

Privacy Policy

Effective as of July 1, 2025

1. Introduction

Gilded Room 107, LLC, doing business as Sorelli Home & Office ("Sorelli," "we," "our," or "us"), is committed to protecting the privacy and security of the personal information we collect from our customers, contractors, employees, and other users. This Privacy Policy explains how we handle personal information and the choices and rights available to you.

2. Scope of this Policy

This Privacy Policy applies to the personal information we collect when you:

- Use our website at www.everneatly.com or our mobile application to explore, book, or manage our services
- Apply to work with us as a contractor or employee
- Interact with us through customer service, communications, or other channels

This policy covers Sorelli's services and operations in the United States.

This Privacy Policy does not apply to personal information processed by third parties on their own behalf. Please review the privacy notices of any third-party services you interact with.

By accessing or using our services, you consent to the collection, use, and sharing of your personal information as described in this Privacy Policy. If you do not agree, please do not use our services.

We may update this Privacy Policy periodically. If we make material changes, we will revise the "Effective as of" date and provide additional notice as required by law.

3. Information We Collect

We collect different types of personal information depending on how you interact with Sorelli. The categories of personal information we collect include:

3.1 From Customers (Individuals Who Book Services)

- Identifiers (name, phone number, email address, service address)
- Payment and billing information (partial payment card data, billing address)
- Service-related information (booking history, preferences, instructions, feedback)
- Visual information (photographs of spaces before or after service, with permission)
- Internet and electronic network activity (IP address, browser type, website interactions)
- Communication data (call recordings, emails, customer support messages)

3.2 From Contractors and Employees (Individuals Who Provide Services)

- Identifiers and contact details (name, phone number, email address, mailing address, profile photo)
- Professional and application information (experience, certifications, references, onboarding materials)
- Payment and tax-related information (taxpayer ID, bank account for direct deposit)
- Job-related media (photos submitted to confirm service completion)
- Customer ratings and service metrics (completed jobs, cancellations, punctuality, feedback)
- Sensitive personal information (background check results, government ID copies, when required by law)

3.3 From All Users

- Device and usage data (IP address, device identifier, operating system, browser type)
- Communication history (messages sent to us and responses received)

We may also collect other categories of information if necessary to provide a service, comply with legal obligations, or support our operations. If our data collection practices change materially, we will revise this Policy and notify you as required by law.

4. How We Collect Information

We collect personal information in the following ways:

4.1 Information You Provide Directly

- When you fill out forms, apply for jobs, or communicate with us

4.2 Information Collected Automatically

- Through cookies, web beacons, and similar technologies on our website and mobile application

4.3 Information Received from Service Providers

- Who help us deliver and support our services (e.g., payment processors, background screeners)

We do not collect precise geolocation data, and we do not engage in cross-context behavioral tracking or targeted advertising.

5. How We Use Personal Information

We use personal information to operate and improve our services, fulfill service requests,

support our team members, and meet legal obligations. We do not collect more information than necessary and do not use it for unrelated purposes.

5.1 For All Users, we may use personal information to:

- Create and manage user accounts
- Communicate about bookings, updates, and customer support
- Improve our website, mobile app, and services based on usage and feedback
- Maintain business records and respond to legal inquiries

5.2 For Customers, we may use information to:

- Schedule services and assign contractors
- Process payments securely through third-party providers
- Review job photos to confirm completion and assess quality
- Contact you for service confirmations, reminders, and surveys

5.3 For Contractors and Employees, we may use information to:

- Review applications and determine eligibility
- Schedule jobs and track completed assignments
- Evaluate performance based on feedback and metrics
- Process compensation and tax reporting through authorized platforms

We do not use algorithmic decision-making, automated scoring, or behavioral profiling to evaluate customers, contractors, or employees.

6. Disclosure of Personal Information

We do not sell or share personal information for advertising purposes. We only disclose personal information when necessary to provide services, support operations, or comply with legal obligations. We limit disclosures to what is reasonably necessary and require service providers to handle information in accordance with our privacy and security standards.

