

# Clietz Inc.

## Privacy Policy

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Clietz Inc.

<https://clietz.net>

[info@clietz.net](mailto:info@clietz.net)

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## 1. Introduction

Clietz Inc. ("Clietz," "we," "us," or "our") is committed to protecting the privacy of our clients, website visitors, and end users. This Privacy Policy describes how we collect, use, disclose, and safeguard your information when you visit our website (<https://clietz.net>), use our services, or interact with us in any capacity.

Clietz Inc. provides home automation consulting services. In certain service offerings, we may access financial data on your behalf through third-party financial data aggregation services, including Plaid Inc. This Privacy Policy explains our practices regarding such data in detail.

By using our website or engaging our services, you consent to the collection and use of your information as described in this Privacy Policy. If you do not agree with the terms of this Privacy Policy, please do not access our website or use our services.

## 2. Information We Collect

### 2.1 Personal Information You Provide

We may collect the following categories of personal information that you voluntarily provide to us:

- Contact information: name, email address, phone number, and mailing address.
- Business information: company name, job title, and project requirements.
- Communication records: contents of emails, messages, and other correspondence with us.
- Account credentials: if you create an account with us, your username and password (stored in hashed form).

### 2.2 Financial Information

With your explicit consent, we may collect financial information through authorized third-party services to provide our consulting services. This may include:

- Bank account and routing numbers (tokenized -- we do not store raw account numbers).
- Transaction history: dates, amounts, merchant names, and transaction categories.
- Account balances and account type information.
- Account holder name as provided by your financial institution.

### 2.3 Information Collected Automatically

When you visit our website, we may automatically collect:

- Device and browser information: IP address, browser type and version, operating system, and device identifiers.
- Usage data: pages visited, time spent on pages, referring URL, and navigation paths.
- Cookies and similar technologies: as described in Section 2.4 below.

### 2.4 Cookies and Tracking Technologies

Our website may use cookies and similar tracking technologies to enhance your experience. We use only essential cookies required for website functionality. We do not use advertising or behavioral tracking cookies. You may disable cookies through your browser settings, though this may affect certain website functionality.

### 3. How We Collect Information

We collect information through the following methods:

- Directly from you: when you contact us, request a consultation, engage our services, or submit information through our website.
- From third-party services: with your explicit authorization, we may receive financial data from services such as Plaid Inc., which connects to your financial institutions on your behalf.
- Automatically: through cookies, server logs, and similar technologies when you interact with our website.
- From your financial institutions: indirectly, through authorized third-party data aggregation services that retrieve your financial data with your consent.

### 4. How We Use Your Information

We use the information we collect for the following purposes:

- Service delivery: to provide, maintain, and improve our home automation consulting services.
- Financial analysis: to analyze your financial data as part of our consulting engagement, solely as authorized by you.
- Communication: to respond to inquiries, provide customer support, and send service-related communications.
- Security: to protect our systems, detect fraud, and ensure the safety of your data.
- Legal compliance: to comply with applicable laws, regulations, and legal processes.
- Business operations: to manage our internal operations, including billing, record-keeping, and quality assurance.

We do not use your information for purposes beyond those described above without obtaining your additional consent.

### 5. Financial Data and Third-Party Services

#### 5.1 Plaid Integration

We use Plaid Inc. (<https://plaid.com>) to securely connect to your financial accounts and retrieve transaction and account data on your behalf. When you connect a financial account through Plaid:

- You provide your credentials directly to Plaid, not to Clietz Inc. We never see or store your banking login credentials.
- Plaid retrieves your financial data from your institution and transmits it to us over encrypted channels (TLS 1.2+).
- Your use of Plaid is subject to Plaid's own privacy policy, available at <https://plaid.com/legal>.

#### 5.2 Our Commitments Regarding Financial Data

- Consent: We will only access your financial data after receiving your explicit, informed consent.
- Purpose limitation: Financial data is used solely for the consulting services you have engaged us to provide.
- No sale of data: We do not sell, rent, or trade your financial data to any third party, under any circumstances.
- No unauthorized sharing: We do not share your financial data with third parties except as described in Section 6 of this policy.
- Data minimization: We collect only the financial data necessary for the specific services you have requested.
- Revocation: You may revoke your consent and disconnect your financial accounts at any time by contacting us.

## 6. Information Sharing and Disclosure

We do not sell your personal information. We may share your information only in the following limited circumstances:

### 6.1 Service Providers

We may share your information with trusted third-party service providers who assist us in operating our business, such as cloud hosting providers, payment processors, and analytics services. These providers are contractually obligated to protect your data and may only use it to provide services to us.

### 6.2 Legal Requirements

We may disclose your information if required to do so by law, or in good faith belief that such action is necessary to:

- Comply with a legal obligation, subpoena, court order, or governmental request.
- Protect and defend the rights or property of Clietz Inc.
- Prevent or investigate possible wrongdoing in connection with our services.
- Protect the personal safety of our users or the public.

