

# Privacy Policy

*Glo — Your GLP-1 Companion*

Last updated: March 1st, 2026

This Privacy Policy (“Policy”) describes how K. I. Foundry, Inc. (“Company,” “we,” “us,” or “our”) collects, uses, discloses, and safeguards information when you access or use the Glo application, SMS-based service, website, and related features (the “Service”).

Glo is a consumer wellness and lifestyle support application. It is not a medical device, healthcare provider, or clinical service.

By using the Service, you agree to the practices described in this Policy. If you do not agree, please discontinue use of the Service.

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## 1. Definitions

The following definitions apply throughout this Policy:

- **Account:** A unique account created to access the Service.
- **Device:** Any device used to access the Service (computer, smartphone, tablet).
- **Health-Related Data:** Information you voluntarily share about your health, wellness, and medication journey. This includes GLP-1 medication type, dosage, side effects, dietary habits, weight, mood, and wellness observations. This data is not Protected Health Information (PHI) under HIPAA.
- **Personal Data:** Any information that relates to an identified or identifiable individual.
- **Sensitive Personal Information:** As defined under the CCPA/CPRA, includes health-related information and other categories receiving heightened protection under California law.
- **Service:** The Glo application, including SMS messaging, mobile app, website, and related features.
- **Service Provider:** Any person or entity that processes data on behalf of the Company.
- **Usage Data:** Data generated by use of the Service (feature usage, session duration, diagnostics).

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## 2. Information We Collect

## 2.1 Personal Data

We collect Personal Data that you provide directly:

- Email address
- First and last name
- Phone number (required for SMS-based service)
- User-generated content, including messages and responses to prompts

## 2.2 Health-Related Data

**Glo collects health-related data only when you voluntarily provide it. We never require you to share health information.**

Health-related data you may choose to share includes:

- GLP-1 medication type (e.g., semaglutide, tirzepatide) and dosage
- Side effects and symptoms
- Dietary habits and food-related observations
- Weight and body measurements
- Mood, energy levels, and wellness observations
- Milestones and progress updates

Glo is not a “covered entity” under HIPAA. Health-related information you share with Glo is not Protected Health Information (PHI). Information shared with the Service should not be considered part of your medical record. However, we recognize the sensitive nature of this data and apply heightened safeguards as described in this Policy.

## 2.3 Usage Data

We collect Usage Data automatically through our backend systems:

- Feature usage patterns and session information
- Interaction timestamps (generated by our systems, not from SMS carrier metadata)
- Device type and operating system (app and website)
- IP address and approximate location derived from IP address (e.g., city or region), when using the app or website
- Error logs and diagnostic data

## 2.4 What We Do Not Collect

- **SMS carrier metadata:** SMS is a delivery channel only. We do not collect or analyze carrier-level metadata such as cell tower data, routing information, or delivery telemetry.
- **Precise geolocation:** We do not track GPS location.

- **Contacts or call logs:** We do not access your contact list, call history, or other device communications.
- **Biometric data:** We do not collect fingerprints, facial recognition data, or other biometric identifiers.

## 2.5 Categories of Personal Information (California Notice)

For purposes of California law, we may collect the following categories of personal information:

- (a) Identifiers (name, email address, phone number)
- (b) Internet or other electronic network activity information (usage patterns, feature interactions, session data)
- (c) Sensitive personal information (health-related information voluntarily provided)
- (d) Device and technical information (IP address, device type, operating system)
- (e) Communications and user-generated content (messages, responses to prompts)

We collect information directly from you, automatically when you use the Service (e.g., Usage Data), and from Service Providers that help us operate the Service (e.g., payment processors for transaction confirmations).

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## 3. Tracking Technologies and Cookies

When you access Glo through our website or mobile app, we may use Cookies and similar technologies.

- **Essential Cookies:** Authenticate users and prevent fraud.
- **Consent Cookies:** Record your Cookie preferences.
- **Functionality Cookies:** Remember preferences such as login state.

You can configure your browser to refuse Cookies. Some web features may not function without them.

SMS-based interactions do not use Cookies or web-based tracking.

