

# Privacy Policy

## Introduction

Cleara, LLC (“Cleara”) provides data aggregation and API-based data access services to credentialed business customers, including Consumer Reporting Agencies and other authorized entities. Cleara does not provide consumer-facing products or services. Cleara is not a Consumer Reporting Agency and does not issue consumer reports directly to individuals.

This Privacy Policy describes how Cleara collects, uses, discloses, and retains personal information in connection with its data products, services, and business operations. This Privacy Policy is made available on Cleara’s public-facing website.

## Applicability of This Privacy Policy

Cleara’s Privacy Policy applies to the use of Cleara’s website, APIs, and related services. Cleara may update this Privacy Policy from time to time to reflect changes in our practices, legal requirements, or business operations. When we make updates, we will revise the “Last Updated” date at the top of this Privacy Policy and, where appropriate, provide notice through our website, API documentation, or other reasonable means. Any changes will become effective upon posting unless otherwise required by applicable law.

## Personal Information We Collect

Within the last 12 months, we have collected, used, disclosed, shared, and sold the following types of personal information, from or about consumers, organized by category:

Category	Information
<b>Identifiers</b>	Name, alias, address, telephone number, IP address, device information and identifiers, date of birth, and email address.
<b>Public Record Information</b>	Information that is lawfully made available from federal, state or local government, like criminal records, landlord-tenant court records, sex offender registry records.

Cleara collects and discloses this information in connection with providing data products and services to credentialed business customers and for related business operations.

Our purposes for collecting the above types of personal information are disclosed in the section of this Privacy Policy entitled “Our Purposes for Collecting Personal Information”.

Please note that we may also collect audio, electronic, visual, and similar information if you communicate with us via telephone or through another calling platform. We do not sell or share this information in the ordinary course of our business but may use this information for our internal recordkeeping purposes, to respond to a subpoena, to respond to a government or law enforcement request, or in the context of a legal proceeding on an as-needed basis.

### Sources of Personal Information We Collect

Cleara may collect information about you directly from you (for example, when you submit a request to us) and from third-party data sources, such as government and public record repositories, other sources of publicly available information, data aggregators, brokers, third-party resellers, and the organization that employs you or with which you are otherwise affiliated.

### Our Purposes for Collecting Personal Information

We may use personal information where necessary to pursue the legitimate business purposes and those of our customers, consistent with applicable law.

More specifically, we may use this information for our business purposes, which may include:

- Incorporating the information and/or inferences we derive from the information into our products and services, as well as matching and linking it to other information we maintain within our products and services;
- Preventing, detecting and investigating fraud, security or technical issues, or other similar issues;
- Performing identity verification;
- For our internal analytics;
- Complying with applicable laws, regulations, court orders, legal process, or government re-quests, enforcing our customer contracts, and protecting our own rights;
- In connection with corporate transactions such as a merger, acquisition, or sale or transfer of assets;
- Communicating with you and responding to your requests and inquiries; and
- Record keeping, consistent with the above purposes.

Cleara does not use personal information for purposes materially different from those described in this Privacy Policy without updating this Privacy Policy or otherwise providing notice as required by applicable law.

### Third Parties to Whom We Share, Sell, or Disclose Personal Information

Cleara may share, sell, or otherwise disclose the personal information we collect about you to:

