



POWERED BY REC

Privacy Policy

Updated June 12, 2024

This Privacy Policy discloses the privacy practices for the site <https://ciello.com/> and various related services and applications (together referred to as the "Sites"). Ciello, Inc. ("we," "us" or "our") is committed to protecting and respecting your privacy. If you access our Sites, or purchase or Use our products or services, we may collect – or you may provide to us - certain information that is personal to you.

This policy describes what information we collect, how we may use that information, and how we keep it confidential. You acknowledge that this Privacy Policy is part of our Site Terms of Use, and by accessing or using our site, you agree to be bound by all of its terms and conditions.

We sell and provide our products and services from, and only within, the United States. We do not condone, or have any responsibility for, the privacy policies or actions of distributors and resellers of our products and/or services.

This policy explains the information we might collect, use, share, and keep about you, and may change from time to time so please check back here frequently. If you disagree with this Privacy Policy, please discontinue using our services and/or purchasing our products.

This Privacy Policy applies to any other agreement you may have with us, including without limitation and by way of example only, our application terms and conditions, our Telephone Service Agreement, and our Internet Service Agreement you may have entered. Our terms, any other agreement we may enter into with you, and this Privacy Policy are collectively referenced herein as our "Terms."

This Privacy Policy applies to:

- Visitors, entities, or persons who:
 - Access/view any of our websites, blogs, social media, and Internet pages (including <https://ciello.com> (collectively referenced as "Sites"),
 - who request information by e-mail or telephone,
 - who provide User Content or upload Personal Data to our Sites or send such information to us,
 - who apply for a job with us or work with us,
 - who participate in any survey or contest;
 - who interact with us on social media.
- Customers who use our application;
- Customers who purchase or Use our products or services;
- Resellers and distributors who offer, ship, or sell our products or services.

The legal definition of Personal Data varies by location. If you are located in the U.S., the legal definition in Colorado shall apply. If you are located outside the U.S., only the legal definition that applies in your physical location will apply to you under this Privacy Policy. Nothing in this Privacy

Policy is meant to alter the applicable law governing this Policy and our Terms. You agree that any claim or dispute that you may have relating to our Terms shall be resolved pursuant to Colorado law and shall only be brought in a court of competent Jurisdiction located in the State of Colorado, U.S.A.

CONSENT

You are not required to provide us with Personal Data, however, some of our products and services may not be available if you decide not to provide certain types of information.

By accessing our Sites, purchasing or using our products, and services and/or providing information to us, you do so voluntarily and are expressly opting-in and unambiguously consenting to the collection, use, retention, disclosure, and transfer, including cross-border transfer, of your Personal Data as explained in this policy.

We may, from time to time, send you email regarding our products and services. Only Ciello, Inc. (or agents working on behalf of Ciello, Inc. and under confidentiality agreements) will send you these direct mailings and only if you indicated that you do not object to these offers. If you do not want to receive such mailings, simply tell us when you give us your personal information or, at any time by following the steps below.

You also have choices with respect to cookies, as described below. By modifying your browser preferences, you have the choice to accept all cookies, to be notified when a cookie is set, or to reject all cookies. If you choose to reject all cookies some parts of our site may not work properly in your case.

MINORS

Our policy is that we do not knowingly collect, use or disclose Personal Data from anyone under the age of majority under Colorado Law. Our products and services are directed at people who are at least the age of majority where they live. If you believe your child has provided us with information, please contact us by email at power@slvrec.com and we will promptly delete such Personal Data.

PERSONAL DATA-UNRELATED THIRD PARTIES

We do not share, sell, or rent Personal Data to unrelated third parties without providing you a choice unless required to do so by applicable law.

Personal Data that you provide to us may be used to contact you for promotional offers, marketing programs, or other communications from us, our vendors, contractors, affiliates, licensors, licensees (other than you), or Business Partners. If you are accessing our Sites or using or purchasing our products and services through an employer, please be aware that your employer may have authorized us to use and/or share Personal Data. If you have questions about this, please speak with your employer.

We may share Personal Data with fraud protection providers to verify your identity; and we may share such data with law enforcement where required or permitted by applicable law.

