

**Effective Date: 09/30/2025**

CLOO LLC, a Delaware limited liability company (hereinafter known as “CLOO”, “us”, “we” or “our”)) is the sole owner of the information collected on this site. This Privacy Policy applies to all our interactions with you, including when you visit our website at <https://www.cloo.io>, request or receive professional services, participate in our messaging program, participate in our educational or marketing events, request information from us, apply for a job, or when you otherwise provide information to us. Our Privacy Policy describes our collection of information during your interactions with our services, and the rights and choices you have regarding your information.

We are committed to protecting your privacy and committed to developing technology that gives you the most powerful and secure experience.

Please be advised that the practices described in this Privacy Policy apply only to information gathered through our Website.

We may update or change this Privacy Policy from time to time. We will provide notice and post the changes on our website and will indicate the effective date. Your continued use of our website or our services after the changes are effective constitutes your acceptance of the Privacy Policy.

By using our website or any of our services, you agree with the terms of this Privacy Policy and our Terms of Use.

### **Information Collection and Use**

We collect and use personal information for a variety of purposes, as described below and within this Privacy Policy. We specifically use information collected to:

- Perform a contract we are about to or have entered into with you, or provide you with the products or services you have purchased; and
- Improve our products, develop new products or features, and conduct research. We may use your personal information to communicate with you about We and other companies' products and services, offers, promotions, upcoming events, and other information about our services; and
- Determine your eligibility for employment with our company or otherwise process your job applications. We may verify your references, qualifications, and/or conduct a criminal records check for certain vetting purposes, where permissible and in accordance with applicable law; and

- Comply with the law, or for other legal, security and safety reasons; and/or provide information about the services you have requested, or alert you to updated information.

## **Information Disclosure**

We never sell or rent your personal information. We will only disclose personal Information to third parties where required by law or to our personnel, or third-party service providers who require such information to assist us with providing our services.

We may also disclose personal information for the following additional purposes where permitted or required by applicable law. We may disclose personal information to:

- Our service providers who help us deliver our products and services to you and for the purposes described in this Privacy Policy. These service providers are required by contract or law to only use or disclose the information as necessary to perform services on our behalf or as otherwise required by law. Although We require these third parties meet our privacy and security requirements, we do not control the privacy or security policies of such third parties;
- A third party in the event of a merger, transfer of ownership or assets, bankruptcy, or other corporate reorganization; and/or
- Other, subsidiaries, and related affiliates acting on our behalf for the purposes described in this Privacy Policy.

We may disclose without your prior consent any personal information about you or your use of our website if we believe disclosure is necessary, including to:

- Protect and defend the rights, property, or safety of us, our employees, other users of the website, or the public;
- Enforce our terms and conditions or other policies;
- Respond to a legally valid request from a competent governmental authority;
- Respond to claims that any content violates the rights of third parties;
- Correspond with law enforcement agencies, if we are required to do so; and/or
- Satisfy any applicable law, regulation, legal process, or governmental request.

## **Transfer and Storage of Information**

Information we collect about you may be transferred, processed, and/or accessed by us in the United States, or another country where we or our service providers operate. Please be aware your personal information may be transferred to, and maintained on, computers located outside

of your state or country where privacy laws may differ from and may not be as protective as those where you live.

If you are located outside the United States and choose to allow us to collect information about you, please be aware that we may transfer your personal information to the United States and process and store it there.

If you are located in the European Economic Area (“EEA”) or other regions with laws governing data collection and use that may differ from U.S. law, please note that we may transfer information to a country or jurisdiction that does not have the same data protection laws as your jurisdiction, as disclosed in this Privacy Policy.

## **Email Marketing**

CLOO uses the service providers Klaviyo or Resend to provide email marketing communications on our behalf.

If you have opted to receive email updates, we may contact you via email in the future to tell you about specials, new products or services, or changes to this privacy policy.

You may opt out of any future contacts from us at any time. To do this, simply click the unsubscribe button at the bottom of any email. You can also unsubscribe to email marketing by sending us a note at [dev@cloo.io](mailto:dev@cloo.io).

