We Collect

### 2.1 Information You Provide Directly

#### Registration & Account Creation
- **Full Name** (first name, last name)
- **Email Address**
- **Password** (hashed and encrypted)
- **Gender/Sex**
- **Consent Preferences** (for astrology, health guidance, chat functionality)

#### Birth Information (Optional - For Astrology Calculations)
- **Date of Birth** (YYYY-MM-DD format)
- **Time of Birth** (HH:MM 24-hour format)
- **Birth Location** (country, province/state, city)

#### Profile Information (Optional)
- **Preferred Name** (how you'd like to be addressed)
- **Profile Picture** (if uploading one)
- **Bio/Description** (if sharing)

#### Communication Data
- **Chat Messages** (all conversation history with The Oracle)
- **Support Requests** (if you contact us with questions)
- **Feedback & Suggestions** (if you submit improvement ideas)
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2.2 Information We Collect Automatically

Technical Data

- **IP Address** (recorded at login, consent, and sensitive actions)
- **User-Agent String** (browser/device information)
- **Device Type** (mobile, desktop, tablet)
- **Browser Type & Version**
- **Operating System**
- **Session Timestamps** (login/logout times)

Usage Data

- **Pages/Features Accessed** (which tools you use)
- **Time Spent** (session duration)
- **Click Events** (which buttons you interact with)
- **Search Queries** (what you ask The Oracle)
- **Error Messages** (if something fails)

Cookies & Tracking

- **Session Cookies** (for authentication)
- **Preference Cookies** (language, theme)
- **Analytics Cookies** (Google Analytics if enabled) Google Analytics Not Implemented

2.3 Information from Third Parties

Geolocation Services

- **Timezone Information** (derived from IP address if not provided)
- **Latitude/Longitude** (calculated from city/country for birth location)

Payment Processing (if applicable)

- **Payment Method** (credit card, PayPal - not stored by us)
- **Transaction History** (stored with payment processor)
- **Billing Address** (if different from profile)

3. Purpose for Collecting Your Data

3.1 Essential Operations

Data	Purpose	Legal Basis
Name, Email, Password	Account creation and authentication	Contract
IP Address, User-Agent	Security and fraud prevention	Legitimate Interest
Login Timestamps	Account access logging and audit trail	Legal Obligation
Gender	Personalized astrological guidance	Consent

3.2 Astrology & Divination Services

Data	Purpose	Legal Basis

Birth Date/Time/Location Calculate Sun, Moon, Rising signs Consent
Birth Timezone Accurate astrological calculations Consent
Chat Messages Provide personalized oracle guidance Consent
Previous Readings Improve consistency in guidance Consent

3.3 Service Improvement
Data Purpose Legal Basis
----- ----- -----
Usage Data Understand feature popularity Legitimate Interest
Error Logs Fix bugs and improve stability Legitimate Interest
Feedback Develop new features users want Legitimate Interest

3.4 Compliance & Legal
Data Purpose Legal Basis
----- ----- -----
Audit Logs Demonstrate compliance with regulations Legal Obligation
Consent Records Prove user agreed to data processing Legal Obligation
Access Logs Respond to data subject requests Legal Obligation

4. Data Retention Schedule
4.1 Active Account Data (Retained While Account Is Active)
Data Type Retention Period Notes
----- ----- -----
Personal Profile Until account deletion Name, email, gender, preferences
Birth Information Until account deletion Used for ongoing astrology calculations
Chat Messages 30 days active, deleted on account closure Automatically purged after 30 days of inactivity
Session Tokens 24 hours Automatically expire
Refresh Tokens 7 days Automatically expire
4.2 Deleted Account Data (Retained After Deletion for Legal Reasons)
Data Type Retention Period Notes
----- ----- -----
Anonymized Profile 12 months Name/email replaced with random values
Consent Records Indefinitely Required by GDPR/CCPA for legal disputes
Deletion Audit Log 7 years Required for financial/legal compliance
Chat Messages Immediately deleted Not retained after account deletion
Technical Logs 12 months IP addresses anonymized after 6 months
4.3 Cookies & Tracking Data

Cookie Type	Retention Period
Session Cookies	Until logout or 24 hours
Preference Cookies	1 year or until browser cleared
Analytics Cookies	13 months (Google Analytics standard) **Google Analytics Not Implemented**

