

THE VILR

Privacy Policy

Effective Date: July 1, 2026 **Last Updated:** July 1, 2026

! ATTORNEY REVIEW REQUIRED — This Privacy Policy draft should be reviewed by a licensed Florida attorney before publication or submission to any app marketplace. Particular attention should be paid to compliance with the Florida Information Protection Act (FIPA), applicable FTC guidelines, FCRA disclosures, and Apple App Store and Google Play privacy requirements.

The Vilr, LLC (“The Vilr,” “we,” “us,” or “our”) is committed to protecting the privacy of everyone who uses our platform. This Privacy Policy explains how we collect, use, share, and protect information when you use The Vilr mobile application (“App”) and our website at thevilr.com (together, the “Platform”).

The Vilr is a community marketplace that facilitates connections between community members (“Vilr Moms”) who need household, childcare, errand, or personal assistance support, and independent service providers (“Support Moms”) who offer those services.

By using the Platform, you agree to the practices described in this Privacy Policy. If you do not agree, please do not use the Platform.

1. Who This Policy Applies To

The Vilr has two types of users:

- **Vilr Moms** — community members who post requests for support and book Support Moms.
- **Support Moms** — independent contractors who offer services, set their own rates, and are paid directly for completed work.

Where data collection or use differs by user type, this Policy identifies those differences.

2. Information We Collect

2.1 Information You Provide Directly

Both Vilr Moms and Support Moms provide:

- Name, email address, phone number, and city or zip code at registration
- Profile photo
- In-app messages sent through our messaging system
- Event and donation posts created in the Resources section
- RSVP responses and event attendance
- Reports submitted about other users or posts
- Communications with our support team

Vilr Moms additionally provide:

- Payment card information for booking Support Moms. Payment information is processed and stored by Stripe — The Vilr does not store card numbers.

- Task and service request details, including descriptions, preferred dates and times, and location information for scheduled tasks.

Support Moms additionally provide:

- Background check consent provided during onboarding. Background checks are conducted by a third-party consumer reporting agency. The Vilr does not collect, handle, or store government-issued identification or Social Security Numbers — all identity screening is performed directly by the third-party provider under their own privacy policy and the Fair Credit Reporting Act (FCRA).
- Bank account or payout information for receiving earnings, processed and stored by Stripe Connect. The Vilr does not store bank account details.
- Hourly rate and service categories listed on your profile.
- Availability settings, including manual availability status and recurring schedule windows.

2.2 Information We Collect Automatically

Device and Usage Data:

- Device type, operating system version, app version, and unique device identifiers
- Screens viewed, features used, in-app actions and taps, and time spent in the App
- Search terms entered in the people search and messaging search features
- Log data including IP address, access times, and error logs

Location Data:

The Vilr is a location-based platform. Location is fundamental to how it works. We collect and use location data as follows:

- **General location:** Your city or zip code is collected at registration and used to connect you with nearby community members.
- **Precise GPS location (required for certain features):** The App requests permission to access your device's precise GPS location. On Android, your device will offer a choice between "Precise" and "Approximate" location. The Vilr requires **Precise location** to be enabled for certain core features to function — specifically, Support Moms must have Precise location active before they can send a support offer. Approximate location is not sufficient for these features because the App relies on accurate GPS coordinates for real-time matching, arrival detection, and safety notifications. On iOS, the App requests your precise location when you use location-dependent features. When granted, precise GPS is used to: find nearby Support Moms for task matching and Instant Match; display Events and Donations within your radius; search for other users and local businesses near you; and show task and event locations on in-app maps.
- **Real-time location tracking during active sessions (Safety Feature):** Once a Support Mom is matched and en route to a task location, the App tracks the Support Mom's real-time GPS location for the duration of transit. This location is shared with the matched Vilr Mom so she can see that the Support Mom is on her way and confirm the right person is arriving at her door. When the Support Mom arrives at the task location, the Vilr Mom receives a push notification. This real-time location sharing is limited strictly to active, confirmed sessions while the Support Mom is in transit — it stops once the session begins or is cancelled. This feature exists solely for the safety and peace of mind of both users.

You can revoke or change location permission at any time through your device settings. On Android, switching from Precise to Approximate location, or disabling location entirely, will prevent Support Moms from sending support offers and will disable Instant Match, arrival

tracking, and proximity-based features. On iOS, disabling location access has the same effect on these features.

User Search and Privacy Settings:

The App allows users to search for other Viltr Moms and Support Moms by name within their local radius. Any user may set their profile to **private** at any time, which removes them from search results. Your privacy setting can be changed in your account settings at any time.

