Privacy Policy for Project Palette
Last Updated: 11/9/2024

1. Introduction

Welcome to Project Palette!
Project Palette, developed and operated by Market Kings LLC, is dedicated to providing you with personalized seasonal color analysis through a secure, AI-driven platform. We respect your privacy and are committed to protecting your personal information. This Privacy Policy is designed to help you understand what information we collect, how we use it, and the measures we take to safeguard it.

Purpose of this Privacy Policy
This Privacy Policy explains how we collect, use, disclose, and protect your information when you use the Project Palette platform. By detailing our data handling practices, we aim to provide transparency and help you make informed decisions about sharing your personal information with us. Our practices are aligned with data protection laws and reflect our commitment to responsible, ethical handling of your data.

Your Consent and Agreement
By accessing or using Project Palette, creating an account, or purchasing an analysis, you consent to the data collection, use, and sharing practices described in this Privacy Policy. We encourage you to read this document carefully to understand our privacy commitments and your rights regarding your information. If you do not agree to these practices, please discontinue your use of Project Palette.

For any questions regarding this Privacy Policy or our data practices, please contact us at [support@projectpalette.ai].

2. Information We Collect

In order to provide Project Palette's personalized seasonal color analysis services, we collect certain information from you. This section details the types of data we collect, how it is gathered, and its specific purpose in delivering our services.

2.1 Information Provided by You

Account Information
When you create an account on Project Palette, we collect your name, email address, and any other information required to set up and manage your user profile. This information is used to authenticate your identity, facilitate secure access to your account, and ensure seamless use of our services.

Photo Data

To perform your personalized color analysis, we require that you upload specific photos. These photos are processed by our AI-powered analysis system to create customized seasonal color recommendations and a color analysis report tailored to your unique characteristics. The photos are stored securely and used exclusively for the purpose of delivering this personalized analysis.

2.2 Information Collected Automatically

Device and Usage Data

When you use Project Palette, we may automatically collect information about the device you use, your browser type, your IP address, and site usage patterns. This information helps us understand how users interact with our platform, enabling us to enhance the user experience, troubleshoot issues, and optimize platform performance. Cookies and other tracking technologies are used to collect this data, and you can control certain aspects of this tracking through your browser settings.

AI Interaction Data

During your use of Project Palette, we may gather general data about your interactions with our AI system, such as your color preferences and selected analysis options. This data enables us to personalize the analysis experience, refine AI-based recommendations, and improve our platform's features over time.

2.3 Payment Information

Payment Processing

For purchases made on Project Palette, all payments are processed securely through Stripe, our trusted third-party payment processor. We do not store or manage your payment details directly; instead, Stripe handles the processing of payment data in compliance with relevant security standards. For more information, please refer to [Stripe's Privacy Policy](#).

Each category of data collected is integral to providing, optimizing, and enhancing Project Palette's offerings while safeguarding your privacy and personal information.

3. How We Use Your Information

We use the information we collect to deliver and improve Project Palette's services, enhance the user experience, and maintain compliance with applicable legal standards. The ways we use your information are detailed below.

Service Delivery

To provide a personalized seasonal color analysis, we use your photos and other account data to generate tailored recommendations and insights. Your photos and associated information are processed using our AI system to create a detailed color report unique to you. This report is

then made accessible through your Project Palette account and available for download upon completion.

Personalization

We strive to make Project Palette a customized experience for each user. By using your input, preferences, and AI interaction data, we tailor your experience within the platform. This includes remembering your selected color preferences, recent analyses, and other features to help make your color recommendations more accurate and relevant.

Service Improvement

We use aggregated, anonymized data to gain insights into how our users interact with Project Palette. This information helps us identify ways to improve our services, troubleshoot technical issues, and develop new features. Our goal is to continuously refine the functionality and usability of our platform to provide a seamless experience.

Legal Compliance

Project Palette may process and retain certain information to comply with applicable legal and regulatory requirements. This includes, but is not limited to, obligations related to user rights, safety, and data protection. Additionally, we may use or disclose information as necessary to respond to lawful requests, protect the rights of our users, and safeguard our platform from fraudulent or malicious activity.

Each use of data is essential to Project Palette's mission of delivering a secure, personalized, and compliant AI-driven color analysis experience.

4. AI Data Usage and Transparency

At Project Palette, we prioritize transparent and ethical usage of AI technology to enhance the user experience while safeguarding privacy. This section outlines how we use AI to process user data, particularly photos, to generate color analysis and other recommendations.

