

iXo — Privacy Policy

Effective Date: November 2, 2026

THIS PRIVACY POLICY EXPLAINS WHAT PERSONAL INFORMATION WE COLLECT WHEN YOU USE iXo, HOW WE USE AND DISCLOSE IT, AND THE CHOICES YOU HAVE. TO GENERATE RESPONSES, iXo SENDS YOUR REQUESTS TO THIRD-PARTY AI MODEL PROVIDERS, WHICH PROCESS THEM UNDER THEIR OWN TERMS (SEE SECTION 5). WE DO NOT SELL YOUR PERSONAL INFORMATION, AND WE DO NOT USE YOUR CONVERSATIONS TO TRAIN AI MODELS UNLESS YOU OPT IN.

1. Who We Are

- 1.1 **Company.** iXo (the "Service") is operated by ATOM Club Services, LLC, a Delaware limited liability company, 16192 Coastal Highway, Lewes, Delaware 19958, United States (the "Company," "we," "us," or "our"). The Company is responsible for the personal information described in this Privacy Policy, except as described in Section 5 for Third-Party AI Providers and in Section 6.3 for other parties that act independently.
- 1.2 **Scope.** This Privacy Policy applies to personal information we process when you use the Service, including our websites, web application, and iOS and Android applications, and when you communicate with us. It does not apply to third-party websites or services, which are governed by their own policies. If you use the Service under a Pro Agreement, that agreement may contain additional privacy terms.
- 1.3 **Related documents.** This Privacy Policy should be read together with our Terms of Use, our Cookie Policy, and our Consumer Health Data Privacy Notice, which applies to consumer health data as defined by certain U.S. state laws. Capitalized terms not defined in this Privacy Policy have the meanings given in the Terms of Use.

2. Information We Collect

- 2.1 **Account information.** When you create an Account, we collect your email address, password (stored only in hashed form), your confirmation that you are at least 18 years old, the version of the Terms of Use and other documents you accepted, and the date and time of acceptance. If you sign in with a third-party sign-in method that we make available, we receive the information you authorize that provider to share, such as your name and email address.
- 2.2 **Your Content.** We collect the content you submit to the Service and the content the Service generates for you, including: (a) your messages and voice input, and transcriptions of your voice input; (b) files and documents you upload; (c) the facts, Life Map, About Me portrait, goals, steps, hypotheses, and other information that make up your Memory; (d) your corrections and instructions about what the Service may use; and (e) your Ratings and feedback.
- 2.3 **Sensitive information you choose to share.** Because of the nature of the Service, you may choose to share information about your health, mental health, relationships, finances, or other sensitive matters, or about other people. We process this information only to provide the Service to you, to operate our safety systems, and as otherwise described in this Privacy Policy and our Consumer Health Data Privacy Notice. Please share only what you are comfortable sharing, and share information about other people only if you are permitted to do so.
- 2.4 **Plan and payment information.** We collect information about your Plan, Quota, subscription status, purchases, cancellations, and refunds. Payments are processed by third-party payment processors and, for in-app purchases, by Apple or Google. We do not receive or store your full

payment card number; we receive limited information such as the payment status, the amount, and, where provided, the card type and last four digits.

- 2.5 **Promo Codes and referral information.** If you redeem a Promo Code or arrive through a referral link, campaign, or partner, we collect the code, the related campaign or partner identifier, the reward it grants, and the dates of redemption and activation.
- 2.6 **Usage and device information.** We automatically collect technical and usage information, such as your IP address, device and browser type, operating system, app version, time zone, language, pages and features used, Quota consumption, performance data, crash and error logs, and the source from which you arrived (for example, a campaign or referral link).
- 2.7 **Cookies and similar technologies.** We and our analytics providers use cookies and similar technologies on our websites and web application, as described in our Cookie Policy.
- 2.8 **Communications.** If you contact our support team, our sales team (including to request a Promo Code), or a Concierge, we collect the content of your communications and the information needed to respond to you.