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## 4. How We Use Your Information

### 4.1 Service Delivery

- Provide, operate, and maintain the Service
- Deliver personalized AI-generated check-ins, support messages, and guidance
- Personalize your experience based on information you share

- Manage your Account and provide access to features
- Respond to your messages and support inquiries

## 4.2 Communication

- Send Service-related messages via SMS, email, or push notification (if enabled)
- Provide notices about changes to the Service or your Account
- Send promotional messages about new features (you may opt out at any time)

## 4.3 Improvement and Analytics

- Perform analytics to identify trends and understand usage
- Diagnose technical issues and improve reliability
- Conduct research using aggregated, de-identified data
- Train and improve AI models using anonymized data (see Section 5)

## 4.4 Legal and Compliance

- Comply with legal obligations
- Enforce our Terms of Service
- Prevent fraud, abuse, and unauthorized access
- Protect the rights and safety of the Company, users, and the public

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# 5. Artificial Intelligence and Your Data

## 5.1 How AI Uses Your Data in Real Time

Glo uses artificial intelligence to generate personalized responses, check-ins, and support content. When you interact with the Service, your conversation history and shared information are processed in real time to provide contextually relevant responses.

This real-time processing occurs solely within the scope of your individual experience. Your conversations are not shared with other users or used to personalize anyone else's experience.

## 5.2 Model Training on Anonymized Data

**We train and improve our AI using de-identified and aggregated data only. No individually identifiable conversations are used for model training.**

We may train and improve our machine learning systems using de-identified (anonymized) and aggregated data. We do not use your identifiable personal conversations or health-related information for model training.

When we use data for model improvement, we apply the following safeguards:

- **Removal of direct identifiers:** Names, email addresses, phone numbers, account IDs, and other directly identifying information are removed before data is used for model improvement.
- **Generalization of indirect identifiers:** Indirect identifiers are generalized or removed where appropriate to reduce the risk of re-identification.
- **De-identification safeguards:** We apply technical and organizational safeguards designed to reduce the risk of re-identification and prohibit re-identification attempts.
- **Contractual protections:** Re-identification of de-identified data is contractually prohibited.

**We do not permit Service Providers to use your identifiable data to train their models for their own purposes.** Service Providers that process data on our behalf are contractually restricted to using data only as we direct and for the purposes we specify.

### 5.3 Your Conversation Data

Your non-anonymized conversation history is retained and used exclusively to:

- Provide continuity in your interactions (so Glo remembers your context)
- Personalize check-ins and support based on what you've previously shared
- Enable you to review your own history and track progress

This data is never shared with other users, used to personalize other users' experiences, or made available outside the scope of your individual account.

### 5.4 What This Means in Practice

To summarize:

- **Your personal conversations** are used only to serve you and improve your individual experience.
- **Anonymized patterns** from across all users are used to make the AI smarter, safer, and more helpful for everyone.
- **We do not use identifiable data to train our models**, and we contractually restrict Service Providers from using identifiable data to train their models for their own purposes. The AI learns from patterns, not from you personally.

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## 6. How We Share Your Information

**We do not sell your Personal Data or Health-Related Data.**

**We do not use health-related data for advertising profiling or marketing segmentation.**

We may share information in the following limited circumstances:

- **Service Providers:** Trusted third parties who help operate the Service (cloud hosting, analytics, payment processing). These providers are contractually required to use data only as we specify and to maintain appropriate security.
- **Business Transfers:** In connection with a merger, acquisition, or sale of assets. We will notify you before your data becomes subject to a different privacy policy.
- **Affiliates:** Parent company, subsidiaries, subject to this Policy.
- **Legal Compliance:** Where required by law, valid legal requests, or to protect rights, safety, or property.
- **With Your Consent:** For any purpose you expressly authorize.

We do not share Personal Data or Sensitive Personal Information for cross-context behavioral advertising.

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## 7. California Privacy Rights (CCPA/CPRA)

We do not “sell” or “share” your Personal Data for cross-context behavioral advertising as defined under California law.

As a California resident, you have the right to:

- Know what Personal Data and Sensitive Personal Information we collect, use, and disclose
- Request deletion of your Personal Data
- Request correction of inaccurate Personal Data
- Opt out of sale or sharing of Personal Data (we do not engage in either)
- Limit use of Sensitive Personal Information to what is necessary to provide the Service
- Not be discriminated against for exercising privacy rights

Because Glo collects Health-Related Data, which may constitute **Sensitive Personal Information** under the CPRA, we limit our use of this data to what is necessary and reasonably expected to provide and improve the Service.

To exercise your rights, contact us at [hello@askGlo.ai](mailto:hello@askGlo.ai). We will respond within 45 days as required by law.