2.3 Information From Third Parties

- **Stripe:** We receive payment status, transaction confirmations, and payout status from Stripe. We do not receive full card numbers, bank account numbers, or government-issued identity documents.
 - **Background check provider:** We receive a pass/not pass result from our third-party background check provider. We do not receive or store your Social Security Number or the full underlying report.
-

3. How We Use Your Information

We use the information we collect to:

- Create and manage your account
 - Connect Viltr Moms with nearby Support Moms based on task needs, location, and availability
 - Power Instant Match — our real-time location-based matching engine for urgent requests
 - Track Support Mom location during active sessions and send arrival notifications to Viltr Moms for safety purposes
 - Process payments through Stripe and facilitate payouts to Support Moms
 - Conduct and facilitate background checks through our third-party provider
 - Display your profile to other users in your local area
 - Enable in-app messaging between users
 - Power the Resources tab, including Events (RSVP, attendee visibility, category notifications) and Donations
 - Power the local Business Directory and enable user-to-business messaging based on business subscription tier
 - Send transactional notifications — booking confirmations, payment receipts, match alerts, and new messages
 - Send push notifications for Instant Match requests, event category updates, donation nudges, and other in-app activity (where you have granted notification permission)
 - Send service updates and platform announcements
 - Send marketing communications where you have opted in (you may opt out at any time)
 - Improve, personalize, and develop the Platform
 - Monitor for fraud, abuse, and violations of our Terms of Service
 - Respond to your support requests
 - Comply with legal obligations
-

4. Features That Involve Sharing Information With Other Users

The following features, by design, make certain information visible to other users.

4.1 Public Profile

Your first name, profile photo, general city or neighborhood (not your street address), service categories or skills, and availability status are visible to other users in your area. Your full address, phone number, and email are never shared publicly.

4.2 User Search

Other users may be able to find your profile by searching within their local radius unless you have enabled the **private profile** setting in your account settings.

4.3 Instant Match

When a Viltr Mom submits an urgent request, nearby available Support Moms are notified with the task type, estimated duration, pay rate, and approximate neighborhood — not the exact address. The exact task location is shared only after a match is confirmed.

4.4 In-App Messaging

In-app messages are private between the participants of each conversation. The messaging search feature allows users to search their own conversations and find other users by name within their area. Message search results respect your privacy setting — users who have set their profile to private will not appear in search results.

4.5 Events (Resources Tab)

When you create an Event, the event details — including title, description, date, time, general location, and your name and profile photo — are visible to other users in your radius. Events are organized by category: Play Date, Coffee Date, Moms Night Out, Fitness Activity, Community Event, and Other.

Users may follow event categories and receive push notifications when new events are posted in categories they follow. When you RSVP to an event, your name and profile photo may be visible to other attendees who view the event listing.

4.6 Donations (Resources Tab)

When you post a donation, your first name, profile photo, general neighborhood (not exact address), and donation details are visible to users in your radius. Other users may message you through in-app messaging to arrange pickup or ask questions.

4.7 Business Directory

The local Business Directory allows users to discover businesses in their area. Business profile information is visible to all users. Depending on a business's subscription tier, users may be able to send the business a direct in-app message.

5. How We Share Your Information With Third Parties

5.1 Service Providers

We share information with trusted third-party vendors who help us operate the Platform, including:

- **Stripe** — payment processing, Support Mom payouts, and payment method management
- **Third-party background check provider** — identity screening and criminal history search for all users, conducted under their own privacy policy and the FCRA
- **Cloud hosting and infrastructure providers** — to store data and run the Platform
- **Analytics providers** — to understand Platform usage (aggregated and anonymized where possible)
- **Email and notification service providers** — to deliver transactional and marketing communications

All service providers are contractually required to protect your information and use it only for the purposes for which it was shared.

5.2 For Legal Reasons

We may disclose your information if we believe in good faith that disclosure is necessary to comply with applicable law or legal process; protect the rights, property, or safety of The Viltr, our users, or the public; or detect and prevent fraud or security issues.

5.3 Business Transfers

If The Viltr is involved in a merger, acquisition, or sale of assets, your information may be transferred as part of that transaction. We will notify you before your information becomes subject to a different privacy policy.

5.4 We Do Not Sell Your Data

The Viltr does not sell, rent, or trade your personal information to third parties for their marketing purposes.

6. Background Checks and the Fair Credit Reporting Act (FCRA)

All users — both Viltr Moms and Support Moms — are required to pass a background check before accessing the Platform. Background checks are conducted through a third-party consumer reporting agency and are governed by the Fair Credit Reporting Act (FCRA).

By registering on the Platform, you authorize The Viltr to initiate a background check on your behalf and consent to the third-party provider collecting and processing your information in accordance with their privacy policy and the FCRA. You will be provided with required FCRA disclosures as part of the onboarding process.

