



PRIVACY POLICY AND TERMS OF SERVICE

Effective Date: 08/06/25

1. Introduction

Welcome to Astella AI.

Astella AI (“us”, “we”, or “our”) operates the website astellaai.com (hereinafter referred to as the “Service”). This Privacy Policy governs your visit to astellaai.com and explains how we collect, safeguard, and disclose information resulting from your use of our Service.

We use your data to provide and improve our Service. By using the Service, you agree to the collection and use of information in accordance with this Privacy Policy. Unless otherwise defined in this Privacy Policy, the terms used herein have the same meanings as in our Terms and Conditions.

Our Terms and Conditions (“Terms”) govern all use of our Service and, together with this Privacy Policy, constitute your agreement with us (“Agreement”).

2. Definitions

- **SERVICE:** The astellaai.com website operated by Astella AI.
- **PERSONAL DATA:** Information that relates to a living individual who can be identified from that data (or from that data and other information in our possession or likely to come into our possession).
- **USAGE DATA:** Data collected automatically, either generated by the use of the Service or from the Service's infrastructure itself (for example, the duration of a page visit).
- **COOKIES:** Small files stored on your device (computer or mobile device).
- **DATA CONTROLLER:** A natural or legal person who determines the purposes for which and the manner in which any personal data are processed. For the purposes of this Privacy Policy, we are the Data Controller of your data.
- **DATA PROCESSORS (OR SERVICE PROVIDERS):** Any natural or legal person who processes data on behalf of the Data Controller. We may use the services of various Service Providers to process your data more effectively.
- **DATA SUBJECT:** Any living individual who is the subject of Personal Data.
- **THE USER:** The individual using our Service, corresponding to the Data Subject.

3. Information Collection and Use

We collect several types of information for various purposes to provide and improve our Service to you. The types of data we may collect include:

- **Personal Data:** While using our Service, we may ask you to provide us with certain personally identifiable information that can be used to contact or identify you. This may include, but is not limited to, your name, email address, and any information related to mental health that you choose to share.
- **Usage Data:** We may collect information on how the Service is accessed and used. This Usage Data may include information such as your device's Internet Protocol address (e.g., IP address), browser type, browser version, the pages of our Service that you visit, the time and date of your visit, the time spent on those pages, and other diagnostic data.
- **Cookies and Tracking Technologies:** We use cookies and similar tracking technologies to track the activity on our Service and hold certain information. You can instruct your browser to refuse all cookies or to indicate when a cookie is being sent. However, if you do not accept cookies, you may not be able to use some portions of our Service.

All data is stored securely in a database managed by Astella AI using Firebase. We adhere to strict data security protocols to protect the information we collect.

4. Use of Data

Astella AI uses the collected data for various purposes, including to:

- Provide and maintain our Service.
- Notify you about changes to our Service.
- Allow you to participate in interactive features of our Service when you choose to do so.
- Provide customer support.
- Gather analysis or valuable information so that we can improve our Service.
- Monitor the usage of our Service.
- Detect, prevent, and address technical issues.
- Provide you with news, special offers, and general information about other services that we offer, similar to those that you have already purchased or inquired about, unless you have opted not to receive such information.

We may also collect information that your browser sends whenever you visit our Service or when you access the Service through any device ("Usage Data"). This Usage Data may include information such as:

- Your computer's Internet Protocol address (e.g., IP address)
- Browser type and version
- The pages of our Service that you visit
- The time and date of your visit

- The time spent on those pages
- Unique device identifiers and other diagnostic data

When you access the Service with a device, this Usage Data may include additional information such as:

- The type of device you use
- Your device's unique ID
- The IP address of your device
- Your device's operating system
- The type of Internet browser you use
- Unique device identifiers and other diagnostic data

5. Data Sharing and Disclosure

We may share your information with trusted third-party service providers to facilitate our Service, provide the Service on our behalf, perform Service-related services, or assist us in analyzing how our Service is used. These third parties have access to your Personal Data only to perform these tasks on our behalf and are obligated not to disclose or use it for any other purpose.

Astella AI shares summarized data with school counselors to identify potential crises that may require attention. This summary includes:

- Sentiment analysis results.
- Recommendations for further action.

Counselors may also provide additional information to the platform, such as:

- Grades.
- Behavior referrals.
- Emotional assessment results
- Notes about sessions regarding family or school dynamics.

6. Security of Data

The security of your data is important to us, and we strive to implement and maintain reasonable, commercially acceptable security procedures and practices appropriate to the nature of the information we store to protect it from unauthorized access, destruction, use, modification, or disclosure.

