

# PRIVACY POLICY

Effective Date: 09/29/2025

Last Updated: 09/25/25

### OUR COMMITMENT TO YOUR PRIVACY

At Everly Nannies, we understand that you are entrusting us with highly sensitive personal information, including information about your children and family. We take this responsibility seriously and are committed to protecting your privacy and safeguarding your personal data.

This Privacy Policy explains how we collect, use, share, store, and protect your personal information when you use our nanny placement and referral services.

By using our services, you consent to the data practices described in this Privacy Policy.

### 1. INFORMATION WE COLLECT

We collect several types of information from and about users of our services.

1.1 Information You Provide Directly

From Families Seeking Nannies:

- Contact Information: Name, address, email address, phone number
- Household Information: Number of children, ages, special needs or requirements, pets, household rules
- Employment Details: Desired schedule, duties, compensation range, start date



- Home Details: Home layout, parking availability, security systems/codes (if applicable)
- Payment Information: Credit/debit card details, billing address, bank account information
- References: Contact information for references you provide
- Communication Records: Messages, emails, notes from consultations

### **From Nanny Candidates:**

- Personal Information: Full legal name, date of birth, Social Security number, address, email, phone number
- Government-Issued ID: Driver's license or state ID information
- Work Authorization: Documents proving eligibility to work in the United States (I-9 documentation)
- Employment History: Previous employers, dates of employment, job duties, reasons for leaving
- Education and Certifications: Degrees, diplomas, CPR/First Aid certifications, childcare training
- References: Names and contact information for professional and personal references
- Background Check Consent: Authorization to conduct criminal, credit, and driving record checks
- Skills and Preferences: Age groups preferred, special skills, availability, salary requirements
- Payment Information: Bank account details for payment processing (if applicable)
- Health Information: TB test results, vaccination records (if voluntarily provided)
- Communication Records: Messages, emails, interview notes

### 1.2 Information Collected Automatically

When you visit our website or use our services, we automatically collect:

- Device Information: IP address, browser type and version, operating system, device identifiers
- Usage Data: Pages viewed, time spent on pages, links clicked, navigation paths
- Location Information: General location based on IP address



• Cookies and Tracking Technologies: Information collected through cookies, web beacons, and similar technologies (see Section 7)

#### 1.3 Information from Third Parties

We receive information from:

- Background Check Providers: Criminal records, credit reports, driving records, sex offender registry checks, professional license verifications
- Reference Providers: Information from references you authorize us to contact
- Social Media: Publicly available information if you connect your social media accounts or if we review public profiles during screening
- Payment Processors: Transaction confirmation and payment status information
- Public Records: Information from publicly available sources to verify credentials or claims

### 1.4 Sensitive Information About Children

We collect limited information about children solely for the purpose of matching families with appropriate nannies:

- Ages of children
- General developmental stages or special needs
- Care requirements (dietary restrictions, medical needs, behavioral considerations)

We do NOT collect: Social Security numbers, detailed medical records, photographs, or other unnecessary sensitive information about children.



### 2. HOW WE USE YOUR INFORMATION

We use the information we collect for the following purposes:

### 2.1 To Provide Our Services

- Match families with qualified nanny candidates
- Screen and verify nanny credentials and backgrounds
- Coordinate interviews and facilitate placement
- Process payments and maintain financial records
- Communicate with you about our services
- Provide customer support

# 2.2 For Background Checks and Verification

- Conduct criminal background checks on nanny candidates
- Verify employment history, education, and certifications
- Check driving records and credit history (when applicable)
- Contact and verify references
- In some cases, conduct a drug screen
- Ensure compliance with legal work authorization requirements

# 2.3 To Improve Our Services

- Analyze usage patterns and trends
- Understand user preferences and needs
- Develop new features and services
- Conduct research and analytics
- Test and improve our website functionality

### 2.4 For Business Operations

- Maintain business records and documentation
- Comply with legal obligations and regulatory requirements
- Enforce our Terms of Service



- Protect against fraud, abuse, and illegal activity
- Resolve disputes and troubleshoot problems

### 2.5 For Marketing and Communications

- Send you service updates and announcements
- Provide information about our services
- Send newsletters (with your consent)
- Conduct surveys and request feedback
- Market related services (with your consent)

You may opt out of marketing communications at any time by following the unsubscribe instructions in our emails or contacting us directly.

