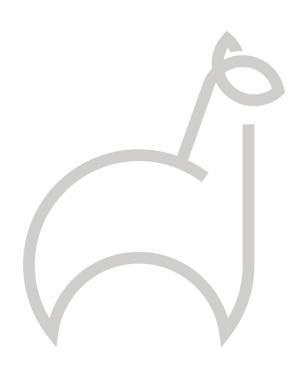
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This privacy policy reflects alpaca-crew's proprietary approach to data handling, automation, and AI-powered Service logic. Copying, redistributing, or repurposing this policy—whether in part or in full—is not allowed without express written consent.



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## alpaca-crew | Privacy Policy

**Effective Date:** 6/1/2026 **Last Updated:** 11/19/2025

### Introduction

#### **0.1** About alpaca-crew

alpaca-crew is a professional property-care company serving residential and commercial clients in California.

We combine expert cleaning, preventive observation, and AI-powered property assessments to help clients maintain long-term value and peace of mind.

Our approach blends human expertise with automation, allowing us to deliver accurate insights, consistent service quality, and transparent reporting.

Protecting client and property information is an integral part of this process. Privacy, data ethics, and responsible automation define how we build trust and operate daily.

# **0.2 Purpose of This Privacy Policy**

This Privacy Policy explains how alpaca-crew collects, uses, stores, and protects personal and property-related information in connection with our services, website, client portals, and communications.

It also clarifies how our AI systems process assessment and service data to generate reports and recommendations.

Our goals are to:

- Explain what information we collect and why.
- Describe how that information supports cleaning, assessments, and reporting.
- Outline how AI processing and human review work together.
- Detail your choices and rights regarding your data.
- Reinforce our commitment to responsible and transparent data governance.

This Policy applies to every interaction with alpaca-crew, including online forms, email or phone communication, and on-site service visits.

### **0.3 Scope of Application**

This Privacy Policy applies to:

- Clients: individuals or businesses who request or receive alpaca-crew services.
- **Employees, contractors, and service providers** who perform, manage, or support operations.
- **Digital interactions** on our website, scheduling systems, Client Hub, and AI-powered reporting tools.

It covers both personal information (e.g., contact, billing, or account data) and property-specific information (e.g., photos, condition notes, or assessment results).

alpaca-crew operates primarily within the United States. Some technology providers that support our operations may process or store limited data in other regions.

While we cannot directly control those environments, we select reputable vendors and expect them to maintain safeguards consistent with this Policy.

### 0.4 Updates and Effective Date

alpaca-crew may update this Privacy Policy to reflect new services, technologies, or legal expectations.

When material updates occur, the revised Policy will be posted on our website with an updated Effective Date.

If changes significantly affect how information is used, we may notify active clients through email or portal announcements.

We encourage all users to review this Policy periodically. Continued use of alpaca-crew's services after any update constitutes acceptance of the revised terms.

#### 1. Information We Collect

alpaca-crew collects information necessary to deliver cleaning, property-care, and AI-powered reporting services.

We collect only what is relevant and proportionate to the purpose of service coordination, communication, quality assurance, and operational improvement.

Information may be provided directly by you, automatically generated through our systems, or recorded during on-site visits.

#### 1.1 Personal and Contact Information

Includes identifiers that allow us to communicate with you and manage service logistics:

- Name, phone number, email address, and mailing or property address.
- Account credentials and Client Hub registration details.
- Preferred communication methods and correspondence history.

This information is collected through booking forms, emails, text messages, or phone calls.

# 1.2 Service and Property Information

Relates to the services you request and the property we care for, including:

- Property type, size, layout, and access instructions.
- Cleaning or assessment scope, service frequency, and preferences.
- Observations noted during service (e.g., buildup, wear, or maintenance issues).

This enables accurate scheduling, pricing, and quality reporting.

# 1.3 Payment and Transaction Information

Collected and processed to complete billing and accounting activities:

- Billing name, address, and payment method.
- Transaction records, service history, and invoice identifiers.
- Partial financial data necessary for secure authorization.

alpaca-crew uses reputable third-party payment processors. We do not store full credit-card or bank-account numbers in our systems.

#### 1.4 Photos, Observations, and Assessment Data

During cleaning or assessment visits, our teams may collect:

- Photographs or short videos documenting service outcomes or visible conditions.
- Notes on surface wear, material integrity, or potential maintenance needs.
- Metrics analyzed by our AI system to generate property reports and recommendations.

All images and observations are limited to service-related areas and retained only as necessary for transparency and client reporting.

# 1.5 Sensitive Personal Information (CPRA Categories)

In limited cases, alpaca-crew may process information classified as "sensitive" under U.S. privacy standards, such as:

- Government-issued identification numbers (for employment or verification).
- Account credentials, limited financial identifiers, or insurance details.
- Precise location data required for route planning and on-site coordination.
- Audio recordings from customer-support calls (for training and quality assurance).