We may disclose personal information to:

- Service providers who help us operate our business
- Contractors and employees who need information to perform assigned jobs
- Authorized internal team members with a legitimate business need
- Government authorities or other third parties as required by law

We do not transfer personal information outside the United States.

7. Sensitive Personal Information

Sorelli recognizes the heightened privacy concerns surrounding sensitive personal information. We collect and process sensitive personal information only when strictly necessary for our services or as required by law. This may include:

- Financial information: We collect partial payment card data and bank account information for payment processing and direct deposits. This information is encrypted and processed through secure, PCI-DSS compliant third-party providers.
- Health information: We do not typically collect health information. However, if a customer provides health-related details relevant to cleaning services (e.g., allergies), we treat this information with utmost confidentiality and use it solely for the purpose of providing appropriate service.
- Biometric data: We do not collect or process biometric data.
- Background check results: For contractors and employees, we may receive background check results as required by law or for safety purposes. This information is stored securely and accessed only by authorized personnel on a need-to-know basis.

We implement additional safeguards for sensitive personal information, including:

- Encryption at rest and in transit
- Strict access controls and logging
- Regular security audits and vulnerability assessments
- Employee training on handling sensitive data
- COPPA Compliance

Sorelli is committed to complying with the Children's Online Privacy Protection Act (COPPA). We do not knowingly collect personal information from children under the age of 13 without obtaining verifiable parental consent. Our measures to ensure COPPA compliance include:

- Age verification: Our website and mobile application include age-gating mechanisms to prevent users under 13 from creating accounts or submitting personal information.
- Content restrictions: Our services do not include any content or features specifically directed at children under 13.

If we learn that we have collected personal information from a child under 13, we will promptly delete that information and take any necessary steps to prevent further collection.

9. Cookies and Tracking Technologies

We use cookies and similar technologies on our website and mobile app to support essential functions, maintain user preferences, and understand how visitors interact with our platform. We do not use behavioral tracking or share cookie data with third-party advertisers.

9.1 Types of Cookies We Use:

- Essential cookies: Required for basic website functionality

- Preference cookies: Remember your settings and preferences
- Analytics cookies: Help us understand how visitors use our site

9.2 Cookie Management: You can manage cookie preferences through your browser settings.

10. Your Privacy Options

While Sorelli is not currently subject to comprehensive state privacy laws, we support offer similar choices to all our users:

10.1 Knowledge and Access: You may request information about the personal data we have collected about you, including the categories of data, its sources, and the purposes for which it was collected.

10.2 Correction: You may request that we correct inaccurate personal information we maintain about you.

10.3 Deletion: You may request the deletion of your personal information, subject to certain exceptions.

10.4 Opt-Out: While we do not sell personal information, you may opt-out of certain data sharing practices.

10.5 Non-Discrimination: We will not discriminate against you for exercising your privacy choices.

To exercise these options, please email us at support@everneatly.com. We may ask for information to verify your identity before fulfilling the request. We will respond to all legitimate requests within the timeframes required by applicable law.

11. How We Protect Personal Information

We implement a comprehensive information security program to protect your personal information, including:

11.1 Administrative Safeguards:

- Regular employee training on data privacy and security
- Access controls and need-to-know policies
- Vendor risk assessments and contractual safeguards

11.2 Technical Safeguards:

- Encryption of data at rest and in transit using industry-standard protocols
- Multi-factor authentication for system access

- Regular security patches and updates
- Intrusion detection and prevention systems

11.3 Physical Safeguards:

- Secure data centers with environmental and access controls
- Clean desk policies and secure document disposal

11.4 Organizational Measures:

- Designated data protection officer
- Regular security audits and penetration testing
- Incident response and data breach notification procedures

If we become aware of a security breach involving your personal information, we will take prompt action and notify affected users in accordance with applicable laws and industry best practices.

12. Changes to This Privacy Policy

We may update this Privacy Policy from time to time to reflect changes in our business, services, or applicable laws. When we make material updates, we will revise the "Effective as of" date and provide a summary of the changes.

