

CapitalVest Privacy Policy

Effective Date: October 25, 2025

This Privacy Policy explains how CapitalVest ("CapitalVest," "we," "us," or "our") collects, uses, shares, and protects your Personal Information (as defined below) when you access or use our online investment platform, website, and related services (collectively, the "Service"). By using our Service, you agree to the terms of this Privacy Policy.

1. Information We Collect

We collect information that identifies, relates to, describes, or is capable of being associated with you ("Personal Information"). Given the nature of our financial service, the information we collect is typically more detailed than a standard website.

A. Information You Provide Directly

This includes information necessary to open and verify your investment account and perform financial transactions:

Category of Data	Specific Data Types Collected	Purpose of Collection (Legal Basis: Contractual Necessity, Legal Obligation)
Identity Data	Full legal name, date of birth, Social Security Number (SSN) or equivalent tax ID, gender, photo ID documents (passport, driver's license).	To verify your identity, comply with Know Your Customer (KYC) and Anti-Money Laundering (AML) regulations.
Contact Data	Residential address, email address, telephone number.	To communicate with you about your account, transactions, and service updates.
Financial Data	Bank account numbers, routing numbers, credit card details (if used for funding), investment objectives, risk tolerance, employment information, and income verification documents.	To process deposits, withdrawals, execute trades, and provide suitability assessments for investment products.
Sensitive Personal Information	Precise geolocation (if using the mobile application).	Fraud prevention and security monitoring.
Voluntary Data	Feedback, survey responses, and communication preferences.	To improve our Service and customize your user experience.

B. Information Collected Automatically

When you access the Service, we automatically collect the following technical and usage data:

- **Usage Data:** Details about how you use our platform, including search queries, pages viewed, time spent on the Service, and investment activity logs.
- **Device Data:** Internet Protocol (IP) address, operating system, browser type, device identifiers, and mobile network information.
- **Tracking Technologies (Cookies):** We use cookies and similar technologies (web beacons, pixels) to authenticate your identity, remember your preferences, and analyze Service usage. Please see Section 5 for more details.

C. Information from Third Parties

We may receive information about you from trusted third-party sources, including:

- **Identity Verification Services:** To confirm the accuracy of the KYC/AML information you provide.
- **Credit Reporting Agencies:** To assess creditworthiness and confirm suitability for certain products (as permitted by law).
- **Data Providers:** For market data, investment research, and account aggregation services, if you choose to link external accounts.

2. How We Use Your Information

We use your Personal Information for the following business and commercial purposes, based on the corresponding legal bases:

Purpose of Use	Legal Basis for Processing (GDPR Context)
Service Provision & Management	Contractual Necessity
To open, maintain, and service your investment account. To execute investment transactions and administer transfers.	
Legal & Regulatory Compliance	Legal Obligation
To comply with KYC, AML, tax reporting obligations, and to respond to lawful requests by public authorities.	
Security & Fraud Prevention	Legitimate Interest
To monitor, detect, and prevent fraudulent activity, unauthorized access, and security breaches.	
Communication & Support	Contractual Necessity / Legitimate Interest
To provide customer support, send technical notices, security alerts, and service-related emails.	
Marketing & Personalization	Consent / Legitimate Interest

To provide you with targeted promotions, new product information, and personalized investment content. You can opt-out at any time.	
Service Improvement	Legitimate Interest
To analyze usage patterns, troubleshoot, and perform internal research to improve the functionality and performance of our Service.	

3. How We Share Your Information

We do not sell your Personal Information to third parties for monetary consideration. We only share your data as necessary to provide the Service, comply with legal obligations, or with your consent:

- **Service Providers:** We share data with third-party vendors and consultants who perform services on our behalf, such as cloud hosting (data storage), payment processing, KYC/AML verification, and technical support. These parties are contractually obligated to protect your data.
- **Financial Counterparties:** Your information is shared with financial institutions, brokers, custodians, and clearing houses necessary to execute and settle your investment transactions.
- **Affiliates:** We may share information with companies under common ownership or control with CapitalVest to provide unified services, subject to this Privacy Policy.
- **Legal & Regulatory Authorities:** We disclose Personal Information when required by law, such as to respond to subpoenas, court orders, or requests from regulatory bodies (e.g., FINRA, SEC, tax authorities).
- **Business Transfers:** In the event of a merger, acquisition, or sale of assets, your Personal Information may be transferred to the successor entity.

