Data processing agreement

Version ae5649489edb, kept at https://starlightglobal.industries/dpa/ae5649489edb. The current version is at https://starlightglobal.industries/dpa.

Who this agreement is between

This agreement is between Starlight Global Industries LLC (“SGI”) and the organization that owns a Streamline workspace (“you”). Each member of the workspace accepts each provider it names, one by one, in Streamline. It adds to our terms of service. Where the two differ about personal data in your workspace, this agreement applies.

Who decides, and who processes

You decide why and how the personal data in your workspace is processed. SGI processes it for one purpose: providing Streamline to your workspace. Your use of Streamline, and the settings of your workspace, are your instructions to us. If we believe an instruction would break data protection law, we tell you and do not follow it until it is resolved.

The personal data in a workspace

- **Members.** For each person in the workspace: the Starlight account they sign in with (for an account made by signing in with GitHub, its GitHub account number), the name an owner gives them in the workspace if any, their role in the workspace, when they were added, and when they first and last signed in. For each invitation an owner makes: the name and role it carries, who made it, when it expires, and the account that used it.
- **Usage.** For each paid action: the member who took it, what it measured, and when. This is how the workspace’s Starlight credits are charged.
- **Item pictures and narration.** When a member asks Claude to name an item: up to four pictures of the item, and up to three lines of what was said while it was recorded. A picture or a line of narration can show or name a person. Streamline sends them to Anthropic for that one request and does not keep a copy.
- **Feedback.** What a member writes when they send feedback, the details they choose to send with it (the screen they were on, the app version, the page address, their browser and device, the window size, their language and time zone, whether the app was installed, and the last error the page showed), and their GitHub account number.

This list is complete. Any change to it is a new version of this agreement.

Who else processes it, and where

SGI uses these providers to run Streamline. Each processes only what it needs for the work named here. Only the providers named here receive your workspace’s data.

- **Cloudflare, Inc.** serves the Streamline app, runs its server, and holds the workspace's database: its members, usage and feedback. Where: each request is handled at the Cloudflare data center nearest the member, and the database is stored in the United States.
- **GitHub, Inc.** confirms who a member is when they sign in, and holds the feedback members send, as issues in SGI's private repository. Where: the United States.
- **Neon, Inc.** holds SGI's record of Starlight credits, which receives the usage described above. Where: the United States.
- **Anthropic, PBC** reads an item's pictures and narration with its Claude models when a member asks Claude to name the item, and answers with what the item appears to be. It does not train its models on them, and it deletes them within 30 days unless its usage policy or the law requires it to keep them longer. Streamline sends a member's requests to Anthropic only after that member has accepted Anthropic's Commercial Terms of Service for the workspace. Where: the United States.

Each member accepts each provider for themselves, for each workspace they belong to, before Streamline sends that provider any of the workspace's data for them. Where a provider has terms of its own that Streamline shows, such as Anthropic's, the member accepts those terms as well. One member's acceptance never counts for another member. A member accepts Cloudflare, GitHub and Neon the first time they open a workspace, because Streamline cannot run without them, and cannot use the workspace until they have. Anthropic is needed only to name items with Claude, and a member who has not accepted it can use the rest of Streamline. Before a member has accepted, Streamline uses Cloudflare and GitHub only to sign them in and to record what they accept.

A member can withdraw any acceptance in Streamline's settings. From then on, that provider receives nothing more for them. A member who withdraws Cloudflare, GitHub or Neon cannot use the workspace until they accept it again.

Before any other provider receives your workspace's data, this agreement changes to name it. That is a new version, and each member is asked to accept the new provider, and its terms, before it receives anything for them. When a new version changes what this agreement says about a provider, each member is asked to accept that provider again.

How it is kept safe

- Every connection to Streamline is encrypted.
- Only accounts SGI has invited can sign in, and a member opens only the workspaces they belong to.
- A member never sees who pays for a workspace, or another workspace's members.
- The people at SGI who can reach your workspace's data are bound to keep it confidential.

Requests from the people in your data

If a member of your workspace asks to see, correct or delete their personal data, we help you answer. If one of them asks us directly, we pass the request to you. Send requests to

info@starlightglobal.industries.

If something goes wrong

If we learn that personal data in your workspace was lost, changed, or reached someone it should not have, we tell the owner of the workspace without undue delay, and within 48 hours. We say what happened, what data it touched, and what we are doing about it.

When a workspace closes

When your organization stops using Streamline, the owner of your workspace closes it, in Streamline or by writing to us at info@starlightglobal.industries. From then on, no one can open the workspace.

30 days after the workspace closes, we delete the personal data in it: its members, the record of what each member accepted, and its usage records. A member who also belongs to another Streamline workspace keeps their account, because they still use Streamline there. A member SGI gave access to Streamline for another reason keeps the record of when they signed in, and nothing else. We keep only the workspace's identifier and the dates it closed and was deleted.

The usage already reported to SGI's record of Starlight credits stays there, because the law requires us to keep it for accounting. A usage record that has not been reported yet is reported first and deleted from Streamline as soon as it has been.

Feedback is kept as product feedback, under its own rules, and it can outlast the workspace. Streamline sends each report to SGI's private GitHub repository as an issue, normally within the hour, and then deletes the report's text and the sender's account number from its own database. A report that cannot be sent is deleted from Streamline 30 days after the last try. The issue keeps what the member wrote and the details sent with it, and names the sender, if at all, only by a coded reference. Streamline also keeps a record that each report was sent. So that it can limit how many reports one account sends in an hour, that record carries a code made from the sender's account with a secret key only Streamline holds, and Streamline deletes the code within 15 minutes of that hour ending. A member can ask for their feedback to be deleted, as described under requests above.

Copies in our database backups expire within a further 30 days. If we ever restore the database from a backup, we delete again, within the hour, anything this section says is deleted. Streamline's service logs do not record personal data.

The law that applies

This agreement is governed by the laws of the State of Wyoming, in the United States, except where data protection law requires the law of another place.

Your record of this agreement

Each version of this agreement is kept as it was accepted. When a member accepts a provider, Streamline records the provider, the version of this agreement it was accepted under, who accepted it and when, and the workspace it was accepted for. When a member withdraws, Streamline records when, and keeps the record of the acceptance until the workspace closes or the member closes their Starlight account.