Sensitive data is stored securely, used only for its intended operational purpose, and never sold or disclosed for advertising.

### 1.6 Website, Cookies, and Analytics Data

When you visit our website or portal, certain technical information is automatically collected:

- Device type, browser, operating system, and IP address.
- Page views, time spent on site, and navigation behavior.
- Cookie identifiers supporting session stability and user preferences.

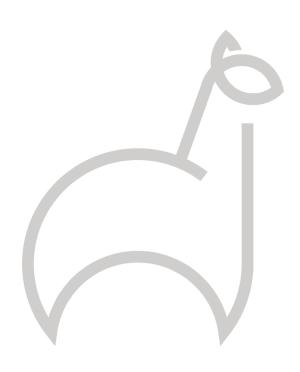
This data helps improve functionality and performance. You can manage cookie settings at any time through your browser or our cookie-control tool.

# 1.7 Employee and Applicant Information

For employment and contracting purposes, alpaca-crew may collect:

- Identification, contact, and tax documentation.
- Work authorization, certifications, and training records.
- Background or verification results when required.
- Payroll, scheduling, and performance information.

Employee and applicant data is used strictly for human-resources, payroll, and compliance functions and is not shared outside internal operations.



#### 2. How We Use Your Information

alpaca-crew uses collected information only for legitimate business purposes related to service coordination, property assessments, communication, and ongoing improvement.

We do not sell, trade, or disclose personal information for advertising or unrelated marketing.

## 2.1 Service Coordination and Operations

Information is used to:

- Schedule, confirm, and manage cleaning or assessment visits.
- Match your property with qualified service staff or assessors.
- Verify address, access instructions, and timing preferences.
- Prepare accurate service estimates and invoices.

This ensures each visit is efficient, safe, and customized to your property's specific needs.

# 2.2 AI-Powered Analysis and Property Insights

Our proprietary AI systems use limited service and property data to:

- Identify visible cleaning or maintenance priorities.
- Generate reports summarizing observed conditions.
- Track trends over time to support long-term property health.

AI output is always reviewed by trained staff before it reaches clients.

This combination of automation and human expertise supports precision without removing accountability.

#### 2.3 Communications and Notifications

We use contact information to:

- Send booking confirmations, reminders, and status updates.
- Provide invoices, receipts, and service follow-ups.
- Respond to client inquiries or feedback.

Communication is kept purposeful and relevant to your active relationship with alpaca-crew.

## 2.4 Contractor Referrals and Service Matching

When a client requests or agrees to a referral for services beyond our scope (for example, HVAC, plumbing, or pest control), we may share minimal data to facilitate coordination.

Shared details are limited to what is necessary—such as name, contact method, and property area of concern.

Referral partners act independently under their own privacy policies, and alpaca-crew assumes no liability for their work or data handling.

# 2.5 Legal Compliance and Risk Management

We may use or disclose information as needed to:

- Comply with legal, regulatory, or tax obligations.
- Respond to lawful requests or investigations.
- Detect or prevent fraud, security incidents, or misuse of services.
- Protect the rights, safety, and property of alpaca-crew, our clients, and the public.

Disclosures occur only when necessary and permitted under applicable law.

# 2.6 Improvement, Analytics, and Research

To enhance service quality and reliability, alpaca-crew may analyze aggregated or de-identified data to:

- Evaluate operational efficiency and staff performance.
- Improve scheduling, reporting, and AI accuracy.
- Develop training programs and workflow improvements.

Any insights generated from such data exclude personal identifiers and are used solely for internal development.

# 3. AI-Powered Data Processing

alpaca-crew integrates artificial intelligence (AI) and automation into select parts of our service and reporting process to enhance efficiency, consistency, and long-term property insight.

AI tools are designed to support human expertise, not replace it.

Every AI-generated report is reviewed, refined, and approved by trained personnel before it is shared with clients.

#### 3.1 Purpose of AI Use

Our AI systems process limited and service-relevant information to:

- Identify visible cleaning or maintenance priorities.
- Generate structured reports summarizing property condition.
- Track surface or environmental trends over time.
- Support staff with reminders, consistency checks, and performance analytics.

AI processing helps us maintain accuracy and efficiency, while our team ensures that context, judgment, and discretion remain central to every client interaction.

### 3.2 Data Reviewed by Humans

Human review is mandatory in every AI-driven report.

Team members verify AI outputs to:

- Confirm factual accuracy.
- Correct interpretation errors or outliers.
- Ensure tone and recommendations are client-appropriate.
- Protect client privacy by removing irrelevant data.

No AI report or recommendation is delivered to a client without human oversight and approval.

### 3.3 Algorithmic Transparency and Bias Prevention

alpaca-crew designs its AI processes to operate transparently and fairly.

