Last Updated: July 18, 2025

At Kefford Consulting LLC ("Kefford," "we," "us"), your trusted growth partner, we are committed to protecting your privacy while helping small and medium-sized businesses (SMBs), freelancers, gig workers, and nonprofits grow through our Services. This Privacy Policy explains how we collect, use, disclose, and safeguard your data when you use our Services, including our Automated Consultant Toolkit (ACT) bot, website (www.keffordconsulting.com) (www.keffordconsulting.com), and Members Area. Our Services offer Personalized Plays (\$500, 2-page PDFs), Playbooks (\$1,500, 7-page PDFs), Consults (\$2,500, 1-hour call + Playbook), and bundles (Starter: \$750, Growth: \$2,000, Premium: \$4,000) with optional monthly support calls. By using our Services, you ("Client," "you") agree to this Privacy Policy. If you do not agree, please do not provide personal information. Questions? Contact us at info@keffordconsulting.com or +1 208-996-0605.

Information We Collect

We collect minimal data to deliver tailored Services:

- Personal Information: Name, email address, and phone number provided during registration (e.g., via the ACT bot) or consult scheduling.
- Business Information: Business details (e.g., type, size, challenges like sales or hiring needs, goals) shared via the ACT bot or Members Area to customize Plays, Playbooks, or support calls.
- Usage Data: Non-identifying data about Service use (e.g., website visits, bot interactions, page load times) collected via analytics tools (e.g., Google Analytics, Wix Analytics).
- Payment Information: Processed securely via Stripe (e.g., for Plays, Playbooks, subscriptions); we do not store payment details.
- Referral Program Data: Information about your participation in our referral program, such as invites sent.
- Review Data: Information about reviews you submit on platforms like Google or LinkedIn.
- Members Area Data: Data from your Members Area account, such as tweak requests, consult call bookings, and activity logs (e.g., session history).
   You control what you share, and we collect only what's necessary to provide effective Services. We do not collect data from children under 13 and comply with the Children's Online Privacy Protection Act (COPPA) by not knowingly collecting such data.
- How We Use Your Information

### We use your information to:

• Deliver and customize Services (e.g., create Plays/Playbooks, provide support calls based on your business details).

- Process payments via Stripe for Plays, Playbooks, subscriptions, or consult calls.
- Communicate with you (e.g., deliver Plays within 24 hours, send reminders, respond to inquiries).
- Manage our referral program (e.g., track invites) and review incentives.
- Improve Services through anonymized analysis (e.g., general "sales trends" from business data, not tied to you).
- Monitor system performance (e.g., bot latency, page load times) to ensure a seamless experience.
- Re-engage inactive users via email campaigns (e.g., reminders to use credits or restart a consult).
- Comply with legal obligations, such as CCPA/GDPR data requests.
- Anonymized data (e.g., "Boise SMB sales trends") may be used to enhance our ACT bot or marketing, ensuring no identifiable information is shared.
- Automated Processing

We use automated systems like the ACT bot to deliver personalized Services efficiently. The bot processes your inputs (e.g., business challenges) to generate tailored Plays or Playbooks. This involves natural language processing (NLP) for customization, with human oversight for accuracy. You can opt out of automated features by contacting us, though this may limit Service functionality.

### How We Protect Your Information

We prioritize your data's security:

- Encryption: Personal and business information is secured with industry-standard measures like encryption (AES-256, HTTPS), multi-factor authentication (MFA), and access controls.
- Confidentiality: Client data is limited to authorized personnel and protected by our Terms of Service.
- Safeguards: We implement measures to detect and prevent misuse, such as fraud detection and usage monitoring.
- Data Retention:
  - Session data for non-subscription users (e.g., Play/Playbook only) is retained for 30 days to support tweaks, then anonymized unless linked to an active Members Area account.
  - For subscription users (e.g., with support calls), data is retained during your subscription (up to 6 months) plus 30 days, then anonymized. Key details may be stored in our CRM (HubSpot) to support future engagement.
  - Members Area data (e.g., emails, tweak logs, activity) is retained while your account is active or during your subscription—deleted 120 days after inactivity with a 30-day notice.

- Access Controls: Only essential staff access your data, ensuring confidentiality. We
  take reasonable measures to prevent unauthorized access, but no system is 100 \%
  secure. Contact info@keffordconsulting.com to report concerns.
- Your Rights Under CCPA and GDPR (Extended to All Users)

We extend privacy rights to all users under the California Consumer Privacy Act (CCPA) and General Data Protection Regulation (GDPR):

- Right to Know/Access: Request what personal information we collect, use, or disclose about you.
- Right to Delete/Erasure: Request deletion of your personal information, subject to legal exceptions (e.g., subscription obligations).
- Right to Non-Discrimination: We won't discriminate (e.g., deny Services) for exercising your rights.
- Right to Data Portability: Request a copy of your data in a portable format.
- Right to Object/Opt-Out: Opt out of data processing for analytics or marketing (e.g., email info@keffordconsulting.com to disable usage tracking). We do not sell your personal information.
  - To exercise these rights, email info@keffordconsulting.com with "Privacy Rights Request" in the subject line. We'll respond within 45 days (or 30 days under GDPR), verifying your identity (e.g., via email confirmation).
- Data Sharing and Disclosure

We do not sell your personal information. We may share data:

- With Service Providers: Trusted vendors (e.g., Stripe for payments, AWS for hosting, Google Analytics for usage data, HubSpot for CRM, Calendly for scheduling, Google Calendar for bookings, Mailchimp for emails, Wix for website, Chatfuel for bot) process data under strict confidentiality agreements. These providers process data according to their own privacy policies, linked on our website for your review.
- For Legal Compliance: If required by law (e.g., court order) or to protect Kefford Consulting rights (e.g., dispute resolution).
- Anonymized Data: General trends (e.g., "sales challenges in Boise") may be used for analysis or marketing, ensuring no identifiable information is shared.
- Prohibited Sharing by Clients: Clients may not share Plays, Playbooks, or other deliverables with third parties without Kefford's written consent, as they contain proprietary information protected by our Terms of Service. See our Terms of Service for more information.
- Cookies and Analytics

Our website (www.keffordconsulting.com) (www.keffordconsulting.com) uses cookies and tools like Google Analytics and Wix Analytics to collect non-identifying usage data (e.g., page visits, click patterns). These help improve our Services and marketing. You can

manage cookie preferences via your browser settings or our cookie consent banner, though this may affect functionality. For more details, see our Cookie Policy (linked on the website).

## Third-Party Links

Our Services may include links to third parties (e.g., HubSpot, Calendly, Google Calendar), which may collect data under their privacy policies. We're not responsible for third-party practices but select trusted partners. Review their policies or contact info@keffordconsulting.com for details.

# Changes to This Privacy Policy

We may update this Privacy Policy with 30 days' notice via email or website posting. Continued Service use constitutes acceptance. Check www.keffordconsulting.com/privacy-policy for the latest version.

### Contact Us

For questions, privacy rights requests, or concerns, contact:

Kefford Consulting LLC

Email: edwin@keffordconsulting.com

Phone: +1 208-996-0605

Website: www.keffordconsulting.com

Thank you for trusting Kefford Consulting LLC with your business growth. We're committed

to protecting your privacy as we deliver exceptional solutions!

Kefford Consulting LLC | In the Commerce of Relationships, We Deliver Wins

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