

## **NOTICE OF PRIVACY POLICY**

Capitol Services, LLC and its affiliated companies, Capitol Corporate Services, Inc., Capitol Services, Inc., and Capitol Document Services, Inc. (hereinafter collectively referred to as “Capitol Services,” “we,” or “our”), are 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. Some of the personal information collected by our Services may be considered sensitive personal information in certain jurisdictions.

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

- *Information You Provide.*
  - **Personal Information.** 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, professional, employment, or education information, signature, and inferences from the foregoing.
  - **Sensitive Personal Information.** You may provide sensitive personal information when you utilize our Services including your user ID, account log in credentials, bank account number, credit card number, other financial information, social security number, driver’s license, state identification card, or passport number.

- *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, including sensitive 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 and sensitive personal information listed above. Third parties that may provide us with your personal information and sensitive personal information include social media platforms, clients, agents, advisors, consultants, lawyers, counterparties, and other third parties.

Capitol Services securely stores your personal information and sensitive personal information for as long as reasonably required for its legitimate business purpose, as required by applicable law, or in certain jurisdictions, until you request deletion of such 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 recruit and assess suitability of a potential job applicant;
- To perform screening and interviews;
- 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.

We use sensitive personal information collected through our Services to provide our Services, including maintaining or servicing accounts, providing customer service, processing or fulfilling orders and transactions, verifying customer information, performing applicant screenings, and processing payments.

### **3. Disclosure of Information**

We may disclose your personal information, including sensitive 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
- If the disclosure does not fall into the categories above, then with your consent or at your direction.

We do not “sell” your personal information in the traditional sense; however, as described above, we may disclose 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**

Capitol Services 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 and other tracking technologies depending on the features offered. While some cookies are essential for the functionality of our website and Services, other cookies may be used to collect analytical information or for marketing purposes.*

### **About Cookies**

*A cookie is a small file stored on your device, 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. We use cookies to make our website work and perform certain functions, described below. Cookies are also useful in recognizing you and your access privileges for certain locations on our Services.*

### **How We Use Cookies**

*We use both first-party and third-party cookies in the following ways:*

*-Strictly Necessary Cookies. These cookies are necessary for our Services to function and cannot be rejected. They do not collect, process, or store any personal information.*

*-Analytical Cookies. These cookies are used to better understand how visitors use our Services. They provide us with information on page views, where visitors come from, and how they use our website. We use this information to improve our Services. These cookies may be rejected.*

*-Third-Party Cookies. Our Services use third-party cookies or cookies owned by other companies that provide us with services.*

*o We use Marketing Cloud Account Engagement 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 Marketing Cloud Account Engagement'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>.*

*o Our Services also use ZoomInfo to enhance your experience, analyze traffic, and help identify business visitors for sales and marketing purposes. These cookies may collect data about your browsing behavior and company affiliation. For further information on ZoomInfo's privacy policy, please visit <https://www.zoominfo.com/legal/privacy-policy>.*

*o We use Clear Company to display open positions on our website. This cookie does not collect any personal information. For more information on Clear Company's privacy policy, please visit <https://www.clearcompany.com/privacy-policy/>.*

## **How We Use Other Tracking Technologies**

*We may collect certain information when you open or click links in our emails through web beacons. These allow us to monitor traffic patterns throughout our website, measure traffic throughout our Services, and analyze content performance.*

## **Your Choices**

*You may browse our Services with cookies disabled; however, you may need to enable cookies to access certain portions of our Services. You may withdraw your consent from the use of our cookies at any time through the "Change Cookie Preferences" link in the footer of our website.*

*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, we do not respond to "Do Not Track" (DNT) signals.*

## **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 Capitol Services. 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**

*Capitol Services 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 following privacy contact:*

*Name: Information Security*

*Email: [infosecurity@capitolervices.com](mailto:infosecurity@capitolervices.com)*

*Phone: 1.800.345.4647*

*Address: Capitol Services, LLC*

*Attn: Information Security*

*PO Box 1831*

*Austin, Texas 78767*

*You can also submit a request by visiting [Do Not Sell Or Share My Personal Information](#). 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, as amended by the California Privacy Rights Act (together, the “CCPA”) provides California residents with specific rights with respect to their personal information, including sensitive 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 and sensitive personal information we have collected, “sold,” shared, 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, sharing, and disclosure of your personal information and sensitive personal information;*
- The right to request that we alter or delete any of your personal information and sensitive personal information collected;*
- The right to know categories of third parties;*
- The right to consent to collection, sharing, and use;*
- The right to opt out of the sale or sharing of your personal information and sensitive personal information;*
- The right to non-discrimination in exercising your CCPA privacy rights; and*
- The right to request correction of inaccurate personal information and sensitive personal information.*

*Any requests to exercise your rights or appeal our response to your requests should be submitted to the privacy contact listed in section 8 above. 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. Privacy Rights of Texas Residents

*The Texas Data Privacy and Security Act (“TDPSA”) provides Texas residents who are acting in an individual or household context with certain rights, including:*

- The right to confirm whether Capitol Services is processing your personal data and to access the personal data;*
- The right to correct inaccuracies in your personal data, taking into account the nature of the personal data and the purposes of the processing of the personal data;*
- The right to delete your personal data;*

- If the data is available in a digital format, the right to obtain a copy of your personal data in a portable and, to the extent technically feasible, readily usable format that allows you to transmit the data without hindrance;
- The right to opt out of the processing of your personal data for purposes of targeted advertising, the sale of personal data, or profiling in furtherance of a decision that produces a legal or similarly significant effect concerning you; and
- If we've refused to take action on a request to exercise your rights under the TDPSA, the right to appeal.

Any requests to exercise your rights or appeal our response to your requests should be submitted to the privacy contact listed in section 8 above. 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 TDPSA. If you use an authorized agent to exercise your Texas 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 TDPSA privacy rights are subject to certain exceptions.

## **11. Location of Information**

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

## **12. Retention of Information**

Capitol Services will retain your personal information in accordance with applicable law.

## **13. Modification to Privacy Policy**

Capitol Services 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.

## **14. 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



## Privacy Policy

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*Address: Capitol Services, LLC*

*Attn: Marketing*

*PO Box 1831*

*Austin, Texas 78767*

*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.*