### 3. HOW WE SHARE YOUR INFORMATION

We do not sell, rent, or trade your personal information. We share your information only in the following circumstances:

# 3.1 With Potential Employers/Nannies

For Matching Purposes:

- We share nanny candidate profiles (without SSN or highly sensitive data) with families seeking nannies
- We share family household information with nanny candidates being considered for placement
- Information is shared only with serious candidates/ families in the matching process

Consent Required: Nannies consent to profile sharing when registering; families consent to information sharing in our Terms of Service.

### 3.2 With Service Providers



We share information with trusted third-party vendors who assist our business operations:

- Background Check Companies: Criminal records providers, credit bureaus, driving record services (e.g., [Name specific providers you use])
- Payment Processors: To process fees and payments (e.g., Stripe, PayPal, Square)
- Technology Services: Website hosting, data storage, email services, CRM systems
- Communication Platforms: Email marketing services (e.g., Mailchimp, Constant Contact)
- Analytics Providers: Google Analytics and similar services

These service providers are contractually obligated to:

- Use your information only for the services they provide to us
- Maintain appropriate security measures
- Comply with applicable privacy laws

# 3.3 For Legal Compliance

We may disclose your information when required by law or when we believe disclosure is necessary to:

- Comply with legal obligations, court orders, or subpoenas
- Respond to lawful requests from government authorities
- Enforce our Terms of Service or other agreements
- Protect the rights, property, or safety of Everly Nannies, our users, or the public
- Investigate or prevent fraud, security issues, or illegal activity
- Defend against legal claims

# 3.4 In Business Transfers



If Everly Nannies is involved in a merger, acquisition, sale of assets, bankruptcy, or other business transaction, your information may be transferred as part of that transaction. You will be notified of any such change via email or prominent notice on our website.

### 3.5 With Your Consent

We may share your information with other parties when you specifically consent to such sharing.

# 3.6 Aggregated or De-Identified Information

We may share aggregated, anonymized, or de-identified information that cannot reasonably be used to identify you for research, marketing, or other purposes.

### 4. BACKGROUND CHECKS AND FCRA COMPLIANCE

# 4.1 Fair Credit Reporting Act (FCRA)

As a nanny placement agency that conducts background checks, we comply with the Fair Credit Reporting Act (FCRA), which regulates how consumer reports are obtained and used.

# 4.2 Consumer Reports

Background checks we conduct may be considered "consumer reports" under FCRA. These include:

- Criminal history checks
- Credit reports
- Driving records
- Employment verification
- Education verification

# 4.3 Your Rights Under FCRA

For Nanny Candidates:



Before we obtain a consumer report about you, we will:

- Provide you with a clear written disclosure that a report may be obtained
- Obtain your written authorization

If we take adverse action (such as not referring you to families) based wholly or partly on information in a consumer report, we will:

- Provide you with a pre-adverse action notice
- Give you a copy of the consumer report
- Provide a summary of your rights under FCRA
- Allow you a reasonable time to dispute inaccuracies
- Provide a final adverse action notice if we proceed

# You have the right to:

- Receive a copy of any consumer report we obtain about you
- Dispute incomplete or inaccurate information with the consumer reporting agency
- Add a statement to your consumer report explaining disputed information
- Request that the consumer reporting agency provide your report to anyone who received it in the past year (two years for employment purposes)

### 4.4 Limitations of Background Checks

Important: Background checks have inherent limitations:

- Records may be incomplete, outdated, or contain errors
- Not all jurisdictions report to national databases
- Some records may be sealed, expunged, or unreported
- Past behavior does not guarantee future conduct
- Identity verification can sometimes produce false matches

# We encourage families to:

• Conduct their own independent background checks



- Thoroughly interview candidates
- Check references personally
- Trust their own judgment

### 5. HOW WE PROTECT YOUR INFORMATION

# **5.1 Security Measures**

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

# Technical Safeguards:

- Encryption of sensitive data in transit (SSL/TLS)
- Encryption of sensitive data at rest
- Secure servers with firewall protection
- Regular security audits and updates
- Access controls and authentication requirements

# Administrative Safeguards:

- Employee training on data protection
- Confidentiality agreements with employees and contractors
- Limited access to personal information on a need-to-know basis
- Regular review and update of security policies

# Physical Safeguards:

- Secure storage of physical documents
- Locked filing cabinets and restricted access areas
- Secure disposal of documents containing personal information

### **5.2 Payment Security**



We use PCI-DSS compliant payment processors to handle credit card and bank account information. We do not store complete credit card numbers on our systems.

### 5.3 Limitations

Important: 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.

