



## Privacy Policy

**Last Updated: June 2023**

At Element 78 Partners (“**E78 Partners**”, “**we**”, “**us**” and “**our**”), we respect our clients and understand that you are concerned about privacy. The purpose of this Privacy Policy is to let you know what kind of information we collect, how we use it, with whom it may be shared, and what choices you have regarding our use of your information. This Privacy Policy applies to our website located at [www.e78partners.com](http://www.e78partners.com) (the “**Site**”) as well as to the services we provide (our “**Services**”).

Our practices comply with applicable U.S. laws and requirements. We are a limited liability company registered in the state of Delaware and our activities are directed only to U.S. citizens or U.S. legal residents who are 18 years or older. All personal information is processed by or on behalf of the controller:

Element 78 Partners, LLC  
1301 W 22nd St, Ste 410  
Oak Brook, IL 60523

A PDF version of this Privacy Policy can be found [here](#).

## Information We Collect and Process

We may collect one or more of the following categories of personal information about our investors and potential investors, and their beneficiaries; our partners and potential partners; and the visitors to our Site, when these individuals (i) visit our Site; (ii) request additional information about our Services; (iii) register for our Services or become our business partners; or (iv) otherwise interact with us.

Category of Personal Information Collected	Examples	Sources of Personal Information	Business Purpose for Collection of Personal Information
<b>Identifiers</b>	Name (first/middle/last), postal address, email address, phone number, business contact information, social security number/EIN, driver's license number, passport number, unique online identifier, IP address, date of birth, bank account information and other financial information (i.e., utility bills), tax return information, medical information.	Directly from you as an investor, potential investor, business partner, or potential business partner; via cookies and other tracking technologies; individuals on your behalf (i.e., third party administrators, accounting firms).	Providing our Services, including customer service/support; Identification and Verification; Security; Legal/Compliance Issues.
<b>Protected characteristics under Data Protection and Other Federal Laws</b>	Gender, marital status, citizenship, age.	Directly from you as an investor, potential investor, business partner, or potential business partner; individuals on your behalf (i.e., third party administrators, accounting firms).	Providing our Services, including customer service/support; Identification and Verification; Security; Legal/Compliance Issues.
<b>Internet or other electronic network activity information</b>	Browser identifiers/type, the time and length of your visit to the Site, the pages of the Site you visit, and other related data.	Cookies and other tracking technologies.	Providing and Improving our Services and the Site.

We do not collect the following categories of personal information through this Site: biometric information; geolocation data; education information, defined as information that is not publicly available personally identifiable information as defined in the Family Educational Rights and Privacy Act (20 U.S.C. Sec. 1232g; 34 C.F.R. Part 99); professional or work-related information; audio, electronic, visual, thermal, olfactory, or similar information; commercial information; or inferences drawn from other personal information.

**Information from Covered Entities:** In order to provide our Services to covered entities, we may at times have access to certain health-related information. Our access to and use of this information is governed by our contractual agreements with these covered entities. Please reference the privacy policies of the covered entities for details on how your personal information is collected, used, and shared, including with us.

***Cookies and Other Tracking Technologies:*** We, or third-party service providers acting on our behalf, may use cookies or web beacons on our Site. A cookie is a small text file that may be stored on the hard drive of your computer when you access the Site. A web beacon is an electronic image used to recognize a cookie on your computer when you view a web page. We may use cookies and web beacons to collect information from you, including your IP address, browser type, the time and length of your visit, the pages of the Site you visit, and other related data. This information may be used in order to

- recognize you when you return to the Site;
- improve and personalize your experience on our Site;
- monitor Site usage and analyze the behavior of Site visitors.

You may decline cookies, but by doing so, you may not be able to use certain features on our Site. Most web browsers will provide you with some general information about cookies, enable you to see what cookies are stored on your device, allow you to delete them all or on an individual basis, and enable you to block or allow cookies for all websites or individually selected websites. You can also normally turn off third-party cookies separately. Please note that the settings offered by a browser or device often only apply to that particular browser or device. Below are links to the cookie opt-out pages of common web browsers. If your web browser is not listed here, you should review your web browser terms to learn more about your cookie choices.

