

## **IEQ CAPITAL WEBSITE PRIVACY POLICY**

Effective Date: 10/26/2023

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### **Introduction**

This Privacy Policy describes the types of information IEQ Capital, LLC. (“**IEQ**,” “**we**,” or “**us**”) may collect from you or that you may provide us when you visit <https://ieqcapital.com/> (the “**Site**”) and our practices for collecting, using, maintaining, protecting, and disclosing that information. Please review this Privacy Policy to learn about the information we collect from you and how we use that information. By using our Site, you acknowledge the practices we outline in this Privacy Policy. If you do not agree with any part of this Privacy Policy, then please do not use our Site.

### **Updates to this Privacy Policy**

We may update this Privacy Policy based upon evolving laws, regulations and industry standards, or as we may make changes to our business including our Site. We will post changes to our Privacy Policy on this page and encourage you to review our Privacy Policy when you use our Site to stay informed. If we make changes that materially alter your privacy rights, we will take appropriate measures to inform you, consistent with the significance of the changes we make. If you disagree with the changes to this Privacy Policy, you should discontinue your use of the Site.

### **Children**

The Site is not directed to, and we do not knowingly collect personal information from, anyone under the age of 13. If a parent or guardian becomes aware that his or her child has provided us with information, they should contact us. We will delete such information from our files as soon as reasonably practicable.

### **Personal Information We Collect**

#### **Information You Provide Us**

You may choose to provide us with your full name, email address, phone number, and address when you choose to contact us via our Contact Us page or to access your account via our log-in portal.

#### **Information We Automatically Collect**

When you visit the Site, we may automatically collect certain information about your device, including information about your web browser, IP address, time zone, and some of the Cookies that are installed on your device using Cookies and similar technologies. Additionally, as you browse the Site, we may collect information about the individual web pages or services that you view, what websites or search terms referred you to the Site, and information about how you interact with the Site.

We automatically collect this information using the following technologies:

- “Cookies” are data files that are placed on your device or computer and often include an anonymous unique identifier. For more information about Cookies, and how to disable Cookies, visit <http://www.allaboutcookies.org>.
- “Log files” track actions occurring on the Site, and collect data including your IP address, browser type, Internet service provider, referring/exit pages, and date/time stamps.
- “Web beacons”, “tags”, and “pixels” are electronic files used to record information about how you browse the Site.

## **Cookies & Similar Technologies**

We use cookies (small, often encrypted, text files that are stored on your computer or mobile device) and similar technologies (“**Cookies**”) to provide you with certain functions on our Site and help collect data. This section explains how we use Cookies to collect information about the way you use our Site and how you can control them.

### How We Use Cookies

We use Cookies to track how you use our Site by providing usage statistics. Cookies are also used to deliver our information (including updates) and allow account authentication to you based upon your browsing history and previous visits to the Site. Information supplied to us using Cookies helps us to provide a better online experience to our visitors and users and send marketing communications to them, as the case may be. We may combine the information we collect from Cookies with personal information that we have collected from you to learn more about how you use our Site to improve it.

### Types of Cookies

We use both session Cookies (which expire once you close your web browser) and persistent Cookies (which stay on your device until you delete them). To make it easier for you to understand why we need them, the Cookies we use on our Site can be grouped into the following categories:

- **Strictly Necessary:** These Cookies are necessary for the Site to work properly. They include any essential authentication and authorization Cookies for our Site.
- **Functionality:** These Cookies enable technical performance and allow us to remember the choices you make while browsing our Site, including any preferences you set. They also include sign-in and authentication Cookies and IDs that enable you to return without additional sign-in.
- **Performance/Analytical:** These Cookies allow us to collect certain information about how you navigate the Site and services running on your device. They help us understand which areas you use and what we can do to improve them.
- **Targeting:** These Cookies are used to deliver relevant information related to our Site to an identified machine or other device (not a named or otherwise identifiable person) which has previously been used to visit our Site. Some of these types of Cookies on our Site are operated by third parties with our permission and are used to identify advertising sources that are effectively driving customers to our Site.

### How to Control and Delete Cookies

Cookies can be controlled, blocked or restricted through your web browser settings. Information on how to do this can be found within the Help section of your browser. All Cookies are browser

specific. Therefore, if you use multiple browsers or devices to access websites, you will need to manage your Cookie preferences across these environments.