Except as otherwise discussed in this Privacy Policy, this document only addresses the use and disclosure of information we collect from you. Other sites accessible through our site have their own privacy policies and data collection, use and disclosure practices. Please consult each site's privacy policy. We are not responsible for the policies or practices of third parties. Additionally, other companies may collect information about you when you view or click on their advertising through the use of cookies. We cannot control this collection of information. You should contact these companies directly if you have any questions about their use of the information that they collect.

PERSONAL DATA- BUSINESS PARTNERS

Our Business Partners who have access to your Personal Data in connection with providing products or services to us or you (e.g., software developers, credit card processors, and/or customer relationship management (“CRM”) services) are not permitted to use this information for any other purpose than to carry out the services they are performing or to market our products to you as long as you have the option to opt out of that communication.

When we make Personal Data available to our Business Partners, we will not share with them any more information than is necessary. We will use reasonable efforts to ensure, by contract or otherwise, that they use your Personal Data in a manner that is consistent with this Privacy Policy.

INFORMATION WE MAY COLLECT FROM YOU

We or our Business Partners may collect the below categories of information.

- **Contact Information.** Name, address, email address, telephone number, and username or social media handle.
- **Device Information.** Networking and device information, such as your MAC address, IP address, language settings, operating system version, pages visited, time spent on a Site, your use of hyperlinks on our Sites, and/or other online identifiers in compliance with your device permissions.
- **Demographics.** This may include your age, sex, and gender (some of which may be protected by applicable law).
- **Commercial information.** Purchased or considered products or services, returned products, product and service preferences.
- **Payment information.** Payments made, payment information (including payment card number, expiration date, delivery address, and billing address).
- **Identity verification information.** Username, loyalty ID, member ID, and other authentication information (like passwords).
- **Site activity.** Interaction with our Sites and how you came to our Site.
- **Geolocation information.** Identification of your physical location (e.g., GPS coordinates or the approximate location of your mobile device).
- **Audio and visual information.** Recordings of your voice when you contact our customer service.
- **Professional information.** Information relating to your employment, resume, employment history, education information, and/or professional licenses or certifications.
- **User Content.** Any text, audio, video, or multi-media information you share with us (e.g., photographs and images, videos, reviews, articles, survey responses and comments).
- **Inferences.** We may also derive or infer information about you based on the other types of data we collect (e.g., we may infer your location based upon your IP address or that you are interested in purchasing a particular product based upon your browsing behavior on our Sites).
- **Information collected by cookies, web beacons, and other tracking technologies.** This may include Internet service provider (ISP), Mobile Advertising ID, media access control (MAC) address, or identifiers associated with such technologies. You may alter “cookie” preferences in your browser.
- **Video monitoring and recording.** We may deploy such recording in our offices or during customer support communications.
- **Information collected from third-party social media and communication services.** Such information may include other websites that you use to interact with our Sites (e.g., Facebook®, Twitter® (n/k/a “X”), Google®, Pinterest®, and Instagram®), but we will only collect such information in accordance with the authorization and privacy settings you establish in those third-party services.

- **Information from unaffiliated service providers.** Such information may include, by way of example only, analytics companies and advertising networks.

We may collect information through a variety of means.