To reduce bias and ensure equitable outcomes, we:

- Use property-based, not personal, data for analysis.
- Conduct periodic reviews to detect and correct systemic bias.
- Restrict AI inputs to verified and relevant service data only.
- Implement accountability measures for both human and automated decisions.

Our systems are built to observe, not judge, ensuring AI insights remain neutral and property-focused.

## 3.4 AI System Security and Confidentiality

All AI-related data is processed under strict security protocols, including:

- Encryption of digital records during transfer and storage.
- Controlled system access limited to authorized employees.
- Isolation of training and operational data to prevent cross-use.
- Regular review of AI tools for compliance with this Privacy Policy.

AI processing never involves external data scraping, public data matching, or profiling outside alpaca-crew's own records.

#### 3.5 Client Consent and Control

By engaging alpaca-crew for assessments or property-care services, you consent to the use of AI for analysis and reporting as described in this Policy.

### Clients may:

- Request clarification about how AI was applied in their report.
- Ask that future reports be generated without AI processing (note that this may limit automation features).
- Withdraw AI consent at any time by contacting <a href="mailto:support@alpaca-crew.com">support@alpaca-crew.com</a>.

Withdrawal will not affect reports already produced under valid prior consent.

## 3.6 Limitations of AI Interpretation

AI-generated content is based solely on available property data and visible conditions.

It should not be treated as legal, engineering, or professional inspection advice.

AI models are designed for informational reporting and care planning—not diagnostic, structural, or valuation purposes.

Clients are encouraged to consult licensed professionals when addressing significant repair or safety issues.

# 3.7 Human Oversight and Error Mitigation

alpaca-crew maintains direct human supervision over all AI outputs.

If an AI-generated report contains an identified error or omission:

- The report will be promptly corrected or withdrawn.
- The incident will be documented internally.
- Corrective measures will be applied to improve AI accuracy.

This oversight framework ensures that automation enhances precision while preserving human accountability and professional judgment.

# 4. Sharing and Disclosure of Information

alpaca-crew limits information sharing to what is necessary to deliver services, support operations, or comply with legal obligations.

We do not sell, rent, or disclose personal information for marketing or advertising purposes.

All disclosures are evaluated under principles of necessity, proportionality, and confidentiality.

## 4.1 Employees and Authorized Personnel

Information may be shared internally only with trained and authorized individuals who require access to perform their duties.

This may include:

- Cleaning staff, assessors, and supervisors performing on-site work.
- Administrative personnel handling scheduling, billing, or reporting.
- Network liaisons managing contractor referrals and project coordination.
- Management and compliance staff responsible for oversight and auditing.

All personnel are bound by confidentiality policies and internal privacy procedures.

#### 4.2 Service Providers and Platforms

alpaca-crew partners with trusted vendors and digital platforms that help us operate efficiently.

These may include:

- Scheduling, booking, and communication systems.
- Cloud-storage and data-management platforms.
- Secure payment processors and invoicing tools.
- IT, analytics, and cybersecurity providers.

These partners process information only as needed to perform their contracted functions.

We select reputable providers who maintain appropriate safeguards consistent with this Policy.

#### 4.3 Contractor Referrals

When clients request assistance beyond alpaca-crew's direct services—such as HVAC, plumbing, or pest control—we may, with consent, provide a referral to a trusted third-party contractor.

#### In these cases:

- Only minimal and service-relevant details are shared (e.g., name, contact method, and property area of concern).
- Each referred provider operates independently under their own terms and privacy policies.
- alpaca-crew does not manage or assume responsibility for third-party work quality or their separate data practices.

Referrals are provided solely as a convenience for clients seeking qualified, insured professionals.

# 4.4 Legal Requirements and Safety

We may disclose information when necessary to:

- Comply with applicable laws, court orders, or government requests.
- Respond to law-enforcement or regulatory inquiries.
- Detect, investigate, or prevent suspected fraud or security incidents.
- Protect the safety, rights, or property of alpaca-crew, our clients, or others.

Disclosures are limited to what is legally required or operationally essential to address the matter at hand.

### 4.5 Business Transfers and Mergers

If alpaca-crew undergoes a merger, acquisition, restructuring, or asset transfer, client and property data may be included among transferred assets.

Should such a transaction occur, alpaca-crew will:

- Require the receiving organization to honor comparable privacy protections.
- Notify clients through reasonable means if ownership or data-handling practices materially change.

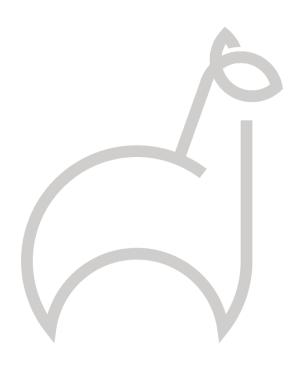
Business continuity plans ensure that client privacy remains protected throughout any transition.

# 4.6 Independent Third-Party Responsibilities

Certain third parties—such as payment processors, integrated service platforms, or external contractors—may collect information directly from you when facilitating transactions or communications.

