

# Privacy Policy

*Effective Date: April 2, 2026*

At ESAI, we take your privacy seriously. Please read this Privacy Policy to learn how we treat your personal data. By using or accessing our Services in any manner, you acknowledge that you accept the practices and policies outlined below, and you hereby consent that we will collect, use and disclose your information as described in this Privacy Policy.

Your use of the Services is at all times subject to our Terms of Use, which incorporates this Privacy Policy. Any terms we use in this Policy without defining them have the definitions given to them in the Terms of Use.

As we continually work to improve our Services, we may need to change this Privacy Policy from time to time. We will alert you of material changes by placing a notice on our website, by sending you an email and/or by some other means. If you use the Services after any changes to the Privacy Policy have been posted, that means you agree to all of the changes.

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## What this Privacy Policy Covers

**This Privacy Policy covers how ESAI collects and processes data that identifies or relates to you ("Personal Data"). This Privacy Policy does not cover the practices of companies we don't own or control or people we don't manage.**

## Personal Data

### Categories of Personal Data We Collect

**Depending on your relationship and interactions with us, we may collect the following categories of Personal Data:**

- **Device or Web Data.** If you interact with us online, we may collect information about your device and/or browser such as your IP address, IP address-based location data, device ID, and type of device or operating system used to connect with us.
- **Contact Data.** If you sign up for a demo, communicate with us, or otherwise sign up for our Services, we may collect your contact information such as your name, email, address, and phone number.
- **Account Data.** If you create an account to use our Services, we collect login credentials.
- **Payment Data.** If you are using a paid Service, our payment processor, Stripe, Inc. ("Stripe"), may collect your payment data including your payment card and billing information. Please note that we only have access to the last 4 digits of your payment card number (not your full payment card number).
- **Professional and Educational Data.** We may collect certain data to help identify educational, scholarship, or professional opportunities. This data may include demographic data (such as age, date of birth), non-public education data (such as grades, GPA, transcript), and/or professional or employment-related data (such as resume, job title, job history), depending on which ESAI tools you use.
- **Sensory Data.** If you choose to engage with any features that include telephone calls, we may collect recordings and transcripts of those calls.

- **User Content.** Any personal information that you include in input, file uploads, or feedback that you provide to our Services.
- **Other Personal Data.** We may collect other Personal Data that you or someone on your behalf makes available through Services, such as in fillable forms, emails, letters, texts, or other communications.

### **Our Sources of Personal Data**

- **From You.** We collect Personal Data when you provide it directly to us (e.g., you create an account or contact us). We also collect certain Personal Data automatically when you use our Services (e.g., through Cookies).
- **Third Parties.** We may collect Personal Data from vendors that provide analytics, advertising partners who assist with marketing, third-party credentials you use to sign in, and third parties you authorize or authenticate through our Services.

### **Our Commercial or Business Purposes for Collecting Personal Data**

#### **Providing, Customizing and Improving the Services**

- Creating and managing your account or other user profiles.
- Processing orders or other transactions; billing.
- Providing you with the products, services or information you request.
- Providing support and assistance for the Services.
- Improving the Services, including testing, research, internal analytics and product development.
- Personalizing the Services, website content and communications based on your preferences.
- Doing fraud protection, security and debugging.

#### **Marketing the Services**

- Marketing and selling the Services.
- Showing you advertisements, including targeted advertising.

#### **Corresponding with You**

- Responding to correspondence that we receive from you, contacting you when necessary or requested.
- Sending emails and other communications according to your preferences.

### **Other Permitted Purposes for Processing Personal Data**

**Each of the above referenced categories of Personal Data may be collected, used, and disclosed with the government, including law enforcement, or other parties to meet certain legal requirements and enforcing legal terms, including: fulfilling our legal obligations under applicable law, regulation, court order or other legal process; protecting the rights, property or safety of you, ESAI or another party; enforcing any agreements with you; responding to claims that any posting or other content violates third-party rights; and resolving disputes.**

**We will not collect additional categories of Personal Data or use the Personal Data we collected for materially different, unrelated or incompatible purposes without providing you notice or obtaining your consent.**

### **How We May Disclose Your Personal Data**

**We disclose your Personal Data to the categories of service providers and other parties listed in this section. Depending on state laws that may be applicable to you, some of these disclosures may constitute a "sale" of your Personal Data.**

- **Service Providers.** These parties help us provide the Services or perform business functions on our behalf, including hosting, technology and communication providers; security and fraud prevention consultants; support and customer service vendors; analytics providers; and payment processors. Our payment processing partner, Stripe,

collects your voluntarily-provided payment card information necessary to process your payment. Please see Stripe's terms of service and privacy policy for information on its use and storage of your Personal Data.