AI Processing of Photos

Our AI technology processes user-uploaded photos to generate a personalized seasonal color analysis. The photos are used to identify features relevant to your color profile, allowing us to provide tailored recommendations based on our analysis. The AI processing is done securely, and the photos are used solely for generating the requested color analysis report.

Data Minimization and Retention

We adhere to the principle of data minimization, collecting and retaining only the data necessary for providing our services. User photos and related data are stored securely and retained only as long as necessary to fulfill the analysis and any subsequent user needs. Users have the

option to request the deletion of their photos and analysis results upon request or upon account deletion, aligning with our commitment to user control and privacy.

Transparency in AI-Generated Recommendations

The recommendations and results generated by our AI are based on user-submitted characteristics, including uploaded photos, and are designed to be fully transparent and explainable. Users can trust that the AI-driven insights are derived from their unique characteristics and preferences.

Through these AI practices, Project Palette aims to maintain a transparent, secure, and user-focused approach to delivering personalized color insights.

5. Data Sharing and Disclosure

At Project Palette, we are committed to safeguarding user privacy and ensuring that data is shared only in ways that align with our strict data protection policies and relevant legal requirements. Below, we outline the circumstances under which user data may be shared with trusted parties.

Third-Party Processors

To provide our service, we work with a select group of third-party service providers who assist us in operating the platform, managing accounts, processing payments, and storing data. These third parties include:

- **Supabase**: For secure data storage and authentication management.
- **Stripe**: For secure payment processing. Please refer to [Stripe's Privacy Policy](#) for more information on how Stripe handles data.

These third-party processors are contractually obligated to handle your data in compliance with applicable data protection laws and are authorized to use your information solely to provide their respective services on our behalf.

Legal and Regulatory Compliance

We may disclose personal data to government authorities, regulatory agencies, or law enforcement if required by law, regulation, or legal process. Such disclosures are made only to the extent necessary to comply with our legal obligations, protect the rights and safety of our users and platform, or respond to valid legal requests.

Corporate Transactions

In the event of a corporate transaction, such as a merger, acquisition, or sale of assets involving Market Kings LLC, user data may be transferred as part of that transaction. Should such a

transfer occur, we will ensure that any entity acquiring user data commits to upholding at least the same level of data protection outlined in this Privacy Policy.

6. Data Security

At Project Palette, we prioritize the protection of your personal information and employ industry-standard security measures to safeguard your data. We are committed to maintaining a secure environment for all user data collected on our platform.

Security Measures

We implement a variety of technical and administrative security protocols to protect your data, including:

- **Encryption**: All data, including user-uploaded photos and account information, is encrypted both in transit and at rest to prevent unauthorized access.
- **Access Controls**: Access to your data is strictly limited to authorized personnel and only for purposes necessary to fulfill our services. Access is monitored and managed through secure authentication and role-based permissions.
- **Regular Security Audits**: We conduct periodic security reviews and assessments of our systems to ensure they remain compliant with industry standards and best practices.

User Responsibilities

We encourage all users to take steps to further protect their accounts. This includes:

- **Using Strong Passwords**: Create unique, complex passwords for your account and update them regularly.
- **Securing Your Login Information**: Ensure your login details remain private, and avoid sharing your credentials with others.
- **Logging Out After Use**: Log out from your account when accessing the platform on shared devices.

Limitations

While we strive to use the best practices to protect your personal data, no system can be guaranteed as completely secure. Therefore, we cannot promise absolute security of user data but will promptly notify users of any security incidents that may affect their data.

By following these security practices, we aim to maintain a safe environment for your personal information on Project Palette.

7. Data Retention and Deletion

At Project Palette, we adhere to industry standards and best practices to ensure data is retained only for as long as necessary to fulfill the purposes for which it was collected. We provide

transparent options for account and data deletion to empower users with control over their personal information.

Data Retention Policy

We retain personal data, including user-uploaded photos and generated color analysis reports, for as long as necessary to provide our services, support user accounts, and comply with applicable legal requirements. Data related to user accounts is generally retained until the account is deleted or as required by applicable law.

Account and Data Deletion

Users have the option to delete their accounts at any time. To delete an account, navigate to the "Settings" section within the platform and select the "Delete Account" option. Upon account deletion:

- **Account Data**: All personal information associated with your account, including name, email, and profile information, will be permanently deleted from our systems.
- **Photos and Analysis Reports**: Uploaded photos and any analysis reports linked to your account will also be removed from our storage and database systems.

Please note that once deleted, account data and associated content cannot be recovered.

Data Deletion Requests

If you wish to delete specific data or photos from our systems while maintaining your account, please contact our support team at support@projectpalette.ai. We will process data deletion requests promptly, subject to any legal or operational requirements that may require us to retain certain information for a limited period.