7. Types of Data Collected

Personal Data

While using our Service, we may ask you to provide us with certain personally identifiable information that can be used to contact or identify you ("Personal Data"). Personally identifiable information may include, but is not limited to:

1. Email address
2. First name and last name
3. Phone number
4. Address, including Country, State, Province, ZIP/Postal code, and City
5. Cookies and Usage Data

We may use your Data to contact you with newsletters, marketing or promotional materials, and other information that may be of interest to you. You may opt out of receiving any or all of these communications by following the unsubscribe link provided in those communications.

8. Location Data

We may use and store information about your location if you permit us to do so ("Location Data"). We use this data to provide features of our Service and to improve and customize your experience. You can enable or disable location services when you use our Service at any time through your device settings.

9. Tracking Cookies Data

We use cookies and similar tracking technologies to monitor activity on our Service and hold certain information. Cookies are files with a small amount of data, which may include an anonymous unique identifier. Cookies are sent to your browser from a website and stored on your device. Other tracking technologies, such as beacons, tags, and scripts, may also be used to collect and track information to improve and analyze our Service.

You can instruct your browser to refuse all cookies or to indicate when a cookie is being sent. However, if you do not accept cookies, you may not be able to use some portions of our Service.

Examples of Cookies we use include:

1. **Session Cookies:** Used to operate our Service.
2. **Preference Cookies:** Used to remember your preferences and various settings.
3. **Security Cookies:** Used for security purposes.
4. **Advertising Cookies:** Used to serve you advertisements that may be relevant to you and your interests.

10. Other Data

In addition to the above, while using our Service, we may also collect the following information, which may be considered sensitive:

- Gender
- Age
- Date of birth
- Place of birth
- Passport details
- Citizenship
- Registration at the place of residence and actual address
- Telephone numbers (work, mobile)
- Educational qualifications and professional training details
- Employment agreements
- Information on bonuses and compensation
- Marital status and family members
- Social security or other taxpayer identification number
- Office location
- Any other relevant data

We recognize that this information is sensitive, especially in the context of mental health, and we are committed to handling it with the highest standards of confidentiality and security.

11. Use of Data

Astella AI uses the collected data for various purposes, including but not limited to:

1. **Providing and Maintaining Our Service:** To ensure the functionality and availability of our Service.
2. **Notifying You of Changes:** To inform you about updates or changes to our Service.
3. **Interactive Features:** To allow you to participate in interactive features of our Service when you choose to do so.
4. **Customer Support:** To provide assistance and support to you when needed.
5. **Data Analysis and Improvement:** To gather analysis or valuable information to enhance and improve our Service.
6. **Monitoring Usage:** To monitor the usage of our Service and ensure its performance.
7. **Technical Issue Management:** To detect, prevent, and address technical issues that may arise.
8. **Fulfillment of Purposes:** To fulfill any other purpose for which you provide the information.
9. **Contractual Obligations:** To carry out our obligations and enforce our rights arising from any contracts entered into between you and us, including billing and collection.

10. **Account and Subscription Notices:** To provide you with important notices about your account and/or subscription, including expiration and renewal notices, and other related communications.
11. **Marketing Communications:** To provide you with news, special offers, and general information about other goods, services, and events that are similar to those you have already purchased or inquired about, unless you have opted out of receiving such information.
12. **Additional Purposes:** In any other way we may describe when you provide the information.
13. **With Your Consent:** For any other purpose for which you have given your explicit consent.

We are committed to using your data responsibly and in accordance with applicable laws and regulations, particularly given the sensitive nature of the data we collect in the context of mental health support.

12. Retention of Data

We will retain your Data only for as long as is necessary to fulfill the purposes outlined in this Privacy Policy. Specifically, we retain and use your Data to the extent necessary to:

1. **Comply with Legal Obligations:** Meet our legal obligations, such as retaining your data to comply with applicable laws and regulations.
2. **Resolve Disputes:** Address and resolve any disputes that may arise.
3. **Enforce Legal Agreements:** Uphold and enforce our legal agreements and policies.

We will also retain Usage Data for internal analysis purposes. Usage Data is typically retained for a shorter duration; however, it may be retained for longer periods in the following circumstances:

- **Security Enhancements:** If the data is used to strengthen the security of our Service.
- **Functionality Improvements:** If the data is used to improve the functionality and performance of our Service.
- **Legal Obligations:** If we are legally required to retain this data for extended periods.

Upon expiration of the retention period, we will take reasonable steps to securely delete or anonymize your Personal Data, ensuring that it is no longer identifiable.

13. Transfer of Data

Your information, including Personal Data, may be transferred to — and maintained on — computers located outside of your state, province, country, or other governmental jurisdiction. Please be aware that the data protection laws in these locations may differ from those in your jurisdiction.

If you are located outside the United States and choose to provide information to us, please note that we will transfer your data, including Personal Data, to the United States and process it there.