4. Data Security and Retention

A. Security Measures

We implement robust technical and organizational measures to protect your Personal Information from unauthorized access, disclosure, alteration, and destruction. These measures include:

- **Encryption:** Using industry-standard encryption for data transmission (SSL/TLS) and for data at rest.
- **Access Control:** Limiting access to your Personal Information to employees and service providers who have a legitimate business need to know.
- **Audits:** Regularly testing our security systems and infrastructure.

B. Data Retention

We retain your Personal Information only for as long as necessary to fulfill the purposes outlined in this policy, including satisfying any legal, accounting, or reporting requirements. Due to the highly regulated nature of financial services, we are typically required to retain transactional and account data for a minimum of five to seven years after you close your account.

5. Your Privacy Rights

Depending on your location (e.g., California residents under CCPA/CPRA, or EU/EEA/UK residents under GDPR), you may have the following rights regarding your Personal Information:

A. Rights for All Users

- **Right to Opt-Out of Marketing:** You can opt-out of receiving promotional communications from us by following the unsubscribe instructions provided in those communications or by contacting us directly.
- **Right to Correct/Rectify:** You have the right to request that we correct any inaccurate or incomplete Personal Information we hold about you.

B. GDPR and Equivalent Rights (EU/EEA/UK)

- **Right of Access:** The right to request copies of your Personal Information.
- **Right to Erasure ('Right to be Forgotten'):** The right to request the deletion of your Personal Information, subject to certain legal exceptions (e.g., regulatory retention requirements).
- **Right to Restrict Processing:** The right to request that we limit the way we use your Personal Information.
- **Right to Data Portability:** The right to request that we transfer the data we have collected to another organization, or directly to you, under certain conditions.
- **Right to Object:** The right to object to our processing of your Personal Information based on our legitimate interests.

C. CCPA/CPRA Rights (California Residents)

- **Right to Know:** The right to request disclosure of the categories and specific pieces of Personal Information we have collected, the sources, and the purposes for use and sharing over the preceding 12 months.
- **Right to Limit Use of Sensitive Personal Information:** You have the right to direct us to limit the use of your Sensitive Personal Information to what is necessary to perform the services you requested.
- **Right to Non-Discrimination:** We will not discriminate against you for exercising any of your CCPA/CPRA rights.

To exercise any of these rights, please submit a request through the contact information provided below. We may need to verify your identity before processing your request.

6. Cookies and Tracking Technologies

We use "cookies" (small text files placed on your device) to facilitate your use of the Service.

- **Essential Cookies:** Strictly necessary for the platform to function (e.g., session management, authentication).
- **Analytical/Performance Cookies:** Allow us to recognize and count the number of visitors and see how visitors move around our Service.
- **Functionality Cookies:** Used to recognize you when you return to our Service and remember your preferences.

You have the right to set or amend your cookie preferences. You can typically manage cookie settings in your browser, but disabling essential cookies may prevent you from using the Service effectively.

7. Children's Privacy

Our Service is not directed to individuals under the age of 18. We do not knowingly collect Personal Information from children under 18. If we become aware that a child under 18 has provided us with Personal Information, we will take steps to delete such information.

8. Changes to This Privacy Policy

We may update this Privacy Policy from time to time to reflect changes in our practices or applicable laws. If we make material changes, we will notify you by posting the new policy on this page and updating the "Effective Date" at the top. We encourage you to review this policy periodically.

9. Contact Us

If you have any questions or concerns about this Privacy Policy or our data practices, or if you wish to exercise your rights, please contact us:

CapitalVest Privacy Officer

Email: info@capitalvest.com

Mailing Address: [1411 Winchester Way #8, Altoona, WI 54720, United States]

Toll-Free Phone Number: [Insert Toll-Free Number for CCPA/CPRA requests]