

# eCapital

## PRIVACY NOTICE

Last modified: February 18, 2025

### Introduction

This Privacy Notice applies to information and data of eCapital. Together with our affiliates (“**eCapital**,” “**we**” or “**us**”) we may collect from you on *ecapital.com*, from mobile and desktop applications you download from us, in our online client portals, or when you interact with us via email, text (SMS, MMS), telephone, social media, fax, mail, and any other messages between you and eCapital.

This Privacy Notice is a part of the Terms of Service that governs your use of our website located at [www.ecapital.com](http://www.ecapital.com).

### Collection of Your Personal Information

We collect several types of information from and about users of eCapital services:

- Directly from you when you provide it to us;
- Automatically as you navigate through our website; and
- From third parties, for example, our business partners.

The following chart outlines what data is collected, the purpose of collection, and via what means:

Information Collected Directly		
Category/Type of Information	Purpose(s)	Lawful Basis for Processing
Contact information: <ul style="list-style-type: none"><li>• first name</li><li>• last name</li><li>• email address</li><li>• telephone number</li><li>• company name</li><li>• company address</li><li>• phone number</li></ul>	To provide information, products, or services as requested. To notify you about changes to our website or any products or services. To follow up with your participation in a promotion or contest entry. To provide customer	Necessary for our legitimate interests (for operating our business) and performance of a contract with you.

	support. For marketing activities.	
Your correspondence, including through our chatbot	To reply to your correspondence and provide customer support. To respond to reported problems with our website.	Necessary for our legitimate interests (for operating our business) and performance of a contract with you.
Your search queries on our Website	To estimate our audience size and usage patterns. To improve our website. To customize our website according to your individual interests. To speed up searches.	Necessary for our legitimate interests (to study how customers use our products and to inform our marketing strategy).
Billing or Business Financial Information	To carry out our obligations and enforce our rights arising from contracts, including billing and collection. To complete transactions.	Performance of a contract with you.
Your Survey Responses	To conduct research about your opinion of current services or of potential new services that may be offered.	Necessary for our legitimate interests (to develop our products and services).
Your User Contributions	To be published or displayed on public areas of our website or transmitted to other users of our website.	Necessary for our legitimate interests (for operating our business) and performance of our contract with you.
Details about your Inquiries	To respond to your sales-related or other inquiries, e.g., via forms we host on our website.	Necessary for our legitimate interests (for operating our business) and performance of our contract with you.
Details about your Transactions, and the fulfillment of your Agreement for use of our Products/Services	To complete transactions and inquiries (e.g., via forms we host on our website). To provide customer support.	Performance of a contract with you.
<b>Information Collected Automatically /Indirectly</b>		

Category/Type of Information	Purpose(s)	Lawful Basis for Processing
<p>Website Tracking and Analytics - details of your visit to our website, including information such as traffic and navigation data (pages visited), previous ad performance and location data and other information about your computer and your internet connection, including IP address, operating system, device type and browser type, and logs.</p>	<p>To present our website and its contents.</p> <p>To allow you to participate in interactive features on our website. To improve our website, our products, services, marketing efforts and customer relationships.</p> <p>To customize our website according to your individual interests and to recognize you when you return to our website.</p> <p>To deliver relevant website content and marketing advertisements to you and to measure the effectiveness of the advertising we serve to you/perform statistical analysis.</p> <p>To speed up searches.</p> <p>To record the popularity of certain website content and services. To estimate our audience size and usage patterns.</p> <p>To verify system and server integrity.</p>	<p>Necessary for our legitimate interests (for operating our business, to study how customers use our products, to develop them, and to inform our marketing strategy). To provide network security and to prevent fraud.</p>
<b>Information Collected from Third Parties</b>		
Category/Type of Information	Purpose(s)	Lawful Basis for Processing
<p>Personal and non-personal information (e.g., ad clicks and views).</p>	<p>To analyze the effectiveness of our prospecting efforts and advertising tools.</p> <p>To improve our placements within social networking sites with whom we engage</p>	<p>Necessary for our legitimate interests (to study how customers use our products, to develop them, and to inform our marketing strategy).</p>

	to promote our products and services and to interact with our clients.	
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## Cookie Notice and Similar Technologies

The technologies we use for automatic data collection may include:

**Cookies (or browser cookies).** A cookie is a small file placed on the hard drive of your computer. You may refuse to accept browser cookies by activating the appropriate setting on your browser. However, if you select this setting, some parts of our website may then be inaccessible or not function properly. Unless you have adjusted your browser setting, our system will issue cookies when you direct your browser to our website.

