



# Privacy Policy

— LAST UPDATED: JUNE 18, 2026 —

This Privacy Policy explains how **Operi LLC** (“Operi,” “we,” “us,” or “our”) collects, uses, shares, and protects personal information in connection with our website at [operi.solutions](https://operi.solutions), our services, and our software platform (collectively, the “Services”). Capitalized terms not defined here have the meaning given in our Terms & Conditions, which this Policy supplements and is incorporated into by reference.

## 1. Scope and Our Role

This Policy applies to personal information we handle as a business through our website, Platform, and engagements. It does not change the allocation of responsibility set out in the Terms & Conditions, and a signed Data Processing Addendum (“DPA”) controls only as to the specific matters it expressly addresses.

- 1. Operi as processor.** For personal data we process on a Client’s behalf to perform the Services, Operi generally acts as a processor and service provider acting on the Client’s documented instructions, and the Client is the controller and business responsible for that data.
- 2. Operi as controller.** For data we collect to operate our website, market our offerings, and administer our business, Operi acts as the controller and business and that use is governed by this Policy.

## 2. Information We Collect

We collect the categories of information described below. We do not require more than is reasonably necessary for the purposes set out in this Policy.

- 1. Information you provide.** Contact and account details such as name, business name, email, phone, and role; engagement, proposal, and billing information; and the content of messages and materials you send us.
- 2. Information collected automatically.** Device, browser, and log data such as IP address, pages viewed, referring URLs, and timestamps, collected through cookies and similar technologies when you use our website or Platform.
- 3. Information from third parties.** Referrals, publicly available business sources, analytics providers, and authorized integrations the Client connects to the Platform.
- 4. Client Data.** Data, files, and credentials a Client provides or grants us access to so we can perform the Services. Client Data is handled under the applicable SOW and, where required, a DPA, and the Client remains responsible for the lawfulness of that data.

### 3. How We Use Information

We use personal information to:

1. Provide, operate, maintain, and secure the Services and Platform;
2. Communicate about engagements, proposals, invoices, and support;
3. Process payments and keep business, tax, and accounting records;
4. Improve and develop our Services, including analytics and quality methods;
5. Detect, prevent, and respond to fraud, abuse, and security incidents;
6. Comply with legal obligations and enforce our agreements; and
7. Send relevant business communications, with consent where required by law.

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### 4. Legal Bases for Processing

Where the EU or UK GDPR applies, we rely on one or more of the following legal bases: performance of a contract with you; our legitimate interests in operating, securing, and growing our business in a manner not overridden by your rights; your consent, which you may withdraw at any time; and compliance with a legal obligation.

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### 5. Cookies and Tracking Technologies

Our website and Platform use cookies and similar technologies. Strictly necessary cookies enable core functionality and cannot be switched off. Analytics and preference cookies help us understand usage and improve the experience, and we use them only where permitted

or with your consent. You can control non-essential cookies through your browser settings or any consent tool we provide; disabling some cookies may affect functionality.

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### 6. How We Share Information

We share personal information only as described here:

1. **Service providers and subprocessors.** With vendors that host, support, or help us deliver the Services under contractual confidentiality and security obligations.
2. **At Client direction.** With integrations and third-party services the Client authorizes or connects to the Platform.
3. **Legal and safety.** Where required by law, legal process, or to protect rights, safety, and the integrity of the Services.
4. **Business transfers.** In connection with a merger, acquisition, financing, or sale of assets, subject to this Policy.

**We do not sell your personal information**, and we do not "share" it for cross-context behavioral advertising as those terms are defined under the CCPA/CPRA.

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### 7. Data Retention

We retain personal information for as long as needed to provide the Services, operate our business, and meet legal, tax, accounting, and recordkeeping requirements, after which we delete or de-identify it. Client Data is retained and returned or deleted in accordance with the applicable SOW or DPA, subject to legal-hold and backup-cycle limitations.

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## 8. Data Security — Allocation of Risk

We use commercially reasonable, industry-appropriate measures to protect personal information within systems under our direct control.

1. **No guarantee.** No method of transmission or storage is completely secure, and we cannot guarantee that any Service, Platform, or data will be free from unauthorized access or other security incidents.
2. **Shared responsibility.** Clients are responsible for securing their own systems, devices, credentials, and accounts, and for maintaining independent backups of Client Data.
3. **Relationship to the Terms.** This section supplements and does not limit Section 9 (Data Handling and Security) of the Terms & Conditions, which governs allocation of risk.

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## 9. Your Privacy Rights

Depending on where you live, you may have the following rights regarding personal information we control. We will not discriminate against you for exercising them.

1. **EU/UK (GDPR).** Access, correction, erasure, restriction, portability, objection, and the right to withdraw consent and lodge a complaint with a supervisory authority.
2. **California (CCPA/CPRA) and similar U.S. laws.** The right to know, access, delete, and correct personal information, to opt out of any sale or sharing, and to limit the use of sensitive personal information.

To exercise a right, contact us using the details below. We will verify your request and respond within the time required by applicable law. Authorized agents may submit requests with proof of authorization. Where Operi acts as a processor, we will refer requests about Client Data to the relevant Client controller and assist as required.

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## 10. International Data Transfers

Operi is based in the United States, and we may process and store information in the U.S. and other countries. Where we transfer personal data subject to the EU/UK GDPR, we use an approved transfer mechanism, such as the Standard Contractual Clauses, together with appropriate safeguards.

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## 11. Children's Privacy

The Services are intended for business and professional use and are not directed to children. We do not knowingly collect personal information from anyone under 16. If you believe a child has provided us personal information, contact us and we will delete it.

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## 12. Third-Party Links and Services

Our website, Platform, and Deliverables may link to or integrate third-party sites and services that Operi does not control. We are not responsible for their content or privacy practices, and their own policies govern your use of them.

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## 13. Changes to This Policy

We may update this Policy from time to time. The current version is posted at [operi.solutions](https://operi.solutions) with a "Last Updated" date, and material changes take effect when posted or as otherwise stated. Your continued use of the Services after a revised version is posted constitutes acceptance of the updated Policy.

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## 14. Contact Us

For privacy questions or to exercise your rights, contact Operi LLC through [operi.solutions](https://operi.solutions) or by writing to Megan Ayala, Operi LLC, Missouri, USA. We will route your request to the appropriate person and respond as required by applicable law.