# **Privacy Policy**

This Privacy Policy describes our policies on the collection, use, and disclosure of information about you in connection with your use of our services, including those offered through our websites, emails, and mobile applications (collectively, the "Service").

The terms "we", "our" and "us" refer exclusively to EZ Capital Group, Inc. The terms "you" and "your" refer exclusively to you, as a user of the Service.

We use your data to provide and improve the Service. By using the Service, you agree to the collection and use of information in accordance with this policy. Unless otherwise defined in this Privacy Policy, terms used in this Privacy Policy have the same meanings as in our Terms and Conditions.

We reserve the right to change our Privacy Policy from time to time by posting the changes here.

We will notify you of any changes by posting the new Privacy Policy on this page. If we make any changes to this Privacy Policy that significantly affect your rights, we will let you know via email and/or a prominent notice on our Service, prior to the change becoming effective and update the "effective date" at the top of this Privacy Policy. You are advised to review this Privacy Policy periodically for any changes. Changes to this Privacy Policy are effective when they are posted on this page. Your use of our Service after we have made changes to our Privacy Policy will mean that you have accepted those changes.

# BY USING THE SERVICE, YOU AGREE TO BE BOUND BY THE TERMS OF THIS PRIVACY POLICY. IF YOU DO NOT AGREE WITH THESE TERMS, PLEASE DO NOT USE THE SERVICE.

If you have questions about anything in our Privacy Policy, please contact us.

# 1. DEFINITIONS

## **Personal Data**

Personal Data means data about a living individual who can be identified from those data (or from those and other information either in our possession or likely to come into our possession).

## Usage Data

Usage Data is data collected automatically either generated by the use of the Service or from the Service infrastructure itself (for example, the duration of a page visit).

## Cookies

Cookies are small pieces of data stored on a User's device.

## **Service Providers**

Service Providers means any third party companies and individuals that we may use their services in order to process your data more effectively.

## Data Subject

Data Subject is any living individual who is the subject of Personal Data.

## User

The User is the individual using our Service. The User corresponds to the Data Subject, who is the subject of

# Personal Data.

# Information Collection And Use

We collect several different types of information for various purposes to provide and improve our Service to you.

# 2. TYPES OF DATA COLLECTED

# Personal Data

While using our Service, we may ask you to provide us with certain personally identifiable information that can be used to contact or identify you ("Personal Data"). Personally identifiable information may include, but is not limited to:

- Email address
- First name and last name
- Phone number
- Address, State, Province, ZIP/Postal code, City
- Personal details (e.g., date of birth, nationality)
- Cookies and Usage Data

We may use your Personal Data to contact you with newsletters, marketing or promotional materials and other information that may be of interest to you. You may opt out of receiving any, or all, of these communications from us by following the unsubscribe link or instructions provided in any email we send.

# Usage Data

We may also collect information that your browser sends whenever you visit our Service or when you access the Service by or through a mobile device ("Usage Data").

This Usage Data may include information such as your computer's internet protocol address (e.g. IP address), browser type, browser version, the pages of our Service that you visit, the time and date of your visit, the time spent on those pages, unique device identifiers and other diagnostic data.

When you access the Service by or through a mobile device, this Usage Data may include information such as the type of mobile device you use, your mobile device unique ID, the IP address of your mobile device, your mobile operating system, the type of mobile Internet browser you use, unique device identifiers and other diagnostic data.

# Location Data

We may use and store information about your location if you give us permission to do so ("Location Data"). We use this data to provide features of our Service, to improve and customize our Service. We also collect your device's source IP address, which may disclose the location of your device at the time you access our mobile application. While you can always decide not to share information about your location with Us, you must agree to provide certain types of

location information if you want to use our Services.

You can enable or disable location services when you use our Service at any time, through your device settings. Page 2 of 12

# **Tracking Cookies Data**

We use cookies and similar tracking technologies to track the activity on our Service and hold certain information.

Cookies are files with small amount of data which may include an anonymous unique identifier.

Cookies are sent to your browser from a Website and stored on your device. Tracking technologies also used are beacons, tags, and scripts to collect and track information and to improve and analyze our Service.

You can instruct your browser to refuse all cookies or to indicate when a cookie is being sent. However, if you do not accept cookies, you may not be able to use some portions of our Service.

# 3. USE OF DATA

We may use your Personal Data for legitimate business purposes, including:

# To provide the functionality of our Services and related support.

• To create, and administer accounts, fulfil and record transactions, and provide you with related assistance (e.g., technical help, answer inquiries relating to Personal Data, etc.).

