



Legal

Privacy Policy

Effective: May 6, 2026 · Updated: May 6, 2026 · Operator: Frankie Quiroz LLC

1. Introduction; Scope of This Policy

Frankie Quiroz LLC, a Wyoming limited liability company ("**Quiroz Enterprise**," "**we**," "**our**," or "**us**"), respects your privacy. This Privacy Policy (this "**Policy**") describes the categories of personal information we collect through the website located at <https://quirozenterprise.com>, any related subdomains, and any iOS or Android application that loads or wraps the Site through a native wrapper such as Apache Cordova or Capacitor (collectively, the "**Site**"), how we use and disclose that information, the rights and choices available to you, and how to contact us about our privacy practices.

This Policy applies to information collected through the Site only. It does not apply to (a) websites operated by separate operating companies within the Quiroz Enterprise brand portfolio, each of which is a separate legal entity with its own privacy policy; (b) third-party services that may be linked from the Site; or (c) information collected by us outside of the Site (for example, through email, telephone, or in-person communications), except as expressly described below. By accessing or using the Site, you acknowledge that you have read this Policy.

Identity of the Controller / Business. For purposes of European Union Regulation 2016/679 (“**GDPR**”) and the UK General Data Protection Regulation, Frankie Quiroz LLC is the “controller” of personal data processed through the Site. For purposes of the California Consumer Privacy Act, as amended by the California Privacy Rights Act, Cal. Civ. Code § 1798.100 *et seq.* (the “**CCPA**”), Frankie Quiroz LLC is the “business” with respect to that information. Frankie Quiroz LLC’s registered office is at 30 N Gould St, Suite R, Sheridan, Wyoming 82801. As required by Cal. Civ. Code § 1798.130(a)(5)(C), Frankie Quiroz LLC’s physical operating address in California is **4432 Holt Boulevard, Unit K, Montclair, California 91763**. Privacy correspondence should nevertheless be directed to legal@quirozenterprise.com and to the registered office.

2. Information We Collect

2.1 Information You Provide to Us

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

- **Contact information** — name, email address, mailing address, telephone number, and the content of any message, when you submit a contact request, send us an email, or otherwise communicate with us.
- **Member sign-in information** — email address and any invitation code you submit through the member sign-in modal on the Site. The Site does not currently process invitation codes; the form is a front-end placeholder. Submitted information is not stored or transmitted to a backend service unless and until that integration is documented in an update to this Policy.
- **Editorial / briefing list information** — if and when an editorial or institutional briefing list is offered through the Site, we may collect your name and email address for that purpose.
- **Press, partnership, or business inquiries** — any information you provide in connection with a press inquiry, a partnership inquiry, a wholesale inquiry, or a similar business communication.

- **Telegram messaging metadata** — if you contact a Quiroz Enterprise affiliate through one of our Telegram-based customer-service channels, Telegram FZ-LLC processes your message as the message broker and may share with us metadata about you (such as your Telegram username, first name, language, and timestamps) along with the content of the message you send. Telegram’s own privacy policy governs Telegram’s independent processing; see <https://telegram.org/privacy>.

2.2 Information Collected Automatically

When you access or use the Site, certain information is collected automatically, including:

- **Server log data** — IP address, request method and path, response status code, response size, user-agent string, referrer URL, date and time of request, and similar HTTP metadata, processed by our content-delivery and edge-compute provider, Cloudflare, Inc. ("**Cloudflare**"), in the ordinary course of operating the Site.
- **Aggregated, cookieless analytics** — we operate the Site using Cloudflare Web Analytics, a privacy-preserving analytics product that produces aggregated traffic and performance metrics without setting third-party cookies and without building cross-site profiles.
- **Essential session cookies** — the Site uses only essential session cookies that are necessary for basic site functionality, security, and abuse prevention. The Site does not set advertising cookies, retargeting cookies, social-media tracking pixels, or third-party analytics cookies. See our [Cookie Statement](#) for details.
- **Device and browser information** — basic environmental information such as browser type, operating system, language, and screen size, when transmitted by your browser as part of normal HTTP traffic.
- **iOS / Android wrapper telemetry** — if you access the Site through a Capacitor- or Cordova-wrapped iOS or Android application, the same browser-level data described above flows through the wrapper’s embedded

WebView. The wrapper does not access your device's contacts, photos, calendar, or location absent your explicit, system-level permission, and we do not request such permission for the marketing-only Site.