- **Advertising Partners.** These parties help us market our services, such as ad networks and marketing providers.
- **Business Partners.** Educational institutions or other organizations that you have a relationship with, and companies that we partner with to offer joint promotional offers or opportunities.
- **Parties You Authorize, Access or Authenticate.** Third parties you access or engage with through the Services, educational institutions, social media services, your parent or guardian, or any other parties with your consent.
- **Legal Obligations.** We may disclose any Personal Data we collect with third parties to meet legal requirements as described under "Other Permitted Purposes for Processing Personal Data."
- **Business Transfers.** All of your Personal Data that we collect may be transferred to a third party if we undergo a merger, acquisition, bankruptcy or other transaction in which that third party assumes control of our business (in whole or in part).

### **Data that is Not Personal Data**

We may create aggregated, de-identified or anonymized data from the Personal Data we collect. We may use such data and disclose it with third parties for our lawful business purposes, including to analyze, build and improve the Services and promote our business. We will not attempt to re-identify you from aggregated, de-identified, or anonymized data. ESAI does not use student submissions, voice recordings, or personal content to train generalized AI models.

### **Cookies**

**The Services use cookies and similar technologies such as pixel tags, web beacons, clear GIFs and JavaScript (collectively, "Cookies") to enable our servers to recognize your web browser, tell us how and when you visit and use our Services, analyze trends, learn about our user base and operate and improve our Services. Cookies are small pieces of data placed on your computer, tablet, phone or similar device when you use that device to access our Services.**

**We may use the following types of Cookies:**

- **Essential Cookies.** Required for providing you with features or services that you have requested. Disabling these Cookies may make certain features and services unavailable.
- **Functional Cookies.** Used to record your choices and settings regarding our Services, maintain your preferences over time and recognize you when you return to our Services.
- **Performance/Analytical Cookies.** Allow us to understand how visitors use our Services by collecting information about the number of visitors, what pages are viewed, and how long visitors are viewing pages. These may also help measure the performance of our advertising campaigns.
- **Retargeting/Advertising Cookies.** Collect data about your online activity and identify your interests so that we can provide advertising that we believe is relevant to you.

You can decide whether or not to accept Cookies through your internet browser's settings. To modify your Cookie preferences, click [INSERT LINK]. For more information about Cookies generally, please visit <http://www.allaboutcookies.org>.

### **Session Replay Technology**

We may use session replay technology in order to identify and resolve customer issues, to monitor and analyze how you use our Services, and to improve our Services. By continuing to use the Services, you consent to the use of session replay technology.

### **Targeted Advertising**

**We may serve advertisements, and also allow third-party ad networks, including third-party ad servers, ad agencies, ad technology vendors and research firms, to serve advertisements through the Services. These advertisements may be targeted to users who fit certain general profile categories or display certain preferences or behaviors. To accomplish this, we or our service providers may deliver Cookies, including web beacons, through the Services. Web beacons allow ad networks to provide anonymized, aggregated auditing, research and reporting and to serve targeted advertisements to you when you visit other websites.**

### **Data Security**

We seek to protect your Personal Data from unauthorized access, use and disclosure using appropriate physical, technical, organizational and administrative security measures based on the type of Personal Data and how we are processing that data. We implement secure servers and data processing, conduct regular audits and updates to security practices, and ensure vendors and subprocessors are contractually required to adhere to data protection, confidentiality, and security obligations.

You should also help protect your data by appropriately selecting and protecting your password, limiting access to your computer or device and browser, and signing off after you have finished accessing your account. Please be aware that no method of transmitting data over the internet or storing data is completely secure.

