

# Privacy Policy

## Introduction

Clear Financial Solutions, Inc., DBA Clear Power Reports, (known as, “Clear”) is committed to respecting and protecting the privacy of those from whom they collect personal information.

## Policy

This policy establishes and communicates the key principles Clear follows in protecting the personal information that it collects. Please note that some privacy rights and obligations may differ in certain locations based on local law, in which case Clear will comply with the local legal requirements.

## Definitions

**Data Subject** is any individual about whom Clear holds personal data.

**Personal data** is any information that allows an individual to be identified directly or indirectly (e.g., name, date of birth, title, address, telephone number and email address).

**Sensitive personal data** is that which, in cases of misuse, may cause unlawful or arbitrary discrimination or other serious risk to a data subject (e.g., racial or ethnic origin, nationality, political opinion, religious and philosophical beliefs, and physical or mental health conditions).

Collectively, personal data and sensitive personal data are referred to as “personal information.”

## Collecting and Processing Personal Information

Clear collects and processes personal information that is necessary for legitimate business purposes, which will be disclosed to the data subject at the time of collection. Clear will use and process this information only for the purposes for which it was collected, retaining the personal information only for so long as is required for the specific purpose for which the information was collected.

Clear will not collect sensitive personal data except when permitted or required to do so by law, and will do so only for legitimate business purposes. If in any other instance a need arises to collect sensitive personal data, Clear will do so only with the data subject’s express consent, which can be withdrawn at any time.

Clear will not sell, disclose or rent personal information for direct marketing purposes.

## Onward Transfer

In limited circumstances, Clear may disclose personal information to a third party who is providing a service to Clear. Clear will only disclose personal information if the third party has

provided satisfactory assurances to Clear of its ability to provide appropriate and sufficient data privacy and security safeguards to protect the personal information from unauthorized disclosure, use or loss. Where Clear learns that a third party is using or disclosing personal information in a manner contrary to this policy, Clear will take reasonable steps to discontinue such use or disclosure.

Disclosures to third parties will be only for the purposes described in this policy, for a compatible purpose, or for a purpose authorized by the data subject.

#### **Security of Personal Information**

Clear has organizational, physical, administrative and technical measures in place to protect the personal information the company collects and maintains. Clear monitors to ensure that its information security program is operating in a manner to reasonably protect the personal information it collects and processes and upgrades information safeguards as necessary to limit risks of unauthorized disclosure or use.

Only authorized colleagues with a valid, work-related need may access a data subject's personal information. In the event of a data breach, Clear will issue breach notifications as may be required under applicable law.

Contact information is as follows:

Clear Financial Solutions, Inc.  
1517 San Jacinto  
Houston, TX 77002  
713-780-0806