**Note that some messages you may receive are required, service-related messages like transaction confirmation messages, legal notices, or updates.**

## **Cookies, Analytics, & Targeted Advertising**

We and our third-party providers use cookies, clear GIFs/pixel tags, JavaScript, local storage, log files, and other mechanisms in connection with our Websites, Apps, and other platforms, in order to, for example, understand how to improve the customer experience, track bugs and errors, provide operate, enable and improve our products, verify account credentials, enable logins, track sessions, personalize content, prevent fraud, and protect and secure our Services, as well as for targeted marketing, advertising, and analytics purposes.

## **Third-Party Platforms**

We use third party platforms, including Meta’ Facebook Pixel and Google products such as Google Analytics and Google Shopping to collect analytics on our website. Through the integration of these platforms, the third parties receive your personal information transmitted

when you visit a page of our website, click on an advertisement from us, or otherwise interact with us online.

For more information about how Meta processes personal data, see Meta's Data Privacy Policy at: <https://www.facebook.com/about/privacy>.

For more information on how Google processes personal data, see Google's Privacy & Terms at: <https://policies.google.com/technologies/partner-sites>.

For more information on how [Klaviyo](#) processes personal data, see Klaviyo's Data Processing Agreement at: <https://www.klaviyo.com/legal/data-processing-agreement>

For more information on how Resend processes personal data, see Resend's [Privacy & Terms](#) at: <https://resend.com/legal/privacy-policy>

## **Cookies**

Cookies are alphanumeric identifiers that we transfer to your computer's hard drive through your web browser for record-keeping purposes. Some cookies allow us to make it easier for you to navigate our website, while others are used to enable a faster log-in process or to allow us to track your activities while using our website. This information is used for internal purposes only. The statistics contain no personal information and cannot be used to gather such information. Cookies cannot be used to run programs or deliver viruses to your computer or phone. Most web browsers automatically accept cookies, but if you prefer, you can edit your browser options to block them in the future. You can choose your cookie preferences and settings for our website [here](#). The Help portion of the toolbar on most browsers will tell you how to prevent your computer from accepting new cookies, how to have the browser notify you when you receive a new cookie, and how to disable cookies altogether. Some of our software may not work properly if you disable cookies.

## **Clear GIFs**

Clear GIFs, also referred to as pixel tags and web beacons, are tiny graphics with a unique identifier, similar in function to cookies. In contrast to cookies, which are stored on your computer's hard drive, clear GIFs are embedded invisibly on web pages. We may use clear GIFs in connection with our website and marketing and advertising campaigns to, among other things, track the activities of customers, help us manage content, and compile reports.

## **Third Party Apps**

To improve our website features and general functionality we have partnered with a number of third-party applications. Each of these applications may have limited access to the following customer information: names, email addresses, phone numbers, physical addresses, geolocations, IP addresses, and browser user agents. These are used to improve the user experience, help with your online purchases, analytics, or assist with our advertising efforts.

## **Targeted Advertising**

In the past twelve (12) months, we have worked with third-party ad networks, channel partners, measurement services, and others (“third-party ad companies”) to personalize content and advertising on our services, and to manage our advertising on third-party sites, mobile apps, and online services. We and these third-party ad companies may use cookies, pixel tags, and other tools to collect activity information, IP address, device ID, advertising IDs, other identifiers, and location information within our services (as well as on third-party sites and services). These third-party ad companies and we use this information to provide you more relevant ads and content on our website and on third-party sites and services, as well as to improve and evaluate the success of such ads and content. We also may share certain customer list information (such as your email address) with third-party ad companies so that we can better target these customers and others with similar interests on third-party sites and platforms.

## **Preferences**

You can opt out of targeting and some other third-party cookies (not including necessary cookies) on our Website by clicking the “Cookie Settings” link in the footer of that Website and reviewing and adjusting your cookie settings. Your preferences are browser-specific and website-specific. So, you need to set your preferences for each Website that you visit, and if you come back to a Website from a different device or a different browser on the same device, you will need to apply your preferences for that browser or device as well.

