**Website Privacy Policy**

**CAPSTONE Identity Theft Protection by Frontline**

CAPSTONE Identity Theft Protection by Frontline, hereinafter Capstone ID (“**Capstone ID**”) values the privacy of our users and others (collectively “**Users**” or individually each a “**User**”) who visit and use any Capstone ID website and its associated services (the “**Website**”). This statement (the “**Privacy Policy**”) governs information provided to us by you as a User of the Website (“**You**”), or that we learn from Your use of the Website. BY ACCESSING, BROWSING, OR USING THE WEBSITE, YOU ACKNOWLEDGE THAT YOU HAVE RECEIVED, READ, UNDERSTOOD, AND AGREE TO BE BOUND BY THE FOLLOWING PRIVACY POLICY AND ANY UPDATES TO IT.

**Personal Information**

**Information you provide to us.**Personal information you may provide to us through the Website or otherwise when contacting us includes:

* **Contact data,**such as your first and last name, business phone number, and business email address.
* **Employment data**, such as your employer’s name and job title.
* **Communications** that we exchange with you, including when you contact us through the Website.
* **Marketing data**, such as your preferences for receiving our marketing communications and details about your engagement with them.
* **Other data** not specifically listed here, which we will use as described in this Privacy Policy or as otherwise disclosed at the time of collection.

**Automatic data collection.** We, our service providers, and our business partners may automatically log information about you, your computer or mobile device, and your interaction over time with the Website, such as:

* **Device data**, such as your computer’s or mobile device’s operating system type and version, manufacturer and model, browser type, screen resolution, RAM and disk size, CPU usage, device type (e.g., phone, tablet), IP address, unique identifiers (including identifiers used for advertising purposes), language settings, mobile device carrier, radio/network information (e.g., Wi-Fi, LTE, 3G), and general location information such as city, state or geographic area.
* **Online activity data**, such as pages or screens you viewed, how long you spent on a page or screen, the website you visited before browsing the Website, navigation paths between pages or screens, information about your activity on a page or screen, access times and duration of access, and whether you have opened our emails or clicked links within them.
* **Location data** when you authorize the Website to access your device’s location.

**Cookies and similar technologies.** Some of our automatic data collection is facilitated by cookies and similar technologies:

* **Cookies**, which are small text files that websites store on user devices and that allow web servers to record users’ web browsing activities and remember their submissions, preferences, and login status as they navigate a site. Cookies used on our Website include both “session cookies” that are deleted when a session ends, “persistent cookies” that remain longer, “first party” cookies that we place, and “third party” cookies that our third-party business partners and service providers place.
* **Local storage technologies**, like HTML5, that provide cookie-equivalent functionality but can store larger amounts of data on your device outside of your browser in connection with specific applications.
* **Web beacons**, also known as pixel tags or clear GIFs, which are used to demonstrate that a webpage or email address was accessed or opened, or that certain content was viewed or clicked.

We use FullStory and other web analytics tools, to gather data on User behavior for the purpose of improving User experience. FullStory collects information on your use of our Website, such as pages visited, links clicked, non-sensitive text entered, and mouse movements, as well as information more commonly collected such as the referring URL, browser, operating system, cookie information, and Internet Service Provider (collectively, “Usage Data”). FullStory’s purpose in collecting Usage Data is to better understand how you and other visitors use a Website. You may opt-out of the use of FullStory here: https://www.fullstory.com/optout/.

**How We Use Personal Information**

Capstone ID may use your personal information collected through the Website for various purposes, including:

* Communicating with you, including responding to your requests for information and other inquiries;
* Improving the Website, facilitating your user experience, and improving performance;
* Monitoring the Website and analyzing usage trends and user activities;
* Preventing, investigating, identifying, or taking other actions with regard to suspected or actual fraudulent or illegal activity or activities that violate our policies;
* Complying with applicable laws, regulations, legal processes, industry standards, and our company policies; and
* For any other purpose with your consent.

**How We Share Personal Information**

* **Affiliates.** Our corporate parent, subsidiaries, and affiliates, for purposes consistent with this Privacy Policy.
* **Service providers.** Third parties that provide services on our behalf or help us operate the Website or our business (such as hosting, information technology, customer support, email delivery, marketing, consumer research, and website analytics).
* **Professional advisors.** Professional advisors, such as lawyers, auditors, bankers and insurers, where necessary in the course of the professional services that they render to us.
* **Authorities and others.** Law enforcement, government authorities, and private parties, as we believe in good faith to be necessary or appropriate for the compliance and protection purposes described above.
* **Business transferees.** Acquirers and other relevant participants in business transactions (or negotiations of or due diligence for such transactions) involving a corporate divestiture, merger, consolidation, acquisition, reorganization, sale or other disposition of all or any portion of the business or assets of, or equity interests in, Capstone ID or our affiliates (including, in connection with a bankruptcy or similar proceedings).
* **Third parties designated by you.** We may share your personal data with third parties where you have instructed us or provided your consent to do so.