2.3 Information from Third-Party Sources

We may receive limited information about you from publicly available sources (such as a press publication that has interviewed you) or from a Quiroz Enterprise operating brand if you have asked that brand to refer you to the holding-company team. We use that information solely for the purpose for which it was provided.

2.4 Categories of Personal Information for CCPA Purposes

For purposes of the CCPA's disclosure obligations, the categories of personal information we have collected through the Site in the preceding twelve (12) months are: identifiers (such as name, email address, postal address, IP address); customer-records information (such as the content of an inquiry that includes your name and contact information); commercial information limited to records of communications with us; internet-or-other-network-activity information (such as server logs); and inferences drawn from any of the above (limited to whether you are a returning visitor or a member of our editorial list). We have **not** collected sensitive personal information as defined by Cal. Civ. Code § 1798.140(ae) for any purpose that would trigger a right to limit use under Cal. Civ. Code § 1798.121.

3. How We Use Personal Information

We use the personal information we collect for the following business and commercial purposes:

- To respond to your inquiries, requests, and other communications;
- To provide, maintain, secure, and improve the Site;

- To understand aggregate Site usage patterns and editorial reach;
- To detect, investigate, prevent, and respond to security incidents, abuse, fraud, and other unlawful activity;
- To comply with applicable law, legal process, or government requests;
- To enforce our [Terms of Service](#), our [Acceptable Use Policy](#), and other agreements; and
- For any other purpose disclosed to you at the time we collect the information or with your consent.

We do **not** sell personal information for monetary or other valuable consideration as those terms are defined by the CCPA, and we do **not** use, disclose, or share personal information for cross-context behavioral advertising. We do not use personal information to make automated decisions that produce legal effects concerning you or that similarly significantly affect you (within the meaning of GDPR Article 22).

3.1 Legal Bases for Processing (GDPR / UK GDPR)

If you are located in the European Economic Area, the United Kingdom, or Switzerland, the legal bases on which we process personal information are: (a) *your consent*, where required (for example, for opt-in editorial-list signup); (b) *performance of a contract*, where processing is necessary to perform a contract with you (such as responding to your business inquiry); (c) *compliance with a legal obligation*; and (d) *our legitimate interests* in operating, securing, and improving the Site, in protecting against fraud or abuse, in maintaining records of our communications, and in conducting our business, except where those interests are overridden by your data-protection rights and freedoms. Where we rely on consent, you may withdraw your consent at any time without affecting the lawfulness of processing prior to withdrawal.

4. How We Share Personal Information

We share personal information only as described below. The categories of recipients are also identified, as required by GDPR Article 13(1)(e), as “recipients or categories of recipients of the personal data.”

- **Service providers / processors.** We share information with vendors and service providers that perform services on our behalf and are contractually obligated to protect the information and use it only for the purposes for which it was disclosed. Our principal subprocessors are listed in Section 5.
- **Affiliates.** We may share information with operating brands within the Quiroz Enterprise portfolio, but only for limited purposes such as routing your inquiry to the correct operating team or coordinating a press, partnership, or wholesale matter that you initiated. Each operating brand is a separate legal entity governed by its own privacy policy.
- **Legal and compliance.** We may disclose information if we believe in good faith that disclosure is necessary to (a) comply with applicable law, regulation, legal process, or a lawful government request; (b) enforce our Terms of Service or other agreements; (c) protect the rights, property, safety, or interests of Frankie Quiroz LLC, our users, or the public; or (d) detect, investigate, prevent, or respond to fraud, security, or technical issues.
- **Business transactions.** If we are involved in a merger, acquisition, financing, reorganization, sale of company assets, or in the unlikely event of bankruptcy or similar proceeding, personal information may be transferred as part of that transaction, subject to standard confidentiality protections. Where such a transaction would result in a material change to the way your personal information is used, we will provide you with notice and choices to the extent required by applicable law.
- **With your consent.** We may share personal information for any other purpose with your consent.