4.4 Backups & Disaster Recovery

- **Database Backups**: Retained for 30 days (for recovery purposes)
 - **Encrypted Backups**: Retained off-site for 90 days
 - **All backups are encrypted** and only accessible by authorized personnel
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5. Your Privacy Rights

5.1 GDPR Rights (EU/EEA Residents)

You have the right to:

Article 15: Right of Access

- Request a copy of all personal data we hold about you
- **Action**: Use "Download My Data" button in account settings
- **Timeline**: Within 30 days

Article 16: Right to Rectification

- Correct inaccurate or incomplete information
- **Action**: Edit your profile information in account Personal Information
- **Timeline**: Immediate

Article 17: Right to Erasure ("Right to Be Forgotten")

- Request deletion of your personal data
- **Action**: Use "Delete My Account" button in account settings
- **Timeline**: Within 30 days (30-day retention period after deletion)
- **Exceptions**: Legal obligations, fraud investigation

Article 20: Right to Data Portability

- Export your data in machine-readable format (JSON)
- **Action**: Use "Download My Data" button in account settings
- **Format**: JSON file containing all personal data
- **Timeline**: Within 30 days

Article 21: Right to Object

- Object to processing of your data for marketing or profiling
- **Action**: Email privacy@starshippsychics.com
- **Timeline**: Honored within 30 days

Article 22: Automated Decision Making

- We do NOT use automated decision-making or profiling

- Our astrology guidance, tarot card readingd, crystal and aroma messages are provided by AI for entertainment only

5.2 CCPA Rights (California Residents)

You have the right to:

Right to Know

- Know what personal information we collect, use, and disclose
- **Action**: Use "Download My Data" button
- **Cost**: Free

Right to Delete

- Request deletion of personal information (with exceptions)
- **Action**: Use "Delete My Account" button
- **Cost**: Free
- **Timeline**: Within 45 days

Right to Opt-Out

- Opt out of "sale" or "sharing" of personal information
- **Status**: We do NOT sell your data
- **Status**: We do NOT share your data with third parties

Right to Non-Discrimination

- We will NOT discriminate against you for exercising your rights
- Same pricing, quality, and service for all users

Right to Limit Use & Disclosure

- Limit use of sensitive personal information
- **Action**: Contact privacy@starshippsychics.com
- **Sensitive Information**: Birth date, location data

5.3 PIPEDA Rights (Canadian Residents)

You have the right to:

Right of Access

- Request all personal information we hold
- **Action**: Use "Download My Data" button
- **Cost**: Reasonable fee (~\$0)
- **Timeline**: Within 30 days

Right to Correction

- Correct inaccurate information
- **Action**: Edit profile personal information
- **Timeline**: Immediate

Right to Deletion

- Request deletion of personal information
- **Action**: Use "Delete My Account" button
- **Timeline**: Within 30 days

Right to Withdraw Consent

- Withdraw consent for astrology services

- **Action**: Contact privacy@starshippsychics.com
- **Effect**: Service will be limited

5.4 LGPD Rights (Brazilian Residents)

You have the right to:

Right of Access

- Request all personal data processed
- **Action**: Use "Download My Data" button
- **Timeline**: Within 15 days

Right to Correction

- Correct inaccurate data
- **Action**: Edit profile personal information
- **Timeline**: Immediate

Right to Deletion

- Request data erasure
- **Action**: Use "Delete My Account" button
- **Timeline**: Within 15 days

Right to Data Portability

- Export data in standard format
- **Action**: Use "Download My Data" button
- **Format**: JSON

Right to Object

- Object to data processing
- **Action**: Contact privacy@starshippsychics.com
- **Timeline**: Response within 15 days

6. How We Share Your Data

6.1 Data We Do NOT Share

- ✗ We do NOT sell your personal data
- ✗ We do NOT share with marketing companies
- ✗ We do NOT share with data brokers
- ✗ We do NOT share with advertisers
- ✗ We do NOT share without explicit consent

6.2 Data We MAY Share

Service Providers (Under Data Processing Agreements)

Provider	What Data	Purpose	Location
Railway.app	All encrypted data	Platform hosting	US
PostgreSQL	Encrypted personal data	Database storage	US
Redis	Session data	Message queue	US

****DPA Status**:** All service providers have Data Processing Agreements in place

Legal Requirements

- ****Law Enforcement**:** If legally required (subpoena, warrant)
- ****Safety**:** If necessary to prevent harm or illegal activity
- ****Terms Enforcement**:** If necessary to enforce our Terms of Service
- ****Notification**:** We will notify you unless legally prohibited