- [Google Chrome](#)
- [Apple Safari](#)
- [Mozilla Firefox](#)
- [Microsoft Edge](#)

You can turn off certain third-party targeting/advertising cookies by visiting the following link: [Network Advertising Initiative](#).

**Legal Bases for Processing:** To the extent we rely on our legitimate interests as a legal basis for processing of your personal information, we have considered the balance between our own interests (among other things, the lawful and efficient operation of our Services) and your interests and we believe that (a) you would reasonably expect us to carry out the kind of processing referenced above and (b) such processing will not cause you any harm and/or will not seriously impact your rights and freedoms with regard to data privacy. You have the right to withdraw any consent given to us for the processing of your personal information.

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

We use your personal information as necessary for us

- to facilitate customer service or to enable us to contact you if you request information;
- to provide information about our Services;
- to monitor and improve navigation and website interaction based on your use of our Site;
- to aggregate utilization statistics in order to improve our website experience; and
- for other lawful purposes with notice to you and with your consent where necessary.

### **Disclosures of Personal Information**

We do not sell your personal information. We may, however, share your personal information with the following categories of recipients in order for us to provide our Services:

- *Service Providers*, including those required to provide and communicate with you regarding our Services, those required to provide and enhance our Site, and those used to secure our Site and protect the systems used to provide our Services.
- *Business Partners*, including those with whom we engage to provide our Services to you, such as tax accountants, attorneys, shareholders, business managers, auditors.
- *Legal/Regulatory Authorities*, including to respond to a subpoena or court order, judicial process, or regulatory inquiry; to defend against fraud, lawsuits, claims or other liabilities; and to prevent physical harm or financial loss in connection with any suspected or actual illegal activity.
- *Individuals as Authorized by you*, including your business managers, banks, and accounting firms.

## **Cross-Border Data Transfers**

We may transfer your personal information to a third-party that is located in a jurisdiction other than the one from which we collected your personal information, including to countries that have not been deemed to have an adequate level of protection for the rights and freedoms of data subjects. If we do transfer your personal information to another jurisdiction, we will do so following due diligence and provided that the data recipient is subject to contractual agreements imposing obligations on it to ensure appropriate technical and organizational measures are implemented and maintained at all times to prevent the unauthorized and unlawful processing of personal information, and the accidental loss or destruction of, or damage to, personal information, consistent with our obligations under applicable data protection laws.

## **Security of Personal Information**

The security of all personal information provided to us is important and we take reasonable steps designed to protect your personal information. We maintain reasonable administrative, technical, and physical safeguards designed to protect the personal information that we receive against accidental, unlawful, or unauthorized destruction, loss, alteration, access, disclosure and/or use.

## **Record Retention**

We will retain your personal information only for as long as is necessary to fulfill the purposes for which it was collected, including to comply with our legal obligations, resolve disputes, and enforce our agreements. If we collect any biometric information about you, we will not store that information for longer than three (3) years.

## **Your Choices & Rights**

Depending upon where you are located, certain choices and rights may be available to you under applicable data protection laws, including the right to request access to your personal information or to have your personal information deleted. If you have questions about what rights may apply to you, please contact us via email at [compliance@e78partners.com](mailto:compliance@e78partners.com).

**Do Not Track:** "Do Not Track" is a privacy preference that users can set in their web browsers. When a user turns on a Do Not Track signal in their browser, the browser sends a message to websites requesting that they do not track the user. For information about Do Not Track, please visit [www.allaboutdnt.org](http://www.allaboutdnt.org).

**"Shine the Light" and "Eraser" Laws:** Residents of the State of California may request a list of all third parties to which we have disclosed certain information during the preceding year for those third parties' direct marketing purposes.

**California Consumer Privacy Act ("CCPA"):** The CCPA provides California residents and/or their authorized agents with specific rights regarding the collection and storage of their personal information.