• To send administrative information to you, for example, information regarding our services and changes to our terms, conditions, and policies. We will engage in these activities to manage our contractual relationship with you, with your

consent, and/or to comply with a legal obligation.

# To provide you with marketing and promotional materials and opportunities, and facilitate social sharing.

- To send you marketing communications and offer other materials that we believe may be of interest to you, such as to send you newsletters or other direct communications.
- To share information with other marketers (and their service providers) to permit them to send you marketing communications, consistent with your choices.
- To allow you to participate in sweepstakes, contests or similar promotions.
- To facilitate social sharing functionality if you choose to do so. We will engage in this activity with your consent, to manage our contractual relationship with you, or where we have a legitimate interest.

# For reporting and trending.

- To better understand you and our other users, so that we can tune and personalize our offering.
- For trending and statistics, and to improve our products and services We will engage in this activity because we have a legitimate interest.

# To accomplish our business purposes.

- For audits, to verify that our internal processes function as intended and are compliant with legal, regulatory or contractual requirements.
- For fraud and security monitoring purposes, for example, to detect and prevent cyberattacks or attempts to commit identity theft.
- For responding to legal duties, such as requests from public and government authorities. We will engage in

these activities to comply with a legal obligation or because we have a legitimate interest.

To the extent that we process your Personal Data based on your consent, you may withdraw your consent at any time.

# 4. DATA RETENTION

We will retain your Personal Data only for as long as is necessary for the purposes set out in this Privacy Policy. We will retain and use your Personal Data to the extent necessary to comply with our legal obligations (for example, if We are required to retain your data to comply with applicable laws), resolve disputes, and enforce our legal agreements and policies.

We will also retain Usage Data for internal analysis purposes. Usage Data is generally retained for a shorter period of time, except when this data is used to strengthen the security or to improve the functionality of our Service, or we are legally obligated to retain this data for longer time periods.

# 5. DATA TRANSFER

Your information, including Personal Data, may be accessed by us or transferred to us in the United States. By providing us with Personal Data, you consent to this transfer. We will protect the privacy and security of personal information according to this Privacy Policy, regardless of where it is processed or stored. By providing us with Personal Data, you consent to the storage or processing of Personal Data in the United States and acknowledge that the Personal Data will be

subject to the laws of the United States, including the ability of governments, courts or law enforcement or regulatory agencies of the United States to obtain disclosure of your personal information.

If you are outside the United States, no matter where you live or where you happen to use our services, your information, including Personal Data, may be shared with our current and future parents, affiliates, subsidiaries and other companies under common control and ownership. We may collect your Personal Date from, transfer it to, and store and process it in other countries outside of where you live.

6. DATA DISCLOSURE

## **Business Transaction**

If we are involved in a merger, acquisition or asset sale, your Personal Data may be transferred. We will provide notice before your Personal Data is transferred and becomes subject to a different Privacy Policy.

## Disclosure for Law Enforcement

Under certain circumstances, we may be required to disclose your Personal Data if required to do so by law or in response to valid requests by public authorities (e.g. a court or a government agency).

## Legal Requirements

We may disclose your Personal Data in the good faith belief that such action is necessary to:

- To comply with a legal obligation
- To protect and defend the rights or property of EZ Capital
- To prevent or investigate possible wrongdoing in connection with the Service

- To protect the personal safety of users of the Service or the public
- To protect against legal liability

### 7. DATA SECURITY

The security of your data is important to us, but remember 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 Data, we cannot guarantee its absolute security.

#### 8. YOUR PRIVACY RIGHTS

We aim to take reasonable steps to allow you to correct, amend, delete, or limit the use of your Personal Data. Whenever made possible, you can update your Personal Data directly within your account settings section. If you are unable to change your Personal Data, please contact us to make the required changes.

If you wish to be informed what Personal Data we hold about you and if you want it to be removed from our systems, please contact us.

In certain circumstances, you have the right:

- To access and receive a copy of the Personal Data we hold about you
- To rectify any Personal Data held about you that is inaccurate
- To request the deletion of Personal Data held about you

Although you cannot opt-out of all data collection when you use our Services, you can limit the collection, use and sharing of your personally identifiable information.