Beyond what is described above, we do not disclose personal information to third parties for their own marketing purposes, and we do not engage in any practice that would constitute a “sale” or “sharing” of personal information under

the CCPA, a “sale” under any analogous state law, or “targeted advertising” under the VCDPA / CPA / CTDPA / UCPA.

5. Subprocessors and Third-Party Data-Protection Terms

The Site is operated using a deliberately minimal vendor stack. The principal subprocessors that may process personal information on our behalf are listed below, together with the data-processing addendum (“**DPA**”) or equivalent terms that apply to that processor. We endeavor to keep this list accurate but reserve the right to substitute or supplement these subprocessors as our infrastructure evolves; in that case, we will update this Policy to reflect the new subprocessor.

- **Cloudflare, Inc.** (San Francisco, California, USA) — content delivery, edge compute, DDoS mitigation, Web Application Firewall, and Cloudflare Web Analytics. Cloudflare DPA: <https://www.cloudflare.com/cloudflare-customer-dpa/>. Cloudflare maintains certifications under SOC 2 Type II, ISO 27001, and ISO 27018 (as currently published by Cloudflare).
- **Notion Labs, Inc.** (San Francisco, California, USA) — if you submit an inquiry that we route to our internal Notion-based customer-relationship system for tracking, your contact information and message content may be stored in our Notion workspace. Notion DPA: <https://www.notion.com/help/notion-data-protection-addendum>.
- **Anthropic, PBC** (San Francisco, California, USA) — if a customer-service channel operated by us or a Quiroz Enterprise affiliate uses Claude or another Anthropic model to assist with classification, routing, summarization, or drafting, the inputs to that model are processed by Anthropic on our behalf. Anthropic’s commercial commitments (“the Anthropic Commercial Terms of Service”) state that prompts and outputs in API contexts are not used to train Anthropic’s foundation models. Anthropic’s privacy and trust documentation: <https://www.anthropic.com/legal/privacy> and <https://trust.anthropic.com>. The Anthropic data-processing addendum is available on request from Anthropic.

- **Telegram FZ-LLC** (Dubai, United Arab Emirates / British Virgin Islands) — where you initiate contact through Telegram, Telegram is the message broker; Telegram’s own privacy policy governs Telegram’s independent processing of your message and account data; see <https://telegram.org/privacy>. Frankie Quiroz LLC has no DPA with Telegram and treats Telegram as an independent controller for the messaging service it provides.
- **Email host.** Our email host routes messages sent to addresses at `quirozenterprise.com` to the appropriate inbox and provides standard spam and abuse filtering. Specific provider identity is available on request.

We do not use third-party analytics, advertising, retargeting, or social-tracking vendors on the Site.

6. Data Retention

We retain personal information only for as long as necessary to fulfill the purposes for which it was collected, to comply with our legal and tax obligations, to resolve disputes, and to enforce our agreements. As of the Effective Date of this Policy, our standard retention guidelines are:

- **Server log data and aggregated analytics:** retained for up to **ninety (90) days** in identifiable form, after which the data is aggregated, anonymized, or deleted.
- **Email communications and contact-form submissions:** retained for up to **twenty-four (24) months**, unless a longer retention period is required for an active matter, a legal hold, or compliance with a tax, audit, or recordkeeping obligation.
- **Editorial / briefing list information:** retained until you unsubscribe or otherwise request deletion, plus a reasonable period to honor and document your request.
- **Customer-service messaging and AI-classification logs (where used by an affiliate):** retained for up to **thirty (30) days** in identifiable form for fraud-

prevention and quality-assurance purposes, and thereafter purged from the active system. Aggregated, non-identifiable performance metrics may be retained longer.