- **Our Customers.** When we say “our Customers” we mean credentialed organizations and professionals who contract to access our products and services. Our Customers may include companies who incorporate our information into their own services for disclosure to their own customers. We restrict Customer access to certain personal information in our products and services based on a variety of factors, including: the type and sensitivity of the information; applicable laws and regulations; restrictions imposed on us by our third-party data sources; and our internal policies. Cleara does not provide its products and services directly to consumers.
- **Our Vendors.** Cleara may disclose personal information to the following categories of third parties:
  - ▷ Cloud infrastructure providers that host and support Cleara’s systems and platform
  - ▷ Data storage, backup, and database service providers
  - ▷ Identity resolution and data matching service providers
  - ▷ Security, monitoring, compliance, and audit service providers
  - ▷ Professional service providers, including legal, accounting, and consulting firms
  - ▷ Credentialed Consumer Reporting Agency customers and other authorized business clients
  - ▷ Government authorities, regulators, and law enforcement where required by law
- **Government, Law Enforcement, and Parties to Litigation.** We may disclose information to government and/or law enforcement agencies where we reasonably determine that we are required to provide information to comply with applicable laws, regulations, court orders, legal process, or other government requests. We may also provide information to government and/or law enforcement agencies for purposes of preventing, detecting, and investigating fraud or other similar issues. We may provide information in connection with litigation purposes, for example, where we determine

that we are required to furnish the information to protect our own rights or where we are subject to a subpoena or other legal obligation. In all such cases, we will take reasonable efforts under the circumstances to attempt to preserve the confidentiality of the information and restrict it from being used for other purposes.

### Personal Information About Minors

Cleara does not knowingly collect personal information directly from minors under the age of 16 through its website or business operations.

### Your Choices

You may control your information in the following ways:

- You may request suppression of your personal information as contained in Cleara's products and services, subject to applicable legal and contractual limitations. You may submit a suppression request by contacting us using the contact information provided in this Privacy Policy. If you submit personal information to us for the purpose of making such a request, we will use that information solely to verify your identity, process your request, respond to you, and maintain a record of your request and our response. In certain cases, individuals may be directed to contact the Consumer Reporting Agency or business customer that obtained information from Cleara, where appropriate.
- Where required by applicable law, Cleara will obtain consent prior to collecting or processing personal information. In other cases, personal information is processed as permitted by law in connection with Cleara's provision of services to credentialed customers.

### Request to know and access

You may submit a request for disclosure of: (i) the categories of personal information we collect about you, (ii) the categories of sources from which the personal information is collected, (iii) the specific pieces of personal information we collect about you, (iv) the business or commercial purpose for collecting or selling personal information about you, (v) the categories of personal information about you that we sold or disclosed for a business purpose, and (vi) the categories of third parties to whom we sold or to whom we disclosed for a business purpose such information in the preceding 12 months.

### Request for correction

You can request that we correct inaccuracies in your personal information. Because the data we obtain about you may be derived from a public record or other record for which we are not the original source, we may be limited in our ability to correct it in our systems while maintaining its utility as a reflection of the public record or original record.

Accordingly, we may elect to delete the portion of personal information that you consider inaccurate, instead of changing it within our systems. Individuals are encouraged to review the underlying public record or original source where applicable to ensure accuracy.

You may submit a request to correct by contacting us using the contact information provided in this Privacy Policy.

### Request for deletion

You may submit a request to delete by contacting us using the contact information provided in this Privacy Policy.

Request to opt-out of the sale or sharing of your personal information

You may submit a request to opt out of the sale or sharing of personal information by contacting us using the contact information provided in this Privacy Policy.

Cleara may collect and process personal information that may be considered “sensitive” under certain state privacy laws, including criminal history information lawfully obtained from public record sources. Cleara processes such information solely in connection with providing its data products and services to credentialed customers and in compliance with applicable law.

### Right to be free from discrimination

You may not be discriminated against for exercising your rights under any state’s privacy laws, as applicable to you. This includes denying you products or services, charging different prices for products or services, providing a different level or quality of products or services, or suggesting that you will receive a different price or rate for products or services or a different level or quality of products or services.

### Requests submitted through authorized agents

You may designate an authorized agent in writing or through a valid power of attorney to exercise their rights under applicable privacy laws on your behalf.

If using an authorized agent without a power of attorney, the authorized agent must provide proof that you gave the agent signed permission authorizing the named agent to submit the request on your behalf. Also, you must (i) submit information enabling us to verify your identity and/or determine that the request is not fraudulent, such as a partial (i.e., first five digits or last four digits) Social Security Number, copy of your birth certificate, or a copy of your driver’s license, identification card issued by the motor vehicle administration or any other government issued identification, or (ii) directly confirm to us that you provided the authorized agent permission to submit the request on your behalf.