You can submit a request to opt out of sales, sharing, and targeting as defined under applicable privacy laws, by submitting a request through our pop-up banner—or by contacting us at (dev@cloo.io).

Please note that while it is CLOO’ policy to opt you out of tracking that occurs on our website, third-party cookies and tracking policies are governed by their own tracking technologies. CLOO is not responsible for these third-party tracking technologies.

## **Audio Data**

If you call us first or contact us and signify that you'd like to receive phone calls, you may be contacted by one of our sales or service representatives. Calls may be monitored and recorded for quality assurance purposes in accordance with all applicable laws.

### **Aggregate and Non-Identifiable Information**

We may collect, use, and disclose aggregate, anonymous, and other non-identifiable data about users for marketing, advertising, research, compliance, or other purposes. Where we use, disclose, or process de-identified data (data that is no longer reasonably linked or linkable to an identified or identifiable natural person, household, or personal device), we will maintain and use the information in de-identified form and not to attempt to reidentify the information, except as permitted by applicable privacy and data protection laws (such as to confirm whether our de-identification processes are reasonable and adequate).

### **Security**

When handling your personal information, we use administrative, technical, and physical safeguards designed to protect your personal information from unauthorized access, disclosure, alteration, or loss. However, no internet transmission is ever fully secure, and we cannot guarantee that information transmitted via our website will remain confidential at all times.

We only collect information considered sensitive with your consent. If any sensitive information is submitted to CLOO via phone, we have security policies in place and take steps to protect that information from unauthorized disclosure.

Wherever we collect sensitive information online (such as credit card data), that information is encrypted and transmitted to us securely. You can verify this by looking for a closed lock icon at the bottom of your web browser, or look for "https" at the beginning of the address of the web page.

While we use encryption to protect sensitive information transmitted online, we also protect your information offline. Only employees who need the information to perform a specific job (for example, billing or customer service) are granted access to personal information. The computers/servers in which we store personal information are kept in a secure environment.

CLOO does not independently collect or store credit card data online. Any Credit card data submitted to is collected through our third-party service provider, Stripe. Stripe may use various third-party vendors to support its services. More information about Stripe and its data protection measures can be found here: <https://stripe.com/privacy>.

## **User Generated Content, Submissions & Photo Sharing**

You may email, post, upload, or submit content you have created, including photographs, videos, reviews and comments (collectively, “User Submissions”) to your social media accounts, through <https://www.Cloo.io>, or directly via email. By posting, uploading, or sharing User Submissions that you have tagged with @cloo, #cloo or other CLOO brand hashtags, you grant CLOO and our third-party content-management service providers the perpetual, irrevocable, royalty-free, fully-paid, non-exclusive, transferable right to use at our discretion your User Submissions for educational and promotional purposes. In making a User Submission, you also agree to hold CLOO and any person acting on our behalf harmless from any liability related in any way to the use of your User Submissions.

## **Our website includes links to other websites**

This website contains links to other sites. Please be aware that we are not responsible for the content or privacy practices of such other sites. We encourage our users to be aware when they leave our site and to read the privacy statements of any other site that collects personally identifiable information.

If you have any questions or concerns, please don't hesitate to contact us.

**Our website and related services are hosted on Amazon Web Services (AWS), a leading cloud services provider. AWS provides us with secure data storage, networking, and infrastructure services. While AWS may store or process your personal information on our behalf, it does not use or access your information for its own purposes. AWS maintains industry-standard security certifications and compliance frameworks (including ISO 27001, SOC 1/2/3, and GDPR-ready controls). You can learn more about AWS’s privacy and data protection practices at: <https://aws.amazon.com/compliance/data-privacy/>** If you would like a detailed list of all our partners, need your personal information purged from our system, or have any other questions or concerns, please don't hesitate to contact us.

