

Crown Close Privacy Policy

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This Privacy Policy ("Policy") describes how Crown Close LLC, a North Carolina limited liability company ("Crown Close," "we," "us," or "our"), collects, uses, discloses, and protects information in connection with the Crown Close platform, website, and related services (collectively, the "Service").

This Policy applies to two categories of individuals:

1. **Customers** — licensed real estate listing agents and their authorized team members who create accounts and use the Service; and
2. **End Recipients** — buyer agents and other third parties who receive automated SMS communications, emails, or other messages sent through the Service on behalf of Customers.

By accessing or using the Service, or by receiving communications sent through the Service, you acknowledge that you have read and understood this Policy.

1. Information We Collect

1.1 Information Provided Directly by Customers

- Full name, email address, phone number, and brokerage affiliation
- Account credentials (encrypted at rest)
- Billing and payment information (processed and stored by Stripe; Crown Close does not store full payment card numbers)
- Property listing details, showing schedules, and listing preferences
- AI response preferences, messaging rules, and communication settings
- SMS provider credentials and OAuth tokens for connected Twilio or RingCentral accounts

1.2 Information Received from Third-Party Integrations

- Showing appointment data, including buyer agent name, phone number, brokerage affiliation, property address, and scheduled showing time, received from showing management platforms such as ShowingTime and BrokerBay via automated email notifications forwarded to or received by the Service
- OAuth account data from Twilio Connect or RingCentral when Customers connect their own SMS provider accounts

1.3 Information Collected from End Recipients

- Name and phone number (as provided by showing management platforms)
- SMS message content, including showing feedback responses
- SMS metadata, including timestamps, delivery status, and opt-out requests

1.4 Information Collected Automatically

- IP addresses, browser type and version, device type, operating system, and referring URLs
- Usage data, including pages viewed, features accessed, and session duration
- Cookies and similar tracking technologies (see Section 5)
- Analytics data collected via Mixpanel (production environment only)

2. How We Use Information

We use the information we collect for the following purposes:

- **Service Delivery:** To operate the core Service, including automating post-showing follow-up communications, collecting buyer agent feedback, generating AI-powered responses, and delivering showing management tools to Customers.
- **AI Processing:** To generate context-aware, automated responses to buyer agent communications using third-party artificial intelligence models. Conversation content, showing details, and listing information are

transmitted to our AI provider (Anthropic) for processing. See Section 3.3 for additional detail.

- **Account Management:** To create and maintain Customer accounts, process subscription payments, and manage billing.
- **Product Improvement:** To analyze usage patterns, diagnose technical issues, and improve Service functionality and performance. This includes the use of de-identified and aggregated data to train and improve AI models and response quality. See Section 7 for additional detail.
- **Communications:** To send transactional emails, service notifications, onboarding guidance, and product updates to Customers.
- **Security and Compliance:** To detect and prevent fraud, enforce our Terms of Service, and comply with applicable legal obligations.

3. How We Share Information

3.1 With Customers

Buyer agent feedback, message content, and showing-related communications are shared with the listing agent Customer on whose behalf the communication was initiated. **This is the core function of the Service.** End Recipient data is scoped to the Customer account associated with the relevant showing and is not shared across Customer accounts.

3.2 With Third-Party Service Providers

We share information with the following categories of third-party service providers, solely to the extent necessary to operate the Service:

Provider Category	Provider(s)	Data Shared
SMS Delivery	Twilio, RingCentral	Phone numbers, message content, delivery metadata
Email Delivery	SendGrid	Email addresses, email content, delivery metadata
AI Processing	Anthropic	

		Conversation content, showing details, listing information
Payment Processing	Stripe	Billing information, subscription status
Database and Hosting	Supabase, DigitalOcean	All Service data (encrypted at rest and in transit)
DNS and CDN	Cloudflare	IP addresses, request metadata
Analytics	Mixpanel	Usage events, anonymized interaction data

3.3 AI Processing Disclosure

The Service uses artificial intelligence provided by Anthropic (Claude) to generate automated responses to buyer agent communications. When the AI processes a message, the following data may be transmitted to Anthropic: the incoming message content, relevant conversation history, showing details, listing information, and Customer-configured response preferences. Anthropic processes this data pursuant to its own data handling policies. Crown Close does not permit Anthropic to use Customer or End Recipient data to train its general-purpose models.