These parties are independently responsible for their own privacy and security standards.

alpaca-crew cannot control their systems but expects all partners to maintain lawful, responsible data practices consistent with professional norms.



### 5. Data Security and Governance

alpaca-crew applies layered security and governance controls to protect client, employee, and property-related information.

While no system is completely immune from risk, we use reasonable and proportional measures to reduce the likelihood of unauthorized access, misuse, loss, or alteration of information.

Privacy and data protection are integrated into every part of our operational design.

### **5.1 Technical and Organizational Measures**

alpaca-crew employs a combination of technical tools and structured policies to secure data, including:

- Encryption of sensitive data in transit and at rest when applicable.
- Access controls and authentication safeguards for internal systems.
- Secure cloud environments with firewall protection and monitoring.
- Routine software updates and patch management.
- Backup and recovery procedures for data continuity.

These controls are reviewed periodically and adjusted as technology and risk evolve.

### 5.2 Employee Confidentiality and Training

All team members and contractors handling personal or property data must adhere to strict confidentiality standards.

alpaca-crew provides guidance and training focused on:

- Secure handling of service and client information.
- Recognition of phishing, data-loss, or unauthorized-access risks.
- Proper documentation and secure record disposal.
- Reporting and escalation of suspected privacy or security incidents.

Staff accountability is a key element of our governance framework.

## 5.3 Reliance on Third-Party Security Providers

alpaca-crew uses established technology providers for cloud hosting, payment processing, and software management.

These providers maintain their own data-protection and cybersecurity controls.

Although alpaca-crew does not directly audit these systems, we select vendors based on:

- Proven reliability and transparency.
- Industry reputation and compliance credentials.
- Commitment to safeguarding data consistent with this Policy.

We monitor vendor relationships and review them periodically for continued suitability.

#### **5.4 Data Breach Notification Procedure**

If alpaca-crew becomes aware of a confirmed data breach involving personal or property-related information, we will:

- Investigate immediately to determine scope and impact.
- Contain and mitigate potential exposure.
- Notify affected parties and authorities when required by law or policy.
- Review and reinforce relevant safeguards to prevent recurrence.

We take every suspected breach seriously and document all related findings.

### 5.5 Client Responsibilities

Clients also play an important role in protecting their information.

We encourage clients to:

- Use secure networks when communicating or accessing Client Hub systems.
- Keep login credentials private and update passwords regularly.
- Notify alpaca-crew promptly if unauthorized access or suspicious activity is suspected.

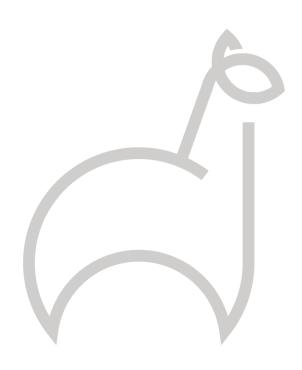
Shared vigilance between clients and alpaca-crew strengthens collective data security.

### 5.6 Governance Accountability and Auditing

alpaca-crew's internal governance process includes:

- Periodic reviews of operational and privacy compliance.
- Documentation of how client and property data is collected, stored, and removed.
- Evaluations of AI processing for accuracy, fairness, and proper access control.
- Reporting to management on any identified risks or corrective actions.

These audits help maintain accountability, reinforce internal controls, and promote continuous improvement.



#### 6. Data Retention and Deletion

alpaca-crew retains client, employee, and property-related data only for as long as it is reasonably necessary to fulfill service, legal, and operational purposes.

When information is no longer required, it is securely deleted, anonymized, or archived according to internal procedures and applicable retention standards.

## **6.1 Retention Periods by Category**

Different data types are retained for varying durations, depending on their use and legal requirements:

- Client and Service Records: kept for operational continuity, trend analysis, and client support.
- Payment and Transaction Data: retained for accounting, reconciliation, and tax documentation.
- **Property Assessments and AI Reports:** stored to support quality tracking, historical comparison, and follow-up reporting.
- Employee and Contractor Files: maintained for payroll, insurance, and compliance obligations.

alpaca-crew periodically reviews retention schedules to ensure data is not held longer than necessary.

# **6.2 Cloud Storage and Backup Policy**

Operational and client data may be stored in secure cloud environments provided by trusted third-party vendors.

Backups exist solely for recovery and continuity purposes and are:

- Encrypted or access-restricted.
- Managed on controlled retention cycles.
- Automatically overwritten as part of system maintenance.

Access to backup environments is limited to authorized administrative staff.

## **6.3 Inactive Account Management**

When a client account or service relationship becomes inactive, data may be archived or deleted after a reasonable period of non-use.

Archived records are isolated from active systems and protected under the same security measures.

Clients may request reactivation or removal of archived information at any time, subject to verification

# 6.4 Deletion Requests and Verification

Clients have the right to request deletion of personal or property-related data.