**Your Choices**

**Opt-out of marketing communications.**You may opt-out of marketing-related emails by following the opt-out or unsubscribe instructions at the bottom of the email, or by contacting us. Please note that if you choose to opt-out of marketing-related emails, you may continue to receive service-related and other non-marketing emails.

**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.

**Children**

The Website is not intended for use by anyone under thirteen (13) years of age. Consistent with the Children’s Online Privacy Protection Act of 1998 (COPPA), Capstone ID will never knowingly request information from anyone under the age of thirteen (13) without requiring parental consent. IF YOU ARE UNDER THIRTEEN (13) YEARS OF AGE, THEN PLEASE DO NOT USE OR ACCESS THE WEBSITE AT ANY TIME OR IN ANY MANNER. If you believe the personally identifiable information of anyone under the age of thirteen (13) has been provided to Capstone ID, and you are the parent or guardian of that individual, you may contact us to request that we delete any such personally identifiable information, at privacy@capstonetheft.com.

**Our Commitment to Data Security**

No data transmissions over the internet can be guaranteed to be 100% secure. Consequently, we cannot ensure or warrant the security of any information You transmit to us and You do so at your own risk. Capstone ID implements reasonable administrative, technical, and physical safeguards designed to ensure the security and confidentiality of Your information, protect against any anticipated threats or hazards to the security or integrity of such information, and protect against unauthorized access to or use of such information that could result in substantial harm or inconvenience to any User. However, please note that this is not a guarantee that such information may not be accessed, disclosed, altered, or destroyed by breach of any of our administrative, technical, and physical, safeguards.

**Note to International Visitors**

We are headquartered in the United States and may use service providers that operate in other countries. Therefore, by using the Website or contacting us from outside of the United States, you acknowledge that your personal information may be transferred to or stored in the United States where we are established, as well as in other countries outside of the United States. Such countries may have data protection rules that are different and less protective than those of your country.

**Changes and Updates to this Privacy Policy**

Capstone ID reserves the right to modify this Privacy Policy at any time. Any modifications to this Privacy Policy will be effective upon our posting the modified version (or as otherwise indicated at the time of posting). In all cases, your use of the Website after the effective date of any modified Privacy Policy indicates your acceptance of the modified Privacy Policy.

**How to contact us**

**Email**: privacy@capstonetheft.com

**Mail**:

Capstone ID Protection

2401 Sardis Rd N

Charlotte, NC 28227

**CCPA Privacy Policy**

This Privacy Policy for California residents supplements the information contained in CAPSTONE Identity Theft Protection by Frontline, hereinafter Capstone ID (“**Capstone ID**”) current Privacy Policy. At Capstone ID, we want you to understand the personal information we collect, use, share, and protect, which identifies or is associated with you and your device(s). This CCPA Privacy Notice only applies to individuals residing in the state of California who are considered to be “Consumers” under the CCPA and from whom we collect “Personal Information” as described in the CCPA.

**Scope.**

Capstone ID may have collected the following categories of CCPA Personal Information from consumers within the last 12 months (categories and examples):

* Identifiers: A real name, alias, postal address, unique personal identifier, online identifier, Internet protocol address, email address, account name, social security number, driver’s license number, or passport number.
* Personal information categories listed in the California Customer Records statute (Cal. Civ. Code § 1798.80(e)): A name, signature, social security number, physical characteristics or description, address, telephone number, passport number, driver’s license or state identification card number, insurance policy number, education, employment, employment history, bank account number, medical information, or health insurance information.
* Internet or other similar network activity: Browsing history, search history, information on a consumer's interaction with a website, application, or advertisement.
* Geolocation data: Physical location
* Professional or employment-related information: Current or past job history or performance evaluations
* Education information: Current or past education history

CCPA Personal Information does not include:

1. Publicly available information from government records,
2. Information excluded from the CCPA’s scope, such as:
	1. Protected Health Information under HIPAA, information subject to the California Confidentiality of Medical Information Act, or clinical trial data; or
	2. “Business to business” information, which is information related to communications or transactions between a business collecting the information and a consumer who is acting on behalf of another business where the communications or transaction relate solely to an exchange of products or services between the two businesses.

**Collection of Your CCPA Personal Information.**

Capstone ID collects each of the categories of CCPA Personal Information listed above in one or more of the following ways:

* When you contact us (i.e. from forms you complete).
* Automatically when you use Capstone ID services.
* From other sources, including the Internet and other publicly-available sources and databases, data aggregators, marketing companies, and other third parties.