Where personal information is no longer required, we will delete or anonymize it, or, if that is not possible (for example, because the information is stored in backup archives), we will securely store it and isolate it from any further processing until deletion is possible.

7. Cookies, Tracking, and Browser-Signal Honor

The Site uses only essential session cookies and Cloudflare's cookieless privacy-preserving analytics. The Site does not deploy advertising cookies, retargeting pixels, or third-party analytics cookies. For details, including a description of categories and your choices, see our [Cookie Statement](#).

7.1 Global Privacy Control (GPC)

The Site honors browser-level Global Privacy Control signals as a request to opt out of any sale or share of personal information for cross-context behavioral advertising, consistent with the position of the California Attorney General that a GPC signal is a legally valid opt-out request under the CCPA. Because we do not sell personal information or share it for cross-context behavioral advertising, the practical effect of a GPC signal at this time is that we record that you have asserted the right and decline to engage in any future practice that would constitute a sale or share without first obtaining your affirmative consent.

7.2 Do Not Track (DNT)

Some browsers transmit a "Do Not Track" (DNT) signal. Because no industry-standard interpretation of DNT signals has been adopted, and because the Site does not engage in cross-site tracking, the Site does not respond differently to the DNT signal. If a future industry standard is adopted, we will update our practice and this Policy to honor that standard. Users who wish to express a

comprehensive opt-out should rely on the GPC signal described above (which the Site does honor).

8. Children's Privacy; California Eraser Button (Delete Act)

The Site is intended for an adult, professional audience. The Site is not directed to children under the age of **thirteen (13)**, and we do not knowingly collect personal information from any child under the age of thirteen, in compliance with the United States Children's Online Privacy Protection Act, 15 U.S.C. § 6501 *et seq.*, and its implementing rules ("**COPPA**"). If we learn that we have inadvertently collected personal information from a child under the age of thirteen, we will delete that information promptly. If you are a parent or guardian and believe that your child has provided personal information to us, please contact us at legal@quirozenterprise.com so that we can take appropriate action.

California "Eraser Button" for Minors. California Business & Professions Code § 22581 (the so-called "Online Eraser Law") and the California Delete Act (SB 362, 2023) provide that minors who are California residents may request the removal or anonymization of content or information they have posted on a website. If you are a California resident under the age of eighteen (18) and you have submitted information to the Site (for example, by sending us a message), you may request that we remove or anonymize that information by emailing legal@quirozenterprise.com from the email address you used to send the original message, with the subject line "Eraser Button Request — Minor." We will remove the information consistent with our retention obligations and the requirements of California law. Note that removal may not be complete if the information has been republished by a third party or if removal is restricted by another law.

9. Your Privacy Rights

Depending on your jurisdiction, you may have certain rights with respect to your personal information. We honor verifiable requests submitted by or on behalf of residents of jurisdictions that have enacted comprehensive consumer-privacy laws.

9.1 Rights of California Residents (CCPA / CPRA)

If you are a California resident, the California Consumer Privacy Act, as amended by the California Privacy Rights Act, gives you the following rights with respect to your personal information:

- **Right to Know.** The right to request that we disclose to you the categories and specific pieces of personal information we have collected about you, the categories of sources, our business or commercial purposes for collecting it, and the categories of third parties to whom we have disclosed it (Cal. Civ. Code § 1798.110, § 1798.115).
- **Right to Delete.** The right to request that we delete personal information we have collected from you, subject to the statutory exceptions in Cal. Civ. Code § 1798.105(d) (for example, where we are legally obligated to retain the information).
- **Right to Correct.** The right to request that we correct inaccurate personal information we maintain about you (Cal. Civ. Code § 1798.106).
- **Right to Opt Out of Sale or Sharing.** The right to opt out of the sale or sharing of personal information for cross-context behavioral advertising (Cal. Civ. Code § 1798.120). As stated above, we do not sell personal information and we do not share it for cross-context behavioral advertising.
- **Right to Limit Use of Sensitive Personal Information.** The right to limit the use and disclosure of sensitive personal information to those purposes specified in Cal. Civ. Code § 1798.121. We do not use sensitive personal information for purposes that would trigger this right.
- **Right to Non-Discrimination.** The right not to receive discriminatory treatment for exercising any of the rights described above (Cal. Civ. Code § 1798.125).