Upon receiving a verified request, alpaca-crew will:

- Remove or anonymize the data from active systems.
- Retain limited records only where required by law or legitimate business needs (e.g., invoices or dispute resolution).
- Confirm completion once the process is finalized.

Backup copies may persist temporarily until overwritten by normal system operations.

#### 6.5 Right to Limit Use of Sensitive Information

Clients may request that alpaca-crew restrict the use of sensitive personal data (such as identification numbers, precise geolocation, or financial details) to essential service and compliance functions.

We will acknowledge such requests and confirm any resulting limitations to specific services or features.

Requests may be submitted at any time to <u>support@alpaca-crew.com</u>.

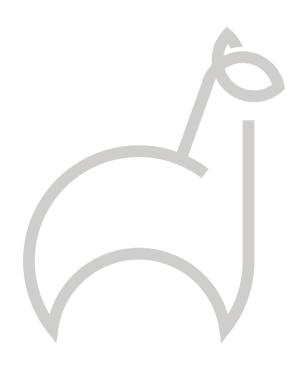
# 6.6 Archival and Legal Hold Procedures

In rare circumstances, alpaca-crew may place specific records under legal hold or archival preservation—for example, in connection with audits, insurance claims, or regulatory inquiries.

# During such holds:

- Data will not be altered or deleted until the matter is resolved.
- Once the hold is lifted, normal retention and deletion timelines resume.

All legal holds are tracked and periodically reviewed to ensure compliance and timely closure.



## 7. Your Rights and Choices

alpaca-crew respects your right to transparency, control, and choice over how your information is collected and used

We make it simple for clients to access, update, or limit data processing, while ensuring these actions are verified and securely managed.

### 7.1 Access, Correction, and Deletion

You may request to:

- Access the personal or property-related information we maintain about you.
- Correct inaccurate or outdated data.
- **Delete** information no longer required for service, legal, or safety purposes.

Requests are verified to ensure authenticity before changes are made.

If a deletion request cannot be honored due to a legal or operational requirement, we will explain the reason in writing.

# 7.2 Opt-Out and "Do Not Sell or Share" Rights

alpaca-crew does not sell or share personal information for advertising or data brokerage.

However, clients may still:

- Opt out of optional data sharing, such as analytics tools or referral matching.
- Limit third-party integrations used for non-essential features.

  Opt-outs will be processed promptly and respected in all future interactions.

# 7.3 Right to Limit Use of Sensitive Personal Information

Clients may direct alpaca-crew to limit the use of sensitive information—such as financial details, government IDs, or precise location data—to strictly necessary business functions.

We will confirm these preferences and clearly explain any impacts on service functionality or recordkeeping.

## 7.4 Non-Discrimination Policy

Exercising your privacy rights will not affect your access to services, pricing, or treatment by alpaca-crew.

We do not discriminate against any client for choosing to restrict, delete, or modify their data preferences.

## 7.5 How to Exercise Your Rights

You may submit a verified request by contacting:

**Email:** support@alpaca-crew.com

Mail: 548 Market Street, PMB 948619, San Francisco, CA 94104

Please include:

- Your full name and contact details.
- A description of your request (access, correction, deletion, limitation, or opt-out).
- Enough information for verification purposes (e.g., service address or invoice number).

We will acknowledge receipt and provide updates as the request is processed.

# 7.6 Identity Verification and Response Timelines

To protect client data, alpaca-crew verifies all privacy-related requests before making changes.

We confirm receipt of each verified request within 10 business days and explain how it will be processed. Verified requests are generally completed within 45 days, or within a timeframe allowed under applicable regulations.

If additional time is required, we will notify you of the reason and expected completion date.

If a request cannot be fulfilled or is denied, alpaca-crew will provide a written explanation of the outcome.

### 8. Cookies and Online Tracking

alpaca-crew uses cookies and similar tracking technologies to support secure website functionality, improve performance, and understand how visitors engage with our content.

Cookies help personalize user experience, maintain account sessions, and ensure reliable system performance.

We do not use cookies for behavioral advertising or for selling or sharing personal information.

### 8.1 Types of Cookies We Use

Our website and Client Hub platforms may use several categories of cookies, including:

- **Essential Cookies:** Required for core functionality such as login authentication, session management, and navigation.
- **Functional Cookies:** Remember user preferences, display settings, and property selections.
- **Performance Cookies:** Measure technical performance and help optimize site speed and reliability.
- **Analytics Cookies:** Provide aggregated statistics about traffic patterns and visitor interactions.
- **Security Cookies:** Detect and prevent unauthorized access or misuse of platform features

Each cookie category serves a specific operational purpose.

#### **8.2** How We Use Cookies

Cookies are used to:

- Keep users logged in while navigating through secure areas.
- Save form data or display preferences between sessions.
- Track general website activity to improve usability and design.
- Identify performance issues or system errors.

