

Privacy Policy

EFFECTIVE DATE	LAST UPDATED
July 23, 2026	July 23, 2026

This Privacy Policy explains how Capital Connect Solutions, Corp. d/b/a CapConnect collects, uses, discloses, and protects Personal Data when individuals visit our websites, interact with our marketing, communicate with us, or use CapConnect OS.

This Policy does not replace the Data Processing Addendum where CapConnect processes Personal Data on behalf of a business customer. In that context, the customer generally determines the purposes and means of processing, and individuals should direct privacy requests to that customer.

1 1. Information We Collect

1.1 Information Provided Directly

We may collect:

- name, title, company, email, phone number, address, and account details;
- billing and transaction information;
- support requests and communications;
- survey, feedback, and event registration information;
- uploaded files and information submitted through the Services;
- communications, call recordings, transcripts, messages, and CRM records where enabled by a customer; and
- preferences and consent records.

1.2 Information Collected Automatically

We may collect:

- IP address, browser, device, operating system, and approximate location;
- pages viewed, links clicked, referring pages, and session activity;
- log, security, diagnostic, and performance data;
- cookies, pixels, local storage, and similar technologies;
- feature usage and workflow activity; and
- communication delivery, response, and engagement events.

1.3 Information from Other Sources

We may receive information from customers, integrations, data providers, public sources, social networks, advertising partners, service providers, and business partners.

2 2. How We Use Information

We may use Personal Data to:

- provide, operate, secure, and support the Services;
- create and administer accounts;
- process payments and transactions;
- communicate about the Services;
- provide implementation, professional, or managed services;
- personalize features and customer experiences;
- analyze usage, performance, and product demand;
- improve and develop products, models, workflows, and services as permitted by contract;
- detect fraud, abuse, security incidents, and policy violations;
- comply with law and enforce agreements;
- market CapConnect and measure campaigns;
- create Aggregated Data and De-identified Data; and
- support corporate transactions.

3 3. De-identified and Aggregated Information

We may create and use Aggregated Data, Derived Data, and De-identified Data for analytics, benchmarking, research, model development, service improvement, and commercial purposes. We do not publicly disclose such information in a manner that reasonably identifies an individual or customer unless authorized.

4 4. How We Disclose Information

We may disclose information to:

- hosting, infrastructure, analytics, security, support, payment, communications, and professional service providers;
- customer-selected integrations and service providers;
- affiliates and corporate transaction counterparties;
- advisors, auditors, insurers, and financing sources;
- government authorities or other parties where required by law or needed to protect rights, safety, and security;
- business partners where the individual has requested or consented; and
- customers that control the account or campaign through which the individual interacted.

We may disclose Aggregated Data and De-identified Data for lawful business purposes.

5 5. Cookies and Advertising

We may use necessary, functional, analytics, and advertising technologies. Depending on location and configuration, visitors may be offered choices through a cookie banner or settings interface. Browser controls may also limit cookies, but disabling them may affect functionality.

We may use advertising services to measure campaigns and show relevant advertisements. We will provide legally required opt-out mechanisms for targeted advertising, sale, or sharing where applicable.

6 6. Data Retention

We retain Personal Data for as long as reasonably necessary for the purposes described, including to provide Services, maintain business records, comply with law, prevent fraud, resolve disputes, and enforce agreements. Retention varies by data type, account status, customer instructions, backup cycle, and legal requirement.

7 7. Security

We use reasonable administrative, technical, and physical safeguards. No transmission or storage method is completely secure. Individuals should use strong credentials and promptly report suspected unauthorized access.

8 8. Privacy Rights

Depending on location, individuals may have rights to request access, correction, deletion, portability, restriction, objection, or information about disclosures; to opt out of certain targeted advertising, sale, sharing, or profiling; or to withdraw consent.

Requests may be submitted to privacy@capconnectsolutions.com. We may verify identity and authority. Where CapConnect processes data on behalf of a customer, we may direct the request to that customer.

Authorized agents may submit requests where permitted by law. Individuals may appeal a denied request by replying to our decision with "Privacy Appeal."

9 9. International Transfers

Information may be processed in the United States and other countries where we or our providers operate. Where required, we use recognized contractual or legal mechanisms for international transfers.

10 10. Children

The Services are intended for businesses and are not directed to children under 16. We do not knowingly collect Personal Data from children through our own websites.

11 11. Third-Party Links and Services

Third-party services have their own privacy practices. CapConnect is not responsible for those practices.

12 12. Changes

We may update this Policy. We will post the updated version and revise the "Last Updated" date. Where required, we will provide additional notice.

13 13. Contact

Capital Connect Solutions, Corp. d/b/a CapConnect 522 W Riverside Ave #6608, Spokane, WA 99201 Privacy: privacy@capconnectsolutions.com Legal: legal@capconnectsolutions.com

Questions about this document may be sent to legal@capconnectsolutions.com.