Consent-Based Sharing

- Only with your explicit, written consent
- You can withdraw consent anytime

7. Data Security

7.1 Encryption

- ****At Rest**:** All PII encrypted using PostgreSQL pgcrypto (AES-256)
- ****In Transit**:** All connections use HTTPS/TLS 1.3
- ****End-to-End**:** Chat messages encrypted in database
- ****Backups**:** All backups encrypted at rest

7.2 Access Controls

- ****API Authentication**:** JWT tokens (24-hour expiration)
- ****Password Hashing**:** bcrypt with salt
- ****Email Hashing**:** bcrypt with salt
- ****IP Logging**:** All sensitive actions logged with IP address
- ****Audit Trail**:** All data access logged and timestamped

7.3 Infrastructure Security

- ****Firewall**:** Railway.app managed firewall
- ****DDoS Protection**:** Automatic protection enabled
- ****Vulnerability Scanning**:** Regular security scans
- ****Penetration Testing**:** Periodic third-party testing
- ****SSL Certificate**:** Valid HTTPS certificate

7.4 Employee Access

- ****Need-to-Know Basis**:** Only essential personnel access data
- ****Confidentiality Agreements**:** All staff sign NDAs
- ****Background Checks**:** Required before access granted
- ****Training**:** Annual security training required

8. Data Breach Notification

8.1 Our Commitment

In the event of a data breach affecting your personal information, we will:

1. **Investigate Immediately** (within 24 hours)
2. **Contain the Breach** (stop further unauthorized access)
3. **Notify Regulators** (within 72 hours of discovery - GDPR requirement)
4. **Notify You** (within 72 hours if risk to rights/freedoms)

8.2 What You'll Receive

- **Email Notification** with:
 - What data was affected
 - What we've done to secure it
 - What steps you should take
 - Contact information for questions
 - Reference number for your records

8.3 Breach Reporting Contacts

- **EU Residents**: Report to your national data protection authority
- **California Residents**: California Attorney General
- **Canadian Residents**: Office of the Privacy Commissioner of Canada
- **Brazilian Residents**: National Data Protection Authority (ANPD)

9. Cookies & Tracking

9.1 Cookie Types We Use

Cookie	Purpose	Type	Duration
`auth_token`	Authentication	Functional	24 hours
`refresh_token`	Session persistence	Functional	7 days
`theme`	UI preferences	Preference	1 year
`language`	Language selection	Preference	1 year
`_ga`	Analytics (Google)	Analytics	13 months
			Google Analytics Not Implemented

9.2 Cookie Management

- **Enable/Disable**: Use browser cookie settings
- **Clear Cookies**: "Clear browsing data" in your browser
- **Opt-Out Analytics**: Disable Google Analytics tracking**Google Analytics Not Implemented**

9.3 Third-Party Analytics

We do not use Google Analytics to understand usage patterns:

- **Opt-Out**: [Google Analytics Opt-Out Browser Add-on] (<https://tools.google.com/dlpage/gaoptout>) **Not Implemented**
- **Data**: Anonymized, aggregated usage data
- **No PII**: Personal information NOT sent to Google

10. Children's Privacy

10.1 Age Restriction

- **Minimum Age**: 18 years old
- **Why**: Astrology is entertainment for adults; we do not provide medical/legal advice to minors

10.2 If We Discover a Child

- Immediately delete all personal data
- Notify parent/guardian
- Comply with COPPA (Children's Online Privacy Protection Act)

10.3 Parental Contact

If you believe your child has created an account:

- Email: privacy@starshippsychics.com
- Phone: +1-XXX-XXX-XXXX
- We will investigate and delete data within 24 hours

11. Contact Information

11.1 Privacy Questions

Email: privacy@starshippsychics.com

Mail Address:

Starship Psychics
Privacy Team
PO Box 13
Winberley, TX 78676

Response Time: Within 30 days (or as required by law)

11.2 Data Subject Request Form

To make a formal data subject request:

...