**How We Use Your CCPA Personal Information.**

Capstone ID may use or disclose each of the categories of CCPA Personal Information described above for one or more of the following business purposes:

* **Information.** Capstone ID may use your CCPA Personal Information to verify your identity or provide you the information, products, and services that you request.
* **Experience.** Capstone ID may use your CCPA Personal Information to personalize and enhance your experience.
* **Business Transaction:** If I Capstone ID is exploring or go through a business transition, such as a merger, acquisition, divestiture, restructuring, reorganization, dissolution, bankruptcy, securities offering, or sale of all or a portion of Capstone ID assets.
* **Legal Purposes:** Capstone ID will use your CCPA Personal Information when we think it is necessary to investigate or prevent actual or expected fraud, criminal activity, injury or damage to us or others; when otherwise required by law, regulation, subpoena, court order, warrant or similar legal process; or if necessary to assert or protect our rights or assets.

**Sharing Your CCPA Personal Information.**

Capstone ID may share your CCPA Personal Information with the following categories of third parties for a business purpose:

* **Internally** (i.e. with our group companies and affiliates).
* **Vendors:** Capstone ID may share your CCPA Personal Information with our vendors (including third-party hosting providers) that provide services on our behalf, such as for email marketing, advertising, promotions, newsletters, notices and other communications, or that assist us in monitoring, improving, and hosting services.
* **Business Transaction:** If Capstone ID is exploring or go through a business transition, such as a merger, acquisition, divestiture, restructuring, reorganization, dissolution, bankruptcy, securities offering, or sale of all or a portion of Capstone ID assets.
* **Legal Purposes:** Capstone ID may disclose your CCPA Personal Information when it thinks it is necessary to investigate or prevent actual or expected fraud, criminal activity, injury or damage to us or others; when otherwise required by law, regulation, subpoena, court order, warrant or similar legal process; or if necessary to assert or protect our rights or assets.

**Security Measures.**

Capstone ID restricts access to your personal information to employees who we have determined need it in order to provide products or services to you. Further, Capstone ID provides thorough training to its employees to safeguard customer personal information. We maintain strict physical, electronic and procedural safeguards to protect your personal information from unauthorized access by third parties.

**Rights and Choices under the CCPA.**

* **Right to Know.** You have the right to request that Capstone ID disclose certain information to you about our collection and use of your CCPA Personal Information over the past 12 months.
* **Right to Deletion.**
	+ You have the right to request that we delete any of your CCPA Personal Information that Capstone ID collected from you and retained, subject to certain exceptions. Any requests for deletion should be directed at privacy@capstonetheft.com.
	+ Capstone ID may deny your deletion request for reasons permitted by the CCPA. (i.e. if the information is excluded from the CCPA or does not constitute CCPA Personal Information).
* **Response Timing and Format.** Once verified the request is from a California consumer, Capstone ID will try to respond within 45 days. If we need more time, we will tell you in writing why and how much longer we need, either by mail or electronically (based on your choice).
* **Non-Discrimination.** Capstone ID will not discriminate against you for choosing to exercise any of your CCPA rights, including with respect to any Capstone ID services.
* **Alternative Format.** To obtain this Privacy Policy in an alternative format please contact Capstone ID at **1-866-358-3314.**

**Changes and Updates to this Privacy Policy.**

Capstone ID may occasionally update this CCPA Privacy Policy. Your continued use of the Website constitutes Your agreement to this CCPA Privacy Policy and any updates.

**Contacting Us.**

If you have any questions or comments about this Supplement, including how we collect and use your CCPA Personal Information or your choices and rights regarding such use, or if you wish to exercise your rights under California law, please contact us by either:

Capstone ID Theft Powered by Frontline

2401 Sardis Rd N

Charlotte, NC 28227

Email: support

Telephone: 1-866-358-3314

**Last updated:** April 8, 2025

**Do Not Sell My Personal Information Privacy Policy**

This Privacy Policy only applies to individuals residing in the state of California who are considered to be “Consumers” under the CCPA.

CAPSTONE Identity Theft Protection by Frontline, hereinafter Capstone ID (“**Capstone ID**”) **does not sell your personal information**. However, we support the CCPA by allowing California residents to opt out of any future sale of their personal information. If you would like to record your preference that Capstone ID not sell your data in the future, you may do so by contacting us at privacy@capstonetheft.com or following the instructions to change your cookies preferences in our Privacy Policy. Please note that by opting out of these types of disclosures, you may limit our ability to customize your experience with content that may be of interest to you.

**Last updated:** April 8, 2025

**GDPR PRIVACY POLICY**

**Introduction**

CAPSTONE Identity Theft Protection by Frontline, hereinafter Capstone ID (“**Capstone ID**”) recognizes that the personal information we receive is held in a position of trust. We therefore seek to fulfil that trust by adhering to general principles regarding the protection of personal information. This Privacy Policy explains how we collect, use, share, and protect information gathered through this Site and during other interactions you may have with Capstone ID.

