

Revised RIA Privacy Policy

(Annotated Draft for Legal Review)

RIA™ Privacy Policy

Effective Date: March 26, 2026

Climate Resilience Consulting LLC (“CRC,” “we,” “our,” or “us”) operates the Resilience Intelligence Advantage™ platform (“RIA” or the “Platform”). This Privacy Policy describes how CRC collects, uses, processes, stores, and protects information when individuals or organizations access or use the RIA platform or related services.

This Privacy Policy is intended to provide a complete description of CRC’s information practices and should be read together with the RIA Terms of Use and any applicable Data Processing Addendum (“DPA”) governing CRC’s processing of data on behalf of government customers. This Privacy Policy is intended to comply with applicable United States privacy laws, and CRC will comply with additional state-specific requirements to the extent applicable.

CRC is the legal entity responsible for operating the RIA platform and processing information collected through the platform.

1. Definitions

For purposes of this Privacy Policy:

Personal Data means information that identifies or can reasonably be linked to an identifiable individual, including information such as a person’s name, email address, account identifier, or other information associated with an individual user account.

Customer means the government agency, municipality, organization, or other entity that subscribes to the RIA platform.

User means an individual authorized by a Customer to access and use the RIA platform.

Customer Data means information uploaded to or entered into the platform by a Customer or its Users.

Processor means an entity that processes Personal Data on behalf of another entity.

Controller means the entity that determines the purposes and means of processing Personal Data.

2. Information CRC Collects

CRC collects limited categories of information necessary to operate the RIA platform and support authorized users.

2.1 Information Provided by Users

Users may provide limited Personal Data when creating or managing accounts or interacting with the platform. Such information may include an individual's name, email address, department or organizational role, and optional internal notes entered into the system.

Users may also enter planning or operational information into the platform, including project notes, resilience planning activities, or internal comments related to resilience implementation.

2.2 Automatically Collected Technical Information

When Users access the platform, CRC automatically collects certain technical information necessary for system performance, security monitoring, and troubleshooting. Such information may include IP address, browser type, device type, operating system, login timestamps, activity logs, and diagnostic information related to platform performance.

This information is collected to support system integrity, prevent unauthorized access, maintain platform reliability, and assist with troubleshooting or technical support.

2.3 Government or Organizational Data

Customers may upload or input non-personal information relating to resilience planning activities, including infrastructure information, climate hazard information, resilience actions, governance structures, implementation processes, geospatial information, and internal project data.

CRC treats all Customer Data as confidential and restricts access to authorized personnel who require such access to operate or support the platform.

3. Purpose of Processing

CRC processes information only for legitimate operational purposes related to the RIA platform. These purposes include authenticating Users, managing accounts, generating resilience analysis and reports, maintaining system security, providing technical support, monitoring system performance, improving platform functionality, and complying with applicable legal obligations.

CRC does not sell Personal Data, share Personal Data for advertising purposes, or use Personal Data to train artificial intelligence or machine-learning models.

CRC may analyze anonymized or aggregated data derived from platform activity to monitor system performance, evaluate platform usage patterns, and improve the functionality and reliability of the RIA platform. Such aggregated or anonymized information does not identify individuals or Customer organizations.

4. CRC's Role When Serving Government Customers

When CRC provides services to government entities or other organizations, the Customer typically acts as the **Controller** of Personal Data and determines what information is uploaded to the platform and how it is used.

CRC acts as a **Processor** and processes Personal Data only for the purpose of providing the RIA service and supporting authorized use of the platform. CRC processes Personal Data only according to Customer instructions and applicable law.

Additional terms governing CRC's processing of Personal Data may be described in the RIA Terms of Use, applicable subscription agreements, or a Data Processing Addendum between CRC and the Customer.

5. Sharing of Information

CRC shares information only in limited circumstances necessary to operate the platform or comply with legal obligations.