You have the right to data portability. You can request to obtain a copy of your Personal Data in a commonly used electronic format so that you can manage and move it. Be advised that we may not be able to delete your Personal Data without also deleting your user account. You will not be permitted to examine the Personal Data of any other person or entity and may be required to provide us with Personal Data to verify your identity prior to accessing any records containing information about you. We may not accommodate a request to change or delete Personal Information if we believe doing so would violate any law or legal requirement or result in incorrect information.

If you do not want us to collect your Personal Data, please do not provide it to us. Please understand that if you choose not to provide certain Personal Data to us, your choice will restrict your ability to access some content and use some of the functionality of our Services.

For your protection, we may only implement requests with respect to the Personal Data associated with the particular email address that you use to send us your request, and we may need to verify your identity before implementing your request. We will try to comply with your request as soon as reasonably practicable. We do not support Do Not Track ("DNT"). Do Not Track is a preference you can set in your web browser to inform websites that you do not want to be tracked. You can enable or disable Do Not Track by visiting the Preferences or Settings page of your web browser.

#### 9. SERVICE PROVIDERS

We may employ Service Providers, to provide the Service on our behalf, to perform Service-related services or Page 5 of 12 to assist us in analyzing how our Service is used.

These third parties have access to your Personal Data only to perform these tasks on our behalf and are obligated not to disclose or use it for any other purpose.

## Analytics

We may use third-party Service Providers to monitor and analyze the use of our Service.

# **Tracking and Advertising**

We and our third-party service providers may use remarketing services to advertise on third party Websites to you after you used our Service. We and our third-party vendors may employ various tracking technologies, such as cookies, Web beacons and analytics software, that help us better manage content on our Services by informing us what content is effective.

## Payments

We may provide paid products and/or services within the Service. In that case, we use third-party services for payment processing (e.g. payment processors).

We will not store or collect your payment card details. That information is provided directly to our third-party payment processors whose use of your personal information is governed by their Privacy Policy. These payment processors adhere to the standards set by PCI-DSS as managed by the PCI Security Standards Council, which is a joint effort of brands like Visa, Mastercard, American Express and Discover. PCI-DSS requirements help ensure the secure handling of payment information.

# LINKS TO OTHER WEBSITES

This Privacy Policy does not address, and we are not responsible for, the privacy, information or other practices of any third parties. The inclusion of a link does not imply endorsement of the linked site or Service by us. Please note that we are not responsible for the collection, usage and disclosure policies and practices (including the data security practices) of other organizations, such as Facebook, Apple, Google, Microsoft, RIM or any other application developer, application provider, social media platform provider, operating system provider, wireless service provider or device manufacturer, including any Personal Data you disclose to other organizations through or in connection with

our Services.

# 10. CHILDREN

The Service is intended for audiences above 13 years old. The Service is not directed to children 13 and under. We do not knowingly collect Personal Data from children under 14. If you become aware that a child has provided us with Personal Data without parental consent, please contact us. If we become aware that a child under 14 has provided us with Personal Data without parental consent, we will take steps to remove such information and terminate the child's account.

# 11. CONTACT US

If you have any concerns relating to this Privacy Policy, you may correspond with us at the following address: 339 5th Ave, Ste 500

# Manhattan, NY 10016

Email: info@ezcapital.com

# **CCPA** Notice

# **Privacy Notice for California Residents**

This Privacy Notice for California Residents supplements the information contained in our general privacy notice and applies solely to all visitors, users, and others who reside in the State of California ("consumers" or "you"). We adopt this notice to comply with the California Consumer Privacy Act of 2018 (CCPA) and any terms defined in the CCPA have the same meaning when used in this notice.

## Information We Collect

Our Website collects information that identifies, relates to, describes, references, is capable of being associated with, or could reasonably be linked, directly or indirectly, with a particular consumer or device ("personal information"). In particular, our website has collected the following categories of personal information from its consumers within the last twelve (12) months:

Category	Examples
A. Identifiers.	A real name, postal address, email address, account name.
<ul><li>B. Personal information categories listed in the California Customer Records statute (Cal. Civ. Code § 1798.80(e)).</li></ul>	A name, physical characteristics or description, address, telephone number.
C. Commercial information.	Records of personal property, products or services purchased, obtained, or considered, or other purchasing or consuming histories or tendencies.
D. Internet or other similar network activity.	Browsing history, search history, information on a consumer's interaction with a website, application, or advertisement.
E. Inferences drawn from other personal information.	Profile reflecting a person's preferences, characteristics, psychological trends, predispositions, behavior.