**Scope**

This Privacy Policy applies to personal information collected on websites, mobile applications, or controlled widgets embedded in communication platforms (“**Sites**”) and personal information collected in connection with Capstone ID’s business operations, such as information from patients, health care professionals or employees’ human resource data. Personal Information as used herein, is any information that can be used either alone or combined with other information to identify an individual or that can be directly linked to an individual. This Privacy Policy describes Capstone ID’s collection, use, and distribution practices with respect to personal information.

**Information Collection**

Capstone ID does not require you to provide Personal Information to access any portion of our public website. Only Personal Information you voluntarily provide to us is collected. Capstone ID maintains physical, technical, and administrative safeguards to protect your nonpublic personal information.  Personal Information collected via Capstone ID Sites may include, but is not limited to:

* Contact information, such as name, address, email, telephone number, fax number, and/or job title
* Unique identifiers and preference information marketing preferences, internet protocol (IP) address, browser type, operating system, computer or mobile device, or navigation and clickstream behavior

Capstone ID may collect, keep, and use Personal Information obtained through the Sites to provide you with access to the Sites.  This information may be collected when you:

* Create an account with Capstone ID
* Request a product demo or receive information about our products
* Request customer or technical support
* Apply for employment
* Request to be contacted, i.e. through our website or at exhibitions
* Receive our products or services

**Basis for Using Personal Information**

* **Compliance with legal requirements or obligations** – Capstone ID may disclose Personal Information as permitted or required by law when we believe in good faith it is necessary for safety purposes, required for legal reporting, necessary to protect our legal rights or enforce our Terms of Use or any applicable rules or to protect the rights of others.
* **For establishment or performance of a contract** – The use of Personal Information may be necessary to perform the contract that you have with us or your insurance provider has with Capstone ID.
* **Consent** – Capstone ID will rely on consent, which is (i) gained through a contractual relationship or (ii) in some cases may be implied, to use technical information such as cookie data and geolocation data as described in this Privacy Policy.  Consent may be withdrawn at any time by contacting us through the mediums described within this Privacy Policy. We may obtain Personal Information through healthcare professionals or users of our products and services, in which case that healthcare professional or product/services user is responsible for the management of consent, where required.
* **Legitimate interests** – Capstone ID may use Personal Information for our legitimate interests to improve our products, services and website content and for administrative purposes.

**Marketing**

Capstone ID markets in a number of ways, including, but not limited to, email marketing campaigns. We may use your Personal Information to inform you of other products or services offered by Capstone ID. We do not sell, rent, or lease our customer’s lists to third parties. In order to help provide our services, we occasionally provide information to other affiliate companies that work on our behalf.

**Tracking Tools**

Your browser may give you the ability to control cookies.  How you do so depends on your browser and the type of cookie. Certain browsers can be set to reject all browser cookies. If you configure your computer to block all cookies, you may disrupt certain web page features and limit the functionality we can provide when you visit or use our Sites. If you block or delete cookies, not all of the tracking that we have described in this Policy will stop. Some browsers have a “Do Not Track” feature that lets you tell websites that you do not want to have your online activities tracked.

**How Long We Keep Information**

Capstone ID will retain your Personal Information for as long as reasonably necessary for legitimate business purposes.

**Security**

The security and confidentiality of your Personal Information matters to us. For this reason, Capstone ID has physical, technical and administrative controls in place to protect your Personal Information from unauthorized access, use and disclosure. Capstone ID evaluates these safeguards on an ongoing basis to help minimize risks from new security threats as they become known. However, as is the case with all websites, Capstone ID is not able to guarantee security for data collected through our Site.

**Rights**

You may contact us at any time to request access to or rectify your Personal Information. You also have a right to the objection to or restriction of processing, as well as the right to data portability, when applicable. If Capstone ID has processed your Personal Information based on your consent, you have a right to withdraw it at any time. To exercise your rights, please write to us at the contact information provided below. Please note that additional information will likely be requested from you in order to honor the request. If you receive any marketing email from Capstone ID, you may request to have your Personal Information removed using the unsubscribe link, or reply email address, provided within the content.

**Processing of Personal Data**

The subject matter and duration of the processing of Personal Information by Capstone ID is set out in contractual agreements with its clients.

**Updates**

This Privacy Policy may be amended at any time. If material changes are made in how Personal Information is collected, used, disclosed, or otherwise processed, this Privacy Policy will be updated.

Capstone Identity Theft Protection by Frontline, dba Capstone ID®

2401 Sardis Rd

Charlottle, NC 28227

Email: support@capstonetheft.com

Telephone: 1-866-358-3314

**Last updated:** April 8, 2025