By providing clear retention and deletion options, we are committed to maintaining your privacy and giving you control over your personal data at Project Palette.

8. Rights and Choices

At Project Palette, we are committed to providing you with control over your personal data. As a user, you have specific rights and choices regarding the information we collect, store, and use. We strive to make exercising these rights clear, accessible, and simple.

Access and Correction

You have the right to access the personal information we hold about you and request corrections if any information is inaccurate or incomplete. To request access or update your data, please contact us at support@projectpalette.ai. We will address your request promptly, in accordance with applicable privacy regulations.

Data Deletion Requests

Users may request the deletion of specific data, including photos and analysis reports, while retaining their account. To initiate a data deletion request, please reach out to our support team. We will comply with deletion requests promptly unless certain information must be retained to meet legal or operational requirements.

Opt-Out of Automated Processing

Our platform may use automated processes, including AI, to deliver personalized recommendations and color analyses. If you prefer to limit or opt-out of certain types of AI-driven personalization, please reach out to us at support@projectpalette.ai for more information on available options. We will assist you in configuring your experience in line with your preferences.

Managing Your Preferences

In addition to the above rights, you may have options to manage your experience within Project Palette, including updating profile preferences and adjusting data sharing settings. For detailed instructions, please refer to your account settings or contact our support team for assistance.

Exercising Your Rights

To exercise any of the above rights or for assistance, please contact us at support@projectpalette.ai. We are committed to processing your requests promptly and transparently, respecting your rights in accordance with applicable data protection laws.

By offering clear access and control options, Project Palette prioritizes your privacy and empowers you to manage your personal data effectively.

9. Cookies and Tracking Technologies

Project Palette utilizes cookies and similar tracking technologies to enhance user experience, analyze site traffic, and personalize content. By using our platform, you agree to our use of these technologies, as outlined below.

Cookies

Cookies are small text files that are placed on your device when you visit our site. We use different types of cookies to ensure the best possible user experience, including:

- **Essential Cookies**: These are necessary for the basic operation of our site, allowing you to navigate and access secure areas.
- **Performance and Analytics Cookies**: These help us understand how users interact with our site by collecting data on usage patterns, which we use to improve our services.

- **Functional Cookies**: These cookies allow us to remember choices you make on our site, like language preferences, to provide a more personalized experience.
- **Advertising and Marketing Cookies**: With your consent, these cookies enable us to deliver targeted advertisements based on your preferences and browsing behavior.

Opt-Out Options

You have the ability to control cookie settings through your browser's preferences. Most browsers allow you to block or delete cookies, though doing so may affect certain features of the site. For specific instructions on adjusting cookie preferences, please refer to your browser's support page.

Additionally, you can install opt-out tools such as the Google Analytics Opt-Out Browser Add-On to prevent data from being collected for analytics purposes.

Third-Party Tracking

We may allow certain trusted third-party providers to use cookies and tracking technologies on our site to deliver content and services, including analytics and marketing support. We do not control these third-party cookies and recommend reviewing the privacy policies of these providers for more information.

By managing your preferences, you can choose the level of personalization and tracking that suits your privacy preferences while using Project Palette. For further details on cookies and how they are used, please contact us at support@projectpalette.ai.

10. Updates to the Privacy Policy

Project Palette may update this Privacy Policy periodically to reflect changes in our data practices, evolving legal requirements, or enhancements to our platform and services.

Policy Changes

When we make material updates to this Privacy Policy, we will notify users of these changes to ensure transparency and provide clarity on any new data practices. Notification of significant updates may be provided through various methods, such as in-platform notifications, email, or prominent announcements on our website.

User Review

We encourage users to review this Privacy Policy regularly to stay informed about how we are safeguarding their data and their rights under this policy. Continued use of Project Palette after any changes to this Privacy Policy signifies acceptance of those changes.

For further details or inquiries regarding policy updates, users may contact us at support@projectpalette.ai.

11. Contact Information

If you have any questions, concerns, or feedback about this Privacy Policy or our data practices, please contact our support team, who will be happy to assist you.

Customer Support Email: support@projectpalette.ai

For formal inquiries or additional assistance, you may also reach us by mail at:

Market Kings LLC
1013 Centre Road Ste 403s
Wilmington, Delaware, 19805

Please include any relevant details in your inquiry to help us respond as efficiently as possible.

Thank you for trusting Project Palette with your personal information. We are committed to respecting your privacy and protecting your data as you enjoy a personalized color analysis experience with our platform.