

# PRIVACY POLICY

## Turnkey Services Pro and Its Associated Entities

Effective Date: June 3, 2025 | Last Updated: June 3, 2025

## 1. Introduction

Welcome to **Turnkey Services Pro** ("Company," "we," "our," or "us"). We are committed to protecting the privacy and personal information of all individuals who interact with our consulting and professional services. This Privacy Policy describes how Turnkey Services Pro and its affiliated entities, subsidiaries, and associated companies (collectively, "Associated Entities") collect, use, disclose, and safeguard your personal information.

This Privacy Policy applies to:

- Our website(s) and online portals
- Our consulting and professional services
- All communications between you and the Company
- Any other interactions you have with Turnkey Services Pro or its Associated Entities

By engaging our services or providing us with your personal information, you acknowledge that you have read and understand this Privacy Policy. If you do not agree with its terms, please discontinue use of our services. **This Policy is not a substitute for legal advice. We recommend consulting a qualified attorney for questions specific to your circumstances.**

## 2. Information We Collect

### 2.1 Information You Provide Directly

We collect personal information that you voluntarily provide to us, including:

- Full name
- Email address
- Phone number(s), including mobile, home, and business numbers
- Business or company name and title
- Mailing address and/or billing address
- Communications, correspondence, and feedback you send to us
- Information provided in connection with service agreements or contracts

- Any other information you choose to share with us

## **2.2 Information Collected Automatically**

When you visit our website(s) or use our online platforms, we may automatically collect:

- Internet Protocol (IP) address and approximate geographic location
- Browser type and version
- Device type and operating system
- Pages visited, time spent on pages, and clickstream data
- Referring URLs and search terms
- Cookies, web beacons, and similar tracking technologies

## **2.3 Information from Third Parties**

We may receive personal information about you from third-party sources, including:

- Business partners and referral sources
- Publicly available databases and directories
- Social media platforms (where you have granted applicable permissions)
- Service providers acting on our behalf

# **3. How We Use Your Information**

We use the personal information we collect for the following purposes:

## **3.1 Service Delivery**

- To provide, perform, and fulfill our consulting and professional services
- To communicate with you regarding your engagement, project, or inquiry
- To schedule appointments, meetings, and consultations
- To send service-related notices and administrative messages

## **3.2 Business Operations**

- To manage and maintain client relationships
- To process invoices, contracts, and service agreements
- To respond to your requests, questions, and feedback
- To improve the quality and efficiency of our services

### **3.3 Marketing and Communications**

- To send you information about our services, updates, and industry insights (where you have consented or where permitted by applicable law)
- To conduct client satisfaction surveys
- To personalize communications and tailor our outreach to your interests

### **3.4 Legal and Compliance**

- To comply with applicable laws, regulations, and legal obligations
- To enforce our contractual rights and terms of service
- To protect the rights, safety, and interests of the Company, our clients, and the public
- To respond to lawful requests from government or regulatory authorities

## **4. How We Share Your Information**

We do not sell your personal information. We may share your information in the following circumstances:

### **4.1 Associated Entities**

We may share your information with our affiliated companies and associated entities for the purposes described in this Privacy Policy. All such entities are required to handle your data in a manner consistent with this Policy.

### **4.2 Service Providers**

We engage trusted third-party service providers to assist us in operating our business, including:

- IT and cloud infrastructure providers

- Customer relationship management (CRM) platforms
- Email communication and marketing tools
- Accounting and billing software
- Legal and compliance advisors

These service providers are contractually obligated to process your information only on our behalf and in accordance with this Privacy Policy.

### **4.3 Legal Requirements**

We may disclose your information when required by law, court order, subpoena, or other legal process, or when we believe disclosure is necessary to:

- Comply with applicable legal obligations
- Protect the rights or property of the Company
- Prevent or investigate potential wrongdoing
- Ensure the personal safety of our clients, employees, or the public

### **4.4 Business Transfers**

In the event of a merger, acquisition, restructuring, sale of assets, or other business transaction involving the Company or its Associated Entities, your personal information may be transferred to the relevant successor or acquiring entity, subject to the same privacy protections described herein.

## **5. Data Retention**

We retain personal information for as long as necessary to fulfill the purposes outlined in this Privacy Policy, unless a longer retention period is required or permitted by law. The criteria we use to determine retention periods include:

- The duration of our ongoing client relationship with you
- Our legal obligations under applicable federal, state, or international law
- Applicable statutes of limitations for potential legal claims
- Guidelines from relevant regulatory and professional bodies

When personal information is no longer required, we take reasonable steps to securely destroy or de-identify it.

## **6. Cookies and Tracking Technologies**

Our website(s) may use cookies, web beacons, pixels, and similar tracking technologies to enhance your experience and collect usage data. Cookies are small data files stored on your device that help us recognize you and remember your preferences.

### **6.1 Types of Cookies We Use**

- **Essential Cookies:** Necessary for the operation of our website and cannot be disabled.
- **Analytical/Performance Cookies:** Help us understand how visitors interact with our site.
- **Functionality Cookies:** Remember your preferences and improve your experience.
- **Marketing Cookies:** Used to deliver relevant content and track the effectiveness of our outreach (where applicable and with consent).

### **6.2 Your Cookie Choices**

You may configure your browser settings to refuse cookies or to alert you when cookies are being sent. Please note that disabling certain cookies may affect the functionality of our website. Where required by law, we will seek your consent before placing non-essential cookies.