By consenting to this Privacy Policy and submitting your information, you are agreeing to this transfer of data.

Astella AI will take all reasonable steps to ensure that your data is treated securely and in accordance with this Privacy Policy. We will not transfer your Personal Data to any organization or country unless there are adequate safeguards in place to ensure the security of your data and compliance with applicable data protection laws. This may include the use of standard contractual clauses or other legally recognized mechanisms for data transfer.

In the event that your Personal Data is transferred to a third party or international organization, we will ensure that appropriate measures are in place to protect your information in accordance with applicable laws and regulations.

14. Disclosure of Data

We may disclose your personal data that we collect or that you provide under the following circumstances:

1. **Disclosure for Law Enforcement:** We may be required to disclose your personal data if mandated by law or in response to valid requests by public authorities, such as a court or government agency.
2. **Business Transactions:** If we or our subsidiaries are involved in a merger, acquisition, or asset sale, your personal data may be transferred as part of that transaction. In such cases, we will take steps to ensure that your Personal Data remains protected.
3. **Other Cases:** We may disclose your information in the following situations:
 - **To Subsidiaries and Affiliates:** To our subsidiaries and affiliated companies.
 - **To Service Providers:** To contractors, service providers, and other third parties, we engage to support our business operations.
 - **To Fulfill Purposes:** To fulfill the purpose for which you provided the information.
 - **For Marketing Purposes:** For the purpose of including your company's logo on our website or in promotional materials, if applicable.
 - **As disclosed:** For any other purpose disclosed by us when you provide the information.
 - **With Your Consent:** With your consent in other cases where you have expressly agreed to the disclosure.
 - **To Protect Rights and Safety:** If we believe that disclosure is necessary or appropriate to protect the rights, property, or safety of Astella AI, our customers, or others.

We are committed to ensuring that any disclosures of your Personal Data are made in accordance with applicable laws and regulations.

14. Security of Data

The security of your data is important to us. However, please remember that no method of transmission over the Internet or method of electronic storage is 100% secure. While we strive to use commercially acceptable means to protect your Personal Data, we cannot guarantee its absolute security. We implement a variety of security measures to maintain the safety of your Personal Data against unauthorized access, alteration, disclosure, or destruction.

15. Your Rights

Depending on your location, you may have certain rights regarding your Personal Data, including the right to access, correct, delete, or restrict the processing of your Personal Data. If you wish to exercise these rights, please contact us using the contact information provided below.

Your Data Protection Rights Under the General Data Protection Regulation (GDPR)

If you are a resident of the European Union (EU) or the European Economic Area (EEA), you have certain data protection rights under the General Data Protection Regulation (GDPR). We aim to take reasonable steps to allow you to correct, amend, delete, or limit the use of your Personal Data.

If you wish to know what Personal Data we hold about you, or if you want it to be removed from our systems, please contact us at admin@astellaii.com.

In certain circumstances, you have the following data protection rights:

1. **The Right to Access:** You have the right to request copies of your Personal Data.
2. **The Right to Rectification:** You have the right to have your information rectified if that information is inaccurate or incomplete.
3. **The Right to Object:** You have the right to object to our processing of your Personal Data.
4. **The Right to Restriction:** You have the right to request that we restrict the processing of your Personal Data under certain conditions.
5. **The Right to Data Portability:** You have the right to receive a copy of your Personal Data in a structured, machine-readable, and commonly used format.
6. **The Right to Withdraw Consent:** You have the right to withdraw your consent at any time when we rely on your consent to process your data.

Please note that we may ask you to verify your identity before responding to such requests. Additionally, we may not be able to provide our Service without some necessary data.

You also have the right to complain to a Data Protection Authority regarding our collection and use of your Personal Data. For more information, please contact your local data protection authority in the European Economic Area (EEA).

Your Data Protection Rights Under the California Privacy Protection Act (CalOPPA)

The California Online Privacy Protection Act (CalOPPA) is the first state law in the United States to require commercial websites and online services to post a privacy policy. This law applies not only to businesses in California but also to any individual or company in the United States (and potentially worldwide) that operates websites collecting personally identifiable information from California consumers. As such, we are committed to posting a conspicuous privacy policy on our website that clearly states the information we collect and the individuals with whom we share it, and we will comply with this policy.

Under CalOPPA, we agree to the following:

1. **Anonymous Visits:** Users can visit our site anonymously.
2. **Privacy Policy Accessibility:** Our Privacy Policy link includes the word “Privacy” and is easily found on the home page of our website.
3. **Notification of Changes:** Users will be notified of any changes to our Privacy Policy on our Privacy Policy page.
4. **Updating Personal Information:** Users can change their personal information by emailing us at admin@astellaai.com.

