

Privacy Policy

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1. Introduction

Landa Solutions Ltd. DBA Kleerr, together with its affiliates and subsidiaries (collectively "Company", "we", "us", or "our") operates the website www.kleerr.com (the "Website") and provides related services (collectively, the "Services"). This Privacy Policy explains how we collect, use, disclose, and safeguard your information when you visit our Website or use our Services and our practices for collecting, using, maintaining, protecting, safeguarding and disclosing your information.

We are committed to protecting your personal information and your right to privacy. If you have any questions or concerns about this Privacy Policy or our practices, please contact us at info@kleerr.com.

Please read this Privacy Policy carefully to understand our policies and practices for collecting, processing, and storing your information. If you do not agree with our policies and practices, your choice is not to use our Website. By accessing or using this Website, you indicate that you understand, accept, and consent to the practices described in this Privacy Policy. This Privacy Policy may change (see [Changes to This Privacy Policy](#)) to reflect changes in our practices from time to time. Your continued use of this Website after we make changes indicates that you accept and consent to those changes, so please check the Privacy Policy periodically for updates. Significant changes will be communicated to you and will require your consent if necessary.

2. Information We Collect

We collect information from and about users of our Website and Services, including:

2.1. Personal Information

Identification Data: that we can reasonably use to directly or indirectly identify you, such as your name or company name, mailing address, e-mail address, telephone number, Internet protocol (IP) address used to connect your computer to the Internet, user name or other similar identifier, billing and account information to or provide to us through the Website (including through email, text, or other electronic messages between you and the Website), and any other identifier we may use to contact you ("personal information");

We provide an opportunity for any user to unsubscribe or opt-out of contact for marketing purposes on an ongoing basis by using the unsubscribe mechanism at the bottom of our e-mails.

Account Credentials: Passwords and other security information for authentication and account access.

2.2. Non-Personal Information

Information that does not directly or indirectly reveal your identity or directly relate to an identifiable individual, such as demographic information, or statistical or aggregated information. Statistical or aggregated data does not directly identify a specific person, but we may derive non-personal statistical or aggregated data from personal information. For example, we may aggregate personal information to calculate the percentage of users accessing a specific Website feature;

2.3. Usage Data

Information about your interactions with our Website and Services, including the full Uniform Resource Locators (URLs), clickstream to, through and from our Website (including date and time), products you viewed or searched for, page response times, download errors, length of visits to certain pages, page interaction information (such as scrolling, clicks, and mouse-overs), methods used to browse away from the page, pages visited, links clicked, and other usage statistics.

2.4. Device and Technical Data

Device Information: IP address, browser type, operating system, device type, unique device identifiers, and other diagnostic data.

2.5. Cookies and Tracking Technologies

We use cookies, web beacons, pixels, and other tracking technologies to collect information about your browsing and usage activities. For more details, please refer to Cookies and Tracking Technologies below.

3. How We Use Your Information

We use the information we collect for various purposes, including:

- To Provide and Maintain Our Services: To operate, improve and administer our Website and Services.
- To Personalize Your Experience: To tailor content and features to your preferences.
- To Communicate with You: To send administrative information, respond to inquiries, and provide customer support.
- For Marketing and Advertising: To send you promotional materials and offers, and to analyze the effectiveness of our marketing campaigns.
- To Analyze and Improve Our Services: To understand how users interact with our Website and Services and to enhance user experience.
- To Enforce Our Terms and Policies: To comply with legal obligations and protect our rights and interests.

- To Detect and Prevent Fraud: To monitor for security breaches and protect against malicious, deceptive, fraudulent, or illegal activity.
- For any other purpose with your consent.

By using our Website, you consent to your personal information being collected, held and used in this way and for any other use you authorize. We will only use your information for the purposes described in this Privacy Policy or with your express permission.

We may also use your information to contact you about our own and third-party services that may be of interest to you, as permitted by law. If you do not want us to use your information in this way, please use the unsubscribe mechanism at the bottom of our e-mails.

4. Disclosure of Your Information

We may disclose aggregated information about our users, and information that does not identify any individual, without restriction.