## **U.S. State Privacy Rights**

In this section, we provide additional information to certain state residents, including residents in California, Colorado, Connecticut, Virginia, Utah, and other states with comprehensive privacy rights about how we handle their personal information, as required under certain state privacy laws. This section does not address or apply to our handling of publicly available information or other personal information that is exempt under state data protection laws. Below we describe, generally, how we collect and disclose personal information. While our collection, use, and disclosure of personal information varies based upon our relationship and interactions with you, the categories below identify, generally, the categories of personal information (as defined by

state data protection laws ) that we collect (and have collected in the prior 12 months) about residents, as well as the categories of third parties to whom we may generally disclose this information for a business or commercial purpose.

## **Identifiers**

Identifiers include direct identifiers, such as name, IP address, phone number, address, and other contact information or similar identifiers. Categories of third-party disclosures for business or commercial purposes include:

- Vendors or service providers;
- Marketing and advertising providers;
- Analytics providers; and
- Third party apps.

## **Customer Records**

Includes personal information such as name, business name, or contact information. Categories of third-party disclosures for business or commercial purposes include:

- Third party apps;
- Analytics providers; and
- Marketing and advertising providers.

## **Usage Data**

Includes personal information such as browsing history, clickstream data, search history, access logs and other usage data and information regarding an individual's interaction with our website, marketing emails, and online ads.

- Third-party services;
- Analytics providers; and
- Marketing and advertising providers.

## **Geolocation Data**

Includes precise location information about a particular individual or device. Categories of third-party disclosures for business or commercial purposes include:

- Analytics providers



## **Audio, Video, & Electronic Data**

Includes audio, electronic, visual, thermal, olfactory, or similar information such as CCTV footage (e.g., collected from visitors to our premises, photographs and images (e.g., that you provide us or post to your profile), call recordings (e.g., of customer support calls) Categories of third-party disclosures for business or commercial purposes include:

- Analytics providers; and
- Third-party apps.

## **Professional Information**

Includes professional or employment-related information. Categories of third-party disclosures for business or commercial purposes include:

- Analytics providers; and
- Third-party apps.

## **Inferences**

Includes inferences drawn from other personal information that we collect to create a profile reflecting an individual's preferences, characteristics, predispositions, behavior, attitudes, intelligence, abilities or aptitudes. For example, we may analyze personal information in order to identify the offers and information that may be most relevant to customers, so that we can better reach them with relevant offers and ads. Categories of third-party disclosures for business or commercial purposes include:

- Analytics providers; and
- Third-party apps.

## **Sensitive Personal Information**

Precise geolocation information may be collected through our analytics and third-party app providers, but CLOO does not track precise geolocation directly.

## **Sales and Sharing Personal Information**

CLOO does not sell personal information as the term "sell" is commonly understood. However, as defined in U.S. data protection laws, the "sale" of personal information means disclosing

personal information to third parties for monetary or other valuable consideration, in which case we have “sold” data to third parties for the purposes of advertising.

Under certain data privacy laws, a “sale” includes disclosing or making available personal information to a third party in exchange for monetary compensation or other benefits or value, and “sharing” broadly includes disclosing or making available personal information to a third party for purposes of cross-context behavioral advertising. We may sell or share: identifiers, usage data, customer records, geolocation, commercial information, and inferences to or with affiliates, marketing and advertising partners, and analytics providers. We do not sell or share personal information or sensitive personal information about California consumers who we know are younger than 16 years old. Residents of states with privacy laws may opt out of sales of their personal information by us as set forth below.

We may collect personal information from the following sources:

- Directly from you;
- Advertising networks and marketing partners;
- Data analytics providers;
- Social networks;
- Internet service providers;
- Operating systems and platforms;
- Data brokers/aggregators; and
- Platform providers.

### **Purpose of Collection, Use and Disclosure**

We collect, use, disclose, and otherwise process personal information for the following business or commercial purposes and as otherwise directed or consented to by you:

- Analyzing and improving your customer experience;
- Communicating with you
- Personalizing content and experiences
- Advertising, marketing, and promotional purposes;
- Supporting our general business operations;
- Planning and implementing business transactions;
- Securing and protecting our assets and rights; and
- Complying with legal obligations.

We will also disclose personal information as directed or consented to by you, or where otherwise necessary to respond to your requests or fulfill your orders.