If we deny your request, you may appeal by replying to our response email or contacting [hello@askGlo.ai](mailto:hello@askGlo.ai) with “Privacy Appeal” in the subject line. We will respond to appeals within the timeframe required by applicable law.

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## 8. De-identification and Aggregation

When we anonymize data for model training, analytics, or research, we apply the following:

- Removal of all direct identifiers (name, email, phone number, account ID)
- Removal or generalization of indirect identifiers
- Technical and organizational safeguards designed to reduce the risk of re-identification
- Contractual prohibitions on re-identification attempts

De-identified data is no longer Personal Data under this Policy and may be used for any lawful purpose, including AI model training, research, and service improvement.

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## 9. Data Retention

We retain data only as long as necessary:

- **Account and conversation data:** Retained while your account is active, plus a reasonable period for reactivation or dispute resolution.
  - **Health-Related Data:** Retained for the duration of your account. Deleted or anonymized within 30 days of account deletion, subject to legal requirements.
  - **Anonymized training data:** Once data has been de-identified and incorporated into model training datasets, it cannot be deleted because it is no longer linked to any individual.
  - **Usage Data:** Retained for shorter periods unless needed for security or legal compliance.
  - **Payment data:** Processed by third-party payment providers. We do not store payment card details on our servers.
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## 10. International Transfers

Your information may be processed and stored in the United States and in other jurisdictions where our Service Providers operate.

By using the Service, you consent to the transfer and processing of your data outside your home country. We take reasonable measures to ensure data is treated securely and in accordance with this Policy.

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## 11. Your Rights

You have the right to:

- **Access:** Request a copy of the Personal Data we hold about you.
- **Correction:** Request correction of inaccurate or incomplete data.
- **Deletion:** Request deletion by contacting hello@askGlo.ai or using in-app tools. Processed within 30 days, subject to legal retention requirements. Note that de-identified data already incorporated into training datasets cannot be deleted as it is no longer linked to you.
- **Restriction:** Where applicable law provides, request that we restrict certain processing.

*Regional rights:* Depending on your location (EEA/UK, certain U.S. states), you may have additional rights including opting out of profiling, appealing decisions, or filing complaints with supervisory authorities.

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## 12. GDPR Legal Bases

Where the GDPR or UK GDPR applies, we process Personal Data on the following bases:

- **Contract:** Processing necessary to provide the Service.
  - **Legitimate interests:** Security, fraud prevention, service improvement.
  - **Consent:** Where required (certain marketing, Health-Related Data collection).
  - **Legal obligations:** Compliance with applicable laws.
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## 13. Security

We apply commercially reasonable measures to protect your data, with heightened safeguards for health-related information:

- Encryption of data in transit and at rest
- Access controls limiting internal access to user data
- Regular security assessments and monitoring
- Secure cloud infrastructure from reputable providers

No system is completely secure. While we strive to protect your information, we cannot guarantee absolute security. You are responsible for the security of your account credentials.

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## 14. Security Incidents

If a security incident affects your data, we will investigate and, where required by law, notify you and applicable regulators without undue delay.

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## 15. Age Restriction

The Service is intended solely for adults aged **18 years and older**.

We do not knowingly collect Personal Data from anyone under 18. If we learn we have collected data from a minor, we will promptly delete it.

If you believe a minor has provided us with Personal Data, contact us at [hello@askGlo.ai](mailto:hello@askGlo.ai).

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## 16. Third-Party Links

The Service may link to third-party websites or services. We are not responsible for their content, privacy practices, or availability.

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## 17. Changes to This Policy

We may update this Policy at any time. Updates will be posted with a revised “Last updated” date.

For material changes — particularly those affecting Health-Related Data or AI training practices — we will notify you via SMS, email, or in-app notification before changes take effect.

Continued use of the Service after changes take effect constitutes acceptance.

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## 18. Contact

For questions about this Policy or to exercise your data rights:

**Glo — K. I. Foundry, Inc.**

Email: [hello@askGlo.ai](mailto:hello@askGlo.ai)

Website: [www.askGlo.ai](http://www.askGlo.ai)

Data Deletion: [hello@askGlo.ai](mailto:hello@askGlo.ai) or in-app account settings

Privacy Appeals: [hello@askGlo.ai](mailto:hello@askGlo.ai) (subject line: “Privacy Appeal”)