

ShimmerAI Privacy Policy

Last Updated: August 2026

ShimmerAI Inc. (“ShimmerAI,” “we,” “us,” or “our”) respects your privacy and is committed to protecting the personal information we collect from you. This Privacy Policy explains how we collect, use, share, and protect information when you visit www.shimmer.ai, use the ShimmerAI mobile application (the “App”), or use ShimmerAI hardware and related products and services (together with the App and website, the “Services”).

By using the Services, you agree to this Privacy Policy. Your use of the Services is also governed by our Terms of Use. If you do not agree, please do not use the Services.

1. Camera, Likeness, and Biometric Information

This section is central to how ShimmerAI works, and we encourage you to read it carefully.

The ShimmerAI App and hardware use your device camera(s) to analyze the lighting in your environment — including your face, likeness, and image — in real time. This analysis is what powers ShimmerAI’s intelligent lighting engine, allowing it to adjust your lights automatically.

How we handle this data:

- **Real-time processing only.** Camera input is processed on-device and/or in real time solely to calculate lighting adjustments.
- **No recording or storage.** We do not record, save, transmit, or store your environment, face, likeness, or image in any form, and we do not use it to identify you.
- **No sale or disclosure.** We do not sell, license, or disclose camera or likeness data to any third party.

Biometric notice and consent. To the extent any camera-derived data is deemed “biometric information” or a “biometric identifier” under applicable laws (including the Texas Capture or Use of Biometric Identifier Act, the Illinois Biometric Information Privacy Act, and the Washington biometric privacy law), we obtain your consent before the camera is used, we use such data only to provide the lighting features you request, and we do not retain it. [Confirm with counsel the exact consent flow presented at onboarding and whether a separate written biometric consent and retention/destruction schedule is required for your target states.]

You can disable camera access at any time in your device settings, though doing so will limit or disable the core ShimmerAI lighting features.

2. Information We Collect

Information you provide to us

- **Account and contact information:** name, email address, telephone number, mailing/billing address.
- **Purchase and payment information:** for hardware and web purchases, payment card details are collected and processed by our third-party payment processor(s); we do not store full card numbers. For subscriptions purchased through the Apple App Store or Google Play, payment is handled by Apple or Google and governed by their terms — we do not receive your full payment card details.
- **Support and communications:** information you provide when you contact us, respond to surveys, or participate in promotions.

Information collected automatically

- **Device and app data:** device type and model, operating system, app version, unique device and advertising identifiers, and in-app activity and diagnostics/crash data.
- **Usage and log data:** IP address, general location (derived from IP), browser type, access dates/times, pages or screens viewed, and referring pages.
- **Cookies and similar technologies:** on our website, as described in Section 5.

3. How We Use Your Information

We use the information we collect to:

- Provide, operate, and maintain the Services, including your account and subscriptions;
- Process transactions and send related confirmations and administrative messages;
- Provide customer support and respond to your requests;
- Improve, personalize, and develop the Services, including analytics and product research;
- Send you marketing communications (which you can opt out of at any time);
- Detect, prevent, and address fraud, security, and technical issues; and
- Comply with legal obligations and enforce our Terms of Use.

4. How We Share Your Information

We do not sell your personal information, and we do not share it with third parties for their own marketing purposes.

We share personal information only as follows:

- **Service providers:** vendors who perform services on our behalf, such as payment processing, hosting, analytics, customer support, and communications, under contractual confidentiality obligations.
- **App stores:** Apple and Google, in connection with app distribution and subscription billing.
- **Legal and safety:** when reasonably necessary to comply with law, legal process, or governmental request; to enforce our terms; or to protect the rights, property, or safety of ShimmerAI, our users, or the public.
- **Business transfers:** in connection with a merger, acquisition, financing, or sale of assets, in which case we will seek to have the recipient honor this Privacy Policy.