We will notify you of any material changes through a prominent notice on our website or mobile app, or by sending you an email notification if we have your contact information.

Your continued use of our services after an update means you accept the revised policy. We encourage you to review this Privacy Policy periodically to stay informed about our data practices.

13. State-Specific Privacy Rights

13.1 California Privacy Rights

While Sorelli is not currently subject to the California Consumer Privacy Act (CCPA) or the California Privacy Rights Act (CPRA), we provide the following disclosures to California residents:

Categories of Personal Information Collected:

- Identifiers, commercial information, internet activity, geolocation data, employment information, and sensitive personal information (as described in Section 3)

How We Use and Share Personal Information:

- To provide and manage our services, comply with legal obligations, and support our operations
- We do not sell personal information or share it for cross-context behavioral advertising purposes

Your California Privacy Rights:

- You may have the right to request to know, access, correct, delete, or limit the use of your personal information
- To make a request, email us at support@everneatly.com

We will update this section if our legal obligations or data handling practices change in the future.

13.2 Other State-Specific Rights

Sorelli is committed to complying with all applicable state privacy laws. While we are not currently subject to specific requirements in other states, we strive to provide similar options and protections to all our users, regardless of their location.

As privacy laws continue to evolve, we will update our practices and this Privacy Policy to ensure compliance with any new requirements that may apply to our operations.

14. Mobile Application Privacy Practices

Sorelli offers a mobile application to enhance user experience and provide convenient access to our services. Our mobile app adheres to the same privacy principles outlined in this policy, with the following additional considerations:

14.1 Data Collection Through Mobile Devices:

- Device information (e.g., device type, operating system version)
- Mobile app usage data and interactions
- Push notification tokens (with user consent)

14.2 Mobile-Specific Features:

- Location services (optional, used only when explicitly enabled by the user)
- Camera access (for uploading service-related photos, requires user permission)

14.3 Mobile App Privacy Controls:

- Users can manage app permissions through their device settings
- Push notification preferences can be configured within the app

14.4 Third-Party SDKs:

- Our app may use third-party software development kits (SDKs) for analytics and functionality. We carefully vet these SDKs and limit their data access to what is necessary for their intended purpose.

14.5 App Store Compliance:

- Our mobile app complies with the privacy requirements of both the Apple App Store and Google Play Store.

For more detailed information about our mobile app's privacy practices, please refer to the in-app privacy settings and disclosures.

15. International Data Transfers

While Sorelli primarily operates in the United States, we recognize that our users may access our services from other countries. We do not intentionally transfer personal information outside the United States. However, if you access our services from another country, your information may be transferred to, stored, and processed in the United States.

By using our services, you consent to any such transfer of information outside of your country. We will ensure that any international data transfers comply with U.S. data protection laws and that appropriate safeguards are in place to protect your personal information.

16. Data Retention

We retain personal information for as long as necessary to fulfill the purposes for which it was collected, to provide our services, to comply with legal obligations, or to protect our legitimate business interests. The specific retention periods depend on the type of information and the context in which it was collected.

When personal information is no longer needed, we will securely delete or anonymize it. You may request the deletion of your personal information as described in Section 10 (Your Privacy Rights and Choices).

17. Third-Party Links and Services

Our website and mobile app may contain links to third-party websites or services that are not owned or controlled by Sorelli. This Privacy Policy applies only to our services. We are not responsible for the privacy practices or content of any third-party sites or services.

We encourage you to review the privacy policies of any third-party sites or services you interact with. If you provide any information to such third parties, their privacy policies and practices will apply.

18. How to Contact Us

If you have any questions, concerns, or requests regarding this Privacy Policy or our data practices, please contact us using one of the following methods:

Email: hello@sorelliclean.com

Postal Mail: Sorelli Home & Office

Attention: Privacy Office, 3965 Bethel Rd SE, Suite 1 #112 Port Orchard, WA 98366

Phone: 425-484-6686

We will make every effort to respond to your inquiry promptly and address your concerns thoroughly.

By using our services, you acknowledge that you have read and understood this Privacy Policy and agree to its terms.