You have rights under the FCRA, including the right to be notified if information in your consumer report is used to take adverse action against your account, the right to dispute inaccurate information, and the right to obtain a copy of your report from the provider.

7. Data Retention

We retain your personal information for as long as your account is active or as needed to provide services, comply with legal obligations, resolve disputes, and enforce our agreements.

Specific retention periods:

- **Account data:** Retained while your account is active. Deleted or anonymized within 90 days of account closure, except where legally required.

- **Financial and transaction records:** Retained for up to 7 years for tax, compliance, and legal purposes.
 - **Background check consent records:** Retained for 5 years in accordance with FCRA requirements.
 - **Messages:** Retained while your account is active. [ATTORNEY REVIEW: Confirm message retention period with developer and legal counsel.]
 - **Resources (Events, Donations):** Event records are archived after the event date. Donation records are retained in a historical state after being claimed or expired.
-

8. Your Rights and Choices

8.1 Access and Correction

You may access, update, or correct your account information at any time through your account settings. Contact us at support@thevilr.com for assistance.

8.2 Account Deletion

You may request deletion of your account and personal data by contacting support@thevilr.com. We will process your request within 30 days, subject to legal retention obligations.

8.3 Private Profile

You may make your profile private at any time through your account settings. This removes you from user search results while allowing you to continue using the Platform.

8.4 Location Data

You may change or revoke location permissions through your device settings at any time.

On **Android**, your device offers a choice between Precise and Approximate location. The Vilr requires Precise location for Support Moms to send support offers and for real-time arrival tracking. Selecting Approximate location or disabling location entirely will prevent these features from functioning.

On **iOS**, you may set location access to “Never,” “While Using the App,” or “Always.” The Vilr uses location only while the app is in use or during an active session — we do not request Always-On background location access beyond what is necessary for active-session arrival tracking.

Disabling or downgrading location access will limit Instant Match, proximity-based search, arrival tracking, and safety notifications, but will not prevent you from using other Platform features.

8.5 Push Notifications

You may disable push notifications through your device notification settings or within the App settings. Note that disabling push notifications may affect your ability to receive time-sensitive alerts, including Instant Match requests and event notifications.

8.6 Event Category Notifications

You may follow or unfollow event categories at any time from the Events section of the Resources tab. Unfollowing a category stops push notifications for new events in that category.

8.7 Marketing Communications

You may opt out of marketing emails at any time by clicking “unsubscribe” in any marketing email or by contacting us. You will continue to receive transactional and service-related communications necessary to your use of the Platform.

8.8 Florida Residents

Florida residents may have additional rights under the Florida Information Protection Act (FIPA) and other applicable Florida law. [ATTORNEY REVIEW: Confirm current Florida privacy rights obligations and include any required disclosures.]

9. Data Security

We take reasonable technical and organizational measures to protect your information against unauthorized access, loss, misuse, or alteration. These measures include encryption of data in transit (TLS/SSL), secure access controls, and regular security reviews.

No method of transmission over the internet or electronic storage is completely secure. If you believe your account has been compromised, contact us immediately at support@thevilr.com.

In the event of a data breach affecting Florida residents, we will provide notification as required by the Florida Information Protection Act (FIPA).

10. Mobile Analytics and Device Identifiers

The Vilr mobile app uses analytics tools and device identifiers (not browser cookies) to:

- Keep you logged in to your account
- Remember your preferences and settings
- Understand how users navigate and use the Platform
- Measure the effectiveness of our communications

You can control tracking permissions through your device privacy settings:

- **iOS:** Settings → Privacy & Security → Tracking
- **Android:** Settings → Privacy → Ads

You may disable push notifications at any time through your device notification settings. We do not sell your data to third parties.

11. Children’s Privacy

The Vilr is intended for adults aged 18 and older. We do not knowingly collect personal information from anyone under the age of 18. If we learn that we have collected personal information from a minor, we will delete it promptly. If you believe a minor has provided us with personal information, please contact us at support@thevilr.com.

12. Third-Party Links and Services

The App integrates with third-party services (including Stripe and our background check provider) and may contain links to third-party websites or services. This Privacy Policy does not apply to those third parties. We encourage you to review the privacy policies of any third-party services you use. The Vilr is not responsible for the privacy practices of third parties.

13. Changes to This Privacy Policy

We may update this Privacy Policy from time to time. We will notify you of material changes by push notification, in-app notice, or email at least 14 days before the changes take effect. Your continued use of the Platform after changes take effect constitutes your acceptance of the updated Policy.

14. Contact Us

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

The Vilr, LLC Email: support@thevilr.com Website: thevilr.com Davenport, FL (Polk County)

© The Vilr, LLC. All rights reserved. This Privacy Policy is effective as of the date listed above.