

Capitol Services, Inc. or Capitol Corporate Services, Inc. (hereinafter collectively referred to as “CSI,” “we,” or “our”) is committed to maintaining the privacy of anyone who visits our website or utilizes any of our software or services (hereinafter collectively referred to as “Services”). Please read this privacy policy (“Privacy Policy”) before accessing our Services. By accessing our Services, you are accepting the practices described in this Privacy Policy. These practices may be changed at any time. You are encouraged to review this Privacy Policy whenever you access our Services to make sure that you understand how your information will be processed.

## 1. Collection and Storage of Information

Our Services collect information which may include personal information. Personal information is any information that identifies, relates to, describes, is capable of being associated with, or may reasonably be linked, directly or indirectly, with a particular consumer or household.

The following broadly describes our practices regarding the collection of your personal information:

- **Information You Provide** - You provide certain personal information to us when you set up an account, submit requests through phone, mail, email, or our Services, or communicate with us in any other way. This information may include your name, alias, title, address, telephone number, email address, job title, organization, user ID, account log-in credentials, professional or employment information, signature, bank account number, credit card number, debit card number, other financial information, and inferences from the foregoing.
- **Information Collected Automatically Through Your Use of Our Services** - When you utilize our Services, we may, through our own practices or other tracking technologies, automatically collect certain personal information in order to improve our Services and address other business needs, such as information security, legal compliance, and business continuity. This information may include device information, such as your IP address, operating system, browser ID, and geolocation, log data, usage data, records of personal property or other purchasing or consuming histories or tendencies, and inferences from the foregoing.
- **Information Provided by Third Parties** - Your personal information is often provided to us by third parties in connection with the uses specified in section 2 and includes the same categories of personal information listed above. Third parties that may provide us your personal information include social media platforms, clients, agents, advisors, consultants, lawyers, counterparties, and other third parties.

CSI securely stores your personal information for as long as reasonably required for its legitimate business purpose, as required by applicable law, or until you request deletion of your personal information.

## 2. Use of Information

We process personal information collected through our Services lawfully, fairly, and in a transparent manner. We may process the personal information we collect through the aforementioned processes for the following purposes:

- To provide and improve our Services;
- To provide customer service by responding to your requests, questions, and comments;
- To personalize our Services based on your preferences and behaviors;
- To communicate marketing news and updates, security alerts, and support messages;
- To administer surveys and other market research;
- To monitor usage of our Services;
- To detect and investigate security incidents and address other information security needs;
- To invoice you for Services rendered;
- To comply with court orders, subpoenas, search warrants, or other law enforcement requests;
- To protect our rights and property, through providing information to advisors and prosecuting and/or defending a legal proceeding;
- To perform data analytics in order to improve our Services;
- To enforce compliance with our terms and conditions, policies, and applicable law; and
- For any other purpose with your consent.

Such processing is necessary to serve our legitimate business interests, including, but not limited to, the operation and administration of our Services, compliance with legal requirements, and provision of Services you have requested.

### 3. Disclosure of Information

We may share your personal information as follows:

- With our affiliated entities under common ownership and control to provide Services;
- With service providers who perform services on our behalf solely in accordance with our terms and conditions and other policies;
- With our banking partner in order to facilitate secure transaction processing;
- With external auditors and third parties engaged in fraud prevention or investigation;
- With our advisors, such as lawyers and accountants, in order to protect our rights and property;
- With a buyer or successor in the event of a merger, reorganization, dissolution, or other sale or transfer of title;
- To comply with legal obligations; and
- With your consent or at your direction.

We do not “sell” your personal information in the traditional sense; however, as described above, we may share your personal information with our trusted third-party service providers. Certain jurisdictions have defined these transfers as “sales,” and therefore, we are required to disclose them.

### 4. Children’s Information

CSI does not knowingly collect information or target our Services to children under thirteen. If we determine that an individual under the age of thirteen has submitted information to our Services, we will delete that information.

## 5. Cookies and Analytics

Our Services may use cookies depending on the features offered. A cookie is a small file stored on your computer, which is read by a website's server and may contain personal information, such as your user identification code, customized web preferences, and browser history. Cookies are useful in recognizing you and your access privileges for certain locations on our Services. You may browse our Services with cookies disabled; however, you may need to enable cookies to access certain portions of our Services. Your browser may also allow you to adjust your browser settings so that "do not track" requests are sent to websites that you visit. However, CSI does not respond to "Do Not Track" (DNT) signals.