We may disclose your personal information in the following circumstances:

- Service Providers: To contractors, affiliates, service providers, and other third parties who assist us in operating our business and providing our Services, and who are contractually obligated to keep personal information confidential, use it only for the purposes for which we disclose it to them, and to process the personal information with the same standards set out in this Privacy Policy.
- Business Transfers: In connection with a merger, sale of company assets, reorganization, financing, or acquisition of all or a portion of our business to another company whether as a going concern or as part of bankruptcy, liquidation, or similar proceedings, in which personal information held by us about our customers and users is among the assets transferred.
- Legal Obligations: To comply with any legal obligations, court orders, or governmental requests.
- Protecting Rights: To enforce our Terms and Conditions, protect our rights, privacy, safety, or property, and/or that of our affiliates, you, or others.
- Consent: With your explicit consent for any other purposes disclosed by us when you provide the information.

We may also disclose your personal information:

- To comply with any court order, law, or legal process, including to respond to any government or regulatory request, in accordance with applicable law.
- To enforce or apply agreements, including for billing and collection purposes.
- If we believe disclosure is necessary or appropriate to protect the rights, property, or safety of our Company, our customers, or others. This includes exchanging information

with other companies and organizations for the purposes of fraud protection and security risk reduction.

5. Transferring Your Personal Information

We may transfer personal information that we collect or that you provide as described in this policy to contractors, service providers, and other third parties we use to support our business (such as analytics and search engine providers that assist us with Website improvement and optimization) and who are contractually obligated to keep personal information confidential, use it only for the purposes for which we disclose it to them, and to process the personal information with the same standards set out in this Privacy Policy and in accordance with PIPEDA; HIPAA; GDPR; CCPR/CPRA; and other regional privacy laws and regulations where we operate.

We may process, store, and transfer your personal information in and to a foreign country, with different privacy laws that may or may not be as comprehensive as Canadian law. In these circumstances, the governments, courts, law enforcement, or regulatory agencies of that country may be able to obtain access to your personal information through the laws of the foreign country. Whenever we engage a service provider, we require that its privacy and security standards adhere to this Privacy Policy and applicable Canadian privacy legislation. Specifically, we operate in Canada, and our servers are located in the United States.

We use a third-party web hosting service provider, Amazon Web Services (AWS) to host our services and act as sub-processors on servers located throughout the world. At present, we use AWS servers located in the United States to host your personal information. At the time of subscribing to our services, we will reasonably attempt to allocate a server in a geographically proximate location to you to avoid cross-border transfer of personal information.

You consent to this potential transfer, storage, or processing by submitting your personal information or engaging with the Website.

Upon request, we will provide you with a list of third-party service providers used to host your personal information and the countries in which our servers are located.

6. Data Retention

Except as otherwise permitted or required by applicable law or regulation, we will only retain your personal information for as long as necessary to fulfill the purposes we collected it for, including for the purposes of satisfying any legal, accounting, or reporting requirements and we ensure the secure disposal of information no longer required. Under some circumstances, we may anonymize your personal information so that it can no longer be associated with you. We reserve the right to use such anonymous and de-identified data for any legitimate business purpose without further notice to you or your consent.

7. Security of Your Information

The security of your personal information is very important to us. We take reasonable administrative, electronic, technical, and physical measures to protect your personal information from unauthorized access, use, alteration, loss, theft, and disclosure. These measures include encryption, access controls, and secure hosting environments. The safety and security of your information also depend on you. Where we have given you (or where you have chosen) a password for access to certain parts of our Website, you are responsible for keeping this password confidential. We ask you not to share your password with anyone. We urge you to be careful about giving out information in public areas of the Website like message boards, which any Website visitor can view, or in communications with other users on the Website. It is your responsibility to keep your password or other forms of authentication to the website safe. You agree to notify us as soon as possible if you become aware of any misuse of your password and immediately change your password within the Website.

Unfortunately, the transmission of information via the Internet is not completely secure. Although we do our best to protect your personal information, we cannot guarantee the absolute security of your personal information transmitted to our Website.

8. Your Rights

Depending on your jurisdiction, you may have certain rights regarding your personal information.