Find out how to manage Cookies on popular browsers:

- Google Chrome, available at <https://support.google.com/accounts/answer/61416?co=GENIE.Platform%3DDesktop&hl=en>
- Microsoft Edge, available at <https://privacy.microsoft.com/en-us/windows-10-microsoft-edge-and-privacy>
- Mozilla Firefox, available at <https://support.mozilla.org/en-US/kb/enable-and-disable-cookies-website-preferences>
- Microsoft Internet Explorer, available at <https://support.microsoft.com/en-gb/help/17442/windows-internet-explorer-delete-manage-cookies>
- Opera, available at <https://www.opera.com/help/tutorials/security/privacy/>
- Apple Safari, available at <https://support.apple.com/guide/safari/manage-cookies-sfri11471/mac>

If you are using a mobile device to access the Site, you will need to refer to your instruction manual or other help/settings resource to find out how you can control Cookies on your device. For more information about Cookies, and how to disable Cookies, visit <http://www.allaboutcookies.org>.

Please note that if you restrict, disable or block any or all Cookies from your web browser or mobile or other device, the Site may not operate properly, and you may not have access to our services available through the Site. We are not responsible for your inability to use our Site or any degraded function you may experience that may be caused by your settings and choices regarding Cookies.

### Third-Party Analytics Providers

We use Google Analytics and other third-party analytics providers (“Analytics Providers”) to collect information about how you use our Site. Analytics Providers use Cookies in order to collect demographic and interest-level information and usage information from users that visit the Site, including information about the pages where users enter and exit the Site and what pages users view on the Site, time spent, browser, operating system, and IP address. Analytics Providers use the information they collect from the Site and other websites to share with us and other website operators’ information about users including age range, gender, geographic regions, general interests, and details about devices used to visit the Site and other websites and purchase items.

For more information regarding Google’s use of cookies, collection and use of information, see their privacy policy here: <https://policies.google.com/privacy?hl=en> The Google Analytics Opt-Out Browser Add-On is available at: <https://tools.google.com/dlpage/gaoptout>

### **How We Use Personal Information**

We use your personal information for the following purposes and as otherwise described in this Privacy Policy or at the time of collection:

- To provide, operate and improve the Site;
- To answer your inquiries;
- To provide support and maintenance;

- To respond to your requests and feedback;
- To conduct outreach programs and contact potential business leads; To respond to law enforcement requests and as required by applicable law, court order, or governmental regulations;
- To comply with legal obligations; and
- With your consent.

### **How We Share Personal Information**

We do not share your personal information with third parties without your consent, except as described in this Privacy Policy. We may share your personal information with our corporate partners, subsidiaries, and affiliates for purposes consistent with this Privacy Policy.

We may share your personal information with third party companies and individuals that provide services on our behalf or help us operate the Site (such as professional advisors, customer support, hosting, analytics, email delivery, marketing, and database management services). These third parties may use your personal information only as directed or authorized by us and in a manner consistent with this Privacy Policy and are prohibited from using or disclosing your information for any other purpose. We may also share your personal information for compliance purposes.

We may sell, transfer or otherwise share some or all of our business or assets, including your personal information, in connection with a business transaction (or potential business transaction) such as a corporate divestiture, merger, consolidation, acquisition, reorganization or sale of assets, or in the event of bankruptcy or dissolution.

### **Privacy Technology Practices**

#### Do Not Track

Some Internet browsers may be configured to send “Do Not Track” signals to the online services that you visit. We currently do not respond to “Do Not Track” or similar signals. To find out more about “Do Not Track,” please visit <http://www.allaboutdnt.com>.

#### Links to Third-Party Sites

The Site may contain links to other websites, mobile applications, and other online services operated by third parties. These links are not an endorsement of, or representation that we are affiliated with, any third party. In addition, our content may be included on web pages or in mobile applications or online services that are not associated with us. We do not control third party websites, mobile applications or online services, and we are not responsible for their actions. Other websites, mobile applications and services follow different rules regarding the collection, use and sharing of your personal information. We encourage you to read the privacy policies of the other websites, mobile applications and online services you use.

#### Data Security

The security of your personal information is important to us. We employ a number of administrative, technical, and physical safeguards designed to protect the personal information we collect. The safety and security of your information also depends on you. Where we have given you (or where you have chosen) a password for access to certain parts of our Site, you are responsible for keeping this password confidential. We ask you not to share your password with anyone. We urge you to be careful about giving out information in public areas of the Site.

Unfortunately, the transmission of information via the internet is not completely secure. Although we do our best to protect your personal information, we cannot guarantee the security of your data transmitted to our Site. Any transmission of personal information is at your own risk.