5.1 Subprocessors and Service Providers

CRC may engage trusted service providers ("Subprocessors") to support platform operations, including cloud hosting providers, infrastructure services, cybersecurity monitoring services, and email delivery services.

Subprocessors are contractually required to maintain confidentiality and appropriate security safeguards when processing information on CRC's behalf. CRC selects Subprocessors that maintain industry-standard security protections and periodically reviews their security practices.

5.2 Customer Administrators

Customer administrators may access account information, activity logs, and reports generated by Users within their organization. CRC does not share Customer Data between different Customers or organizations.

5.3 Legal Compliance

CRC may disclose information if required by law, judicial process, or other lawful government request. CRC reviews such requests carefully and, where legally permitted, seeks to protect confidential or proprietary information before disclosure.

Where appropriate, CRC may notify the affected Customer of such requests unless prohibited by law.

5.4 Business Transactions

If CRC undergoes a merger, acquisition, financing transaction, or sale of assets, Customer Data may be transferred as part of that transaction. Any acquiring entity will be required to maintain privacy protections consistent with this Privacy Policy.

6. Data Retention

CRC retains Personal Data only for the period necessary to provide the RIA platform services, maintain system security, comply with legal obligations, and support legitimate operational needs.

Upon termination of a Customer subscription, the Customer may request deletion or anonymization of Personal Data. CRC will process such requests within a reasonable timeframe unless retention is required by law or necessary to maintain system integrity.

CRC may retain anonymized or aggregated data that cannot reasonably identify individuals or Customer organizations.

Subprocessors are contractually required to follow equivalent retention and deletion obligations when processing information on CRC's behalf.

7. Security Safeguards

CRC maintains administrative, technical, and physical safeguards designed to protect information against unauthorized access, disclosure, alteration, or destruction.

These safeguards include secure cloud infrastructure, encryption of data in transit, role-based access controls, identity management systems, logging and monitoring of system activity, incident response procedures, and periodic security training for personnel.

Access to Customer Data is restricted to authorized personnel whose job responsibilities require such access, and all access is subject to monitoring and auditing controls.

CRC maintains procedures for detecting and responding to potential security incidents and will notify affected Customers of confirmed breaches involving Personal Data without unreasonable delay.

8. Cookies and Similar Technologies

The RIA platform uses limited cookies and session technologies necessary to authenticate user sessions, maintain platform performance, and enhance security.

These technologies do not track users across websites and are not used for advertising purposes.

Users may manage or disable cookies through browser settings; however, disabling certain cookies may affect the functionality of the platform.

9. Children's Privacy

RIA is designed for professional use by government agencies and organizations and is not intended for use by children under the age of 16.

CRC does not knowingly collect Personal Data from children. If CRC becomes aware that Personal Data from a child has been collected inadvertently, CRC will take reasonable steps to delete such information.

10. International Use

RIA is primarily intended for use by U.S.-based government entities and organizations. Data is stored and processed within the United States unless otherwise required by contract.

CRC applies the same privacy and security protections to all Users regardless of geographic location.

11. User Rights

Depending on applicable law, Users may have rights to request access to Personal Data, request correction of inaccurate information, or request deletion of Personal Data.

When CRC acts as a Processor on behalf of a government Customer, such requests should be submitted through the Customer organization that controls the data.

CRC will reasonably assist Customers in responding to such requests where required by law.

Certain legal obligations, including government records retention requirements, may limit the ability to delete or modify certain information.

12. Artificial Intelligence and Data Use Restrictions

CRC does not use Personal Data, Customer Data, project notes, uploaded datasets, or system logs to train artificial intelligence or machine-learning models.

CRC may use anonymized or aggregated operational data solely to evaluate platform performance and improve system functionality.

13. Changes to This Policy

CRC may update this Privacy Policy from time to time. Updated versions will be posted within the RIA platform and will include a revised effective date.

Continued use of the platform after changes are posted constitutes acceptance of the updated Privacy Policy.

14. Contact Information

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