Personal information does not include:

- Publicly available information from government records.
- De-identified or aggregated consumer information.
- Health or medical information covered by the Health Insurance Portability and Accountability Act of 1996 (HIPAA) and the California Confidentiality of Medical Information Act (CMIA) or clinical trial data;

• Personal information covered by certain sector-specific privacy laws, including the Fair Credit Reporting Act (FRCA), the Gramm-Leach-Bliley Act (GLBA) or California Financial Information Privacy Act (FIPA), and the Driver's Privacy Protection Act of 1994. We obtain the categories of personal information listed above from the following categories of sources:

• Directly from you. For example, from forms you complete or products and services you purchase, name, postal address, email address, telephone number, and driver's license for certain verification processes.

 Indirectly from you. For example, from observing your actions on our Website which includes products and purchase history.

# **Use of Personal Information**

We may use or disclose the personal information we collect for one or more of the following business purposes:

• To fulfill or meet the reason you provided the information. For example, if you share your name and contact information to request a price quote or ask a question about our products or services, we will use that personal information to respond to your inquiry. If you provide your personal information to purchase a product or service, we will use that information to process your payment and facilitate delivery. We may also save your information to facilitate new product orders or process returns.

• To provide, support, personalize, and develop our Website, products, and services.

- To create, maintain, customize, and secure your account with us.
- To process your requests, purchases, transactions, and payments and prevent transactional fraud.
- To provide you with support and to respond to your inquiries, including to investigate and address your concerns and monitor and improve our responses.
- To personalize your Website experience and to deliver content and product and service offerings relevant to your interests, including targeted offers and ads through our Website, third-party sites, and via email or text message (with your consent, where required by law).
- To help maintain the safety, security, and integrity of our Website, products and services, databases and other technology assets, and business.
- For testing, research, analysis, and product development, including to develop and improve our Website, products, and services.

• To respond to law enforcement requests and as required by applicable law, court order, or governmental regulations as described to you when collecting your personal information or as otherwise set forth in the CCPA. We will not collect additional categories of personal information or use the personal information we collected for materially different, unrelated, or incompatible purposes without providing you notice.

## **Sharing Personal Information**

We may disclose your personal information to a third party for a business purpose [or sell your personal information, subject to your right to opt-out of those sales (see Personal Information Sales Opt-Out and Opt-In Rights)]. When we disclose personal information for a business purpose, we enter a contract that describes the purpose and requires the recipient to both keep that personal information confidential and not use it for any purpose except performing the contract. [The CCPA prohibits third parties who purchase the personal

information we hold from reselling it unless you have received explicit notice and an opportunity to opt-out of further sales.]

We share your personal information with the following categories of third parties:

- Service providers, such as delivery companies and warranty providers.
- Data aggregators.
- Third parties with whom we partner to offer products and services to you.

# Your Rights and Choices

The CCPA provides consumers (California residents) with specific rights regarding their personal information. This section describes your CCPA rights and explains how to exercise those rights.

# Access to Specific Information and Data Portability Rights

You have the right to request that we disclose certain information to you about our collection and use of your personal information over the past 12 months. Once we receive and confirm your verifiable consumer request (see Exercising Access, Data Portability, and Deletion Rights), we will disclose to you:

- The categories of personal information we collected about you.
- The categories of sources for the personal information we collected about you.
- Our business or commercial purpose for collecting or selling that personal information.
- The categories of third parties with whom we share that personal information.
- The specific pieces of personal information we collected about you (also called a data portability request).
- If we sold or disclosed your personal information for a business purpose, two separate lists disclosing:
  - Sales, identifying the personal information categories that each category of recipient purchased
- Disclosures for a business purpose, identifying the personal information categories that each category of recipient obtained.

# **Deletion Request Rights**

You have the right to request us to delete any of your personal information that we collected from you and retained, subject to certain exceptions. Once we receive and confirm your verifiable consumer request (see Exercising Access, Data Portability, and Deletion Rights), we will delete (and direct our service providers to delete) your personal information from our records, unless an exception applies.

We may deny or delay your deletion request if retaining the information is necessary for us or our service provider(s) to:

• Complete the transaction for which we collected the personal information, provide a good or service that you requested, take actions reasonably anticipated within the context of our ongoing business relationship with you, or otherwise perform our contract with you.

• Detect security incidents, protect against malicious, deceptive, fraudulent, or illegal activity, or prosecute those responsible for such activities.

- Debug products to identify and repair errors that impair existing intended functionality.
- Exercise free speech, ensure the right of another consumer to exercise their free speech rights, or exercise

another right provided for by law.