Our Services uses Pardot and Google Analytics, which utilize cookies and similar technologies, to collect and analyze information about the use of our Services and report on activities and trends. For information on Pardot's privacy policy, please visit <https://www.salesforce.com/company/privacy>. Further information about Google's privacy policy is available at <https://policies.google.com/privacy>, and the Google Analytics opt-out browser add-on can be downloaded by visiting <https://tools.google.com/dlpage/gaoptout>.

## 6. Third-Party Links

Our Services may contain links to other websites, services, and social media platforms that are owned or operated by third parties not affiliated with CSI. We make no promises or guarantees regarding the data collection, use, disclosure, or privacy practices of such third parties. If you choose to access third-party websites, services, or social media platforms through our Services, please review their applicable privacy policies.

## 7. Commitment to Information Security

CSI maintains the appropriate technical and organizational measures that are necessary to ensure a level of security appropriate to the risks associated with the categories of personal information and the processing we undertake. However, no method of electronic transmission or storage is 100% secure. Therefore, while we strive to use commercially reasonable means to protect your personal information, we cannot guarantee its absolute security.

## 8. Your Rights to Your Information

In certain jurisdictions, you may have legal rights associated with your personal information which could include the following:

- The right to access (request copies of your personal information);
- The right to rectification (request we correct any information you believe to be inaccurate or incomplete);
- The right to erasure (erase your personal information under certain conditions);
- The right to restrict processing under certain conditions;
- The right to be notified (informed about the uses of your personal information and actions that can be taken);
- The right to reject automated processing of personal information under certain conditions;
- The right to object to processing under certain conditions; and

- The right to data portability (request we transfer your collected personal information to another organization, or directly to you, under certain conditions).

Any such requests or questions about this Privacy Policy should be submitted to the privacy contact listed in section 9 below. We will respond to all verified requests within the timeframe required by applicable law.

### 9. Privacy Rights of California Residents

The California Consumer Privacy Act (the “CCPA”) provides California residents with specific rights with respect to their personal information. If you are a California resident, you have the following rights:

- The right to request disclosure of the categories and specific pieces of personal information we have collected, “sold,” or disclosed in the preceding twelve (12) months. Please see sections 1, 2, and 3 for this information and an extensive explanation of our practices regarding the collection, use, sale, and disclosure of your personal information.
- The right to request that we delete any of your personal information collected.
- The right to opt out of the sale of your personal information.
- The right to non-discrimination in exercising your CCPA privacy rights.

Any such requests or questions about this Privacy Policy should be submitted to the following privacy contact:

Name: Information Security  
Email: [infosecurity@capitol-services.com](mailto:infosecurity@capitol-services.com)  
Phone: 1-800-345-4647  
Address: Capitol Services, Inc.  
Attn: Information Security  
206 E. 9th Street, Suite 1300  
Austin, Texas 78701

You can also submit a request by visiting <https://www.capitol-services.com/do-not-sell-my-personal-information/>.

In responding to requests, we will only collect the necessary personal information to verify the authenticity of the request and will respond to verified requests within the timeframe required by the CCPA. If you use an authorized agent to exercise your California privacy rights, we may request additional information in order to prove the authorized agent has the authority to submit requests on your behalf. The exercise of your CCPA privacy rights are subject to certain exceptions.

### 10. Location of Information

Any personal information collected when you utilize our Services is transferred to, stored, or processed in the United States by CSI or a third party acting on our behalf.

### 11. Retention of Information

CSI will retain your personal information in accordance with applicable law.

### **12. Modification to Privacy Policy**

CSI reserves the right to change this Privacy Policy at any time by updating this posting. Updated versions of this Privacy Policy will appear on our Services and are effective immediately.

### **13. Marketing Opt-Out**

If you would like to opt-out of future marketing communications, you may contact us using one of the following methods:

Name: Marketing Department

Email: [info@capitolservices.com](mailto:info@capitolservices.com)

Phone: 1-800-345-4647

Address: Capitol Services, Inc.

Attn: Marketing

206 E. 9th Street, Suite 1300

Austin, Texas 78701

Please note that if you opt-out of receiving marketing communications, we may still send you important administrative messages from which you cannot opt-out.