3.4 Legal Requirements

We may disclose information if required to do so by law, regulation, legal process, or governmental request, including in response to subpoenas, court orders, or requests from law enforcement agencies.

3.5 Business Transfers

In the event of a merger, acquisition, reorganization, bankruptcy, or sale of all or a portion of our assets, information may be transferred as part of that transaction. We will notify affected Customers via email prior to any such transfer, and the acquiring entity will be bound by the terms of this Policy with respect to previously collected information.

3.6 No Sale of Personal Information

We do not sell personal information. We do not share personal information with third parties for their own direct marketing purposes.

4. SMS and Communications Disclosures

4.1 Nature of Communications

The Service sends automated SMS messages to buyer agents and other End Recipients on behalf of Customers. These messages relate to property showing follow-up, feedback collection, scheduling coordination, and related transactional communications. Messages may be generated by artificial intelligence.

4.2 Consent Basis

Communications sent through the Service are transactional messages related to scheduled property showings. The End Recipient initiates the showing transaction by scheduling a showing through a showing management platform (such as ShowingTime or BrokerBay) and providing their phone number as part of that process. Crown Close's first SMS to each End Recipient includes the Crown Close business name, the purpose of the message, and opt-out instructions (reply STOP). **This first-contact disclosure establishes the messaging relationship between Crown Close and the End Recipient. Crown Close does not rely on any third-party platform's consent mechanisms as the basis for its messaging.**

Customers acknowledge during onboarding that Crown Close sends automated SMS messages on their behalf and agree to use the Service only for legitimate showing-related communication (see [Terms of Service](#), Sections 4.2 and 4.9).

4.3 Opt-Out

End Recipients may opt out of receiving SMS communications at any time by replying "STOP" to any message. Opt-out requests are processed immediately. Once an End Recipient opts out, no further automated messages will be sent to that phone number by the originating Customer. Opt-out

records are retained for a minimum of ten (10) years to ensure ongoing compliance.

4.4 Message Frequency and Rates

Message frequency varies based on showing activity and Customer configuration. Standard message and data rates imposed by your wireless carrier may apply. Crown Close does not charge End Recipients for messages received.

4.5 AI Disclosure

Automated first-contact messages sent through the Service include a disclosure that the communication is sent by an AI-powered assistant on behalf of the listing agent, in compliance with applicable regulations governing AI-initiated communications.

5. Cookies and Tracking Technologies

The Service uses the following categories of cookies and tracking technologies:

- **Essential Cookies:** Required for authentication, session management, and core Service functionality. These cannot be disabled.
- **Analytics Cookies:** Used via Mixpanel to understand usage patterns and improve the Service. Analytics cookies are only active in the production environment and are gated by hostname verification.

You may control cookie preferences through your browser settings. Disabling essential cookies may impair Service functionality.

6. Data Security

We implement reasonable administrative, technical, and physical safeguards designed to protect information against unauthorized access, alteration, disclosure, or destruction. These measures include:

- Encryption of data at rest and in transit (TLS 1.2+)

- Row-level security (RLS) enforced at the database level to isolate Customer data
- OAuth token management for third-party SMS provider integrations
- Service-role access controls for backend operations
- Secure credential storage (API keys and secrets managed via environment-level secrets management)

No method of transmission over the Internet or method of electronic storage is 100% secure. While we strive to use commercially reasonable means to protect information, we cannot guarantee absolute security.

7. Data Retention

Data Category	Retention Period
Active account data (profile, settings, listings)	Duration of active subscription
Showing records and message history	Duration of active subscription, plus 90 days post-cancellation
Billing and payment records	As required by applicable tax and accounting regulations (typically 7 years)
TCPA consent records	Minimum 10 years from date of last communication
Opt-out records	Minimum 10 years from date of opt-out request
De-identified and aggregated data	Indefinitely, for Service improvement and AI training

7.1 Post-Cancellation

Upon cancellation of a Customer account, Customers may submit a data export request to support@crownclose.com within ninety (90) days. Following the expiration of the 90-day export window, personally identifiable data

associated with the Customer account will be deleted, except as required for legal, regulatory, or compliance purposes as described in the table above.