**Web Beacons.** Pages of our website and our emails may contain small electronic files known as web beacons (also referred to as clear gifs, pixel tags, and single-pixel gifs) that permit eCapital, for example, to count users who have visited those pages or opened an email and to record related website statistics (for example, recording the popularity of certain website content and verifying system and server integrity).

**Anti-spam Technology.** This site is protected by Google's reCAPTCHA technology to prevent malicious form submissions. You may click these links to review Google's [Privacy Policy](#) and [Terms of Service](#).

## How We Use Your Personal Information

We use information that we collect about you or that you provide to us, including any personal information:

- To present our website and its contents to you.
- To provide you with information, products, or services that you request from us.
- To carry out our obligations and enforce our rights arising from any contracts entered into between you and us, including for billing and collection.
- To notify you about changes to our website or any products or services we or our affiliates offer or provide through it.
- To allow you to participate in interactive features on our website.
- To conduct research about your opinion of current products and services or of potential new services that may be offered.

- To keep track of pages our users visit on our websites in order to determine what eCapital products and services are the most popular. This data is used to deliver customized content and advertising pertaining to eCapital customers whose behavior indicates that they are interested in a particular subject area.

Note that we may transfer and/or store your personal information to or from the United States, United Kingdom, and Canada pursuant to these purposes.

### How We Disclose Your Information

eCapital does not sell, rent or lease personal information; however, we may disclose or share personal information as outlined in the chart below. We may also provide information about our users, and information that does not identify any individual or household, without restriction.

Recipient Category/Type	Type of Information	Purpose
Subsidiaries and Affiliates	Personal information	To fulfill a business purpose
Service Providers and Contractors	Personal information such as: IP address, browser type, host name and chat content.	To fulfill a business purpose
Third Party Website Tools	Personal information such as: IP address, browser type, host name and chat content.	To perform statistical analysis. To send emails. To provide customer support. To inform our marketing strategy. To analyze the effectiveness of our advertising tools.
Buyers or other Successors	Personal information	To complete any merger, divestiture, restructuring, reorganization, dissolution, or other sale or transfer of some or all of eCapital's assets.
Government or other regulatory bodies or as required via a legal process	Personal information	To comply with any court order, law, regulation or legal process.

## Opt-in Events

Where legally required or as elected by eCapital, we collect prior written express consent to send you marketing emails, calls, and text messages at the email address and phone number provided. This activity may include calls and texts made using an automatic telephone dialing system or pre-recorded or artificial voice recordings, even if your number is listed on any company-specific, state or federal Do-Not-Call list. Message and data rates may apply. Consent is not required as a condition to obtain any products or services from eCapital.

## Your Privacy Rights

We strive to provide you with choices regarding the personal information you provide to us. We have created mechanisms to provide you with control over how your data is used and/or disclosed. According to the applicable laws, you may have the ability to exercise one or more of the following rights:

- Opt-Out
- Know/Access and port your information
- Correct or rectify your information
- Delete or erase your information

To make a Privacy Rights request, please use the specific email addresses within each section below, or write to us at:

### **eCapital**

Attention:

Privacy Officer and  
Legal Department  
20807 Biscayne Blvd #203,  
Aventura, Florida 33180

Please see more information below for details of each Privacy Right we honor.

### Opt-Out

- **Tracking Technologies and Advertising.** You can set your browser to refuse all or some browser cookies, or to alert you when cookies are being sent. If you disable or refuse cookies, please note that some parts of this site may then be inaccessible or not function properly.
- **Promotional Offers from eCapital.** You can opt out of receiving promotions of our own or third parties' products or services to your

email address or other contact information by checking the relevant box if one is provided on the form on which we collect your data, by logging into our website and adjusting the user preference boxes in your account profile within our online client portals, or by sending us an email stating your request to [unsubscribe@ecapital.com](mailto:unsubscribe@ecapital.com). You can also reply to any promotional email asking to be omitted from future email distributions, or simply click the “unsubscribe” link from our email campaigns located at the bottom of any promotional email we send to you. Please note that this opt-out mechanism does not apply to information provided to eCapital as a result of a transaction with eCapital, warranty registration, product service experience or other transactions.