- **Through you.** If you download marketing collateral, contact us with a question or complaint, Use one of our mobile applications (if any), execute a signed media consent, purchase or Use a product or service, create an account with us, respond to a survey, participate in a contest, make an appointment, attend an event, apply for employment, or sign up to receive marketing.
- **Through your family and friends.** If someone makes a referral or sends you a gift.
- **Through automatic means.** We and our Business Partners use technologies such as video and sound recordings, cookies, web beacons, tags, and other technologies to analyze Site traffic, purchases, to provide products and services and customer support. These technologies enable us, or our Business Partners, to collect information such as device identifiers and online or other network activity information. NOTE: Cookies are small text files that websites send to your computer or mobile devices to uniquely identify your browser or to store information or settings in your browser. Web beacons or pixel tags are small images embedded into our Sites or emails that provide us with information about your browser or device, or whether you open or click on our emails.
- **Through our Business Partners.** Such partners may collect demographic information, analytics, credit card information, name, telephone number, shipping and billing addresses, email, professional titles and licensing information, product and purchase information and preferences, and employment information.
- **Through SMS/MMS Mobile Messaging Marketing.** This includes, but is not limited to, sharing information with platform providers, phone companies, and other vendors who assist us in the delivery of mobile messages.
 - WE DO NOT SELL, RENT, LOAN, TRADE, LEASE, OR OTHERWISE TRANSFER FOR PROFIT ANY PHONE NUMBERS OR CUSTOMER INFORMATION COLLECTED THROUGH SUCH MESSAGING TO ANY THIRD PARTY. Nonetheless, we reserve the right at all times to disclose any information as necessary to satisfy any law, regulation, or governmental request, to avoid liability, or to protect our rights or property.
- **Through social media and third-party Internet websites.** We obtain your information from third-party websites if you access our Sites using your credentials from such third-party websites.
- **CPNI.** In the course of providing telephone services to you, Ciello, Inc. along with its external service providers, may obtain certain information (“Customer Proprietary Network Information” or “CPNI”) such as time of call, number called, length of call, etc., as well as the other subscribed services. CPNI includes all information necessary to bill you for these services. Both United States Federal Law and the Federal Communications Commission (“FCC”) impose strict requirements on service providers about how they can use CPNI information, and the measures required to protect such information from disclosure. The law also prohibits the unauthorized sale or transfer of confidential phone records or the purchase or receipt of such information with knowledge that it was obtained fraudulently or without authorization. Ciello, Inc. has taken measures to protect all of our customers’ CPNI and is in full compliance with these laws. Both federal law and the FCC rules impose a general duty on service providers to protect the confidentiality of your customer information. Ciello, Inc. may only use, disclose, or permit access to your customer information in these circumstances: (1) as required by law; (2) with your approval; and (3) in providing the service from which the customer information is derived. Only if customer designates another party to have access to their CPNI information will Ciello, Inc. provide such information to that designated party.

We use your Personal Data for legitimate business purposes such as direct marketing,

- taking necessary steps to respond to a request, fulfill orders,
- providing and offering products and services,
- auditing our interactions with you to measure the effectiveness of our products, services, and advertisements,
- identifying and repairing bugs on our Sites and within our applications,
- processing payments,
- research and development,
- quality assurance, and
- furthering our business goals.

Your Personal Data may be available to our employees, contractors, and Business Partners with a legitimate business need, such as resellers or distributors, our marketing team, order fulfillment team, operations team, survey processors, contest judges, customer relationship management (CRM) providers, software providers, and credit card processors. Your Personal Data may also be utilized by your employer if you have an account through that employer.

We do not request or require you to provide any special categories of Personal Data including, for example, genetic data, biometric data, or information relating to your racial or ethnic origin, political opinions, religious beliefs, trade union membership, physical or mental health, or sexual orientation. If we become aware of any such data having been submitted to us, we will, where reasonably practicable, endeavor to delete it.

OPT OUT - CAN-SPAM COMPLIANCE

Emails. You may unsubscribe from our emails at any time by clicking on the “unsubscribe” link in the emails you receive. Please note that it may take up to 10 business days for us to process opt-out requests. If you opt-out of receiving emails about recommendations or other information we think may interest you, we may still send you emails about your account or any product or service you have requested or received from us.

Text Messages. You may opt out of receiving text messages from us by replying STOP to the text message received. Note that this will only opt you out of messages associated with that specific number.

Postal Mail. You may opt out of receiving postal deliveries by contacting our office by email at power@slvrec.com and providing us with your name, address, and request to stop all communications. We will retain your information for a reasonable period of time in order to process your request and will then delete, anonymize, or pseudonymize such information so that it cannot be associated with you.

Push Notifications. If you download an application to a computer or mobile device, we may provide you with the option to receive push notifications. You may opt out of such notifications by adjusting your computer or mobile device’s location services settings.

Geolocation. When you Use our mobile application(s), we may ask you to share your location. You may opt out of sharing such information by adjusting your computer or mobile device’s location services settings.

COOKIES

A “Cookie” is a small data file generated by a website and saved by your web browser. Cookies may provide us with information about you. When you visit our Sites or view, Use, or purchase our products or services we may use the below types of Cookies.