7.2 De-Identified Data

Crown Close retains de-identified, aggregated data derived from Service usage — including conversation patterns, feedback trends, and response effectiveness metrics — indefinitely for the purpose of improving the Service and training AI models. This data cannot reasonably be used to identify any individual Customer or End Recipient. The use of de-identified data for Service improvement is an integral component of the Service and is not subject to opt-out.

8. State Privacy Rights

Depending on your state of residence, you may have additional rights with respect to your personal information. Crown Close honors the following state-specific rights to the extent applicable:

8.1 California (CCPA/CPRA)

California residents have the right to:

- **Know** what personal information we collect, use, disclose, and sell (we do not sell personal information)
- **Delete** personal information we have collected, subject to certain exceptions
- **Correct** inaccurate personal information
- **Opt out** of the sale or sharing of personal information (not applicable — we do not sell or share for cross-context behavioral advertising)
- **Non-discrimination** for exercising any of these rights

To submit a request, contact support@crownclose.com. We will verify your identity before processing any request and respond within 45 days as required by law.

8.2 Virginia (VCDPA)

Virginia residents have the right to access, correct, delete, and obtain a portable copy of their personal data, and to opt out of targeted advertising, the sale of personal data, and profiling in furtherance of decisions that produce legal or similarly significant effects. Opt-out requests are honored for a minimum of ten (10) years in accordance with Virginia SB 1339.

8.3 Colorado (CPA)

Colorado residents have the right to access, correct, delete, and obtain a portable copy of their personal data, and to opt out of targeted advertising, the sale of personal data, and profiling in furtherance of decisions that produce legal or similarly significant effects. Crown Close honors universal opt-out signals recognized under Colorado law.

8.4 Connecticut (CTDPA)

Connecticut residents have substantially similar rights to those described under the Virginia VCDPA, including the right to opt out of targeted advertising and the sale of personal data. Crown Close honors universal opt-out mechanisms as required.

8.5 Texas (TDPSA)

Texas residents have the right to access, correct, delete, and obtain a portable copy of their personal data. Under Texas SB 140, text messages are regulated as telephone solicitations, and Crown Close complies with all applicable requirements, including quiet hours and consent obligations.

8.6 Additional States

Crown Close monitors evolving state privacy legislation and extends comparable rights to residents of Oregon (OCA), Montana (MCDPA), and other states with comprehensive consumer privacy laws as they take effect. To exercise any state-specific privacy right, contact support@crownclose.com.

8.7 Exercising Your Rights

To exercise any privacy right described in this Section, submit a request to support@crownclose.com. Include your full name, state of residence, and a description of the right you wish to exercise. We may require identity

verification before processing your request. We will respond within the timeframe required by applicable law (typically 45 days, with a possible extension of an additional 45 days for complex requests).

9. Children's Privacy

The Service is not directed to, and we do not knowingly collect personal information from, individuals under the age of eighteen (18). The Service is designed for use by licensed real estate professionals. If we become aware that we have collected personal information from an individual under 18, we will take steps to delete such information promptly. If you believe a minor has provided us with personal information, contact support@crownclose.com.

10. Third-Party Links

The Service may contain links to third-party websites or services not operated or controlled by Crown Close. This Policy does not apply to the practices of third parties. We are not responsible for the privacy practices of any third-party website or service, and we encourage you to review the privacy policies of any third-party site you visit.

11. Changes to This Policy

We may update this Policy from time to time. If we make material changes, we will notify Customers via email at least thirty (30) days prior to the effective date of the revised Policy. The "Last Updated" date at the top of this Policy indicates when it was most recently revised. Your continued use of the Service after the effective date of any revised Policy constitutes your acceptance of the changes.

12. Contact

If you have questions about this Policy, wish to exercise a privacy right, or have concerns about our data practices, contact us at:

Crown Close LLC

Email: support@crownclose.com

Website: crownclose.com