

Privacy Policy for Glenoaks Capital Inc. dba aqeel

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1. Introduction

This privacy policy explains how Glenoaks Capital Inc. dba aqeel ("aqeel", "we", "our", or "us") collects, uses, discloses, and protects personal information when you use our website, services, applications, and other offerings (collectively "Services"). It applies to all individuals who interact with us for business purposes, including personnel of our business customers ("you" or "your").

If you create an aqeel account or use our Services on behalf of a business customer, our data practices are governed by our agreements with that customer. For personal data processed on our own behalf, the practices in this policy apply.

Please contact support@getaqeel.com with questions or to exercise your rights. Additional disclosures apply for Nevada and California residents.

2. Information We Collect

A. Information Collected Through Our Services

We collect the following categories of personal information when you directly interact with our Services:

- Contact Data: Name, email, phone number
- Company Data: Company name, tax ID number, address
- Content: Information within messages, posts, chat logs, and other content you upload or provide
- Job Applicant Data: Resumes, employment history, transcripts, references
- Referral Data: Information about referees including their contact details, with your authorization
- Public Profile Data: Information made public in your user profile
- Other Data: Other personal information you choose to directly provide

We also automatically collect Device Data (IP address, hardware and software details); Usage Data (clicks, views, navigation patterns, timing); and Location Data (general location from IP address) when you use our Services via cookies, pixel tags, and similar tracking technologies that collect and analyze usage information. You may limit collection via standard browser controls.

B. Information Collected Through Our Product

Through our product platform, we collect:

- Contact Data: Your name, email, phone number
- Company Data: Company name, ownership details, financial details, billing details
- Financial Data: Bank account information, transaction history, tax ID number
- Billing Data: Information to process payments like bank account numbers
- Account Credentials: Login details and authentication information
- Transaction Data: Information relating to transactions
- Receipt Data: Invoices and receipt details
- Financing Application Data: Information provided when applying for Financing Products, including financial history, financial statements, tax returns, credit scores, bank transaction history, and credit information. This information may be shared with third-party Financing Providers as part of the financing application process.
- Authorized User Data: Name, email, and details of users you authorize
- Content: Messages, posts, chats sent via the product

We automatically collect Device Data, Usage Data, and Location Data when you access our product platform or use product features.

C. Information From Other Sources

We also collect personal information from:

- Financial Partners: Credit bureaus and similar data sources
- Identity Services: Services that verify identity and prevent fraud
- Integrations: Third party services you connect to your account
- Public Sources: Sources providing information in the public domain
- Business Customers: Personnel details provided by our customers
- Joint Marketing Partners: Partners we jointly market or share rewards programs with

We collect this information in accordance with applicable laws and regulations.

3. How We Use Your Information

We use your personal information in the manner and for purposes explained below:

A. To Provide and Manage Our Services

We use your information as needed to provide and manage our Services, create and administer accounts, verify identity, process transactions, provide customer support, configure custom account settings, allow access to account features, monitor performance to protect and improve our Services, and carry out other essential activities relevant to providing our online Services.

B. To Protect Security and Prevent Fraud

We use your information as needed to detect and prevent fraud, spam, abuse, security threats, and other harmful activity. This allows us to protect the integrity of our Services, scan for technical issues, investigate suspicious activity, enforce our policies, and comply with legal obligations.

C. To Improve and Customize Our Services

We use your information to personalize our Services, remember your preferences, track usage trends, conduct research, analysis and surveys to understand how you use and interact with our Services. We leverage this information to customize the content and functionality of our Services to improve usability and overall customer experience.

D. To Communicate with You

We use contact information to respond to inquiries, send confirmations, provide technical notices, send security alerts, send marketing communications, remind you of appointments and payments, communicate about your account and transactions, and provide other customer support. You may opt out of non-essential communications as detailed in Section 8.

E. To Market Products and Services

We may use your information internally to tailor marketing offers, advertise on third party platforms, send promotional communications via email, text and other channels, measure effectiveness of marketing campaigns, and remarket our products and services. Use of your information for marketing purposes depends on your communications preferences and requires your consent where applicable.