- **Strictly Necessary Cookies.** These Cookies enable you to browse our Sites and use features.
- **Session Cookies.** Our Sites use session Cookies which your computer stores only for that browsing session. Once you close your browser, the Cookie is deleted. These Cookies allow Users to navigate around our Sites using your login details without having to login again on every page.
- **Performance Cookies.** These Cookies collect information about how visitors utilize our Sites allowing us to improve the Sites. These Cookies also let Business Partners know if you came to a Site from a Business Partner's website and if your visit resulted in a purchase or Use of our products or services. Only your IP address or domain name and Uniform Resource Identifier ("URI") or web address are collected.
- **Functionality Cookies.** These Cookies allow our Sites to remember choices you make while browsing the Sites. We may store geographic location to ensure a Site is optimized for your area or we may store text, font, or other customizable elements. These Cookies will not track your browsing activity on other websites.
- **Targeting or Advertising Cookies.** These Cookies are used to deliver advertising more relevant to you and your interests. They are also used to limit the number of times you see an advertisement as well as help measure the effectiveness of the advertising campaign. They are usually placed by advertising networks with the website operators' permission. They remember that you have visited a website, and this information is shared with other organizations such as advertisers.
- **Web Beacons and Parameter Tracking.** These Cookies count visitors to our Sites after clicking through from one of our advertisements on another website or in e-mails and to collect details of any products purchased.
- **Google Analytics Tracking Cookies.** These Cookies allow us to understand more about Site visitors, such as the number of visits, details of the devices used to access our Sites, which Site pages are accessed, and the various time details per visit. We currently do not change our tracking practices in response to "do-not-track" signals or other similar mechanisms as a uniform standard has not yet been established. You may read more about how Google® uses this information at <https://marketingplatform.google.com/about/analytics/terms/us/>. Third parties that have content, products, or services on our Sites such as a social feature, an analytics service, or an advertising network partner, may obtain information about your browsing or usage habits. These third parties do not change their tracking practices in response to "do-not-track" signals from your web browser and we do not obligate these parties to honor "do-not-track" signals.

YOU MAY DISABLE SOME OR ALL COOKIES IN YOUR BROWSER SETTINGS. PLEASE KEEP IN MIND, DISABLING ALL COOKIES MAY IMPAIR FUNCTIONALITY AND YOU MAY NOT BE ABLE TO USE SOME FEATURES OF OUR SITES.

WHERE WE STORE YOUR PERSONAL DATA

We use servers in the United States to process and store Personal Data. Specifically, our website is hosted with Touchstone Energy Cooperatives, Inc.

(Privacy Policy: <https://www.touchstoneenergy.com/legal>)

While no server can be completely secure, we make reasonable efforts to ensure that servers where data is kept are in a secure, locked environment with restricted access and we have on our own, and in conjunction with the third parties who operate the servers, established physical, electronic, and procedural safeguards to protect your information.

Personal Data stored by us may be accessed and processed by staff operating outside your jurisdiction, who work either for us or for one of our Business Partners. This staff may be engaged in fulfilling your order or request, processing a payment, and/or providing support services to us. We require these Business Partners to agree to treat your Personal Data securely and in accordance with this Privacy Policy and applicable law.

We have implemented a variety of technical and organizational measures to protect Personal Data from loss, misuse, unlawful processing, unauthorized access, disclosure, copying, alteration, and destruction. These include limiting access to the databases to a limited number of authorized staff who can only access the database for legitimate pre-authorized purposes. Further, access to the databases is password protected. We also have in place audit logs, intrusion detection software, anti-virus or malware protection, and system integrity tools to further protect data stored on these databases.

PASSWORDS

Where we have provided you (or where you have chosen) a password that enables you to access certain portions of our Sites or to Use or purchase our products or services, you are responsible for keeping this password confidential. You are responsible in protecting your account by not sharing your password with anyone.

HACKERS

While we make reasonable and industry-standard efforts to ensure the integrity and security of our network and systems using the standard measures in place through our Sites' host(s), we cannot guarantee that such security measures will prevent third-party "hackers" from illegally obtaining this information.

We are not responsible for circumvention of any privacy settings or security measures contained in our Sites, including the illegal acts of third parties (such as criminal hacking).