3. How We Use Information

- 3.1 We use personal information to:
 - (a) provide the Service to you, including generating responses, operating your Memory, Life Map, About Me portrait, goals, and steps, analyzing documents you upload, searching your Conversation History, and looking up information on the web when relevant to your request;
 - (b) create and manage your Account, record your acceptance of our terms, and verify eligibility;
 - (c) manage your Plan, Quota, payments, subscriptions, Promo Codes, and refunds;
 - (d) operate our safety systems, including detecting crisis situations and displaying crisis resources, and preventing harmful outputs;
 - (e) send you service messages, receipts, and, unless you turn them off, reminders and notifications about your goals and steps;
 - (f) provide support and, for Pro customers, Concierge services;
 - (g) maintain, secure, and improve the Service, including by analyzing Usage Data and aggregate statistics, fixing errors, and preventing fraud, abuse, and violations of our Terms of Use;
 - (h) measure the effectiveness of our marketing, referral, and partner programs using aggregate or de-identified information;
 - (i) use Your Content for Model Improvement, but only if you have opted in, as described in Section 5.6 of the Terms of Use; and
 - (j) comply with law, respond to legal process, and establish, exercise, or defend legal claims.
- 3.2 **No training without your consent.** We do not use the content of your conversations, files, or Memory to train, fine-tune, or otherwise improve AI models unless you have given us your Model Improvement Consent. You can withdraw that consent at any time in your Account settings.

4. How the Service Processes Your Requests

- 4.1 When you send a message, the Service takes your request together with relevant context from your Account (for example, facts from your Memory or text from a document you uploaded), prepares instructions for an AI model, sends them to a Third-Party AI Provider, receives the response, checks it through our safety systems, and returns it to you. Some requests involve several such steps. The

Company does not develop the underlying AI models; it routes your requests to the models and stores the results in your Account so that the Service can provide continuity across conversations.

5. Third-Party AI Providers

- 5.1 **What we send.** To generate responses, we send Third-Party AI Providers the content needed to process each request, which may include your message, your voice input, the relevant parts of your Memory and Conversation History, and text extracted from documents or images you upload. We send only the content needed for the request and do not send your password or payment information.
- 5.2 **Providers' responsibility.** Third-Party AI Providers process the content we send them to generate responses, under their own terms of service, data processing terms, and privacy policies. Each provider is responsible for its own processing, storage, security, and use of that content, and for its own compliance with applicable law. We do not control, and to the maximum extent permitted by applicable law are not responsible for, the independent practices of Third-Party AI Providers, including how long they retain content and where they process it.
- 5.3 **How we select providers.** We select Third-Party AI Providers that publish data handling terms, and we use them only to provide the Service. We do not authorize Third-Party AI Providers to use the content we send them to train their models, to the extent their terms allow us to make that choice.
- 5.4 **Changes to providers.** We may change the Third-Party AI Providers we use at any time. We do not list specific providers in the Service. If you have questions about how your content is handled, contact us at support@ixo.chat.

6. How We Disclose Information

- 6.1 **Service providers.** We disclose personal information to service providers that process it on our behalf to operate the Service, including: (a) providers of AI models and related AI features, such as speech recognition and synthesis, image description, and media generation; (b) cloud hosting, database, and file storage providers; (c) web search providers, which receive the search queries generated for your request; (d) email and push notification providers; (e) analytics and error monitoring providers; (f) customer support tools; and (g) payment processors.
- 6.2 **Apple and Google.** If you use our mobile applications or make in-app purchases, Apple or Google process information in accordance with their own terms and privacy policies.
- 6.3 **Parties that act independently.** Third-Party AI Providers (as described in Section 5), payment processors, Apple, and Google may process personal information only for limited purposes of their own, such as abuse and fraud prevention and legal compliance, under their own privacy policies. They are responsible for that processing.
- 6.4 **Partners.** We do not disclose your personal information to partners that distribute Promo Codes. We may provide partners with aggregate information, such as the number of codes activated, that does not identify you.
- 6.5 **Legal and safety.** We may disclose personal information if we believe in good faith that it is required by law or legal process, or necessary to protect the rights, property, or safety of you, other users, the Company, or others, including in an emergency involving a risk of serious harm.
- 6.6 **Business transfers.** We may disclose personal information in connection with a merger, acquisition, financing, reorganization, or sale of all or part of our business, subject to this Privacy Policy.
- 6.7 **With your consent.** We may disclose personal information with your consent or at your direction.

- 6.8 **No sale.** We do not sell personal information, and we do not share personal information for cross-context behavioral advertising.

7. How Long We Keep Information

- 7.1 We keep personal information only for as long as needed for the purposes described in this Privacy Policy, as summarized below.