To: privacy@starshippsychics.com
Subject: Data Subject Request - [Your Name]

Request Type (choose one):

- [] Right of Access (send me my data)
- [] Right to Deletion (delete my account)
- [] Right to Rectification (correct my data)
- [] Right to Portability (send data in portable format)
- [] Right to Object (object to processing)

Name: [Your Full Name]
Email: [Your Email]
Date of Birth: [YYYY-MM-DD] (helps us verify your identity)
Account ID: [Your Account ID, if known]

Details:
[Explain your request]

Signature:
[Your Signature]
Date:
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### ### 11.3 Regulatory Contacts (If You Have Complaints)

- \*\*EU Residents\*\*:**
  - Your local Data Protection Authority
  - [Find your DPA] ([https://edpb.ec.europa.eu/about-edpb/members\\_en](https://edpb.ec.europa.eu/about-edpb/members_en))
- \*\*California Residents\*\*:**
  - California Attorney General: [oag.ca.gov] (<https://oag.ca.gov>)
- \*\*Canadian Residents\*\*:**
  - Office of the Privacy Commissioner: [priv.gc.ca] (<https://priv.gc.ca>)
- \*\*Brazilian Residents\*\*:**
  - ANPD (Autoridade Nacional de Proteção de Dados):  
[anpd.gov.br] (<https://www.anpd.gov.br>)

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## ## 12. Third-Party Links & Services

### ### 12.1 External Links

Our Service may contain links to external websites:

- **\*\*Not Responsible\*\*:** We are not responsible for external sites' privacy practices
- **\*\*Read Their Privacy Policy\*\*:** Before sharing information on external sites
- **\*\*No Endorsement\*\*:** Links don't mean we endorse those sites

### ### 12.2 Sub-Processors

We use the following services to process your data:

| Service     | Purpose          | Location | DPA |
|-------------|------------------|----------|-----|
| Railway.app | Platform hosting | US       | Yes |
| PostgreSQL  | Database hosting | US       | Yes |
| Redis       | Message queue    | US       | Yes |

**\*\*Data Transfer\*\*:** For EU residents, we rely on Standard Contractual Clauses (SCCs) for US-based processors.

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## # 13. International Data Transfers

### ## 13.1 Your Information May Be Transferred To

- \*\*United States\*\* (hosting infrastructure)
- \*\*Mexico\*\* (if you access from Mexico)
- \*\*European Union\*\* (if you access from EU)
- \*\*Canada\*\* (if you access from Canada)
- \*\*Brazil\*\* (if you access from Brazil)

### ## 13.2 Data Transfer Mechanisms

#### \*\*For EU/EEA Residents\*\*:

- Standard Contractual Clauses (SCCs) with US processors
- Data Processing Agreements (DPAs) in place

#### \*\*For Canadian Residents\*\*:

- PIPEDA-compliant transfer agreements

#### \*\*For Brazilian Residents\*\*:

- LGPD-compliant transfer agreements

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## # 14. Your Choices & Controls

### ## 14.1 Marketing Communications

- \*\*Email Marketing\*\*: Opt-out via link in every email
- \*\*Push Notifications\*\*: Disable in account settings
- \*\*SMS Marketing\*\*: Reply STOP to any SMS

### ## 14.2 Data Preferences

#### \*\*In Account Settings\*\*, you can control:

- [ ] Turn off anonymous usage analytics
- [ ] Allow email communication

### ## 14.3 Download or Delete Your Data

#### \*\*Download Your Data\*\*:

1. Log in to your account
2. Go to My Account → Settings
3. Click "Download My Data"
4. Receive JSON file with all your information

#### \*\*Delete Your Account\*\*:

1. Log in to your account
2. Go to My Account → Settings
3. Click "Delete My Account"
4. Confirm with password

5. Confirm with email verification
6. Account and data deleted within 30 days

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## ## 15. Changes to This Privacy Policy

### ### 15.1 Updates

We may update this Privacy Policy occasionally to:

- Reflect changes in our practices
- Respond to legal requirements
- Improve clarity

### ### 15.2 Notification

- **Email**: We'll notify you of material changes
- **In-App**: Notice displayed when you log in
- **Website**: Updated date shown at top of this policy

### ### 15.3 Your Consent

- **Continued Use**: Using our Service after updates means you accept changes
- **Opt-Out**: Stop using the Service if you disagree

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## ## 16. Additional Information by Jurisdiction

### ### 16.1 California (CCPA/CPRA) Specific

**Your California Privacy Rights**:

- [x] Right to know what PII is collected
- [x] Right to delete PII (with exceptions)
- [x] Right to opt-out of "sale" (we don't sell data)
- [x] Right to opt-out of "sharing" (we don't share data)
- [x] Right to correction
- [x] Right to limit use of sensitive PII
- [x] Right to non-discrimination

