

Privacy Policy

Effective 1 October 2026 · Replaces the Privacy Policy dated 9 May 2026

This Privacy Policy explains what personal information Zorax collects, why we collect it, who we share it with, and what rights you have over it. It covers the Zorax mobile app, our website, the Zorax Community, our online store and the Zora AI assistant — together, the Platform.

1. Who we are

Zorax is a business name used by Chimezirim Robert, a sole trader established in the United Kingdom, who is the data controller responsible for the personal information described in this policy.

Address: 4 Fatherson Road, Reading RG1 4PL, United Kingdom

Email: support@zoraxlabs.com

Website: <https://zoraxlabs.com>

If you have any question about this policy or about your personal information, contact us at the address above. You can also ask us to stop using your information, or to delete it — see section 15.

2. Information you give us

When you create an account, buy something, build a hair profile or take part in the Community, we collect:

- your name and username;
- your email address;
- your phone number and gender, if you choose to give them;
- your profile photograph, if you upload one;
- your billing and delivery addresses;
- your hair profile — hair type, density, porosity, strand thickness, scalp condition and hair goals;
- the posts, comments, replies, photographs and videos you share in the Community;
- your messages to our support team; and
- your membership and, if you have one, your subscription details.

3. Information we collect automatically

When you use the Platform we collect your device type and operating system version, device identifiers, your IP address, which features you use and when, app performance data, and crash and diagnostic logs.

We do not collect your precise location. Your approximate country or region may be inferred from your IP address, which we use to show the right currency and delivery options.

If you turn on notifications, we store a notification token for your device so that we can send the reminders and updates you have asked for. You can turn notifications off at any time in your device settings or in the app.

4. Information from sign-in providers

If you register or sign in using Sign in with Apple or Google Sign-In, we receive your name, email address and profile image from that provider, according to the settings you have with them. We do not receive your password.

If you use Sign in with Apple and choose to hide your email address, we receive a private relay address instead of your real one, and we will correspond with you through it.

5. How we use your information

We use your information to create and manage your account and sign you in; to personalise your experience and generate hair care recommendations; to process your orders, take payment and deliver your products; to operate the Community and keep it safe; to provide customer support; to administer loyalty points, rewards and memberships; to improve the Platform; to detect fraud, abuse and security threats; to meet our legal obligations; and to send you service messages about your orders and account.

We send marketing messages only where you have consented or where the law otherwise permits it, and you can stop them at any time.

6. Your hair profile

Your hair profile exists so that the Platform can give you recommendations that suit your hair rather than generic ones. It is stored against your account, used to personalise recommendations and by the Zora AI assistant, and it is **never sold**. You can change or remove it at any time in the app, and it is deleted when your account is deleted.

Hair profile information, including the scalp condition you select, is collected for one purpose: to personalise cosmetic product recommendations. **We do not use it to infer, diagnose or record a medical condition, and we do not treat it as data concerning health.** We ask how your scalp usually feels and offer four answers — oily, dry, sensitive or normal. Those describe everyday comfort, not a clinical diagnosis, and we neither ask for nor want anything more.

Please do not use your hair profile, or Zora, to record a diagnosed medical condition. If you have one, speak to a qualified healthcare professional.

7. The Zora AI assistant

Zora is an AI assistant that gives educational information, product recommendations and personalised guidance about hair care. When you use Zora, your questions and conversations may be stored so that Zora can respond in context and so that we can improve the service, your hair profile may be used to personalise what it tells you, and your conversation may be processed by the AI providers listed in section 10, acting on our instructions.

Zora is free to use up to 20 messages per calendar month. We count how many messages you have sent in the current month against your account so that we can apply that allowance and reset it on the first of each month. We use that count for nothing else.

Zora is not a medical professional. What Zora tells you is information for cosmetic purposes only. It is not medical advice, diagnosis or treatment. Please speak to a qualified healthcare professional about any medical condition, allergy, scalp disorder or treatment decision.

8. Buying products, payments and orders

Most products you see in Zorax are sold by third-party retailers rather than by us — at present, Amazon. When you choose to buy one, we send you to that retailer's own website or app, and **what happens from that point is covered by their privacy policy, not ours**. We do not receive your payment details, and we do not receive a copy of your order from them.

We may be told, in aggregate, that a purchase resulted from a link in Zorax, so that we can be paid commission. That information does not identify you to us.

Where we sell to you directly, payment is processed by a third-party payment provider and **Zorax never sees or stores your full payment card details**. We keep your order history, transaction details, delivery information and billing records for as long as we are required to for accounting, tax and legal purposes.

9. Community content

Anything you post in the Community — your username, profile image, posts, comments and replies — can be seen by other members. Please think about what you share publicly.

By posting, you give us a non-exclusive, worldwide, royalty-free licence to host, store, reproduce, display and distribute that content for the purpose of operating, improving and promoting the Platform. **You keep ownership of everything you post.**

10. Who we share information with

Service providers

We share information with providers who help us run the Platform, and only so far as they need it to do so:

- **Supabase** — hosting, database, authentication and file storage;
- **Stripe** — payment processing for website and direct purchases;
- **Apple** — Sign in with Apple;
- **Google** — Google Sign-In;
- **Anthropic** — AI processing for the Zora assistant;
- **Expo** — delivery of push notifications to your device;
- email, analytics and monitoring providers.