F. To Process Job Applications

We use your Job Applicant Data as needed to evaluate you for potential employment or contractor opportunities. This may include verifying your references, qualifications, and other details submitted in connection with your job application.

G. At Your Direction

We use your information at your direction when you authorize or link third party services to your accounts, upload or provide documents through our Services, fill out forms, participate in promotions, or otherwise provide information or direct us to process your information in specific ways.

H. To Consider and Complete Mergers & Acquisitions

We may use your information in connection with prospective or completed corporate mergers, acquisitions, divestitures, asset sales, financing transactions, bankruptcy or reorganization of all or part of our business. Your information may be among assets transferred as permitted by law and applicable contracts.

I. To Comply with Legal Obligations

We use your information as required to comply with all applicable laws, regulations, court orders and legal processes, to cooperate with regulators and law enforcement bodies, to collect amounts owed, resolve disputes and enforce our agreements.

J. To Facilitate Third-Party Financing

We use your information to connect you with third-party Financing Providers when you express interest in or apply for their Financing Products through our platform. This includes sharing relevant information, including financial statements, tax returns, credit scores, and bank transaction history, to facilitate the financing application and approval process.

4. How We Share Your Information

We disclose your information to the following categories of recipients based on the purposes and uses set out in Section 3:

A. Service Providers Under Contract

We share your information with service providers under contract who assist in providing our Services, including identity verification, fraud prevention, transaction processing, marketing, analytics, advertising, communications, data storage, security, billing, customer service, and technical operations.

B. Business Partners

We share your information with business partners that jointly offer products or services, process transactions, deliver orders, analyze usage, host events, or engage in joint marketing activities. We share details needed for them to carry out the collaboration.

C. Legal and Regulatory Authorities

To comply with the law and regulations, we share your information with law enforcement, regulators, courts, governments, and as compelled by subpoena, legal orders or similar requests. This includes sharing to prevent harm and protect the rights and safety of others and GLENOAKS CAPITAL INC. dba aqeel.

D. Prospective Buyers and Transferees

If GLENOAKS CAPITAL INC. engages in a merger, acquisition, bankruptcy, dissolution, reorganization, financing, acquisition of all or a portion of our business, your information may be sold, disposed of, or transferred consistent with applicable law and contractual obligations.

E. Third-Party Financing Providers

We may share your information, including financial information such as financial statements, tax returns, credit scores, and bank transaction history, with third-party Financing Providers when you apply for or express interest in their Financing Products through our platform. This sharing is necessary to facilitate potential financing offers and is done with your consent as part of the financing application process. We only share information relevant to the financing application process, and you should review the privacy policies of these third-party Financing Providers for information on how they handle your data.

5. Tracking Technologies

We use tracking technologies like cookies, pixels, and device fingerprinting to collect usage data, deliver customized and relevant advertisements across websites and devices, improve product functionality, monitor conversions, and analyze user interactions. You may manage cookie preferences through browser settings and request us to remove unique identifiers we have assigned to your device. You may opt out of interest-based advertising through industry organizations as outlined in Section 8.

6. Data Security

While we aim to protect your personal information using technical and organizational controls, total security is not always possible. Please contact us immediately if you have reason to believe your data has been compromised so we can notify affected individuals in accordance with applicable laws.

7. International Data Transfers

We transfer your personal information globally to locations where we have facilities and service providers, including the United States. Laws vary, but we institute appropriate safeguards governing transfers as required by applicable law.

8. Your Privacy Rights

You may exercise the following rights regarding your personal information, subject to certain restrictions and limitations:

- Request Access to or Copies of your personal information
- Request Correction or Update of inaccurate or incomplete data
- Object to or Restrict certain data uses and disclosures
- Request Erasure of personal information when required by law
- Obtain your data in a usable electronic format for portability purposes
- Withdraw any consent you previously provided regarding use of your personal information
- Refrain from Automated Individual Decision Making, where applicable

To make a request, please contact us indicating your country of residence and right you wish to exercise. We will process requests in accordance with applicable laws. An authorized agent may submit requests on your behalf.

Regarding cookies and advertising, you may manage your preferences through browser settings limiting cookies and request us to remove device identifiers. Opt out of interest-based ads through industry organizations referenced in Section 5.