8.1. European Economic Area (EEA) Residents

Under the General Data Protection Regulation (GDPR), you have the right to:

- Access: Request access to your personal data.
- Rectification: Request correction of inaccurate or incomplete data.
- Erasure: Request deletion of your personal data under certain conditions.
- Restriction: Request restriction of processing your personal data.
- Data Portability: Receive a copy of your personal data in a structured, commonly used, and machine-readable format.
- Objection: Object to the processing of your personal data for certain purposes.
- Withdraw Consent: Withdraw consent at any time where we are relying on consent to process your personal data.

To exercise these rights, please contact us at info@kleerr.com.

8.2. California Residents

Under the California Consumer Privacy Act (CCPA) and the California Privacy Rights and Enforcement Act (CPRA) California residents have the right to:

- Know: Request disclosure of categories and specific pieces of personal information collected.
- Delete: Request deletion of personal information.

- Opt-Out: Opt-out of the sale of personal information.
- Non-Discrimination: Not be discriminated against for exercising their privacy rights.

We do not sell personal information as defined under the CCPA. To exercise your rights, please contact us at info@kleerr.com.

8.3. Canadian Residents

Under the Personal Information Protection and Electronic Documents Act (PIPEDA), you have the right to:

- Access: Request access to your personal information.
- Correction: Request correction of inaccurate or incomplete personal information.
- Withdrawal of Consent: Withdraw consent to the collection, use, or disclosure of your personal information, subject to legal or contractual restrictions.

To exercise these rights, please contact us at info@kleerr.com. We may request specific information from you to help us confirm your identity and your right to access, and to provide you with the personal information that we hold about you or make your requested changes. Applicable law may allow or require us to refuse to provide you with access to some or all of the personal information that we hold about you, or we may have destroyed, erased, or made your personal information anonymous in accordance with our record retention obligations and practices. If we cannot provide you with access to your personal information, we will inform you of the reasons why, subject to any legal or regulatory restrictions.

9. Cookies and Tracking Technologies

As you navigate through and interact with our Website, we may use cookies or other automatic data collection technologies to collect certain information about your equipment, browsing actions, and patterns, including:

- Details of your visits to our Website, including traffic data, location data, logs, and other communication data and the resources that you access and use on the Website.
- Information about your computer and internet connection, including your IP address, operating system, and browser type.

The information we collect automatically is statistical data and does not include personal information and we may maintain it or associate it with personal information we collect in other ways, that you provide to us, or receive from third parties. It helps us to improve our Website and to deliver a better and more personalized service, including by enabling us to:

- Estimate our audience size and usage patterns.
- Store information about your preferences, allowing us to customize our Website according to your individual interests.

- Speed up your searches.
- Recognize you when you return to our Website.

The technologies we use for this automatic data collection may include:

- Cookies (or browser cookies). A cookie is a small file placed on the hard drive of your computer. You may refuse to accept browser cookies by activating the appropriate setting on your browser. However, if you select this setting you may be unable to access certain parts of our Website. Unless you have adjusted your browser setting so that it will refuse cookies, our system will issue cookies when you direct your browser to our Website.
- Flash Cookies. Certain features of our Website may use local stored objects (or Flash cookies) to collect and store information about your preferences and navigation to, from, and on our Website. Flash cookies are not managed by the same browser settings that are used for browser cookies.
- Web Beacons. Pages of our Website and our e-mails may contain small electronic files known as web beacons (also referred to as clear gifs, pixel tags, and single-pixel gifs) that permit the Company, for example, to count users who have visited those pages or opened an email and for other related website statistics (for example, recording the popularity of certain website content and verifying system and server integrity).

You may always choose not to provide Personal Information to us, but it may mean that we are unable to provide you with our services or access to the Website.

10. Third-Party Links

Our Website may contain links to third-party websites, plug-ins, applications, or services that are not owned or controlled by us. Clicking on those links or enabling those connections may allow the third party to collect or share data about you. If you follow a link to a third-party website or engage a third-party plugin, please note that these third parties have their own privacy policies, and we do not accept any responsibility or liability for these policies. We do not control these third-party websites. We are not responsible for the privacy practices of such third parties. We encourage you to review the privacy policies of every website you visit.