## **Retention**

We will retain your personal information, including sensitive personal information, in accordance with the law and for as long as reasonably necessary for purposes for which the personal information was collected and is used by us, as stated in this Privacy Policy.

## **U.S. Resident Rights**

Consistent with these laws, we give you options to access, edit, or remove certain information, as well as choices about how we contact you. Although some of these rights apply generally, certain rights will only apply to limited individuals or circumstances. To the extent that these laws apply, you may exercise the following rights:

**Opt out of sales and sharing:** You may have the right to opt-out of our sale and sharing of their personal information.

**Right to withdraw consent:** You may opt-out of our use of your personal information for advertising purposes.

**Limit use and disclosure of sensitive personal information:** You may have the right to opt in or to limit certain uses or disclosures of sensitive personal information to those uses authorized by data protection laws.

**Limit use for Advertising:** You may opt-out of our use of your personal information for advertising purposes.

**Deletion:** You may have the right to request deletion of their personal information, subject to certain exceptions.

**To know/access:** You may have the right to know what personal information we have collected about them, including the categories of personal information, the categories of sources from which the personal information is collected, the business or commercial purpose for collecting, selling, or sharing personal information, the categories of third parties to whom we disclose personal information, and the specific pieces of personal information we have collected about them.

**Correction:** You may have the right to request correction of inaccurate personal information.

**Non-discrimination:** You may have the right to not to be subject to discriminatory treatment for exercising their rights under this section.

**Right to Appeal:** If we deny your request, you may appeal our decision. Please note if we deny your request, it is likely based on a legal obligation.

### **Compliance with the Children’s Online Privacy Policy Protection Act**

**Protecting the privacy of the very young is especially important. For that reason, we never collect or maintain information through our Website from those we actually know are under thirteen (13), and no part of Our Service is structured to attract anyone under thirteen (13).**

### **California “Shine the Light” Law**

Under California’s “Shine the Light” law (Cal. Civ. Code § 1798.83), California residents who provide us certain personal information are entitled to request and obtain from us, free of charge, information about the personal information (if any) we have shared with third parties for their own direct marketing use. Such requests may be made once per calendar year for information about any relevant third-party sharing in the prior calendar year. To submit a “Shine the Light” request, follow the instructions provided in “Submitting Rights Requests”. For additional information about our privacy practices, please contact us.

### **Nevada Privacy Rights**

Nevada residents have the right to opt-out of the sale of their Personal Information by contacting us and including “NV Sale Opt Out Request” in the subject line. Please note we will take reasonable steps to verify your identity and the authenticity of the request. We will respond to your request within sixty (60) days and, once verified, we will maintain your opt-out request in the event our practices change. Please note that this right does not apply to business-to-business customers, employment applicants, or independent contractors to us, or if the disclosure of Personal Information is for purposes consistent with the Nevada resident’s reasonable expectations when considering the submission’s circumstances.

### **European Union, UK, and Switzerland Privacy Rights**

Certain laws, including but not limited to, the General Data Protection Regulation (GDPR) grant you rights to control your personal information. Although some of these rights apply generally, certain rights will only apply to limited individuals or circumstances.

To the extent that these laws apply, you may exercise the following rights:

**Right to Access:** Note that much of the information you are entitled to know or access is disclosed in this Privacy Notice. With this said, you have the right to know about our information practices. You also have the right to access the categories of data we collect, with whom we share or sell that information, and, in some cases, what specific personal information we associate with you or your account.

**Right to Rectification:** You may request we correct or rectify inaccurate information we have collected about you.

**Right to Erasure:** You may request that we delete the personal information we have collected about you. Depending on the applicable law, in some cases we are required or permitted to retain your information, even if you validly requested we delete or erase it.

**Right to Restrict Processing:** If we process your information based on our legitimate interests as explained in this Privacy Notice, you may have the right to restrict processing in certain circumstances.

**Right to Object:** If we process your information based on our legitimate interests as explained in this Privacy Policy, or in the public interest, you can object to this processing in certain circumstances. Where we use your data for direct marketing purposes, you can always object using the unsubscribe link in such communications or changing your account settings.