All analytics data is de-identified and aggregated to avoid linking it to specific individuals.

## 8.3 Managing and Disabling Cookies

You can manage cookie preferences at any time through your browser or system settings.

Most browsers allow you to:

- Accept or reject all cookies.
- Block specific cookie categories.
- Receive alerts when a cookie is set.
- Delete existing cookies manually.

Disabling certain cookies may reduce website performance or restrict access to secure client areas.

# 8.4 Third-Party Tracking Technologies

Some embedded tools or third-party integrations used on our website—such as analytics dashboards, map displays, or embedded forms—may apply their own cookies or scripts.

These third parties are independently responsible for their data-handling practices.

alpaca-crew does not control or endorse their tracking technologies and recommends reviewing their individual privacy statements.

# 8.5 Analytics and Advertising Disclosures

alpaca-crew may use anonymous analytics tools to understand website trends, visitor counts, or interaction flows.

These insights help improve navigation, service explanations, and accessibility.

We do not use tracking for cross-site behavioral profiling, retargeting, or advertising.

All analytics outputs remain aggregated and used strictly for internal performance evaluation.

#### 9. Communications and Consent

alpaca-crew communicates with clients to coordinate services, confirm appointments, and provide essential updates.

We value transparency and ensure all communications are purposeful, relevant, and respectful of your preferences.

Clients can modify or withdraw consent for non-essential communications at any time.

### 9.1 Text Messaging (SMS)

If you provide a mobile number, alpaca-crew may send text messages (SMS) for service coordination, including:

- Appointment confirmations and reminders.
- Arrival or access notifications.
- Urgent scheduling or rescheduling updates.
- Post-service satisfaction follow-ups.

By providing your mobile number, you consent to receive these messages.

You may reply "STOP" at any time to opt out of non-essential texts. Standard message and data rates may apply.

### 9.2 Email Communications

alpaca-crew uses email to share important service-related and administrative updates, including:

- Booking confirmations, invoices, and receipts.
- Service reminders and property-care reports.
- Notices of policy updates or Client Hub improvements.

From time to time, we may also send optional newsletters or updates about new services, membership benefits, or seasonal care tips.

You can opt out of these non-essential communications by clicking "unsubscribe" or emailing <a href="mailto:support@alpaca-crew.com">support@alpaca-crew.com</a>.

## 9.3 Phone Calls and Recordings

alpaca-crew may contact clients by phone for service coordination or clarification purposes.

Calls may be recorded for quality assurance, training, and dispute resolution.

If you prefer not to have calls recorded, you may request alternative communication methods at any time.

# 9.4 Marketing and Promotional Opt-Out

We keep marketing and promotional outreach limited, focusing on relevant updates such as:

- New or enhanced property-care services.
- Membership rewards or referral opportunities.
- Exclusive content or educational material related to maintenance and cleaning.

You may opt out of receiving marketing materials at any time by:

- Following the unsubscribe link in our emails.
- Replying "STOP" to promotional SMS messages.
- Emailing <a href="mailto:support@alpaca-crew.com">support@alpaca-crew.com</a> with your preference.

Essential service notifications, policy updates, or legally required communications will continue even if promotional consent is withdrawn.

# 10. Employee and Workforce Privacy

alpaca-crew collects and manages personal information about employees, job applicants, and contractors to support lawful business operations.

This information is used for hiring, training, payroll, performance management, and compliance with applicable employment laws.

All workforce data is handled with the same level of care and confidentiality applied to client information.

# 10.1 Employment Data Collected

alpaca-crew may collect the following information from employees and contractors:

- Full name, address, phone number, and email.
- Date of birth, tax identification, and work authorization.
- Employment or contractor agreements, role assignments, and job titles.
- Payroll, banking, and benefits-related data.
- Timekeeping, scheduling, and attendance records.
- Certifications, training records, or credentials related to service performance.

This data supports employment administration, operational scheduling, and workforce management.

## 10.2 Use and Disclosure of Employee Information

Employee and contractor information is used to:

- Process payroll, reimbursements, and benefits.
- Maintain compliance with labor, tax, and safety regulations.
- Conduct training, evaluations, and disciplinary processes.
- Investigate workplace incidents or policy violations.
- Manage scheduling, service assignments, and performance tracking.

Information may be shared internally with managers, HR staff, and accountants who require it for legitimate business reasons.

## 10.3 Applicant and Background Data

alpaca-crew collects information from job applicants and prospective contractors to evaluate qualifications and ensure safety and compliance.

This may include:

- Resume or employment history, professional references, and contact details.
- Professional licenses, certifications, business verification, and insurance documentation.
- Background or identity verification results, where required.
- Communication records related to recruitment or onboarding.

Applicants may withdraw their application or request deletion of their data at any time, subject to legal retention obligations.

