

CHEERZZ

PRIVACY POLICY

How Cheerzz handles your personal information across our websites, services, and products

Effective: May 7th, 2026 · Last Updated: May 7th, 2026

Overview

Cheerzz, LLC (“Cheerzz,” “we,” “us,” or “our”) respects your privacy. This Privacy Policy explains how we collect, use, share, and protect personal information when you visit our websites (cheerzz.com, cheerzz.impact, and related Cheerzz subdomains — collectively the “Site”) or engage Cheerzz services.

If you engage Cheerzz under a separate written agreement, the data-handling provisions of that agreement govern the personal information shared under that engagement. This Privacy Policy supplements those agreements; it does not replace them.

1. Information We Collect

1.1 Information You Provide Directly

You may provide us with information when you fill out a form, request an Operational Leak Audit, sign up for updates, send us an email, or engage Cheerzz services. Categories include:

- Identity information — name, business name, role
- Contact information — email address, phone number, mailing address
- Business information — industry, business size, current systems, business challenges or goals
- Communication content — messages, requests, and inquiries you send us
- Authorization information — limited credentials or delegated access to systems necessary to deliver paid services (governed by your service agreement)
- Payment information — billing contact, payment method information (handled by our payment processor; we do not store full credit card numbers on our systems)

1.2 Information We Collect Automatically

When you visit the Site, we may automatically collect:

- Device information — IP address, browser type, operating system, device identifiers
- Usage information — pages viewed, time on page, links clicked, referring URL
- Cookie and similar technology data — see Section 5

1.3 Information from Third Parties

We may receive limited information about you from:

- Referrals — name and contact information when someone refers you to Cheerzz
- Public sources — LinkedIn, business registries, professional directories
- Service providers — analytics providers, payment processors, recruiting platforms

1.4 Information We Do Not Knowingly Collect

Cheerzz does not knowingly collect personal information from children under 13. The Site is not directed to children. If we discover we have collected information from a child under 13, we will delete it. Parents who believe their child has provided information to Cheerzz can contact us at [privacy email].

2. How We Use Your Information

We use the information we collect for the following purposes:

- **Deliver our services.** Including delivering Cheerzz Impact, Cheerzz Setup, Cheerzz Home, Cheerzz Anchor, and Cheerzz Lab engagements; performing the Operational Leak Audit; recruiting work; and other services you engage Cheerzz to perform.
- **Communicate with you.** Respond to inquiries, schedule audits and meetings, send service updates, send invoices, send customer-relationship communications. We will not send marketing communications without your consent or a pre-existing customer relationship; you can opt out at any time.
- **Improve our services.** Analyze how visitors use the Site; improve service delivery; train Cheerzz personnel; harden agentic workflows. Where workflow patterns are improved using insights from multiple clients, we anonymize and aggregate the data so that no individual client's personal or business information is identifiable.
- **Comply with legal obligations.** Including tax filings, regulatory reporting, responding to subpoenas, and similar obligations.
- **Protect our business and customers.** Detect fraud, secure our systems, enforce agreements, defend legal claims.

2.1 AI Training and Inference — Limitations

Cheerzz uses AI agents in delivering services. The following limitations apply to how your information interacts with AI:

- We do not use Client Data (data shared by paid clients under an Engagement Letter) to train AI models in a way that exposes Client Data to third parties or that creates derivative datasets identifiable to a specific client.
- We do not sell personal information to third parties for AI training.
- AI models we use to deliver services may be operated by third-party providers (e.g., Anthropic, Google). Those providers operate under their own privacy and data-handling commitments, which may include limitations on training. We use enterprise/business-grade access where available, which typically excludes use of submitted data for training.
- Workflow patterns may be improved using anonymized aggregated insights, governed by privacy safeguards described in our service agreements.

3. How We Share Your Information

We share your information with the following categories of recipients:

- **Service providers.** Third parties who help us operate the Site or deliver services — analytics, hosting, email, payment processing, calendaring, AI inference. We require service providers to protect your information consistent with this Policy.
- **Partner firms.** Where Cheerzz delivers services through a vetted partner (e.g., Finance & Accounting full-cycle services through a partner accounting firm), we share only the information needed for that partner to deliver the service. The partner is bound by confidentiality obligations.
- **Legal and compliance.** When required by law, court order, or governmental authority. We will provide notice to you to the extent legally permitted.

