

Ellevest California Consumer Privacy Policy

Last Updated: January 2020

Protecting your privacy is important to Ellevest, Inc. (“Ellevest”). This Ellevest California Consumer Privacy Policy (“CA Privacy Policy”) supplements the information disclosed to you in the [Ellevest Privacy Policy](#) which defines the personal information we collect from you in connection with obtaining a financial product or service under federal law. This CA Privacy Policy, in contrast, is for California residents and is adopted to comply with the California Consumer Privacy Act of 2018. It describes how Ellevest collects, uses, discloses and safeguards the personal information you provide on Ellevest’s website, www.ellevest.com and through or in connection with our mobile apps or other software- and Internet-enabled programs and services sponsored by Ellevest (the “Sites”) as well as information collected when you otherwise communicate or interact with Ellevest.

The following table sets forth the categories of personal information we have collected in the preceding 12 months, the source of that personal information, and how we have used and shared such personal information in the preceding 12 months. Ellevest has not sold your personal information to third parties for a business or commercial purpose in the preceding 12 months.

Category of Personal Information Collected and Source	Source of information	Purpose for Collection	Categories of recipients
Contact information: such as your name, home and work address, personal and work telephone numbers, personal and work email addresses.	From you	We will use this information to communicate with you when you contact us, when you request customer service or support, or to complete your registration on our Sites and to administer your account from us	Third party service providers for customer support and customer relations management.
Preference information: your marketing preferences, your account settings including any default preferences, any preferences you have indicated, the types of services/offers that interest you, or the areas of our website that you visit	From you, from our website technology interaction with your browser/devices and cookies and other similar technologies tracking the pages you visit, the marketing	To make your visits easier and more convenient and make sure you get the information you want from us in the way we think you will like.	Third party service providers that perform website analytic services on our behalf

	messages you open and the links you follow		
Voluntary information: any voluntary information you provide us with, such as responses to surveys or competitions and social media account details	From you and your social media account provider	So we can get to know you better; make our communications with you more personal; learn and improve from your survey feedback, organize events and pick competition winners	Third party service providers that perform online surveys on our behalf
Personalization: Your journey online and how you use our websites and use your devices when doing so. Whether and when you open our marketing emails and respond to our advertisements. When you are on our website, our website technology is able to collect the technical details of your mouse clicks and movements, page scrolling and text content you key in to our online forms.	From you; from our website/app technology interaction with your browser/devices and cookies tracking the pages you visit	So we can understand how many customers use our websites and apps, what works best online and in our marketing and advertising and what we need to change and improve to attract and keep your attention	Third party service providers that perform email and online marketing on our behalf
Device information: IP address, internet provider, operating system and browser used, type of device, such as laptop or smart phone, device cookie settings and other device details, such as MAC address and the geographic region which your device reports to us that you are located in	From you; from our website/app technology interaction with your browser/devices	So our website and app technology can work properly with your device and make sure you can see and use our intended website and apps on the device you are using. If you have also signed up to receive our marketing, we will personalize your emails based upon your interaction with our website/apps across your devices. This will allow us to remember information about you	Third party service providers that perform website analytic services on our behalf

		even when you use different devices to build a picture of your interests and preferences.	
Information automatically collected from your browser: when you visit the Sites, some data is automatically transferred from your browser to our server, including log files, IP address, app and device identifier, advertising ID, location info, browser type and operating system, device type, domain name, the website that led you to our services, the website to which you go after leaving our services, the dates and times you access our services, and the links you click and your other activities within the services.	From you; from our website/app technology interaction with your browser/devices	In order to offer you a better service with personalized information and to make it easier for you to use our sites.	Third party service providers that perform website analytic services on our behalf

In addition to the sharing of your personal information as described above, we also may disclose personal information we collect as follows:

In Connection with Business Transfers

In the event that a division or part or all of Ellevest is bought, sold or otherwise transferred, or is in the process of a potential transaction, customer information will likely be shared for evaluation purposes and included among the transferred business assets.

To Comply with Laws

Ellevest may also disclose specific information when such disclosure appears necessary to comply with the law, a subpoena or other litigation process or to protect the interests or safety of its visitors and customers, Ellevest employees or others.

Do Not Track

Do Not Track (DNT) is a privacy preference that users can set in some web browsers, allowing users to opt out of tracking by websites and online services. At the present time, the World Wide Web

Consortium (W3C) has not yet established universal standards for recognizable DNT signals and therefore, Ellevest and the Sites do not recognize DNT.

Opt-Out

If you provide us with your email or postal address, or have done so in the past, we will ask you if we can use it to send you updates on the latest Ellevest news. If you do not want us to contact you, you can choose to “opt out,” and Ellevest will respect your wishes.

If you opt out of receiving promotional communications from us whether online or on your mobile device, we may still send you non-promotional communications such as emails about your Ellevest account, if you have one, or our ongoing business relations.

Children’s Privacy

The Sites do not knowingly solicit or collect personally identifiable information online from children under the age of 13 without prior verifiable parental consent. If Ellevest learns that a child under the age of 13 has submitted personally identifiable information online without parental consent, it will take all reasonable measures to delete such information from its databases and to not use such information for any purpose (except where necessary to protect the safety of the child or others as required or allowed by law). If you become aware of any personally identifiable information we have collected from children under 13, please call us at 844.355.7100 or email us at support@ellevest.com.

Minors under 18 years of age may have the personal information that they provide to us deleted by sending an email to support@ellevest.com requesting deletion. Please note that, while we make reasonable efforts to comply with such requests, deletion of your personal information does not ensure complete and comprehensive removal of that data from all systems.

Company Commitment to Privacy

Ellevest's CA Privacy Policy is subject to change at any time and without notice. For updates, please return here. You agree that the information that we gather now will be subject to the CA Privacy Policy in effect at the time of use.

Contact Us

If you have questions or concerns about this CA Privacy Policy, or to request a copy of this CA Privacy Policy in another format, please feel free to call us at 844.355.7100 or email us at support@ellevest.com.

Your California Privacy Rights

This CA Privacy Policy describes how we may share your information for marketing purposes, as described above. California residents are entitled to request and obtain from us once per calendar year information about any of your personal information shared with third parties for their own direct marketing purposes, including the categories of information and the names and addresses of those businesses with which we have shared such information. To request this information and for any other questions about our privacy practices and compliance with California law, please contact us as explained above.

If you are a California resident, you have the right to know, or request that we delete, any personal information we have collected about you, and inquire about our collection, use, and disclosure of your personal information by calling us at 844.355.7100 or emailing us at support@ellevest.com. You may designate an authorized agent to make a request on your behalf by emailing us at support@ellevest.com. When you submit a request to us, we will first set up a call with you to verify your identity by requesting additional information including, but not limited to, email address associated with your Ellevest account, zip code, date of birth, and last 4 digits of social security number. Additionally, if you have a phone number associated with your account, we will send a two-factor authentication (“2FA”) code to verify the client before we can begin to process your request.

Your exercise of these rights will have no adverse effect on the price and quality of our goods or services.