5. Cookies, Analytics, and Tracking Technologies

On our website we use cookies and similar technologies (such as pixels and web beacons) to operate the site, remember preferences, and measure usage. We use Google Analytics to understand how visitors use the site; information generated by these cookies may be transmitted to and stored by Google in the United States. You can opt out of Google Analytics at tools.google.com/dlpage/gaoptout.

You can set your browser to refuse or delete cookies, though some site features may not function properly. Where required by law (for example, in the EEA/UK), we present a cookie consent banner and honor your choices.

[Confirm a consent-management banner is deployed if you serve EEA/UK visitors.]

Do Not Track: our website does not currently respond to browser “Do Not Track” signals.

6. Data Retention

We retain personal information only for as long as necessary to provide the Services, comply with our legal obligations, resolve disputes, and enforce our agreements. Account information is generally retained for the life of your account and for [X months/years] afterward; transaction records are retained as required by tax and accounting laws. Camera/likeness data is not retained (see Section 1). [Confirm specific retention periods with counsel.]

7. Your Privacy Rights

California residents (CCPA/CPRA)

If you are a California resident, you have the right to: (i) know the categories and specific pieces of personal information we collect, use, and disclose; (ii) request deletion of your personal information; (iii) request correction of inaccurate personal information; and (iv) not be discriminated against for exercising your rights. Because we do not sell or “share” personal information (as those terms are defined under the CPRA) and do not use sensitive personal information for purposes requiring an opt-out, no “Do Not Sell or Share” or “Limit” mechanism is required; if this changes, we will provide those links.

Categories of personal information we collect include identifiers, customer records, commercial information, internet/network activity, geolocation (general), and — only transiently and without retention — audio/visual information from the camera. To exercise your rights, contact us using Section 12. We will verify your request before responding.

Other U.S. state residents

Residents of states with comprehensive privacy laws (including Virginia, Colorado, Connecticut, Utah, Texas, and others) may have similar rights to access, correct, delete, and obtain a copy of their personal information, and to appeal a denied request. Contact us using Section 12 to exercise these rights. [Confirm the list of states and appeal process with counsel.]

EEA, UK, and international users

If you are located in the European Economic Area, the United Kingdom, or another region with data-protection laws, you may have rights to access, correct, delete, restrict, or object to processing of your personal data, and to data portability. Our legal bases for processing are performance of a contract, your consent (including for camera use), our legitimate interests, and compliance with legal obligations. You may withdraw consent at any time and have the right to lodge a complaint with your supervisory authority.

Our Services are operated from the United States, and your information will be processed there. Where required, we implement appropriate safeguards (such as Standard Contractual Clauses) for international transfers. [If you knowingly serve EEA/UK users, confirm whether an EU/UK representative and a lawful transfer mechanism are required.]

8. Security

We use physical, technical, and administrative safeguards designed to protect personal information. However, no method of transmission or storage is completely secure, and we cannot guarantee absolute security. You are responsible for keeping your account credentials confidential. Please do not send sensitive information to us by unencrypted email.

9. Children's Privacy

The Services are not directed to children under 13, and we do not knowingly collect personal information from children under 13. If you believe a child under 13 has provided us personal information, please contact us and we will delete it. Where a higher age of digital consent applies (for example, 16 in parts of the EEA/UK), we apply that higher threshold. [Confirm the App's age rating and target-audience settings in App Store Connect and Google Play.]

10. Third-Party Links and Services

The Services may link to third-party websites or integrate third-party services (including smart-home platforms and app stores). We are not responsible for the privacy practices of those third parties, and we encourage you to review their policies.

11. Changes to This Privacy Policy

We may update this Privacy Policy from time to time. We will post the updated version here and, if changes are material, provide more prominent notice (such as in-app or email notice). The "Last Updated" date above indicates when it was last revised.

12. How to Contact Us

If you have questions or requests regarding this Privacy Policy or your personal information, contact us at:

Email: Reagan@shimmer.ai

Mail: ShimmerAI Inc., 8537 Calera Drive, TX 78735, USA