You are responsible for:

- Maintaining the confidentiality of your account credentials
- Using strong, unique passwords
- Notifying us immediately of any unauthorized access
- Taking precautions when sharing information online

### 5.4 Data Breach Notification

In the event of a data breach that compromises your personal information, we will:

- Notify affected individuals as required by applicable law
- Take immediate steps to mitigate the breach
- Cooperate with law enforcement if criminal activity is suspected
- Provide information about steps you can take to protect yourself

#### 6. HOW LONG WE RETAIN YOUR INFORMATION

# **6.1 Retention Periods**

We retain your personal information for as long as necessary to fulfill the purposes outlined in this Privacy Policy, unless a longer retention period is required or permitted by law.

### Active Users:

• Information is retained while your account is active



- Background check records retained per FCRA requirements for 7 years
- Employment records retained per IRS and labor law requirements

### Inactive Accounts:

- Information may be retained for [TIME PERIOD e.g., 2 years] after account closure
- Some information retained longer for legal, tax, or regulatory compliance
- De-identified data may be retained indefinitely for analytics

# Specific Retention Periods:

- Financial records: 7 years (IRS requirement)
- Background check records: 7 years (FCRA requirement)
- Employment-related documents: As required by state and federal law
- Communication records: [TIME PERIOD e.g., 3 years]
- Marketing communications: Until you opt out

### 6.2 Deletion of Information

After the retention period, we will:

- Delete or anonymize personal information
- Securely destroy physical records
- Remove information from active databases

You may request earlier deletion (see Section 9 - Your Privacy Rights).

### 7. COOKIES AND TRACKING TECHNOLOGIES

### 7.1 What Are Cookies?

Cookies are small text files placed on your device by websites you visit. They help websites remember your preferences and improve your experience.



# 7.2 Types of Cookies We Use

### **Essential Cookies:**

- Required for website functionality
- Enable core features like security, account access, and shopping cart
- Cannot be disabled without affecting site performance

# Analytics Cookies:

- Track how visitors use our website
- Help us understand traffic patterns and improve user experience
- Include Google Analytics and similar services

### **Functional Cookies:**

- Remember your preferences and settings
- Personalize your experience
- Remember login information (if you choose)

# Marketing Cookies:

- Track visits across websites
- Display relevant advertisements
- Measure advertising campaign effectiveness
- May be set by third-party advertising partners

# 7.3 Third-Party Cookies

Some cookies are placed by third-party services that appear on our pages:

- Google Analytics (analytics and tracking)
- Social media platforms (if you interact with social media widgets)
- Advertising networks (if we use advertising services)

These third parties have their own privacy policies governing their use of information.



# 7.4 Managing Cookies

You can control cookies through:

# Browser Settings:

- Most browsers allow you to refuse or accept cookies
- You can delete cookies already stored on your device
- Check your browser's help section for instructions

# Opt-Out Tools:

- Google Analytics Opt-Out: https://tools.google.com/dlpage/gaoptout
- Network Advertising Initiative: http://www.networkadvertising.org/choices/
- Digital Advertising Alliance: http://www.aboutads.info/choices/

Note: Disabling cookies may limit your ability to use certain features of our website.

# 7.5 Do Not Track Signals

Some browsers offer "Do Not Track" (DNT) signals. Currently, there is no industry standard for responding to DNT signals, and our website does not respond to DNT requests. We will update this policy if standards are adopted.

### 8. THIRD-PARTY LINKS AND SERVICES

### 8.1 Third-Party Websites

Our website may contain links to third-party websites, services, or applications. We are not responsible for the privacy practices or content of these third parties.

### We recommend:

• Reviewing the privacy policies of any third-party sites you visit



- Understanding how those sites collect and use your information
- Exercising caution when providing personal information to third parties

# 8.2 Third-Party Services We Use

We use the following categories of third-party services:

- Website Hosting: [Provider name if you want to specify]
- Email Services: [Provider name]
- Payment Processing: [e.g., Stripe, PayPal]
- Background Checks: [Provider names]
- Analytics: Google Analytics
- Customer Relationship Management (CRM): [Provider name]
- Email Marketing: [Provider name]

Each of these services has its own privacy policy governing how they handle data.