### 6.3 Business Transfers

In the event of a merger, acquisition, or sale of all or a portion of our assets, your information may be transferred as part of that transaction. We will notify you via email or prominent notice on our website before your information is transferred and becomes subject to a different privacy policy.

### 6.4 With Your Consent

We may share your information with third parties when you have given us explicit consent to do so.

## 7. Data Retention

We retain your information only for as long as necessary to fulfill the purposes described in this policy:

- Contact and business information: retained for the duration of our business relationship and up to 3 years thereafter for record-keeping purposes.
- Financial data: retained for no longer than 12 months after the purpose for collection has been fulfilled, unless a longer retention period is required by law.
- Website usage data: retained for up to 12 months.
- Communication records: retained for the duration of our business relationship and up to 2 years thereafter.

When data is no longer needed, it is securely deleted or anonymized using industry-standard methods that prevent recovery.

## 8. Data Security

We implement appropriate technical and organizational measures to protect your information against unauthorized access, alteration, disclosure, or destruction. These measures include:

- Encryption: All data is encrypted in transit using TLS 1.2 or higher. Sensitive data is encrypted at rest using AES-256 or equivalent.

- Access controls: Access to personal and financial data is restricted to authorized personnel on a need-to-know basis, with multi-factor authentication required.
- Monitoring: We maintain audit logs and monitoring systems to detect and respond to security incidents.
- Vendor security: Third-party service providers are assessed for security practices and contractually bound to protect your data.

While we strive to protect your information, no method of transmission over the internet or electronic storage is 100% secure. We cannot guarantee absolute security, but we are committed to maintaining industry-standard protections.

## 9. Your Rights and Choices

Depending on your jurisdiction, you may have the following rights regarding your personal information:

- Access: You may request a copy of the personal information we hold about you.
- Correction: You may request that we correct any inaccurate or incomplete personal information.
- Deletion: You may request that we delete your personal information, subject to certain legal exceptions.
- Portability: You may request a copy of your data in a structured, commonly used, machine-readable format.
- Restriction: You may request that we restrict the processing of your personal information in certain circumstances.
- Objection: You may object to our processing of your personal information for certain purposes.
- Withdrawal of consent: Where processing is based on consent, you may withdraw your consent at any time.

To exercise any of these rights, please contact us at [info@clietz.net](mailto:info@clietz.net). We will respond to your request within 30 days, or within the timeframe required by applicable law.

## 10. California Privacy Rights (CCPA/CPRA)

If you are a California resident, you have additional rights under the California Consumer Privacy Act (CCPA) and the California Privacy Rights Act (CPRA):

- Right to know: You may request that we disclose the categories and specific pieces of personal information we have collected about you, the categories of sources, the business purposes for collection, and the categories of third parties with whom we share your information.
- Right to delete: You may request deletion of your personal information, subject to certain exceptions.
- Right to opt out of sale: We do not sell your personal information. If this changes, we will provide a clear opt-out mechanism.
- Right to non-discrimination: We will not discriminate against you for exercising your privacy rights.
- Right to correct: You may request correction of inaccurate personal information.
- Right to limit use of sensitive personal information: You may direct us to limit the use of your sensitive personal information to purposes necessary to provide the services you have requested.

To submit a CCPA/CPRA request, contact us at [info@clietz.net](mailto:info@clietz.net) or by mail at the address listed in Section 15. We will verify your identity before processing your request.

## 11. Children's Privacy

Our services are not directed to individuals under the age of 18. We do not knowingly collect personal information from children. If we become aware that we have collected personal information from a child under 18, we will take steps to delete that information promptly. If you believe we have collected information from a child, please contact us at

info@clietz.net.

## 12. Third-Party Links

Our website may contain links to third-party websites or services that are not owned or controlled by Clietz Inc. We are not responsible for the privacy practices of these third parties. We encourage you to review the privacy policies of any third-party sites you visit.

## 13. International Data Transfers

Clietz Inc. is based in the United States. If you access our services from outside the United States, please be aware that your information may be transferred to, stored, and processed in the United States, where data protection laws may differ from those in your jurisdiction. By using our services, you consent to this transfer.

## 14. Changes to This Privacy Policy

We may update this Privacy Policy from time to time to reflect changes in our practices, technologies, legal requirements, or other factors. When we make material changes, we will:

- Update the "Last Updated" date at the top of this policy.
- Post a prominent notice on our website.
- Notify you by email if the changes materially affect how we handle your personal information.

We encourage you to review this Privacy Policy periodically. Your continued use of our services after changes are posted constitutes your acceptance of the updated policy.

## 15. Contact Us

If you have questions, concerns, or requests regarding this Privacy Policy or our data practices, please contact us:

**Clietz Inc.**

**Email:** [info@clietz.net](mailto:info@clietz.net)

**Website:** <https://clietz.net>

We will acknowledge your inquiry within 5 business days and provide a substantive response within 30 days, or within the timeframe required by applicable law.