

CLOSE HER

Privacy Policy

Effective Date: December 17, 2025

1. Introduction

Valentina Murra LLC, doing business as CloseHer ("CloseHer," "we," "us," or "our"), is committed to protecting the privacy and security of your personal information. This Privacy Policy describes how we collect, use, disclose, and safeguard your information when you access or use our website, online coaching platform, training portal, community features, and related services (collectively, the "Services").

By accessing or using the Services, you acknowledge that you have read, understood, and agree to be bound by this Privacy Policy. If you do not agree to this Privacy Policy, please do not access or use our Services.

2. Information We Collect

2.1 Information You Provide Directly

We collect information you voluntarily provide when you:

- Create an account or register for our Services
- Purchase or enroll in our coaching programs, training modules, or Offer Network access
- Complete onboarding forms, goal-mapping questionnaires, or intake surveys
- Participate in 1:1 coaching calls, group coaching sessions, or live workshops
- Access the training portal on School or engage with course materials
- Participate in community discussions, forums, or messaging features
- Apply for opportunities through our Offer Network
- Contact us with questions, feedback, or support requests
- Subscribe to newsletters or marketing communications

This information may include:

- **Personal Identifiers:** Name, email address, phone number, mailing address
- **Professional Information:** Current employment status, work history, sales experience, career goals, income objectives
- **Payment Information:** Credit card details, billing address (processed securely through third-party payment processors)
- **Application Materials:** Resumes, cover letters, role preferences, and other materials submitted through the Offer Network
- **Communications:** Content of messages, coaching call notes, and community posts

2.2 Information Collected Automatically

When you access or use our Services, we may automatically collect:

- **Device Information:** Device type, operating system, browser type, unique device identifiers
- **Usage Data:** Pages visited, features accessed, training modules completed, time spent on the platform
- **Log Data:** IP address, access times, referring URLs, clickstream data
- **Cookies and Tracking Technologies:** Information collected through cookies, web beacons, and similar technologies

2.3 Information from Third Parties

We may receive information about you from third-party sources, including our platform hosting providers (such as School/Whop), payment processors, Offer Network partner companies, and publicly available sources.

3. How We Use Your Information

We use the information we collect for the following purposes:

- **Service Delivery:** To provide, maintain, and improve our coaching programs, training portal, community features, and Offer Network access
- **Account Management:** To create and manage your account, process transactions, and communicate about your enrollment
- **Personalization:** To personalize your experience, including tailoring training roadmaps and role recommendations based on your goals and strengths
- **Coaching Support:** To facilitate 1:1 and group coaching sessions, track progress, conduct call reviews, and provide performance optimization guidance
- **Offer Network Facilitation:** To connect you with guaranteed interview opportunities, facilitate introductions to hiring managers, and coordinate with partner companies
- **Communication:** To send administrative notices, respond to inquiries, and provide customer support
- **Marketing:** To send promotional materials, newsletters, and information about new features or opportunities (with your consent where required)
- **Analytics:** To analyze usage patterns, measure program effectiveness, and improve our Services
- **Compliance:** To comply with legal obligations, enforce our Terms of Service, and protect our rights
- **Quality Assurance:** To record coaching calls and workshops for training and quality improvement purposes

4. How We Share Your Information

We may share your information in the following circumstances:

4.1 Offer Network Partners

When you apply for opportunities through our Offer Network, we share relevant professional information (such as your resume, application materials, and training completion status) with our vetted partner companies. These companies are independent third parties, and their use of your information is governed by their own

privacy policies. CloseHer does not control the hiring practices or data handling of Offer Network partners.

4.2 Service Providers

We engage third-party service providers to perform functions on our behalf, including payment processing (Whop/Stripe), platform hosting (School), email delivery, analytics, and customer support. These providers have access to your information only to perform their designated functions and are contractually obligated to protect your data.

4.3 Community Features

Information you share in community forums, group coaching sessions, or public discussions may be visible to other members. Please exercise caution when sharing personal information in these settings.

4.4 Legal Requirements

We may disclose your information if required by law, subpoena, court order, or government request, or when we believe disclosure is necessary to protect our rights, your safety, or the safety of others, investigate fraud, or respond to a government request.