## **10.4 Workforce Security Measures**

All employee and contractor records are stored in secure systems accessible only to authorized HR or administrative staff

Security safeguards include:

- Password-protected employee databases.
- Encryption of sensitive employment files.
- Restricted access to payroll and identification data.
- Confidentiality agreements as part of the hiring process.

Disciplinary action may be taken for misuse or unauthorized disclosure of workforce information.

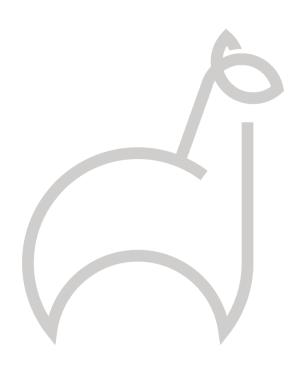
## **10.5 Workforce Privacy Rights**

Employees, contractors, and applicants may:

- Access or request corrections to their employment data.
- Request confirmation of how their personal information is used.
- Withdraw consent for optional data uses (e.g., media releases or non-essential communications).
- Report privacy concerns to the Privacy Office without retaliation.

Requests should be submitted in writing to <a href="mailto:support@alpaca-crew.com">support@alpaca-crew.com</a> or through internal HR channels.

alpaca-crew reviews and responds to workforce privacy requests in a reasonable and timely manner.



### 11. Children's Privacy

alpaca-crew's services and online platforms are designed for adults and business entities.

We do not knowingly collect, store, or process personal information from children under the age of 18.

If we learn that information from a minor has been submitted, it will be promptly reviewed and removed.

#### 11.1 No Services Directed to Minors

alpaca-crew does not market, provide, or tailor its services to children or minors.

Our property-care and AI-reporting offerings are intended exclusively for adult property owners, tenants, or authorized representatives.

Any online forms, communication tools, or booking systems are restricted to individuals 18 years or older.

If a parent or guardian believes their child has provided personal information to alpaca-crew, they should contact us immediately at <a href="mailto:support@alpaca-crew.com">support@alpaca-crew.com</a> for assistance.

### 11.2 Parental Rights and Contact

Parents or legal guardians who discover that their child's information was submitted in error may:

- Request deletion of the child's personal data.
- Obtain confirmation that the data has been removed from active and backup systems.
- Request written verification of completion.

alpaca-crew will process all parental requests promptly and confirm deletion once completed.

# 12. California Privacy Rights (CCPA/CPRA)

alpaca-crew serves clients in California and complies with the California Consumer Privacy Act (CCPA) and California Privacy Rights Act (CPRA).

As a California resident using our services, you have specific rights regarding how your personal information is collected, used, and shared.

## 12.1 Consumer Rights Summary

California residents have the right to:

- **Know** what categories of personal and sensitive information we collect and how it is used.
- Access a copy of the information collected about them.
- Request deletion of personal information, subject to legal or operational exceptions.
- Correct inaccurate information maintained by alpaca-crew.
- Opt out of data sharing or disclosure not essential to service delivery.
- Limit the use of sensitive information to operational or compliance purposes.
- Receive equal service and pricing regardless of whether these rights are exercised.

These rights can be exercised by submitting a verified request as described in Section 7.5 of this Policy.

# 12.2 Categories of Personal and Sensitive Information

alpaca-crew may collect the following categories of information consistent with our services:

- Identifiers such as name, contact details, and property address.
- Commercial information related to services purchased, frequency, and transaction history.
- Property-specific details, assessment observations, and AI-generated report data.
- Internet or technical data, including device and usage information collected through cookies.
- Geolocation information limited to scheduling and routing.
- Employment-related information for staff, contractors, or applicants.
- Sensitive data such as limited financial details, government-issued IDs (for employment), or recorded communications for quality assurance.

We do not collect biometric data, precise medical information, or sell or share information for targeted advertising.

## 12.3 How to Submit Requests

California residents (or their authorized agents) may submit requests to exercise any of the above rights by contacting:

Email: <a href="mailto:support@alpaca-crew.com">support@alpaca-crew.com</a>

Mail: 548 Market Street, PMB 948619, San Francisco, CA 94104

When making a request, please specify the right you wish to exercise and provide enough information for verification, such as your service address or account details.

# 12.4 Verification and Response Timeframes

To protect privacy, alpaca-crew will verify each request by confirming your identity and relationship to the data requested.

Verification may include comparing provided information against existing records or confirming recent transaction history.

We will respond to verified requests within 45 days, or notify you if additional time is needed to complete processing.

If a request is denied or partially fulfilled, we will provide an explanation of the outcome.

#### 12.5 Non-Discrimination and Incentive Disclosures

alpaca-crew does not discriminate against any client for exercising privacy rights.

This includes refusing services, charging different prices, or offering varying service quality based on privacy preferences.

If we ever provide financial or loyalty incentives related to data use—such as referral rewards or membership credits—participation will always be voluntary and clearly explained before enrollment.