We disclaim any and all liability for disclosure of any information obtained due to errors in transmission or the unauthorized acts of third parties as more specifically detailed in our Disclaimers. **ANY TRANSMISSION IS AT YOUR OWN RISK.**

THIRD PARTY WEBSITES

Our Sites may, from time to time, contain links to and from the websites of third parties. If you follow a link to any of these websites, please note that these websites and any products or services that may be accessible through them have their own privacy policies and that we do not accept any responsibility or liability for these policies or for any Personal Data that may be collected through these websites. This includes any posting you may make on our social media page(s); which page(s) are controlled by such third-party social media websites.

We urge you to exercise care when providing information to anyone and to check the policies and terms of all third-party websites before you submit any Personal Data.

SOCIAL MEDIA

When you use features such as social networking, chat rooms, or forums, you should take precautions not to submit any Personal Data that you do not want to be seen, collected, or used by others.

Our Sites may include features from social media websites. These features may collect your IP address, which page you are visiting on our Sites, and may set a Cookie to enable the feature to function properly. Social media features are either hosted by a third party or hosted directly on our Sites. This Privacy Policy does not apply to these features. Your interactions with these features are governed by the privacy policy, terms, and other policies of the companies providing those features.

RETENTION

The amount of time we hold your Personal Data will vary but will not be kept for longer than is necessary for the purposes for which it is being processed. To request deletion of your account, contact power@slvrec.com.

MyCIELLO APPLICATION ACCOUNT DELETION

TO DELETE YOUR MyCIELLO APPLICATION ACCOUNT, SEND A MESSAGE TO POWER@SLVREC.COM VIA EMAIL. IN THE SUBJECT LINE OF YOUR EMAIL, INCLUDE THE PHRASE “MyCIELLO ACCOUNT DELETION.” IN THE BODY OF YOUR EMAIL, PROVIDE YOUR USERNAME AND/OR EMAIL ASSOCIATED WITH THE ACCOUNT. UPON RECEIPT OF THE EMAIL, WE WILL DISASSOCIATE YOUR ACCOUNT FROM YOUR EMAIL AND DELETE YOUR ACCOUNT. WE WILL NOT RETAIN ANY INFORMATION RELATED TO YOUR MyCIELLO APPLICATION ACCOUNT.

REQUESTS FOR INFORMATION

We will retain your Personal Data solely for the legitimate business purpose of responding to your request or inquiry and to communicate with you regarding our other products and services. You may opt out of such communications as detailed in this policy.

CLIENTS

If you provide us with a username for online payments or credit card information, we, or our Business Partners, such as credit card processors will maintain that information for as long as we are conducting business together (for instance, if you have an account with us) in order to accept or send automatic payments. If you provide such information for one-time payments, we will delete such information as soon as the one-time transaction is completed.

LAW ENFORCEMENT

We may retain Personal Data shared with law enforcement where required or permitted by applicable law if necessary to protect our legitimate business interests or if required by such law enforcement.

YOUR RIGHTS

You have certain rights in relation to the Personal Data we process. These rights to access, correct, amend, or delete Personal Data vary by location and only the rights available to you in your physical location will be enforceable by you under this Privacy Policy.

Typically, you have the following rights:

The right to access your Personal Data unless access is subject to a legal exception.

- The right to have your Personal Data corrected if it is inaccurate or incomplete.
- The right to have your Personal Data not processed.
- The right to have your Personal Data erased if it is no longer necessary or required in relation to the purposes and there are no other overriding legitimate grounds for us to continue processing it.
- The right to opt out if your Personal Data is to be used for a purpose that is materially different from the purpose(s) for which it was originally collected or you subsequently authorized.
- The right to complain to a supervisory authority if you think your rights have been infringed.
- You may also have the right to request that a business disclose the categories or details of Personal Data collected.

To exercise your rights, you may make an inquiry by sending an email request directly to us at power@slvrec.com. In some cases, you may need to discuss deletion with your employer if you access our Sites or purchase or Use our products or services through your employer.

We will respond to your request in accordance with the laws that apply to you. When you make your request, we will maintain your request and related Personal Data as we maintain other Personal Data in order to respond, after which time we will delete the Personal Data provided in the request.

Access requests are free; however, we reserve the right to charge a reasonable fee to comply with your request when your request is unfounded or excessive.