4.5 Business Transfers

In the event of a merger, acquisition, reorganization, or sale of assets, your information may be transferred as part of that transaction. We will notify you of any such change and any choices you may have regarding your information.

4.6 With Your Consent

We may share your information for other purposes with your explicit consent.

5. Cookies and Tracking Technologies

We use cookies and similar tracking technologies to collect and store information about your interactions with our Services. These technologies help us:

- Remember your preferences and login information
- Understand how you interact with our platform
- Analyze the effectiveness of our marketing efforts
- Improve the functionality and user experience of our Services

You can control cookies through your browser settings. However, disabling cookies may limit your ability to use certain features of our Services.

6. Data Security

We implement reasonable administrative, technical, and physical security measures designed to protect your personal information from unauthorized access, use, disclosure, alteration, or destruction. These measures include encryption, secure servers, access controls, and regular security assessments.

However, no method of transmission over the Internet or electronic storage is completely secure. While we strive to protect your information, we cannot guarantee absolute security. You are responsible for maintaining the confidentiality of your account credentials and for any activity under your account.

7. Data Retention

We retain your personal information for as long as necessary to fulfill the purposes for which it was collected, including to satisfy legal, accounting, or reporting requirements. Retention periods may vary based on the type of information and our business needs.

For members who maintain lifetime community access, relevant account and training information will be retained to facilitate ongoing access to updated resources, job postings, and the Offer Network.

Recorded coaching calls and workshop sessions may be retained for training and quality purposes as described in our Terms of Service.

8. Your Rights and Choices

Depending on your location, you may have certain rights regarding your personal information:

- **Access:** Request a copy of the personal information we hold about you
- **Correction:** Request correction of inaccurate or incomplete information
- **Deletion:** Request deletion of your personal information, subject to certain exceptions
- **Opt-Out:** Opt out of marketing communications at any time by clicking the "unsubscribe" link in our emails
- **Portability:** Request a copy of your data in a portable format
- **Restriction:** Request restriction of certain processing activities

To exercise these rights, please contact us at valentinamurra@closeher.com. We will respond to your request within the timeframe required by applicable law.

9. California Privacy Rights

If you are a California resident, you may have additional rights under the California Consumer Privacy Act (CCPA) and the California Privacy Rights Act (CPRA), including the right to know what personal information we collect, the right to delete your information, and the right to opt out of the "sale" or "sharing" of your personal information.

CloseHer does not sell personal information in the traditional sense. However, some data sharing activities with advertising or analytics partners may constitute a "sale" or "sharing" under California law. To opt out, please contact us using the information below.

We will not discriminate against you for exercising your privacy rights.

10. Children's Privacy

Our Services are intended for individuals who are at least 18 years of age. We do not knowingly collect personal information from children under 18. If we learn that we have collected personal information from a child under 18, we will take steps to delete that information promptly. If you believe a child has provided us with personal information, please contact us immediately.

11. Third-Party Links and Services

Our Services may contain links to third-party websites, platforms, or services, including those of our Offer Network partners. This Privacy Policy does not apply to those third-party sites. We encourage you to review the privacy policies of any third-party sites you visit. CloseHer is not responsible for the privacy practices or content of third-party websites.

12. International Users

CloseHer is based in the United States and our Services are hosted in the United States. If you access our Services from outside the United States, please be aware that your information may be transferred to, stored, and processed in the United States, where data protection laws may differ from those in your jurisdiction. By using our Services, you consent to the transfer of your information to the United States.

13. Changes to This Privacy Policy

We may update this Privacy Policy from time to time to reflect changes in our practices, technologies, legal requirements, or other factors. The updated policy will be posted on our website with the revised effective date. Your continued use of the Services after any changes indicates your acceptance of the updated Privacy Policy.

For material changes, we will provide notice through the Services, via email, or by other appropriate means.

14. Contact Information

If you have questions, concerns, or requests regarding this Privacy Policy or our data practices, please contact us:

Valentina Murra LLC

303 W 5th Street
Austin, TX 78701
United States

Email: valentinamurra@closeher.com

15. Acknowledgment

By accessing or using CloseHer's Services, you acknowledge that you have read, understood, and agree to be bound by this Privacy Policy. This Privacy Policy should

be read in conjunction with our Terms of Service, which together govern your use of our Services.

— *End of Privacy Policy* —