Our Policy on “Do Not Track” Signals:

We honor “Do Not Track” signals and do not track, plant cookies, or use advertising when a “Do Not Track” browser mechanism is in place. “Do Not Track” is a preference you can set in your web browser to inform websites that you do not wish to be tracked.

You can enable or disable “Do Not Track” by visiting the Preferences or Settings page of your web browser.

Your Data Protection Rights Under the California Consumer Privacy Act (CCPA)

If you are a California resident, you have the right to learn what data we collect about you, request the deletion of your data, and opt-out of the sale (or sharing) of your data. To exercise your data protection rights, you can make specific requests to us:

1. **Request for Personal Information:** You can request the following information regarding your personal data:
 - The categories of personal information we have collected about you.
 - The categories of sources from which we collected your personal information.

- The business or commercial purpose for collecting or selling your personal information.
 - The categories of third parties with whom we share your personal information.
 - The specific pieces of personal information we have collected about you.
 - A list of categories of personal information that we have sold, along with the category of any other company we sold it to. If we have not sold your personal information, we will inform you of that fact.
 - A list of categories of personal information that we have disclosed for a business purpose, along with the category of any other company we shared it with.
2. Please note that you are entitled to request this information up to two times in a rolling twelve-month period. The information provided may be limited to the personal information we collected about you in the previous 12 months.
 3. **Request to Delete Personal Information:** You have the right to request the deletion of your personal information. If you make this request, we will delete the personal information we hold about you as of the date of your request from our records and direct any service providers to do the same. In some cases, deletion may be achieved through de-identification of the information. Please be aware that if you choose to delete your personal information, you may not be able to use certain functions that require your personal information to operate.
 4. **Request to Stop Selling Personal Information:** We do not sell or rent your personal information to any third parties for monetary consideration. However, under certain circumstances, a transfer of personal information to a third party, or within our family of companies, without monetary consideration may be considered a “sale” under California law. You are the sole owner of your Personal Data and can request disclosure or deletion at any time. If you submit a request to stop selling your personal information, we will cease such transfers.

Please note that if you ask us to delete or stop selling your data, it may impact your experience with us, and you may not be able to participate in certain programs or membership services that require the use of your personal information. However, we will not discriminate against you for exercising your rights.

To exercise your California data protection rights described above, please send your requests via email to admin@astellai.com.

Your data protection rights, as described above, are governed by the California Consumer Privacy Act (CCPA). For more information, please visit the official California Legislative Information website. The CCPA took effect on January 1, 2020.

16. Service Providers

We may employ third-party companies and individuals to facilitate our Service (“Service Providers”), provide the Service on our behalf, perform Service-related services, or assist us in analyzing how our Service is used. These third parties have access to your Personal Data only to

perform these tasks on our behalf and are obligated not to disclose or use it for any other purpose.

17. Analytics

We may use third-party Service Providers to monitor and analyze the use of our Service. These analytics services help us understand how users interact with our Service, enabling us to improve functionality and user experience.

18. CI/CD Tools

We may use third-party Service Providers to automate the development process of our Service, including Continuous Integration and Continuous Delivery (CI/CD) tools. These tools help streamline our software development and deployment processes.

19. Behavioral Remarketing

We may use remarketing services to advertise on third-party websites to you after you have visited our Service. We and our third-party vendors use cookies to inform, optimize, and serve ads based on your past visits to our Service. This allows us to provide you with more relevant advertisements tailored to your interests.

20. Links to Other Sites

Our Service may contain links to other sites that are not operated by us. If you click on a third-party link, you will be directed to that third party's site. We strongly advise you to review the Privacy Policy of every site you visit, as we have no control over, and assume no responsibility for, the content, privacy policies, or practices of any third-party sites or services.

21. Children's Privacy

Our Services are not intended for use by children under the age of 18 ("Child" or "Children"). We do not knowingly collect personally identifiable information from Children under 18. If you become aware that a Child has provided us with Personal Data, please contact us immediately. Upon verification, if we discover that we have collected Personal Data from Children without obtaining parental consent, we will take steps to remove that information from our servers.

22. Changes to This Privacy Policy

We may update our Privacy Policy from time to time. We will notify you of any changes by posting the updated Privacy Policy on this page.

We will also notify you via email and/or through a prominent notice on our Service prior to the changes becoming effective and will update the "effective date" at the top of this Privacy Policy.

You are advised to review this Privacy Policy periodically for any changes. Changes to this Privacy Policy are effective when they are posted on this page.

1. We may update our Privacy Policy from time to time. We will notify you of any changes by posting the new Privacy Policy on this page. You are advised to review this Privacy Policy periodically for any changes. Changes to this Privacy Policy are effective when they are posted on this page.

23. Contact Us

If you have any questions about this Privacy Policy, please contact us via email at admin@astellaai.com