Zelo Privacy Policy

Effective Date: October 29, 2025

Company: Zelo LLC

Contact: hello@zelo.chat
Website: https://zelo.chat

Zelo ("we", "our", or "us") values your privacy. This Privacy Policy explains what information we collect, how we use it, the legal basis for processing, who we share it with, and how you can manage or delete your data. By using the Zelo app or related services, you agree to the terms described here.

1. Information We Collect

We collect information you provide directly to us when you create an account, use the Services, or attend an event.

| Category | Data Points Collected | Purpose/Usage |
|-----------------------|---|--|
| Account & Identity | Name, email address, password, phone number (for verification). | User authentication and communication. |
| Profile Data | Photos, gender identity, sexual orientation, | Displaying your profile, enabling online dating/matchmaking. |
| | preferences, location. | <u> </u> |
| Astrology | Full birth details (Date, | Used to generate proprietary Zelo Content |
| Data | Time, and City of Birth). | (compatibility scores, birth charts, personalized |
| (Sensitive) | | insights). |
| User | Chat messages, social | Enabling social interaction, communication, and |
| Content | media posts, voice | posts features. |
| | notes, and videos. | |
| Event | Notes and ratings | Calculating event matches and shared with the |
| Feedback | provided by attendees | relevant attendees. |
| Data | about others during | |
| | Zelo events. | |
| Usage | IP address, device ID, | Improving service performance, security, and |
| Data | operating system, app | troubleshooting. |
| | crashes, and feature | |
| | interaction history. | |

2. Device Permissions and Why We Need Them

We request the following permissions to provide Zelo's core functionality. You can manage or revoke these permissions anytime in your device settings.

- Location Access: Used to show nearby matches and local events. This may include **fine location** (GPS) and **background location** (to suggest nearby features when the app is closed, with your explicit permission).
- Camera and Media Access (Photos/Videos/Audio): Used only when you choose to upload profile media, send photos in chat, or record voice notes. We only access files you explicitly select.
- **Microphone Access:** Used for recording and sending voice/video messages or during live chat features. **No background recording occurs.**
- **Contacts (for Invitations):** Used only for phone number verification or to facilitate our "Invite a Friend" features. We do not read or store your call history or messages beyond verification purposes.
- **Biometric Authentication:** Used for optional biometric login (Face ID/Fingerprint). Data is processed securely on your device and never stored by Zelo.

3. Legal Basis for Processing (GDPR)

We process your data based on the following legal grounds:

| Legal Basis | Description | Example Data |
|------------------|---------------------------------------|--|
| Contractual | Processing is necessary to provide | Account info, Profile Data, User |
| Necessity | the Services you requested (Terms | Content, Location. |
| | of Service). | |
| Legitimate | Processing is necessary for Zelo's | Usage Data, Anonymized Data, |
| Interests | business interests (security, | Security Logs. |
| | marketing, platform improvement). | |
| Consent | Processing of sensitive data is based | Astrology Data (Birth Details), |
| | on your explicit consent. | Background Location, |
| | , | Non-Essential Marketing. |
| Legal Obligation | Processing is necessary to comply | Data required for legal requests, |
| | with legal requirements. | fraud prevention. |

4. How We Use Your Information

We use collected information to:

- Provide Core Services: Enable chat, matchmaking, social posting, and local event recommendations.
- **Personalize Content (Astrology):** Use your birth details to calculate and display your personalized astrology-based insights and compatibility scores ("Zelo Content").
- **Event Matching:** Use **Event Feedback Data** to calculate event matches and share this non-identifying feedback (notes/ratings) with the relevant attendees for mutual learning and matching.
- Security & Safety: Prevent fraud, enhance security, troubleshoot technical issues, and enforce our Community Guidelines.
- Marketing & Promotions: Use event media (with consent) for marketing, and send notifications, and relevant updates.
- Process Payments: Process subscriptions and payments for premium features.

5. Data Sharing and Disclosure

We do not sell or rent your personal data in the traditional sense. We may share limited information only in these cases:

- **Service Providers (Vendors):** We share data with third-party service providers for hosting, analytics, messaging, security, and payment processing (e.g., Firebase, payment gateways). These vendors are contractually bound to protect your data.
- Other Users: Your Profile Data, location (if enabled), and social posts are visible to other users as part of the Services. Event Feedback Data is shared only with the specific user it pertains to.
- **Legal Requirements:** To comply with law, protect user safety, enforce our rights, or respond to government requests.
- **Business Transfers:** In case of merger, acquisition, or restructuring, user data may be transferred as an asset.

6. Data Retention

 Your personal data is retained as long as your account is active or as needed to provide you with the Services.

- Upon account deletion, your data will be removed within a reasonable period, typically 30 days, except for data required for fraud prevention, legal compliance, or anonymous analytical data.
- Anonymized data may be retained indefinitely to improve our machine learning models and systems.

7. User Rights and Data Control (GDPR/CCPA/CPRA)

Depending on your jurisdiction, you may have the following rights:

- **Right to Access and Rectification:** You can access, update, or correct your information via app settings.
- **Right to Deletion ("Right to be Forgotten"):** You can delete your profile and associated data at any time from within the app. You may also request permanent deletion by emailing **hello@zelo.chat**.
- **Right to Know (CCPA/CPRA):** You have the right to request disclosure of the personal information we collect, use, and disclose about you.
- **Right to Opt-Out of Sale or Sharing (CCPA/CPRA):** Zelo does not sell your personal data for monetary value, but certain data sharing (e.g., for cross-context behavioral advertising/analytics) may be considered "sharing." You can opt-out by emailing **hello@zelo.chat** or via device settings.
- **Right to Restrict Processing:** You can revoke permissions (camera, location, microphone, etc.) in device settings.
- **Opt-Out of Communications:** You can opt-out of marketing or non-essential notifications anytime via device or app settings.

8. Security Measures

We implement industry-standard encryption, access control, and secure infrastructure to protect your data during transmission and storage. While we use strong measures, no system is completely immune from risks, and we cannot guarantee absolute security.

9. Children's Privacy

Zelo is intended for users aged 18 and older. We do not knowingly collect data from minors. If a child registers, their data will be promptly deleted.

10. Updates to This Policy

We may update this Privacy Policy periodically. Updates will appear at https://zelo.chat/privacy, and continued use of the app means acceptance of the updated policy.

11. Contact Us

If you have any questions, requests, or concerns regarding your privacy or data rights, please contact:

Zelo Privacy Team Email: hello@zelo.chat