**Right to Data Portability:** If you request a copy of your specific information then we will provide it in an easily accessible format.

**Right to Lodge a Complaint:** You may be entitled to lodge a complaint with your data privacy regulatory authority.

We generally process personal information of those residing in the European Union, the UK, and Switzerland on the legal basis of CLOO' legitimate interests in performing the function or service you requested. Where appropriate, we may rely on alternate legal bases, such as your consent to certain types of processing. Where we process your personal information on the basis of consent, we will clearly obtain your opt-in consent.

Where you have provided consent to certain data processing, you have the right to withdraw that consent at any time by following the instructions on submitting rights requests below. A withdrawal of consent will not affect the validity of our use of your personal information up until the point you have withdrawn your consent.

**Other Global Privacy Rights:** Residents of jurisdictions not specifically listed in this Privacy Policy (including, but not limited to, Canada, Brazil, Australia, South Africa, and other countries with comprehensive data protection laws) may have similar rights with respect to their personal

information under applicable local laws. These rights may include the ability to request access to, correction of, or deletion of your personal information, to restrict or object to certain processing, to withdraw consent to processing (where applicable), and to lodge a complaint with a local supervisory authority. We will honor such rights in accordance with the requirements of the applicable laws.

If you are located outside the United States, the European Union, the United Kingdom, or Switzerland, and wish to exercise your rights under your local data protection laws, please contact us using the methods set forth in the “Submitting Rights Requests” section below.

### **Submitting Rights Requests**

You may submit requests regarding their personal information maintained by us through one of the following methods:

- Online through our contact form
- Through our Privacy Rights Request Form

Please complete all required fields on our web form or otherwise provide us with this information via the phone number so that we can process your request. When you submit a request to know, delete, or correct, we will take steps to verify your request by matching the information provided by you with the information we have in our records. In some cases, we may request additional information in order to verify your request or where necessary to process your request. If we are unable to adequately verify a request, we will notify the requestor. Authorized sales personnel may also submit requests on behalf of consumers using the online form above; authorized personnel will be required to provide proof of their authorization and we may also require that the relevant consumer directly verify their identity and the authority of the authorized agent.

### **Financial Incentives**

We may offer you the opportunity to be eligible for certain perks and benefits such as rewards, exclusive offers, and discounts in connection with the disclosure of your personal information. All benefits are free of charge.

When you participate in these perks and benefits, we will collect and keep the personal information you provide, or that you’ve previously provided, which may include your name, phone number, date of birth, country, and email address. To enhance your experience with CLOO and reward you, and to provide you with tailored benefits, We may also collect and use

the following categories of personal information, including personal information we've previously collected about you. Information will be specified in the terms of the program, but may include:

- Identifiers;
- Protected classifications;
- Additional Data Subject to Cal. Civ. Code § 1798.80;
- Online activity information;
- Geolocation data;
- Commercial information; and

The benefits to you are reasonably related to our good-faith estimate of the value provided to Us by their personal information. The value of personal information to Us varies by individual, and is related to the value of the rewards and discounts provided to account holders, minus the costs of providing those benefits.

California residents have the right to understand the material terms of any “financial incentive” offered to them and to not be included in such without consent. If we provide any programs or offerings that are considered “financial incentives” under the CCPA, we will disclose the material details of such a program to you so that you can choose whether to opt in. You may withdraw from participation from any rewards program at any time by following the instructions provided upon enrollment.

**Global Privacy Controls.** Global Privacy Control (GPC) is a special browser setting that helps user's exercise their rights or share privacy preferences. The GPC sends signals such as not to share or sell personal data without their consent. You can download the GPC browser extension [here](#).

**Do Not Track Signals.** CalOPPA requires us to let you know how we respond to web browser Do Not Track (“DNT”) signals. DNT is a privacy preference you can set in your web browser to indicate that you do not want certain information about your webpage visits collected across websites when you have not interacted with that service on the page. For details, including how to turn on DNT, see [here](#). Because there currently isn't an industry or legal standard recognizing or honoring DNT signals, we don't respond to them at this time.

## **Contact**

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