Information	Retention
Conversations, Memory, profile, and files	Until you delete them or delete your Account.
Voice recognition history	Up to 90 days.
Backups	Files in backups: up to 90 days after deletion. Database backups: up to 180 days after deletion. Backups are not used to restore deleted content except to recover from a system failure.
Payment and transaction records	As required for accounting, tax, and legal purposes. After you delete your Account, we keep only de-identified transaction amounts and the records we must keep by law.
Security and audit logs	Up to 2 years, or longer where needed for an ongoing security investigation, fraud prevention, or legal claim, or where required by law.
Content processed by Third-Party AI Providers	Governed by each provider's own terms (see Section 5).

- 7.2 **Account deletion.** When you delete your Account, your access ends immediately and your conversations, Memory, files, and profile are deleted from our active systems promptly. Copies may remain in backups for the periods stated above.

8. Security

- 8.1 We use reasonable technical and organizational measures designed to protect personal information, including encrypted connections (HTTPS) between your device and the Service and between the Service and Third-Party AI Providers, hashing of passwords, access controls, and incident response procedures.

No method of transmission or storage is completely secure, and we cannot guarantee absolute security. If we become aware of a security incident affecting your personal information, we will notify you and authorities as required by applicable law.

9. Where We Process Information

- 9.1 **We store personal information in the United States.** Our service providers, including Third-Party AI Providers, may process personal information in other countries, which may have data protection laws different from those of your country. Where required by law, we use appropriate safeguards for international transfers, such as the European Commission's Standard Contractual Clauses.

10. Your Choices and Rights

- 10.1 **In the Service.** You can view, correct, and delete facts in your Memory; tell the Service what it may and may not use; turn reminders and notifications on or off; give or withdraw Model Improvement

Consent; and delete your Account in your Account settings. As part of the deletion process, you can request a copy of your data.

- 10.2 **Email and push.** You can unsubscribe from reminder and marketing emails using the link in each email and turn off push notifications in the App or your device settings. You will still receive service messages, such as receipts and security notices.
- 10.3 **U.S. state privacy rights.** Depending on where you live, you may have the right to: (a) know what personal information we have collected about you and how we use and disclose it; (b) access and obtain a copy of your personal information in a portable format; (c) correct inaccurate personal information; (d) delete your personal information; (e) opt out of the sale or sharing of personal information and of targeted advertising (we do not sell or share personal information or engage in targeted advertising); (f) limit the use of sensitive personal information (we use it only as needed to provide the Service); and (g) not be discriminated against for exercising these rights.
- 10.4 **How to exercise your rights.** To exercise your rights, contact us at support@ixo.chat from the email address associated with your Account. We may need to verify your identity before responding. You may use an authorized agent where permitted by law. If we deny your request, you may appeal by replying to our decision; if your appeal is denied, you may contact your state attorney general. We respond within the time required by applicable law.

11. Additional Information for the EEA, the UK, and Switzerland

- 11.1 **Controller.** ATOM Club Services, LLC is the controller of personal information processed under this Privacy Policy. Where required by applicable law, we will designate a representative in the European Union or the United Kingdom and list its contact details in this Privacy Policy.
- 11.2 **Legal bases.** We process personal information: (a) to perform our contract with you, to provide the Service and manage your Plan; (b) based on your explicit consent, for health and other special category data that you choose to share, and for Model Improvement; (c) based on our legitimate interests in securing, maintaining, and improving the Service, preventing fraud, and measuring our marketing, where those interests are not overridden by your rights; and (d) to comply with legal obligations. Where we rely on consent, you can withdraw it at any time without affecting processing before withdrawal.
- 11.3 **Your rights.** You have the right to access, rectify, erase, restrict, or object to the processing of your personal information, and the right to data portability. You also have the right to lodge a complaint with your local data protection authority.

12. Children

- 12.1 The Service is intended only for people aged 18 and older. We do not knowingly collect personal information from anyone under 18. If we learn that we have collected personal information from someone under 18, we will delete it and close the Account.

13. Changes to This Privacy Policy

- 13.1 We may update this Privacy Policy from time to time. We will post the updated version in the Service and on our website and update the Effective Date. If we make material changes, we will notify you at least 30 days before they take effect by email or through the Service, and, where required by law, we will ask for your consent.

14. Contact Us

- 14.1 If you have questions about this Privacy Policy or our privacy practices, contact us at:

Email: support@ixo.chat (privacy requests and legal notices)

Mail: ATOM Club Services, LLC, 16192 Coastal Highway, Lewes, Delaware 19958, United States