• Comply with the California Electronic Communications Privacy Act (Cal. Penal Code §1546 et. seq.).

• Engage in public or peer-reviewed scientific, historical, or statistical research in the public interest that adheres to all other applicable ethics and privacy laws, when the information's deletion may likely render impossible or seriously impair the research's achievement, if you previously provided informed consent.

• Enable solely internal uses that are reasonably aligned with consumer expectations based on your relationship with us.

• Comply with a legal obligation.

• Make other internal and lawful uses of that information that are compatible with the context in which you provided it.

## Exercising Access, Data Portability, and Deletion Rights

To exercise the access, data portability, and deletion rights described above, please submit a verifiable consumer request to us by either:

- Emailing us at info@ezcapital.com
- Visiting our Privacy Policy

Only you, or a person registered with the California Secretary of State that you authorize to act on your behalf, may make a verifiable consumer request related to your personal information.

You may also make a verifiable consumer request on behalf of your minor child. You may only make a verifiable consumer request for access or data portability twice within a 12-month period.

The verifiable consumer request must:

• Provide sufficient information that allows us to reasonably verify you are the person about whom we collected personal information or an authorized representative.

• Describe your request with sufficient detail that allows us to properly understand, evaluate, and respond to it. We cannot respond to your request or provide you with personal information if we cannot verify your identity or authority to make the request and confirm the personal information relates to you.

Making a verifiable consumer request does not require you to create an account with us.

[However, we do consider requests made through your password protected account sufficiently verified when the request relates to personal information associated with that specific account.] We will only use personal information provided in a verifiable consumer request to verify the requestor's identity or authority to make the request.

## **Response Timing and Format**

We endeavor to respond to a verifiable consumer request within forty-five (45) days of its receipt. If we require more time (up to 90 days), we will inform you of the reason and extension period in writing.

If you have an account with us, we will deliver our written response to that account. If you do not have an account with us, we will deliver our written response by mail or electronically, at your option.

Any disclosures we provide will only cover the 12-month period preceding the verifiable consumer request's Page  $10 ext{ of } 12$ 

receipt. The response we provide will also explain the reasons we cannot comply with a request, if applicable. For data portability requests, we will select a format to provide your personal information that is readily useable and should allow you to transmit the information from one entity to another entity without hindrance. 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.

# Personal Information Sales Opt-Out and Opt-In Rights

If you are 16 years of age or older, you have the right to direct us to not sell your personal information at any time (the "right to opt-out"). We do not sell the personal information of consumers we actually know are less than 16 years of age, unless we receive affirmative authorization (the "right to opt-in") from either the consumer who is between 13 and 16 years of age, or the parent or guardian of a consumer less than 13 years of age. Consumers who opt-in to personal information sales may opt-out of future sales at any time.

To exercise the right to opt-out, you (or your authorized representative) may submit a request to us by visiting our privacy policy.

Once you make an opt-out request, we will wait at least twelve (12) months before asking you to reauthorize personal information sales. However, you may change your mind and opt back in to personal information sales at any time by creating a new account on our platform.

You do not need to create an account with us to exercise your opt-out rights. We will only use personal information provided in an opt-out request to review and comply with the request.

#### Non-Discrimination

We will not discriminate against you for exercising any of your CCPA rights. Unless permitted by the CCPA, we will not:

- Deny you goods or services.
- Charge you different prices or rates for goods or services, including through granting discounts or other benefits, or imposing penalties.
- Provide you a different level or quality of goods or services.
- Suggest that you may receive a different price or rate for goods or services or a different level or quality of goods or services.

## Other California Privacy Rights

California's "Shine the Light" law (Civil Code Section § 1798.83) permits users of our Website that are California residents to request certain information regarding our disclosure of personal information to third parties for their direct marketing purposes. To make such a request, please send an email to info@ezcapital. com or write us at:

349 5th Ave, FI 3 New York, NY 10016.

## Changes to Our Privacy Notice

We reserve the right to amend this privacy notice at our discretion and at any time. When we make changes to this privacy notice, we will post the updated notice on the Website and update the notice's effective date. Your continued use of our Website following the posting of changes constitutes your acceptance of such changes. **Contact Information** 

If you have any questions or comments about this notice, the ways in which we collect and uses your information described below [and in the Privacy Policy], your choices and rights regarding such use, or wish to exercise your rights under California law, please do not hesitate to contact us at:

Website: Privacy Policy Email: info@ezcapital.com