- **Right to Designate an Authorized Agent.** The right to designate an authorized agent to submit a request on your behalf, in accordance with the implementing regulations at 11 Cal. Code Regs. § 7063.

“Shine the Light” Disclosure (Cal. Civ. Code § 1798.83). California residents may request information about our disclosure of personal information to third parties for the third parties’ direct marketing purposes during the immediately preceding calendar year. To make a request, please email legal@quirozenterprise.com. We do not currently disclose personal information to third parties for their own direct-marketing purposes.

9.2 Rights Under Other U.S. State Laws

Residents of states that have enacted comprehensive consumer-privacy laws — including, without limitation, the Virginia Consumer Data Protection Act (“**VCDPA**”), the Colorado Privacy Act (“**CPA**”), the Connecticut Data Privacy Act (“**CTDPA**”), the Utah Consumer Privacy Act (“**UCPA**”), the Texas Data Privacy and Security Act (“**TDPSA**”), the Oregon Consumer Privacy Act, the Montana Consumer Data Privacy Act, the Indiana Consumer Data Protection Act, the Iowa Consumer Data Protection Act, the Tennessee Information Protection Act, the Delaware Personal Data Privacy Act, and other materially similar laws now or hereafter in effect — have rights that broadly correspond to the CCPA rights described above (access, deletion, correction, portability, opt-out of certain processing, and the right to appeal a denial). We honor these rights in accordance with each applicable law.

9.3 Rights Under the GDPR / UK GDPR

If you are located in the European Economic Area, the United Kingdom, or Switzerland, you have rights under the EU General Data Protection Regulation 2016/679 and the UK General Data Protection Regulation, including the rights of **access** (Article 15), **rectification** (Article 16), **erasure** (“right to be forgotten,” Article 17), **restriction of processing** (Article 18), **data portability** (Article 20), **objection to processing** (Article 21), and **not to be subject to a decision based**

solely on automated processing (Article 22). The legal bases on which we process personal information typically include your consent, the performance of a contract, our legitimate interests in operating and securing the Site, and compliance with our legal obligations, as further described in Section 3.1. Where we rely on consent, you may withdraw your consent at any time without affecting the lawfulness of processing prior to withdrawal. You may also lodge a complaint with your local supervisory authority — for residents of the European Union, this is typically the data-protection authority of the Member State where you live or work; for residents of the United Kingdom, this is the Information Commissioner's Office (<https://ico.org.uk>).

9.4 How to Exercise Your Rights

To exercise any of these rights, please send a written request to legal@quirozenterprise.com from the email address associated with your interaction with the Site, or to the postal address in Section 14, with the subject line "Privacy Request." Please describe the right you wish to exercise and include enough information for us to verify your identity. We will respond within the time period required by the applicable law (typically forty-five (45) days under the CCPA, with a one-time extension of up to forty-five (45) additional days where reasonably necessary; one (1) month under the GDPR, with an extension of up to two (2) additional months in complex cases). We may need to verify your identity before processing your request; verification may include matching information you provide against information we already maintain. We will not discriminate against you for exercising any privacy right.

Right to Appeal. If we decline to act on your privacy request, you may appeal that decision by replying to our written denial or by emailing legal@quirozenterprise.com with the subject line "Privacy Appeal." Where required by applicable state law (Virginia, Colorado, Connecticut, and others), we will respond to the appeal within sixty (60) days. If your appeal is denied, you may have the right to contact your state attorney general or other regulator.

10. Security; Breach Notification

We implement reasonable administrative, technical, and physical safeguards designed to protect personal information against accidental or unlawful destruction, loss, alteration, unauthorized disclosure, and unauthorized access. These safeguards include enforcing transport encryption (HTTPS/TLS) for the Site, restricting access to information on a need-to-know basis, and operating the Site on the Cloudflare edge with built-in DDoS mitigation, web-application firewall, and bot-management features. **However, no method of transmission over the Internet and no method of electronic storage is one hundred percent secure.** We cannot guarantee absolute security and disclaim liability for any loss arising from circumstances outside our reasonable control to the fullest extent permitted by applicable law.