## **7. Your Rights and Choices**

Depending on your location and applicable law, you may have certain rights regarding your personal information. These rights may include:

### **7.1 General Rights (All Individuals)**

- **Right to Access:** Request a copy of the personal information we hold about you.
- **Right to Correction:** Request that we correct inaccurate or incomplete information.
- **Right to Deletion:** Request that we delete your personal information, subject to certain legal exceptions.

- **Right to Opt-Out of Marketing:** Unsubscribe from our marketing communications at any time by following the opt-out instructions in our emails or by contacting us directly.

## **7.2 California Residents — CCPA/CPRA Rights**

If you are a California resident, you have additional rights under the California Consumer Privacy Act (CCPA) and the California Privacy Rights Act (CPRA), including:

- **Right to Know:** The right to know what personal information we collect, use, disclose, or sell.
- **Right to Delete:** The right to request deletion of your personal information, subject to certain exceptions.
- **Right to Correct:** The right to request correction of inaccurate personal information.
- **Right to Opt-Out of Sale/Sharing:** We do not sell personal information. If this changes, you will have the right to opt out.
- **Right to Non-Discrimination:** We will not discriminate against you for exercising your privacy rights.
- **Right to Limit Use of Sensitive Personal Information:** Where applicable, you may direct us to limit the use and disclosure of sensitive personal information.

To submit a CCPA/CPRA request, please contact us using the details in Section 11. We will verify your identity before processing your request and will respond within 45 days (with a possible 45-day extension where necessary).

## **7.3 EEA, UK, and EU Individuals — GDPR Rights**

If you are located in the European Economic Area (EEA), the United Kingdom, or another jurisdiction governed by the General Data Protection Regulation (GDPR) or equivalent legislation, you have the following rights:

- **Right of Access (Article 15 GDPR)**
- **Right to Rectification (Article 16 GDPR)**
- **Right to Erasure / “Right to be Forgotten” (Article 17 GDPR)**
- **Right to Restriction of Processing (Article 18 GDPR)**
- **Right to Data Portability (Article 20 GDPR)**
- **Right to Object to Processing (Article 21 GDPR)**
- **Rights Related to Automated Decision-Making and Profiling (Article 22 GDPR)**

**Legal Basis for Processing:** We process your personal information on the following legal bases: (i) performance of a contract with you; (ii) compliance with a legal obligation; (iii) your consent, where obtained; and (iv) our legitimate interests in operating and improving our business, where such interests are not overridden by your rights.

**International Transfers:** If we transfer your personal information outside the EEA or UK, we will ensure appropriate safeguards are in place, such as Standard Contractual Clauses (SCCs) approved by the European Commission or equivalent mechanisms.

**Right to Lodge a Complaint:** You have the right to lodge a complaint with your local supervisory authority (e.g., the ICO in the UK, or the relevant Data Protection Authority in your EU member state) if you believe we have not handled your personal information in accordance with applicable law.

## 8. Data Security

We implement appropriate technical and organizational measures designed to protect your personal information against unauthorized access, disclosure, alteration, or destruction. These measures include, but are not limited to:

- Encryption of data in transit (TLS/SSL)
- Access controls and authentication requirements
- Regular review of our data collection, storage, and processing practices
- Contractual obligations with third-party service providers to protect your data

While we take data security seriously, no method of transmission over the internet or electronic storage is 100% secure. We cannot guarantee absolute security, and we encourage you to take precautions when sharing personal information online.

In the event of a data breach that is likely to result in a risk to your rights and freedoms, we will notify you and relevant authorities as required by applicable law.

## 9. Children's Privacy

Our services are intended for business clients and professional use. We do not knowingly collect personal information from children under the age of 13 (or under 16 where required by

applicable law, including the GDPR). If we become aware that we have inadvertently collected personal information from a minor, we will take prompt steps to delete such information. If you believe we may have collected information from a child, please contact us immediately at the details in Section 11.

## 10. Third-Party Links and Services

Our website(s) or communications may contain links to third-party websites, platforms, or services that are not operated by us. This Privacy Policy does not apply to any third-party sites. We encourage you to review the privacy policies of any third-party sites you visit. We are not responsible for the privacy practices or content of any third-party websites.

## 11. Contact Us

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

### **Turnkey Services Pro**

Privacy Compliance Officer

Email: [support@turnkeyservicespro.com](mailto:support@turnkeyservicespro.com)

Phone: 936-788-3591

Mailing Address: 40 Stewart Rd, New Waverly, TX 77358

We will endeavor to respond to all legitimate inquiries within 30 days, or within the timeframe required by applicable law.

## 12. Updates to This Privacy Policy

We reserve the right to update or modify this Privacy Policy at any time. When we make material changes, we will update the “Last Updated” date at the top of this document and, where appropriate, notify you by email or through a prominent notice on our website(s). We encourage you to review this Privacy Policy periodically to stay informed of how we are protecting your information.

Your continued use of our services after any changes to this Privacy Policy constitutes your acceptance of the updated terms.

## **13. Governing Law**

This Privacy Policy and any disputes arising hereunder shall be governed by and construed in accordance with the laws of the United States and the state in which Turnkey Services Pro is principally established, without regard to conflicts of law principles. To the extent applicable, this Policy is also subject to the requirements of the CCPA/CPRA, the GDPR, and other applicable international privacy laws.

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