



HOADOR INC. - PRIVACY POLICY

Effective Date: January 1, 2026

Last Updated: January 1, 2026

Hoador, Inc., a Delaware corporation (“Hoador,” “we,” “us,” or “our”), operates a peer-to-peer marketplace for the rental of tools, equipment, and general services (the “Platform”). This Privacy Policy describes how we collect, use, share, sell, and retain personal data and explains your rights under U.S. privacy laws.

By accessing or using the Platform, you agree to this Privacy Policy.

1. Scope and Account Structure

This Privacy Policy applies to:

- Adult account owners (“Account Owners”)
- Authorized household dependents, including minors (“Dependents”)
- Listers, renters, service providers, and visitors

Dependents do not maintain independent accounts. **All data collected from or about Dependents is collected under the authority and consent of the Account Owner**, to the fullest extent permitted by law.

2. Categories of Information We Collect

A. Identifiers and Account Information

- Name
- Email address
- Phone number
- Username and account credentials

- Household and dependent designations

B. Commercial and Transaction Data

- Listings, bookings, rentals, and services
- Pricing, deposits, refunds, and fees
- Transaction timestamps and histories

C. Usage and Technical Data

- IP address
- Device identifiers
- Browser type and operating system
- Interaction logs and analytics data
- Approximate location (city/state)

D. Communications

- Messages between users
- Communications with customer support
- Reviews and feedback

E. Payment Data

Payments are processed by third-party processors. Hoador does **not** store full payment card numbers but may receive:

- Payment status
- Transaction IDs
- Partial billing information

3. How We Use Personal Data

We use personal data to:

- Operate and maintain the Platform
 - Facilitate rentals, services, and payments
 - Verify identities and prevent fraud
 - Provide customer support
 - Communicate Platform updates and notices
 - Improve products, features, and user experience
 - Conduct analytics, research, and business planning
 - Market Hoador and third-party offerings
 - Comply with legal obligations
 - Enforce our Terms of Service
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4. How We Share and Sell Personal Data

A. General Sharing

We may share data with:

- Other users (as required to complete transactions)
- Payment processors and service providers
- Hosting, analytics, and marketing partners
- Affiliates and business partners
- Legal or regulatory authorities

B. Sale and Commercial Monetization of Data

To the **fullest extent permitted by law**, Hoador may **sell, license, or otherwise monetize personal data**, including through disclosure to third parties for:

- Analytics
- Advertising and marketing
- Research and business development

This may constitute a “sale” or “sharing” of personal data under certain U.S. state laws.

C. Business Transfers

Personal data may be transferred as part of:

- Mergers
 - Acquisitions
 - Asset sales
 - Financing or corporate restructuring
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5. Dependents, Minors, and COPPA Compliance

Hodor allows Dependents, including minors, to use the Platform **only through adult household accounts**.

- The Account Owner provides legally valid consent for all dependent data collection and use
- Hodor does not knowingly collect personal data from minors outside of this structure
- Where required, Hodor limits the sale of minor data or uses aggregated or de-identified data
- Responsibility for lawful consent rests entirely with the Account Owner

Hodor does not offer the Platform directly to children under 13 without parental involvement.

6. Data Retention

We retain personal data:

- While accounts remain active
- As needed to provide services
- To comply with legal, tax, or regulatory obligations
- To resolve disputes and enforce agreements

Aggregated or de-identified data may be retained indefinitely.

7. Your U.S. Privacy Rights

General Rights

Depending on your state of residence, you may have the right to:

- Know what personal data we collect
- Access your personal data
- Correct inaccurate data
- Request deletion
- Opt out of the sale or sharing of personal data
- Limit use of sensitive personal information
- Receive data portability

Requests must be submitted by the **Account Owner**, including requests related to Dependents.

We will not discriminate for exercising these rights.

8. State-Specific Disclosures

California (CCPA / CPRA)

California residents have the right to:

- Know categories and specific pieces of personal data collected
- Opt out of the sale or sharing of personal data
- Limit use of sensitive personal information
- Request deletion or correction

Notice: Hoador may sell or share personal data as defined by California law.

Virginia, Colorado, Connecticut, Utah

Residents of these states may:

- Access, correct, or delete personal data
 - Opt out of targeted advertising or data sales
 - Appeal denied requests
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9. Do Not Sell or Share My Personal Information

Where required by law, users may opt out of the sale or sharing of personal data by:

- Using in-Platform privacy controls (if available)
- Contacting us at the email address below

Opting out may affect certain Platform features.

10. Data Security

We use reasonable administrative, technical, and physical safeguards to protect personal data. However, no method of transmission or storage is 100% secure.

11. Changes to This Privacy Policy

We may update this Privacy Policy from time to time. Continued use of the Platform after updates constitutes acceptance of the revised Policy.

12. Contact Information

Hoador, Inc.

Email: admin@hoador.com