#### 13. International Data Transfers

alpaca-crew operates exclusively within California.

However, some data may be processed or stored by trusted technology partners located outside the U.S., particularly when using global cloud platforms or communication tools.

In these cases, we require vendors to handle data with privacy protections consistent with the principles described in this Policy.

# 13.1 Cross-Border Data Handling

If personal or property-related data is transferred to, stored in, or accessed from another country, alpaca-crew ensures that:

- Transfers occur only when reasonably necessary for service delivery or system functionality.
- Information remains protected under equivalent confidentiality and security standards.
- Vendors or service providers agree contractually to safeguard the information they process.

These measures ensure that international transfers support business continuity without compromising privacy.

#### 13.2 Data Protection Standards

alpaca-crew expects all service providers, regardless of location, to:

- Maintain administrative, technical, and physical safeguards appropriate to the data they manage.
- Restrict data use to the specific purpose of providing contracted services.
- Prevent unauthorized access, disclosure, or alteration of data.
- Notify alpaca-crew promptly if a security event or incident occurs.

Our vendor selection process prioritizes providers with verifiable compliance commitments and transparent security practices.

# 13.3 Contractual Safeguards and Legal Basis

alpaca-crew may use standard contractual terms or data-processing agreements to govern relationships with international vendors.

These agreements require that:

- Personal and property data be processed only under alpaca-crew's instructions.
- Vendors apply comparable privacy protections to those described in this Policy.
- Data subjects (clients or employees) maintain the same level of privacy protection regardless of processing location.

While alpaca-crew cannot oversee every operational detail of third-party systems, we remain accountable for ensuring that all partners uphold the privacy values on which our business is built.

### 14. Changes to This Policy

alpaca-crew may update or revise this Privacy Policy from time to time to reflect operational changes, new technology, or evolving privacy requirements.

We are committed to transparency and will communicate significant updates clearly and promptly.

# 14.1 Right to Modify

alpaca-crew reserves the right to modify or amend this Policy at any time.

Updates may be made to:

- Reflect new data practices, technologies, or services.
- Comply with updated legal or regulatory guidance.
- Improve clarity, readability, or structure.

All modifications are applied prospectively and never retroactively.

### **14.2 Notice of Changes**

When material updates occur, alpaca-crew will:

- Post the revised version on our website with the new effective date.
- Provide notice through email or client portal, where appropriate.
- Explain the nature of significant changes in clear language.

Minor editorial or formatting updates may be implemented without additional notice if they do not alter the meaning or scope of the Policy.

# **14.3 Continued Use and Acceptance**

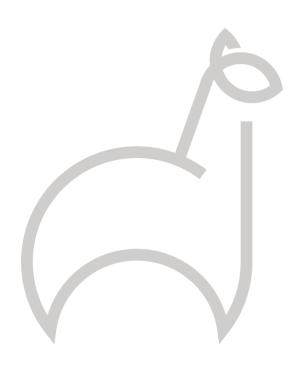
By continuing to use alpaca-crew's services or website after a revised Policy becomes effective, you acknowledge and accept the updated terms.

If you disagree with an update, you may discontinue service use and contact us to exercise your rights or request deletion of your data.

# **14.4 Version History**

alpaca-crew maintains internal records of previous Privacy Policy versions, including effective dates and major revisions.

This ensures accountability and allows clients to reference prior policies upon request.



#### 15. Contact Information

alpaca-crew encourages clients, employees, and partners to reach out with any privacy-related questions or concerns.

We are committed to transparency, responsive communication, and the responsible handling of all inquiries regarding personal or property-related data.

# 15.1 Privacy Inquiries

If you have questions about this Privacy Policy, how your information is handled, or wish to exercise any of your rights, please contact:

Email: <a href="mailto:support@alpaca-crew.com">support@alpaca-crew.com</a>

Mail: 548 Market Street, PMB 948619, San Francisco, CA 94104

**Phone:** (510) 731-6110

We recommend using email for the fastest response.

# 15.2 Data Protection Officer or Privacy Lead

alpaca-crew designates a Privacy Lead responsible for overseeing data protection practices, internal compliance, and the coordination of privacy requests.

While not a formal Data Protection Officer under international law, this individual ensures adherence to U.S. privacy standards and consistent implementation of this Policy.

For internal or formal inquiries, correspondence may be directed to the Privacy Lead at <a href="mailto:support@alpaca-crew.com">support@alpaca-crew.com</a>.

### 15.3 Communication Channels and Response Timeline

alpaca-crew responds to verified privacy inquiries within 45 days, unless an extension is required to address complex requests.

If additional time is necessary, we will provide notice and an estimated response date.

Clients will receive confirmation when a request is fulfilled, modified, or denied, including a written explanation when applicable.

All communications are reviewed by trained personnel, and responses are documented to maintain compliance with privacy governance standards.