9. Data Retention

We retain your personal information while you have an account with us or we are providing Services to you. Thereafter, we keep your information as reasonably needed for purposes in this policy, to comply with law, resolve disputes, enforce agreements, and as advisable based on applicable statutes of limitations. We destroy your personal information when required by law or upon account closure.

10. Disclosures for Nevada Residents

If you are a Nevada resident, you have the right to opt out of certain sales of your information to third parties who intend to license or sell your personal information. As we do not sell your information, no action is required. But you may contact us with any questions.

11. Disclosures for California Residents

Under the California Consumer Privacy Act ("CCPA"), California residents have specific rights around their personal information. See Section 12 for a summary of your rights under the CCPA.

12. Your California Privacy Rights

The CCPA provides California residents the following rights with respect to their personal information.

A. Right to Know About Personal Information Collected, Disclosed, or Sold

You have the right to request that GLENOAKS CAPITAL INC. dba aqeel disclose the categories of personal information we have collected, used, disclosed and sold about you in the preceding 12 months, including categories of sources from which it was collected, purposes of use, and categories of third parties with whom it was shared.

You also have the right to request specific pieces of personal information collected about you in that period. GLENOAKS CAPITAL INC. dba aqeel does not sell your personal information.

B. Right to Request Deletion of Personal Information

You have the right to request that GLENOAKS CAPITAL INC. dba aqeel and our service providers delete any personal information we have collected directly from you, subject to certain exceptions allowed under applicable law. If you request deletion of your personal information, you understand your aqeel account may be closed and you will no longer have access to our Services.

C. Right to Non-Discrimination

You have the right to exercise any of these rights without suffering discrimination, meaning without denied or differently charged goods or services.

D. Other California Privacy Rights

California Shine the Light: California residents may request (1) a list of the categories of personal information disclosed by us to third parties for their direct marketing purposes in the preceding year; and (2) a list of the categories of third parties to whom we disclosed such information.

Right to Opt-Out of Sale: GLENOAKS CAPITAL INC. dba aqeel does not sell your personal information so there is no need to opt out of sale.

Financial Incentives: GLENOAKS CAPITAL INC. dba aqeel does not offer financial incentives or price/service differences in exchange for the retention or sale of your personal information.

10. GDPR Compliance

A. Scope

This section applies only to the extent that we process personal data of individuals residing in the European Economic Area (EEA) or where we are otherwise subject to the General Data Protection Regulation (GDPR).

B. Data Collection and Processing

We do not intentionally collect, store, or process personal information of EU residents for any purposes. Our data collection and processing activities are limited to users in the United States, as outlined in this Privacy Policy.

C. Legal Basis for Processing

In the unlikely event that we process personal data of EU residents, we will do so only on the basis of a valid legal ground under the GDPR, such as consent, contract performance, legal obligation, or legitimate interests.

D. Data Subject Rights

If you are an EU resident and believe we have inadvertently collected your personal data, you may have the following rights:

- Right to access
- Right to rectification
- Right to erasure
- Right to restrict processing
- Right to data portability

- Right to object
- Rights related to automated decision-making and profiling

To exercise these rights, please contact us at support@getaqeel.com.

E. Data Retention

We retain personal data only for as long as necessary to fulfill the purposes for which it was collected, or as required by applicable laws or regulations.

F. International Data Transfers

In the event that we inadvertently collect personal data from EU residents, we will ensure that any transfer of such data outside the EEA is done in compliance with GDPR requirements, including the use of appropriate safeguards such as Standard Contractual Clauses.

13. International Data Transfers

Given our global operations, your personal information may be transferred to and stored in the United States and other countries which may have data protection laws that differ from the laws where you reside. Any transfers are undertaken lawfully through appropriate safeguards like standard contractual clauses. You acknowledge transfer, storage and processing of your information globally per this policy.

14. Changes to this Privacy Policy

We may change this Privacy Policy from time to time. If we make material changes, we will provide notice through the Services. Your use of our Services after a change constitutes acceptance of the modified policy.

15. Contact Us

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Floor 17, Suite 1777
Glendale, CA 91203
USA
support@getaqeel.com

Please contact us with any questions about our personal information practices or this policy.