**Your Right to Know:** California residents have the right to request that we disclose the following information to you about our collection and use of your personal information over the past twelve (12) months. We may ask you to provide certain information to identify yourself so that we may compare it with our records in order to verify your request. Upon verification, we will disclose to you:

1. The categories of personal information we have collected about you.
2. The categories of sources for the personal information we have collected about you.
3. The specific pieces of personal information we have collected about you.
4. Our business or commercial purpose for collecting or selling your personal information.
5. The categories of third parties to whom we have sold or shared your personal information, if any, and the categories of personal information that we have shared with each third-party recipient.

**Your Right to Opt Out of Sale:** California residents have the right to opt-out of the sale of their personal information by submitting a request as directed on the homepage of our website or by contacting us using the information in the “Contact Us” section below.

Please note that we do not knowingly sell the personal information of any individuals under the age of 16.

**Your Right to Delete:** California residents have the right to request that we delete any of the personal information collected from you and retained by us, subject to certain exceptions. We may ask you to provide certain information to identify yourself so that we may compare it with our records in order to verify your request. Once your request is verified and we have determined that we are required to delete the requested personal information in accordance with the CCPA, we will delete, and direct our third-party service providers to delete your personal information from their records. Your request to delete personal information that we have collected may be denied if we conclude it is necessary for us to retain such personal information under one or more of the exceptions listed in the CCPA.

**Non-Discrimination:** You will not receive any discriminatory treatment by us for the exercise of your privacy rights conferred by the CCPA.

**For Individuals Located in the European Economic Area (EEA), the United Kingdom (UK) or Switzerland:**

You have a number of rights under applicable data protection laws in relation to your personal information. Under certain circumstances, you have the right to:

- Have access to your personal information by submitting a request to us;
- Have your personal information deleted;

- Have your personal information corrected if it is wrong;
- Have the processing of your personal information restricted;
- Object to further processing of your personal information, including to object to marketing from us;
- Make a data portability request;
- Withdraw any consent you have provided to us;
- Restrict any automatic processing of your personal information; and
- Complain to the appropriate Supervisory Authority.

**Verifying Your Request:** Only you, or a person that you authorize to act on your behalf, may make a request related to your personal information. In the case of access and deletion, your request must be verifiable before we can fulfill such request. Verifying your request will require you to provide sufficient information for us to reasonably verify that you are the person about whom we collected personal information, or a person authorized to act on your behalf. We will only use the personal information that you have provided in a verifiable request in order to verify your request. We cannot respond to your request or provide you with personal information if we cannot verify your identity or authority. Please note that we may charge a reasonable fee or refuse to act on a request if such request is excessive, repetitive, or manifestly unfounded.

### **Third-Party Links**

This Privacy Policy only addresses the collection, processing, and use (including disclosure) of information by us. This Site may contain various links to third-party websites. These websites may provide additional information, goods, services and/or promotions. These websites are owned and operated independently of E78 Partners and have their own separate privacy and data collection practices. E78 Partners has no responsibility or liability whatsoever for the independent actions or policies of these third-party websites and is not responsible for the content or privacy practices of such websites.

### **Children's Privacy**

We do not knowingly collect personal information from children under the age of 13 through our Site. If you are under 13, please do not give us any personal information. We encourage parents and legal guardians to monitor their children's internet usage and to help enforce this Privacy Policy by instructing their children never to provide us with personal information. If you have reason to believe that a child under the age of 13 has provided personal information to us via our Site, please contact us and we will endeavor to delete that personal information from our databases.

### **Changes to this Privacy Policy**

This Privacy Policy is effective as of the date at the top of this page. We may change this Privacy Policy from time to time when we change our privacy practices. By accessing and using this Site and/or our Services after we notify you of such changes to this Privacy Policy, you are deemed to have accepted such changes. Please refer back to this Privacy Policy on a regular basis.

## Contact Us

If you have any questions regarding this Privacy Policy or any of our privacy practices, please contact us by email at [compliance@e78partners.com](mailto:compliance@e78partners.com).

You may also contact us via [info@e78partners.com](mailto:info@e78partners.com).

If you are located in the United Kingdom or European Economic Area (“EEA”) and believe we have not adequately resolved any issues, you may contact the Supervisory Authority concerned.