## Data Retention

We retain Personal Data about you for as long as necessary to provide you with our Services or to perform our business or commercial purposes for collecting your Personal Data. When establishing a retention period for specific categories of data, we consider who we collected the data from, our need for the Personal Data, why we collected the Personal Data, and the sensitivity of the Personal Data. In some cases we retain Personal Data for longer if doing so is necessary to comply with our legal obligations, resolve disputes or collect fees owed, or is otherwise permitted or required by applicable law.

- We retain your profile information and credentials for as long as you have an account with us.
- We retain your device/IP data for as long as we need it to ensure that our systems are working appropriately, effectively and efficiently.
- Personal information may be processed and stored in the United States or other jurisdictions. We ensure legal safeguards are in place for international data transfers.

## Personal Data of Minors

ESAI is intended to be used by high school (junior or senior) and college students. We do not knowingly collect or solicit Personal Data from minors under 16 years of age without appropriate consent. A parent or guardian of a user under the age of 16 must provide consent to ESAI in order for their child to use the Services.

If you are a minor under the age of 16, please do not attempt to register for or otherwise use the Services or send us any Personal Data without first providing us your parent or guardian's contact information and verified consent. If we learn we have collected Personal Data from a minor under 16 years of age, we may suspend your use of our Services until we have obtained verified consent from your parent or guardian. If we are not able to obtain verified consent, we may terminate your account and delete your Personal Data.

If you believe that a minor under 16 years of age may have provided Personal Data to us, please contact us at [info@esai.ai](mailto:info@esai.ai).

## Commitment to Ethical AI

ESAI uses generative AI to guide students through the college admissions process. We provide scaffolding and prompts that encourage ethical use and original thought, in line with educational standards and admissions policies. Our AI does not produce substantive content; instead, it assists students in developing their unique voice and narrative.

ESAI does not use student submissions, voice recordings, or personal content to train generalized AI models. Any analysis performed is limited to providing and improving the ESAI service and is governed by strict access controls.

## Compliance with Educational Standards

We are dedicated to maintaining compliance with FERPA and other educational standards. ESAI ensures that student grades and other educational records are treated with confidentiality and used only as necessary to provide our services.

## Your Privacy Rights

If you have an account with us, you have the following rights related to your Personal Data. These rights may be subject to additional conditions and exceptions under applicable law. If you have any questions, please contact us at [info@esai.ai](mailto:info@esai.ai).

- **Access:** You can access most of your Personal Data by logging into your ESAI account.
- **Deletion:** You can delete your account by contacting us at [info@esai.ai](mailto:info@esai.ai).
- **Correction:** You may have the right to request that we correct certain Personal Data about you either within your account or by contacting us at [info@esai.ai](mailto:info@esai.ai).
- **Portability:** You may have the right to request a copy of your Personal Data in a machine-readable format, to the extent technically feasible.
- **Withdraw Consent:** You may withdraw consent at any time. Requests to access or delete personal information may be submitted by contacting our support team.

## California Resident Rights

Under California Civil Code Sections 1798.83-1798.84, California residents are entitled to contact us to prevent disclosure of Personal Data to third parties for such third parties' direct marketing purposes. In order to submit such a request, please contact us at [info@esai.ai](mailto:info@esai.ai).

Your browser may offer you a "Do Not Track" option, which allows you to signal to operators of websites and web applications that you do not wish such operators to track certain of your online activities over time and across different websites. Our Services do not support Do Not Track requests at this time. To find out more about "Do Not Track," you can visit [www.allaboutdnt.com](http://www.allaboutdnt.com).

## Nevada Resident Rights

If you are a resident of Nevada, you have the right to opt-out of the sale of certain Personal Data to third parties. However, we do not sell your Personal Data pursuant to Nevada Revised Statutes Chapter 603A.

## Changes to this Privacy Policy

We may update this policy to reflect changes in our practices and service offerings. We will alert you of material changes by placing a notice on our website, by sending you an email and/or by some other means. If you use the Services after any changes to the Privacy Policy have been posted, that means you agree to all of the changes.

## Contact Information

If you have any questions or comments about this Privacy Policy, the ways in which we collect and use your Personal Data, or your choices and rights regarding such collection and use, please do not hesitate to contact us at: [info@esai.ai](mailto:info@esai.ai)