Privacy Policy

Last updated: May 12, 2026

This. Privacy Policy describes how **Lumira Prime XP LLC** (“we”, “us”, or “our”), located at **1603 Capitol Ave Ste, 511B. Cheyenne, WY (82001) USA**, manages personal information in accordance with U.S. federal and state privacy standards, including the California Consumer Privacy Act (CCPA) and the California Privacy Rights Act (CPRA). Our **EIN / Entity Filing Number** is **42-2395092**.

Notice at Collection: We use cookies and similar tracking technologies to manage your session, ensure account security, and analyze service performance. For detailed information on the specific trackers we use and your right to opt-out, please consult our Cookie Policy.

1. Data Lifecycle and Disclosure Matrix

We provide full transparency regarding the data we process. The following table identifies the categories of personal information we collect, our business purposes, and retention criteria.

Category (CCPA/CPRA)	Data Points Collected	Business Purpose	Retention Criteria
Identifiers	Name, email address, IP address, Unique Device ID.	Account management, identity verification, and fraud prevention.	Duration of active account plus applicable statutory limitation periods.
Commercial Information	Transaction history, payment tokens (Apple Pay/Google Pay), subscription tier.	Billing, revenue protection, and tax compliance.	As required by tax laws (typically 7 years) and anti-fraud audits.
Internet/Network Activity	Interaction with the Service, browser type, and access logs.	Analytics and targeted advertising (Sharing).	Maximum of 24 months for analytics; see our Cookie Policy for details.

Category (CCPA/CPRA)	Data Points Collected	Business Purpose	Retention Criteria
Sensitive Personal Information (SPI)	Account login credentials and secure payment tokens.	Essential security and payment processing.	Immediate deletion upon account termination or withdrawal of necessity.
Inferences	Profiles reflecting user preferences and behavior.	Content personalization and recommendation.	As long as the profile remains relevant to provide the Service.

2. Selling, Sharing, and Global Privacy Controls

2.1. "Selling" vs "Sharing": We do not sell your personal information for monetary consideration. However, we may "share" identifiers and network activity with advertising partners for cross-context behavioral advertising. You have the right to opt-out of such sharing.

2.2. Global Privacy Control (GPC): Our systems are configured to automatically recognize and honor **Global Privacy Control (GPC)** signals. If your browser transmits a GPC signal, we will treat it as a valid request to opt-out of the "sharing" of your information for that specific browser and device.

3. Your U.S. State Privacy Rights

Depending on your state of residence (including California, Virginia, Colorado, Connecticut, Utah, and Texas), you may exercise the following rights:

- **Right to Know and Access:** Request a report of the categories and specific pieces of data we hold about you.
- **Right to Delete:** Request the deletion of your information, subject to legal exceptions (e.g., active subscriptions or legal holds).
- **Right to Correct:** Request rectification of inaccurate personal data.
- **Right to Opt-Out:** Direct us not to "share" your data for cross-context behavioral advertising.
- **Right to Limit Sensitive PI:** Request that we limit the use of your Sensitive Personal Information to what is strictly necessary for service delivery.

We will not discriminate against you (e.g., by denying service or charging different prices) for exercising any of these rights.

4. Identity Verification and Authorized Agents

To protect your security, we perform **reasonable identity verification** before fulfilling access or deletion requests. This may involve matching the information you provide with our existing records or requiring an authenticated login to your account.

Authorized Agents: You may designate an agent to submit requests on your behalf. We require written proof of authorization and will verify your identity directly before proceeding with an agent's request.

5. Security and Retention Principles

Security: We implement commercially reasonable, industry-standard administrative, technical, and physical safeguards. However, you acknowledge that no method of digital storage or transmission is 100% secure.

Retention: We do not retain personal information longer than necessary. Our retention periods are determined by (i) the length of our relationship; (ii) legal and tax obligations; and (iii) technical necessity for fraud prevention.

6. Privacy-Related Disputes

Any dispute arising out of or relating to this Privacy Policy shall be governed by the **Dispute Resolution and Binding Arbitration** section of our **Terms and Conditions**, to the maximum extent permitted by applicable law. This includes the waiver of class action and jury trial rights.

For more information or to exercise your rights, contact our Privacy Office at **info@zblix.com** or **1603 Capitol Ave Ste, 511B. Cheyenne, WY (82001) USA**.

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