If you are using an authorized agent with a valid power of attorney, please provide the executed power of attorney in accordance with applicable state law.

If submitting documentation as an authorized agent, please provide the required materials using the contact information set forth in the "Contact Us" section of this Privacy Policy.

You may redact or otherwise cover any information within your documentation that is not necessary for us to verify your identity or authority.

### Verification process

You must provide certain personal information to enable us to verify your request, including your name, address, mobile phone number, partial Social Security number and date of birth. This information will be used only for the purposes of verifying your identity and/or ensuring that the request is not fraudulent, as permitted under applicable law, and processing your request.

### Additional Information for Visitors to Our Website

If you visit our website, we may collect statistical information about you, such as the pages you visited, how long you stayed on a particular page, the website from which you came to our website, or similar information. We may also collect other, aggregate information, such as the total number of unique or return visitors to our website or the number of views occurring in a particular timeframe. This information may be used to measure the use of our websites and to improve our content. This information often is aggregate data or individual information that is tied to a browser or device, rather than specific identifiers such as your name and address, but some of this information might be considered personally identifiable under some federal or state laws.

We may use "cookies", "web beacons", and similar technologies on our websites. We may use first and/or third-party "browser" or "HTTP" cookies, which are unique text files used for data analysis, fraud prevention, and measuring the use of our website. We may also use "web beacons" (i.e., pixel tags/clear gifs) or similar technologies to collect information such as how long you remain on a particular page. Our website does not honor browser "do not track" signals, but if you do not want us to deploy browser cookies to your device when you visit our website, you may set the browser to reject cookies or notify you when a website tries to place cookies in the browser program. Rejecting cookies may affect your ability to use some of the features offered by our website. Use of our website may result in the placement of cookies on your device unless you configure your browser to reject cookies or notify you when a website attempts to place cookies.

We may use Google Analytics, a third-party provider of analytics tools, or a similar third-party service to process and analyze information about visits to our websites. For more information about opting out of Google Analytics, please visit <https://tools.google.com/dlpage/gaoptout>, which also links to Google Analytics' privacy information pages.

### Our Security Practices

Information security is extremely important to us. Therefore, we maintain a written information security program with administrative, technical, and physical safeguards designed to ensure the security and confidentiality of personal information.

Cleara uses encryption methods and multi-layered security controls designed to protect personal information from unauthorized access, use, or disclosure.

Regular audits and risk assessments are conducted to identify vulnerabilities and ensure compliance with best practices in data security.

Please note, however, that we cannot guarantee the security of any information.

### Our Data Retention Practices

We may retain personal information for as long as necessary for the disclosed purposes, consistent with our legitimate business interests and applicable legal and contractual requirements. We may extend our retention in certain cases, for example, to comply with law or legal processes, or as required by a governmental entity. When personal information is no longer required to be retained, it is securely deleted or destroyed in accordance with Cleara's data retention and disposal practices.

### Monitoring and Enforcement

Cleara maintains internal policies and procedures designed to ensure compliance with this Privacy Policy and applicable privacy laws. Compliance is monitored through internal review processes and oversight by Cleara's management.

### Updates to This Privacy Policy

Cleara may update this Privacy Policy from time to time to reflect changes in our practices, legal requirements, or business operations. When we do so, we will revise the "Last Updated" date at the top of this Privacy Policy. Where required by applicable law, Cleara will provide notice of material changes through appropriate means.



## Contact Us

If you have any questions regarding this Privacy Policy, wish to submit an inquiry, complaint, or dispute regarding your personal information, or have questions about our processing of your request, you may contact us at:

Cleara  
Compliance Department  
1-844-784-9954  
[privacy@cleara.com](mailto:privacy@cleara.com)