If we become aware of a breach of security leading to the accidental or unlawful destruction, loss, alteration, unauthorized disclosure of, or access to personal information transmitted, stored, or otherwise processed in connection with the Site, we will respond consistent with applicable law, including notifying you and the relevant supervisory authorities where required (within seventy-two (72) hours after becoming aware of a breach where required by GDPR Article 33, and consistent with the timing requirements of California Civil Code § 1798.82 and analogous state laws).

11. International Data Transfers

The Site is hosted and operated from the United States. If you access the Site from outside the United States, your personal information will be transferred to, stored, and processed in the United States and in any other country in which our service providers operate. The data-protection laws of those jurisdictions may differ from the laws of your jurisdiction. Where required by applicable law (including the GDPR / UK GDPR), we rely on appropriate transfer mechanisms, such as the European Commission's 2021 Standard Contractual Clauses (Implementing Decision (EU) 2021/914), the UK's International Data Transfer Addendum, or, where applicable, the EU-US Data Privacy Framework

certifications maintained by individual subprocessors. Copies of the relevant safeguards are available on request to legal@quirozenterprise.com.

12. Artificial Intelligence and Automated Processing

The Site, and certain operating-brand customer-service channels operated by Quiroz Enterprise affiliates, may use artificial-intelligence and machine-learning systems, including third-party large-language models such as those provided by Anthropic, PBC. The use of such systems is described further in Section 8 of our [Terms of Service](#). Personal information you provide to those channels is processed by us and the relevant AI provider as described in Sections 4 and 5 of this Policy. We do not use AI systems to make solely automated decisions that produce legal effects or similarly significant effects on you, within the meaning of GDPR Article 22. Inputs you submit are not used by Frankie Quiroz LLC to train any foundation model, and the contractual commitments of our AI subprocessors prohibit such use absent your affirmative consent or a separate agreement.

13. Changes to This Policy

We may update this Policy from time to time to reflect changes in our practices, technologies, legal requirements, or other reasons. The most current version will always be posted at this URL, with the "Effective Date" updated to reflect the date of the most recent revision. If we make material changes, we will provide notice by posting an updated version on the Site and, where appropriate, by other means (such as email to the address you most recently provided). Your continued access to or use of the Site after the Effective Date of any updated Policy constitutes your acceptance of the updated Policy. We will retain prior versions of this Policy and make them available on request.

14. Contact Us

If you have questions about this Policy or our privacy practices, or if you wish to exercise any of the rights described above, please contact us:

Frankie Quiroz LLC

Attn: Privacy

30 N Gould St, Suite R

Sheridan, Wyoming 82801

United States

Email: legal@quirozenterprise.com

For California-required disclosure of our physical operating address (Cal. Civ. Code § 1798.130(a)(5)(C)): **4432 Holt Boulevard, Unit K, Montclair, California 91763**. Privacy correspondence should be directed to the registered office and email above, not to the operating address.

If you are located in the European Economic Area, the United Kingdom, or Switzerland and prefer to contact us in writing, you may do so at the registered office address above. Frankie Quiroz LLC has not appointed a designated Article 27 GDPR EU Representative or UK GDPR Representative as of the Effective Date because the Site is not directed at the EU or UK market and our processing of personal data of EU or UK residents through the Site is incidental.

Quiroz Enterprise is the operating company of Frankie Quiroz LLC, a privately held Wyoming-domiciled entity. All brand marks shown are the property of their respective subsidiaries or affiliated entities. The Quiroz Enterprise operating circle is invite-only — there is no public registration.

Quiroz Enterprise

For Business

Company

Legal

Flagship

Wholesale

About

Terms of Service

Portfolio

Press

Insights

Privacy Policy

Capabilities

Member Sign In

Contact

Cookie Policy

Founder

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