**Shine the Light Request**: Email [privacy@psychicchat.example.com](mailto:privacy@psychicchat.example.com)

### ### 16.2 EU/EEA (GDPR) Specific

**Data Protection Officer**: [privacy@starshippsychics.com](mailto:privacy@starshippsychics.com)

**Legal Basis for Processing**:

- **Consent**: Explicit consent for astrology services
- **Contract**: Necessary to provide the service
- **Legal Obligation**: Audit logging, compliance
- **Legitimate Interests**: Security, fraud prevention, service improvement

**\*\*Right to Lodge a Complaint\*\*:** With your local data protection authority

**### 16.3 Canada (PIPEDA) Specific**

**\*\*Data Controller\*\*:** Starship Psychics LLC, PO Box 13, Wimberle, TX

**\*\*Privacy Officer\*\*:** privacy@starshippsychics.com

**\*\*Consent\*\*:** Explicit opt-in required for astrology services

**\*\*Access Requests\*\*:** Submit via privacy@starshippsychics.com

**### 16.4 Brazil (LGPD) Specific**

**\*\*Data Controller\*\*:** Starship Psychics LLC

**\*\*Lawful Bases\*\*:**

- Consent (explicit for astrology)
- Contract performance
- Legal obligation
- Legitimate interest

**\*\*ANPD Complaints\*\*:** [anpd.gov.br] (<https://www.anpd.gov.br>)

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**## 17. California Residents - Summary of Privacy Practices**

**\*\*For California residents, here's a quick summary:\*\***

**### Categories of Information We Collect:**

- ✓ Identifiers (name, email, IP)
- ✓ Commercial info (account history)
- ✓ Biometric info (none)
- ✓ Internet activity (usage logs)
- ✓ Geolocation (city/timezone)
- ✓ Professional info (none)
- ✓ Inferences (astrological profile)

**### Categories of Sources:**

- You (directly via form)
- Automated systems (cookies, analytics)
- Service providers (geolocation services)

**### Use of Personal Information:**

- Provide services (astrology calculations)
- Verify identity and prevent fraud
- Improve the service
- Comply with law
- Respond to your requests

**### "Sale" of Personal Information:**

🚫 \*\*We DO NOT sell your personal information\*\*

### "Sharing" for Cross-Context Behavioral Advertising:

🚫 \*\*We DO NOT share your information for this purpose\*\*

### Your Rights:

- ✓ Right to know what we collect
- ✓ Right to delete your data
- ✓ Right to opt-out of sales/sharing (N/A - we don't do this)
- ✓ Right to correct inaccurate data
- ✓ Right to non-discrimination

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# 18. Definitions

**Personal Information**: Any information that identifies or could identify you individually

**PII**: Personally Identifiable Information (name, email, birth date, location)

**Processing**: Any operation performed on data (collection, storage, use, deletion)

**Data Controller**: The entity that decides why/how data is processed (us)

**Data Processor**: Third party that processes data on our behalf (service providers)

**Data Subject**: The individual whose data is being processed (you)

**Consent**: Your voluntary, informed agreement to data processing

**Legitimate Interest**: A reason to process data that benefits you or us

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# 19. Accessibility

This Privacy Policy is available in:

- **GB** English (this document)
- **ES** Spanish (available upon request)
- **FR** French (available upon request)
- **DE** German (available upon request)

**Request Alternative Language**: privacy@psychicchat.example.com

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# 20. Acknowledgment & Consent

By using Psychic Chat POC, you acknowledge that you have read and understood this Privacy Policy. By providing personal information, you consent to:

- Collection and processing of your data as described
- Storage of data in encrypted form
- Processing by service providers listed above
- International transfer (where applicable)
- Audit logging for compliance

If you do NOT agree with these terms, please do NOT use our Service.

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#### # Final Notes

- \*\*Last Review Date\*\*: January 2, 2026
- \*\*Next Review Date\*\*: July 1, 2026 (or upon regulatory changes)
- \*\*Version\*\*: 1.0 (Initial)
- \*\*Status\*\*:  APPROVED FOR LAUNCH

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\*\*Thank you for trusting us with your information.\*\*

\*\*Questions?\*\* Contact [privacy@psychicchat.example.com](mailto:privacy@psychicchat.example.com)

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\*This Privacy Policy is a compliance document intended for global use. While we've made efforts to address GDPR, CCPA, PIPEDA, and LGPD, you may wish to have legal counsel review for your specific jurisdiction before final publication.\*  
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