11. Children's Privacy

Our Services are not intended for individuals under the age of 18. We do not knowingly collect personal information from children under 18. If we become aware that we have collected personal information from a child under 18, we will take steps to delete such information promptly. If you believe we might have any information from or about a child under 18, please contact us at info@kleerr.com.

12. Withdrawing your Consent

Where you have provided your consent to the collection, use, and transfer of your personal information, you may have the legal right to withdraw your consent under certain circumstances. To withdraw your consent, if applicable, contact us at info@kleerr.com. If you do not want us to collect your information, you may opt-out at any time by clicking on the "unsubscribe" button at the bottom of the page. Note however, that opting out of the Website's collection of location information will cause its location-based features to be disabled. Please note that if you withdraw your consent we may not be able to provide you with a particular service. We will explain the impact to you at the time to help you with your decision.

13. Changes to This Privacy Policy

We reserve the right to update or modify this Privacy Policy at any time. We will notify you of any material changes by posting the new Privacy Policy on this page and updating the "Last Updated" date at the top. Your continued use of the Website and Services after any changes constitutes your acceptance of the revised Privacy Policy.

You are responsible for ensuring we have an up-to-date, active, and deliverable email address for you, and for periodically visiting our Website and this Privacy Policy to check for any changes.

14. Contact Us

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

Landa Solutions Ltd., DBA Kleerr

Email: info@kleerr.com

We have procedures in place to receive and respond to complaints or inquiries about our handling of personal information, our compliance with this Privacy Policy, and with applicable privacy laws. To discuss our compliance with this policy please contact us using the contact information listed above.

15. Processing of Visitors' Data

15.1. Role as Data Processor

We provide analytics services that involve collecting and processing personal data from visitors to our customers' websites ("Visitors") on behalf of our customers. In this context, our customers act as data controllers, and we act as a data processor in accordance with applicable data protection laws, including GDPR, CCPA/CPRA, HIPAA and PIPEDA.

15.2. Data Collected from Visitors

Types of Data Collected:

- IP addresses
- Device and browser information
- Pages visited and time spent
- Referral URLs
- Interaction data (e.g., clicks, scrolls)

15.3. Purpose of Processing

We process this data to provide our customers with insights into their website traffic and user behavior, enabling them to improve their services, content, and user experience.

15.4. Legal Basis for Processing

Our processing of Visitors' data is conducted under the instructions and legal authority of our customers. They are responsible for ensuring they have the appropriate legal basis (e.g., consent, legitimate interests) for collecting and processing Visitors' personal data.

15.5. Data Subject Rights

If you are a visitor to one of our customers' websites and wish to exercise your data protection rights (e.g., access, correction, deletion), please contact the website owner directly. We assist our customers in fulfilling these requests in accordance with applicable laws.

15.6. International Data Transfers

Visitors' data may be transferred to and processed in countries outside of the one in which it was collected, including Canada and the United States. We have implemented appropriate safeguards, such as Standard Contractual Clauses, to protect personal data during international transfers.

15.7. Data Retention

We retain Visitors' data only as long as necessary to provide services to our customers or as required by law. Upon termination of our agreement with a customer, we securely delete or anonymize the data.

15.8. Security Measures

We employ robust technical and organizational measures to protect Visitors' personal data, including:

- Data encryption in transit and at rest
- Access controls and authentication protocols
- Regular security assessments and audits
- Secure data storage facilities

16. Compliance with Google API Services User Data Policy and Limited Use Requirements

We confirm that Kleerr complies with Google's [API Services User Data Policy](#), including the [Limited Use requirements for Google Workspace APIs](#) and the [Limited Use requirements for Google Photos APIs](#).

Specifically:

- We only use data obtained via Google APIs to provide or improve user-facing features that are clearly prominent in our app's user interface.
- We do not use, transfer, or share user data to develop, improve, or train generalized AI/ML models. Any use of Workspace API data in LLM queries is solely for providing user-facing features in real time and not for training or improving models.
- We retain user data only as necessary to provide the requested services and implement appropriate security measures to protect data.
- We do not sell user data to third parties.

We affirmatively state that our use of data obtained from Google APIs adheres to the [Limited Use](#) requirements outlined in the above policies.

For further information, please contact us at info@kleerr.com.