### **Additional Disclosure for California Residents**

This section outlines data privacy rights afforded to California residents and certain disclosures that are required by the California Consumer Privacy Act, as amended by the California Privacy Rights Act (CCPA).

#### Your Right to Know and Delete

You have the right to request that we disclose certain information to you about our collection and use of your personal data over the past 12 months. Once we receive and validate your request, we will include a list of your personal data that may have been disclosed and the categories of third parties the information may have been disclosed to.

You may request that we delete any of your personal data that we collected from you and retained, subject to certain exceptions. Once we receive your request and confirm your identity, we will review your request. We may deny your deletion request if retaining the information is proper and necessary or if an exception allowing us to retain the information applies under applicable law.

If your request is approved, we will delete or deidentify the relevant information and will direct our service providers to take similar action.

#### Exercising Your Rights to Know, Delete or Correct

To exercise your rights to know or delete described above, please submit a request by emailing us at [privacy@ieqcapital.com](mailto:privacy@ieqcapital.com).

Only you, or your authorized representative may make a request to know or delete related to your personal data. We may ask for your name, email address and account information to verify your identity or your authorized representative's identity.

You may only submit a request to know twice within a 12-month period. We endeavor to substantively respond to a verifiable consumer request within forty-five (45) days of its receipt, unless we require an extension. If we reasonably require an extension, we will inform you of the reason and extension period.

#### Non-Discrimination

We will not discriminate against you for exercising any of your data rights.

We do not charge a fee to process or respond to your verifiable consumer request unless it is excessive, repetitive, or manifestly unfounded. If we determine that the request warrants a fee, we will tell you why we made that decision and provide you with a cost estimate before completing your request.

#### California's Shine the Light Law

California Civil Code Section 1798.83 permits users of our Site that are California residents to request certain information regarding our disclosure of the information you provide through the website to third parties for their direct marketing purposes. To make such a request, please contact us at the information provided above.

## Summary of Data Disclosed to Third Parties

In the preceding twelve (12) months, we may have disclosed personal information for a business purpose to the categories of third parties indicated in the chart below. We do not “sell” or “share” your information as those terms are defined in the CCPA.

<b>Personal Information Category</b>	<b>Examples of Information Category</b>	<b>Business Purpose Disclosures</b>	<b>Category of Third-Party Recipients</b>
A: Identifiers.	A real name, alias, postal address, unique personal identifier, online identifier, IP address, email address, account name, Social Security number, driver's license number, passport number, or other similar identifiers	Account processing; product and services recommendations	Data Analytics Providers; Advertising Networks; Operating Systems & Platforms
B: California Customer Records personal information categories.	A name, signature, Social Security number, physical characteristics or description, address, telephone number, driver's license or state identification card number, insurance policy number, education, employment, employment history, bank account number, credit card number. Some personal information included in this category may overlap with other categories	Account processing; product and services recommendations	Data Analytics Providers; Advertising Networks; Operating Systems & Platforms
C: Protected classification characteristics under California or federal law.	Age (40 years or older), race, color, ancestry, national origin, citizenship, religion or creed, marital status, medical condition, physical or mental disability, sex (including gender, pregnancy or childbirth and related medical conditions), sexual orientation, veteran or military status, genetic information (including familial genetic information)	None	N/A
D: Commercial information.	Records of personal property, products or services purchased, obtained, or considered, or other purchasing or consuming histories or tendencies	None	N/A
E: Biometric information.	Genetic, physiological, behavioral, and biological characteristics, or activity patterns used to extract a template or other identifier or identifying information, such as, fingerprints, faceprints, and voiceprints	None	N/A
F: Internet or other similar network activity.	Browsing history, search history, information on a consumer's interaction with a website, application, or advertisement	Product and services recommendations	Advertising Networks; Data Analytics Providers; Operating Systems & Platforms
G: Geolocation data.	IP address based location information and GPS data	None	N/A
H: Sensory data.	Audio, electronic, visual, thermal, olfactory, or similar information	None	N/A
I: Professional or employment-related information.	Current or past job history or performance evaluations	Account processing; product and services recommendations	Operating Systems & Platforms
J: Non-public education information.	Education records directly related to a student maintained by an educational institution or party acting on its behalf, such as grades, transcripts, class lists, student schedules, student identification codes, student financial information, or student disciplinary records	None	N/A
K: Inferences drawn from other personal information.	Profile reflecting a person's preferences, characteristics, psychological trends, predispositions, behavior, attitudes, intelligence, abilities, and aptitudes	None	N/A