- **Digital Analytics.** We use third parties, such as Google Analytics, to gather deidentified information about our website users. For more information about Google Analytics, please visit <https://policies.google.com/technologies/partner-sites>. You can also opt out of Google's collection and processing of data generated by your use of our websites by going to <https://tools.google.com/dlpage/gaoptout>.
- **Targeted Advertising.** If you do not want us to use information that we collect or that you provide to us to deliver advertisements according to any advertisers' target-audience preferences, you can opt-out by sending us an email stating your request to [unsubscribe@ecapital.com](mailto:unsubscribe@ecapital.com). You can also learn more and opt-out of having data collected, used or transferred to targeted advertising by companies that are listed at: <https://optout.aboutads.info/> OR <https://optout.networkadvertising.org/>.

### Know/Access and Port Your Information

You can review your personal information by logging into our website and visiting your account profile page within our online client portals.

You may also request access to your information by emailing us at [access@ecapital.com](mailto:access@ecapital.com). We will do our best to accommodate your access request as specified. This includes requests for portability or information regarding our disclosures of your personal information to third parties for direct marketing purposes under the California Shine the Light law, the California Consumer Privacy Act, and others.



### **Correct or Rectify Your Information**

You may send us an email at [correct@ecapital.com](mailto:correct@ecapital.com) or write to us at the physical address above to request the correction of any personal information that you have provided to us. We may not accommodate a request to change information if we believe the change would violate any law or legal requirement or cause the information to be incorrect.

### **Delete or Erase Your Information**

You may send us an email to [delete@ecapital.com](mailto:delete@ecapital.com) or write to us at the address above to request the deletion, subject to certain exceptions, of any personal information that you have provided to us. Please note that we cannot delete your personal information except by also deleting your user account.

### **Authorized Agent**

If you have been given permission to act on another individual's behalf to submit a Privacy Rights request, please so indicate in writing at the time of your request.

### **Children's Privacy**

Our website is not designed for use by individuals under the age of 18. eCapital does not knowingly collect personally identifiable information from children under the age of sixteen (16). If you have concerns relating to the collection of personal data from minors, please contact us at [datainfo@ecapital.com](mailto:datainfo@ecapital.com) or send a letter to the address included in the Contact Information section at the end of this Notice.

### **Job Applicants and Employee Data**

If you are a resident of the state of California and are considering a position with eCapital, or are hired by eCapital, please note that we may collect banking information, employment history, criminal history, credit information and other personal information. This information is collected directly from applicants, and from a variety of public sources as well as third parties, including recruiters. The purpose of this information is to determine eligibility for employment and potentially hire you.

### **Security of Your Personal Information**

The security of your personal information is important to us. Please remember, however, that no method of transmission over the Internet, or method of electronic storage, is 100% secure. While we strive to use commercially acceptable means to protect your personal information from unauthorized access, use or disclosure, we cannot guarantee its absolute security.





As you engage with our online client portals, or other portions of our service that may require registration and login processes whereby you will be provided a unique User ID and for which you will be required to create a password, this becomes your “user login” information.

You are responsible for maintaining the confidentiality of any user login information and for all activities related to your user login. By using our online client portals, you agree to notify us immediately if there is any unauthorized use of your user login information.

## **Changes to this Notice**

eCapital will occasionally update this Privacy Notice to reflect company and customer feedback. If we make changes to this Notice, we will publish the full Notice on this page including the effective date. eCapital encourages you to periodically review this Privacy Notice to be informed of how eCapital is collecting and protecting your information. If you would like a copy of our past Privacy Notice, please email [archive@ecapital.com](mailto:archive@ecapital.com).

## **Contact Information**

eCapital welcomes your questions or comments regarding this Privacy Notice. If you have any questions or believe that eCapital has not adhered to this published Privacy Notice, please contact eCapital at:

### **eCapital**

Attention:

Privacy Officer and  
Legal Department

20807 Biscayne Blvd #203

Aventura, FL 33180

Email Address: [privacy@ecapital.com](mailto:privacy@ecapital.com)

Telephone: (833) 505-4397

This Privacy Notice is effective as of February 18, 2025.