#### 9. YOUR PRIVACY RIGHTS

### 9.1 Access to Your Information

You have the right to:

- Request a copy of the personal information we hold about you
- Verify the accuracy of your information
- Request information about how we use and share your data

# 9.2 Correction and Updates

You have the right to:

- Correct inaccurate or incomplete information
- Update your information at any time
- Access your account to make changes directly



### 9.3 Deletion of Information

You have the right to request deletion of your personal information, subject to certain exceptions:

We will honor deletion requests except when we need to retain information to:

- Complete transactions or services you requested
- Comply with legal obligations
- Detect and prevent fraud or security issues
- Enforce our Terms of Service
- Exercise our legal rights

# 9.4 Data Portability

You have the right to:

- Receive your personal information in a structured, commonly used format
- Transmit your information to another service provider (where technically feasible)

# 9.5 Opt-Out Rights

You have the right to opt out of:

Marketing Communications:

- Click "unsubscribe" in any marketing email
- Contact us at [EMAIL] to opt out
- Adjust preferences in your account settings

Sale of Personal Information:

- We do NOT sell your personal information
- If this changes, we will update this policy and provide opt-out options

Targeted Advertising:



- Use browser settings to block advertising cookies
- Use industry opt-out tools (see Section 7.4)

### 9.6 Withdrawal of Consent

Where we process your information based on consent, you may withdraw consent at any time. This will not affect the lawfulness of processing before withdrawal.

# 9.7 How to Exercise Your Rights

To exercise any of these rights, contact us:

Email: info@everlynannies.com

Phone: 216-317-1409

Mail: P.O. box 45136, Westlake, OH 44145

We will respond to your request within:

- 30 days for most requests
- 45 days for complex requests
- We may request verification of your identity before processing requests

# 9.8 Right to Lodge a Complaint

If you believe we have violated your privacy rights, you may:

- File a complaint with us directly at info@everlynannies.com
- Contact the Ohio Attorney General's Office
- File a complaint with the Federal Trade Commission (FTC)

### 10. CHILDREN'S PRIVACY



### 10.1 COPPA Compliance

Our services are not directed to children under 13 years of age. We do not knowingly collect personal information from children under 13.

### 10.2 Information About Children

While we collect limited information about the children in families' care (ages, general needs), we:

- Collect this information from parents/guardians only
- Use it solely for matching purposes
- Do not collect children's names, photos, or detailed personal information
- Do not market to children

# **10.3 Parental Rights**

If you believe we have inadvertently collected information from a child under 13, please contact us immediately at [PRIVACYEMAIL] and we will delete such information promptly.

#### 14. CHANGES TO THIS PRIVACY POLICY

### 14.1 Updates

We may update this Privacy Policy from time to time to reflect changes in:

- Our practices
- Legal or regulatory requirements
- Technology and security measures
- Our services

# 14.2 Notice of Changes

When we make changes, we will:

• Update the "Last Updated" date at the top of this policy



- Post the revised policy on our website
- Notify you via email for material changes (if we have your email address)
- Provide prominent notice on our website for significant changes

# **14.3 Material Changes**

For material changes that significantly affect how we handle your personal information, we will:

- Provide at least 30 days' advance notice
- Obtain your consent if required by law
- Allow you to opt out of new uses of your information

### 14.4 Your Continued Use

Your continued use of our services after the effective date of a revised Privacy Policy constitutes your acceptance of the changes. If you do not agree, please discontinue use of our services.

### **15. CONTACT US**

# 15.1 Privacy Questions

If you have questions, concerns, or complaints about this Privacy Policy or our privacy practices, please contact us:

# **Privacy Officer/Contact:**

Everly Nannies

P.O. Box 45136, Westlake, OH 44145

Email:info@everlynannies.com

Phone: 216-317-1409

Website: www.everlynannies.com

# **15.2** Response Time

We will respond to privacy inquiries within:



- 10 business days for general questions
- 30 days for formal privacy rights requests
- 45 days for complex requests

# 15.3 Complaints

If you have a complaint about our privacy practices:

- 1. Contact us first at info@everlynannies.com we want to resolve issues directly
- 2. If unsatisfied, you may file a complaint with:
  - o Ohio Attorney General's Office
  - Federal Trade Commission (FTC)
  - Your state attorney general's office

#### **16. EFFECTIVE DATE**

This Privacy Policy is effective as of 09/26/2025 and was last updated on 09/26/2025

### **ACKNOWLEDGMENT**

By using Everly Nannies services, you acknowledge that:

- ✓ You have read and understood this Privacy Policy
- ✓ You consent to the collection, use, and sharing of your information as described
- ✓ You understand your rights regarding your personal information
- ✓ You agree to receive communications from us as described in this policy

YOUR PRIVACY MATTERS TO US. IF YOU HAVE ANY QUESTIONS OR CONCERNS, PLEASE DON'T HESITATE TO CONTACT US.