Legal reasons

We may disclose information where we have to in order to comply with the law, respond to a lawful request, protect our rights or property, prevent fraud or a security threat, or protect the safety of our users or the public.

We do not sell your information

We do not sell, rent or trade personal information to anyone for their own marketing purposes, and we do not sell analytics information to advertisers.

11. Reporting, blocking and moderation

When you report a post, comment, reply or member, we record what you reported, the reason you chose, anything you added, and your account identifier. We use it to review the report, act on it and recognise repeated abuse.

We never tell the person you reported who reported them. Reports are seen only by Zorax staff carrying out moderation.

We keep reports after they are resolved, so that we can see patterns of behaviour across several reports and keep a record of the decisions we have made. Where we act on a report, we record the decision, the reason for it and who made it.

When you block someone, we record that you blocked them so we can hide their content from you and yours from them. **Only you can see the list of accounts you have blocked.** Nobody is told that they have been blocked, and no member can find out who has blocked them.

12. Our legal bases

Under data protection law we must have a lawful basis for using your information. Ours are: performing our contract with you, for your account, orders and subscriptions; our legitimate interests, for improving the Platform, keeping the Community safe and preventing fraud; complying with a legal obligation, for tax and accounting records; your consent, for marketing messages and optional features; and protecting someone's vital interests, in an emergency.

We do not process special category data under Article 9 of the UK GDPR. As section 6 explains, hair profile information is cosmetic rather than clinical, and we do not use it to infer anything about your health.

Where we rely on consent you can withdraw it at any time, and doing so does not affect anything we did before you withdrew it.

13. How long we keep information, and deleting your account

We keep personal information only as long as we need it to run the Platform, meet our legal and tax obligations, resolve disputes and enforce our agreements.

You can delete your account at any time in the app, under Settings.

When you delete your account it is deactivated straight away: your profile, posts and comments stop being visible to other members and you are signed out. **For 30 days afterwards you can restore it simply by signing in again.** After that it is permanently deleted and cannot be recovered.

On permanent deletion, your profile information, hair profile and Zora conversation history are deleted or anonymised. Community posts and comments may remain in anonymised form so that conversations other members took part in are still readable. Order, payment and tax records are kept for as long as the law requires, currently six years.

We complete permanent deletion within 30 days of the end of the restore period.

14. Keeping your information safe

We encrypt data in transit using TLS, host on secure cloud infrastructure, apply role-based access controls and row-level security policies to our database, use secure authentication, and monitor and review our security.

No method of transmission or storage is completely secure, so while we work hard to protect your information we cannot guarantee absolute security. Please keep your login details to yourself.

If a breach affects your personal information we will investigate it, take steps to limit the harm, restore affected systems, and tell you and the Information Commissioner's Office where we are required to.

15. Your rights

Under the UK GDPR you have the right to access your personal information; to have inaccurate information corrected; to have your information deleted; to restrict or object to how we use it; to receive it in a portable form; and to withdraw consent where we rely on it.

To exercise any of these, email support@zoraxlabs.com. We will respond within one month.

If you are unhappy with how we have handled your information you can complain to the Information Commissioner's Office at ico.org.uk, or by calling 0303 123 1113. We would appreciate the chance to put things right first.

16. Messages you receive

We may send you order updates, shipping notifications, review reminders, hair care tips, price-drop alerts, promotional offers and membership communications. You can choose which of these you receive in the app, under Settings, and you can unsubscribe from marketing at any time. We will still send you essential service messages about your orders and account.

17. Children

Zorax is for people aged 13 and over, and higher where local law sets a higher age for consenting to online services. We do not knowingly collect information from children under 13, and if we learn that we have, we will delete it. If you are under 18 you should use Zorax with the knowledge of a parent or guardian.

If you believe a child has given us their information, contact support@zoraxlabs.com and we will remove it.

18. Sending information abroad

Your information may be processed in countries outside the United Kingdom, including by the providers listed in section 10. Where it is, we put appropriate safeguards in place — such as the International Data Transfer Agreement or the UK Addendum to the EU Standard Contractual Clauses — so that it keeps the same protection it has here.

19. Cookies and analytics

Our website uses essential cookies to keep you signed in and remember your basket. These are necessary for the site to work and do not require your consent.

We do not use tracking, advertising or analytics cookies. We run no third-party analytics or advertising service on our website, we do not build profiles of visitors, and we do not share browsing behaviour with anyone.

Within the app we use diagnostic and performance tools to find crashes and technical problems. We do not use them for advertising.

20. Changes to this policy

We may update this policy. Where a change is significant we will tell you through the Platform or by email before it takes effect. The effective date at the top shows when this version came into force. Continuing to use the Platform after a change takes effect means you accept the updated policy.

21. Contact us

Zorax — Chimezirim Robert
4 Fatherson Road, Reading RG1 4PL, United Kingdom
support@zoraxlabs.com · <https://zoraxlabs.com>

This document should be read together with our Terms & Conditions and our Community Guidelines.