- **Business transactions.** If Cheerzz is involved in a merger, acquisition, financing, or sale of assets, your information may be transferred as part of that transaction. We will notify you and provide reasonable choice.
- **With your consent.** When you ask us to share information with a specific party (e.g., your accountant, your attorney).

We do not sell your personal information to third parties for monetary consideration. We do not share personal information with third-party advertisers for cross-context behavioral advertising.

4. Data Retention

We retain personal information only as long as needed to fulfill the purposes for which it was collected, or as required by law. Specific retention practices:

- Site visitor information (analytics, cookies): up to 24 months from last visit
- Inquiry and Operational Leak Audit information: up to 36 months from inquiry, unless you become a paid client
- Paid client information: governed by your service agreement, typically retained during the engagement plus 7 years for tax and audit compliance
- Legal hold: information subject to litigation or legal investigation is retained until the matter is fully resolved

5. Cookies and Similar Technologies

The Site uses cookies and similar technologies to operate the Site, remember your preferences, analyze usage, and (with your consent) measure the effectiveness of any marketing efforts. Cookie categories:

- **Strictly necessary cookies.** Required for the Site to function. Cannot be turned off.
- **Analytics cookies.** Help us understand how visitors use the Site. May be turned off via your cookie settings.
- **Functional cookies.** Remember your preferences. May be turned off via your cookie settings.

You can manage cookie preferences through your browser settings or the cookie banner on the Site, where applicable.

6. Your Rights

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

- **Access.** Request a copy of the personal information we hold about you.
- **Correction.** Request that we correct inaccurate or incomplete information.
- **Deletion.** Request that we delete your information, subject to certain legal exceptions (e.g., information needed for tax compliance).
- **Portability.** Receive your information in a portable format.
- **Opt-out.** Opt out of certain uses or disclosures of your information, including “sale” or “share” as defined under California law (we do not sell or share your information for cross-context behavioral advertising).
- **Limit use of sensitive information.** Where applicable under California law.
- **Non-discrimination.** We will not discriminate against you for exercising your privacy rights.

6.1 How to Exercise Your Rights

To exercise your rights, contact us at [privacy email]. We will verify your identity before fulfilling your request and will respond within the timeframes required by applicable law (typically 45 days under CCPA, 45 days under the Oregon Consumer Privacy Act). If we deny your request, we will explain why.

6.2 Authorized Agents

California and Oregon residents may use an authorized agent to make a privacy request. Authorized agents must provide proof of authorization, which we may verify directly with you.

7. State-Specific Disclosures

7.1 California Residents

Under the California Consumer Privacy Act (CCPA) and California Privacy Rights Act (CPRA), California residents have specific rights as described in Section 6. We do not sell or share personal information for cross-context behavioral advertising. We do not knowingly collect personal information from California residents under 16 years of age. Categories of personal information we have collected, disclosed for business purposes, or sold/shared in the past 12 months are described in Sections 1, 2, and 3 above.

7.2 Oregon Residents

Under the Oregon Consumer Privacy Act (OCPA), Oregon residents have specific rights as described in Section 6. Oregon-specific disclosures: we are a Cheerzz business operating in Oregon and treat Oregon residents' personal information consistent with the OCPA.

7.3 Other States

Residents of other states with comprehensive privacy laws (e.g., Colorado, Connecticut, Virginia, Texas) may have similar rights. Contact us at [privacy email] to make a request.

8. Security

We implement reasonable administrative, technical, and physical safeguards to protect personal information, including:

- Encryption of data in transit (TLS) and at rest where appropriate
- Access controls and least-privilege principles for personnel
- Per-client data isolation in service delivery (each Cheerzz Impact client's data is partitioned)
- Multi-factor authentication for personnel access to sensitive systems
- Regular security reviews and access audits

No system is perfectly secure. If a security incident affects your information, we will notify you as required by applicable law.

9. International Visitors

Cheerzz operates from the United States. If you access the Site from outside the United States, your information will be transferred to and processed in the United States. By using the Site, you consent to this transfer. We do not currently target services to residents of the European Economic Area or the United Kingdom; if and when we do, we will provide additional disclosures and rights consistent with the GDPR and UK GDPR.

10. Changes to This Policy

We may update this Privacy Policy from time to time. We will post the updated Policy on the Site with a new "Last Updated" date. Material changes will be communicated via a prominent notice on the Site or by email if we have your email address on file.

11. Contact Us

Privacy questions, requests, or concerns can be sent to:

Cheerzz, LLC

Attn: Privacy

Portland, Oregon

Email: hello@gocheerzz.com

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