

PRIVACY POLICY

[BUSINESS NAME]

Effective Date: Last Updated:

This Privacy Policy ("Policy") describes how [BUSINESS NAME] ("we," "us," or "our") collects, uses, discloses, and protects personal information in connection with our website, application, or service located at [WEBSITE OR APP URL] (the "Service"). This Policy applies to all users of the Service. By using the Service, you acknowledge that you have read and understood this Policy.

Our mailing address is [BUSINESS MAILING ADDRESS]. For privacy inquiries, you may contact us at [PRIVACY INQUIRIES EMAIL].

1. Definitions

- **"Personal Information"** means information that identifies, relates to, describes, or could reasonably be linked with a particular individual or household.
- **"Service Provider"** (CCPA) or **"Processor"** (GDPR) means a third party that processes personal information on our behalf under written contract.
- **"Sale"** and **"Sharing"** have the meanings given in Cal. Civ. Code §1798.140(ad) and (ah).
- **"Sensitive Personal Information"** means the categories defined in Cal. Civ. Code §1798.140(ae).

2. Information We Collect

We collect the following categories of personal information (aligned with Cal. Civ. Code §1798.140(v) (1)):

- **Identifiers:** name, email, IP address, account ID, device identifier.
- **Commercial information:** records of products or services purchased.
- **Internet/network activity:** browsing, search, interactions.

Sources

We collect personal information (a) directly from you; (b) automatically via cookies, beacons, server logs, and SDKs; and (c) from third parties such as social-login, payment, and analytics providers.

3. How We Use Personal Information

1. To provide, operate, maintain, and improve the Service.
2. To process transactions and manage accounts.

3. To communicate with you, including transactional messages.
4. To send marketing communications where permitted and with consent where required.
5. To personalize content.
6. To perform analytics.
7. To detect, prevent, and address fraud and security incidents.
8. To comply with legal obligations.
9. To enforce our terms and protect rights.

4. Cookies and Tracking Technologies

We use cookies and similar technologies (web beacons, pixels, local storage, SDKs) to operate the Service, remember preferences, analyze usage, and — with consent — deliver advertising.

Category	Purpose	Consent?	Strictly necessary	Login, session, security	No	Functional	Preferences	No / implied	Analytics	Usage measurement	Yes in EU/UK	Marketing	Behavioral advertising	Opt-in EU/UK; opt-out CCPA

California DNT. We do not currently respond to DNT signals; this notice is provided pursuant to Cal. Bus. & Prof. Code §§22575-22579 (CalOPPA).

Analytics. Third-party analytics providers may set cookies and collect IP, configured to anonymize where available. Opt out of Google Analytics via <https://tools.google.com/dlpage/gaoptout>.

5. How We Share Personal Information

1. **Service providers/processors** under written contract.
2. **Advertising/marketing partners** subject to opt-out.
3. **Legal/regulatory authorities** in response to valid legal process.
4. **Business transferees** in M&A.
5. **Professional advisors.**
6. **Aggregated/de-identified data** without restriction.

6. Sale and Sharing of Personal Information

We do not sell personal information for monetary consideration. Some advertising/analytics activities may constitute "sharing" under CPRA; opt out via Section 7.

7. Your Rights

Other U.S. State Residents

Residents of VA, CO, CT, UT, TX, OR, MT, FL and other states with comprehensive privacy laws have rights to access, correct, delete, port, and opt out of targeted advertising, sale, and certain profiling. Submit requests to [PRIVACY INQUIRIES EMAIL]; we honor appeals as required.

8. Security

We implement technical and organizational measures: TLS in transit, encryption at rest where appropriate, access controls, MFA for administrative systems, vendor due diligence, training, and incident response. **No method of transmission or storage is 100% secure.**

9. Breach Notification

We will notify affected individuals and regulators in accordance with applicable state and federal breach-notification laws.

10. Data Retention

- **Account data:** account life + 3 year(s).
- **Transaction records:** 7 years (IRC §6501).
- **Server/access logs:** 90 days.
- **Marketing data:** until opt-out or three years from last interaction.
- **Backups:** subject to rotation schedule.

11. International Data Transfers

The Service is operated primarily in the United States. International users consent to U.S. processing.

13. Children's Privacy

The Service is not directed to children under 13. We do not knowingly collect PI from children under 13.

15. Marketing Communications

Marketing emails comply with the CAN-SPAM Act (15 U.S.C. §§7701-7713). Unsubscribe requests honored within 10 business days. SMS marketing complies with the TCPA (47 U.S.C. §227); reply STOP to opt out. Canadian marketing: CASL.

16. Third-Party Links

The Service may contain links to third-party websites. We are not responsible for their privacy practices.

17. Changes to This Policy

Material changes communicated by prominent on-Service notice. "Last Updated" date will reflect changes.

18. Contact Us

- **Email:** [PRIVACY INQUIRIES EMAIL]
- **Mail:** [BUSINESS NAME], [BUSINESS MAILING ADDRESS]

This Policy is governed by the laws of the State of [STATE], except where another jurisdiction's law applies by operation of law.