

Elford Asset Management ("us", "we", or "our") operates this website (the "Service"). This page informs you of our policies regarding the collection, use, and disclosure of personal data when you use our Service and the choices you have associated with that data. 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.

### **Information Collected**

We collect information from you when you fill out a form. 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

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. We may also collect information how the Service is accessed and used ("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. Any data we request that is not required will be specified as voluntary or optional. When ordering or registering on our site, as appropriate, you may be asked to enter your: name, e-mail address or phone number. You may, however, visit our site anonymously.

### **Information Used For:**

Any of the information we collect from you may be used in one of the following ways:

To personalize your experience (your information helps us to better respond to your individual needs).

To improve our website

To improve customer service

### **Google Analytics**

This website uses Google Analytics, a web analytics service provided by Google, Inc. ("Google"). Google Analytics uses Cookies. The information generated by the Cookie about your use of the website, including your IP address, will be transmitted to and stored by Google on servers in the United States. Google will use this information for the purpose of evaluating your use of the website, compiling reports on website activity for website operators and providing other services relating to website activity and internet usage. Google may use the data collected to contextualize and personalize the ads of its own advertising network. Google may

also transfer this information to third parties where required to do so by law, or where such third parties process the information on Google's behalf. Google will not associate your IP address with any other data held by Google. You may refuse the use of cookies by selecting the appropriate settings on your browser, however, please note that if you do this you may not be able to use the full functionality of this website. By using this website, you consent to the processing of data about you by Google in the manner and for the purposes set out above.

### **Retention of Data**

Elford Asset Management 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. Elford Asset Management 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.

### **Cookies**

Yes. Cookies are small files that a site or its service provider transfers to your computer's hard drive through your Web browser (if you allow) that enables the sites or service providers systems to recognize your browser and capture and remember certain information. In addition to our own cookies, we may also use various third-party vendors may use cookies to report usage statistics of the Service, deliver advertisements on and through the Service.

### **Disclosing Information**

We do not sell, trade, or otherwise transfer to outside parties your personally identifiable information. This does not include trusted third parties who assist us in operating our website, conducting our business, or servicing you, so long as those parties agree to keep this information confidential. We may also release your information when we believe release is appropriate to comply with the law, enforce our site policies, or protect ours or others' rights, property, or safety. However, non-personally identifiable visitor information may be provided to other parties for marketing, advertising, or other uses.

### **Third Party Links**

Occasionally, at our discretion, we may include or offer third party products or services on our website. These third-party sites have separate and independent privacy policies. We therefore have no responsibility or liability for the content and activities of these linked sites. Nonetheless, we seek to protect the integrity of our site and welcome any feedback about these sites.

### **California Online Privacy Protection Act Compliance**

Because we value your privacy, we have taken the necessary precautions to be in compliance with the California Online Privacy Protection Act. We therefore will not distribute your personal information to outside parties without your consent.

## **Children's Privacy**

Our Service does not address anyone under the age of 18 ("Children").

We do not knowingly collect personally identifiable information from anyone under the age of 18. If you are a parent or guardian and you are aware that your child has provided us with Personal Data, please contact us. If we become aware that we have collected Personal Data from children without verification of parental consent, we take steps to remove that information from our servers.

## **Disclosure for Law Enforcement**

Under certain circumstances, Elford Asset Management may be required to disclose your Personal Data if required to do so by law or in response to valid requests by public authorities such as courts, government agencies, warrants, search warrants, subpoenas etc...

## **Online Privacy Policy Only**

This online privacy policy applies only to information collected through our website and not to information collected offline.

## **Your Consent**

By using our site, you consent to our privacy policy.

## **Changes to our Privacy Policy**

If we decide to change our privacy policy, we will post those changes on this page, send an email notifying you of any changes, and/or update the Privacy Policy modification date below. Policy changes will apply only to information collected after the date of the change.

**This policy was last modified on April 30, 2025**

## **Contact Us**

If there are any questions regarding this privacy policy, you may contact us by emailing [info@elfordam.com](mailto:info@elfordam.com)