TRANSFER OF PERSONAL DATA OUTSIDE OF THE UNITED STATES

In some instances, we may transfer your Personal Data in our possession to countries other than the country in which the information was originally collected, and that data may be processed and stored outside of your country of residence. Those countries may not have the same data protection laws as your country of residence and your Personal Data will be subject to applicable foreign laws. When we transfer your information to other countries, we will use industry-standard measures to protect your data in the manner described in this policy.

In the case of individuals located in countries where the General Data Protection Regulation (“GDPR”) applies, to the extent we transfer Personal Data to our office, or our Business Partners’ offices, in the U.S., we make efforts to comply with the GDPR. To the extent we transfer Personal Data to Canada, for the purposes set out in this Privacy Policy, we rely on the fact that Canada has been designated by the European Commission as a country that offers an adequate level of protection for Personal Data.

We provide reasonable technical and organizational measures to protect Personal Data from accidental or unlawful destruction, accidental loss, alteration, unauthorized disclosure or access.

COMPLAINTS | ACCESSIBILITY

If you have a complaint regarding this Privacy Policy or how your Personal Data is being maintained, used, or processed, you should first contact us at power@slvrec.com. If you would like us to read this Privacy Policy to you, please contact us at 719.852.3538.

CONTACT

Questions, comments, notices, and requests regarding this Privacy Policy are welcomed and should be emailed to power@slvrec.com. Please make sure that you identify the Site and/or service through which you submitted Personal Data to enable us to identify your records. We will respond to your communications within thirty (30) days unless your request involves information that requires significant and/or unusual research.

CHANGES TO PRIVACY POLICY

We reserve the right to change this Privacy Policy at any time. Such changes, modifications, additions or deletions shall be effective immediately upon notice thereof, which may be given by means including, but not limited to issuing an email to the email address listed by registered users and posting the revised Policy on this page. You acknowledge and agree that it is your responsibility to maintain a valid email address as a registered user, review this site and this Policy periodically and to be aware of any modifications. Your continued use of the site after such modifications will constitute your: (a) acknowledgment of the modified Policy; and (b) agreement to abide and be bound by the modified Policy. You may be required to review and acknowledge our Privacy Policy prior to purchasing or Using our products or services.

DEFINITIONS

“Business Partners” are individuals or companies with whom we enter into agreements to provide services or products and/or that assist with maintaining our products and services, including without limitation, and by way of example only, processing payments, analyzing traffic, providing software, assisting with customer service, distributing and/or selling products or services, and communicating with clients.

“Jurisdiction” means the Rio Grande County, Colorado and/or the U.S. District Court located closest to Ciello, Inc. principal place of business in Colorado should U.S. Federal laws apply. This Jurisdiction is the sole appropriate location to bring any Claims against us that are related to our Terms, Privacy Policy, and any other agreements we may have with you that we have approved and executed, your Use of our Sites or services, and your purchase of our products or services. All Claims shall be determined pursuant to Colorado law unless U.S. Federal law applies. You agree that the Colorado courts and U.S. District Court of Colorado will have personal and subject matter jurisdiction over you and Claims you make against or involving us.

“Personal Data” is defined differently depending on where you reside. If you reside in the United States, to the extent appropriate under applicable laws, Colorado law shall control in this Privacy Policy. In the event you are located elsewhere in the world, Personal Data will be defined by the applicable laws where you reside, however, these laws shall not over-ride Jurisdiction (in Colorado) or any other of the rights and obligations contained in our Terms.

“Use,” “Using” or “Used,” as to our products or services, means accessing, viewing, displaying, downloading, or operating Ciello, Inc. Sites or software or purchasing our products for resale (if authorized) or for personal Use for their intended purposes. If services include software or applications, Use includes downloading an application or program on a single computer or device. “Use” includes transmitting our software services, in whole or in part, to hardware to process information contained therein. Use does not permit further transfer without our written authorization. In the event you are an employer and multiple authorized devices are licensed, Use also includes your employees downloading, viewing, and accessing our services.

“User Content” means any information or material in any form or format, whatsoever, that you may upload to our Sites or provide to us while using or accessing or using our services or purchasing our products, and any portion thereof. Examples include, but are not limited to, photos, videos, audio files, text messages, comments, and recommendations.