# Eleable

## Privacy Policy

Last updated: November 10, 2026

This Privacy Policy describes how Eleable ("Eleable," "we," "our," or "us") collects, uses, shares, retains, and protects personal information when you visit our websites, contact our team, request a proposal, engage us for services, or otherwise interact with us (collectively, the "Services"). Eleable provides digital design psychology, website design and accessibility review, search and visibility strategy, public relations, branding, and related professional services.

This policy applies to Eleable's own business activities and to websites or online properties that expressly link to it. When we process data on behalf of a client through a website or service we develop or manage, that client's privacy notice and contractual arrangements may also apply. This policy does not automatically cover the independent activities of other businesses or organizations linked from this website.

IN THIS POLICY

## WHO WE ARE

Eleable is a digital design psychology agency providing website design, accessibility-focused review, brand and digital strategy, and related professional services. For privacy questions about Eleable's business operations, contact us using the information below.

References to Eleable in this Privacy Policy concern the agency providing the Services described here. When Eleable determines the purposes and means of processing, it acts as the responsible business or controller under applicable privacy law. In client engagements, the parties' respective roles are determined by the facts, contracts, and governing law; Eleable may instead act as a service provider or processor.

## CONTACT US

For questions, requests, or concerns about privacy, email legal@eleable.com. We may request information reasonably necessary to verify identity before responding to a request about personal data.

## INFORMATION WE COLLECT

The categories of personal information involved in our Services depend on how you interact with us. We describe the types of information that may be involved in operating the Services below. Not every category is collected from every visitor. Some categories apply only where the relevant features or services are used.

**Sources of information.** We may receive data directly from you; automatically from your browser or device when you use a site; from a client that authorizes us to work on a project; from payment, scheduling, hosting, or communications providers; and from public business sources or referrals. The sources relevant to a particular interaction depend on the Services involved.

**Information we do not need.** We ask that you avoid sending sensitive personal information—including medical details, government identifiers or account passwords—unless specifically required for an agreed service and transmitted through an appropriate secure method. We do not need sensitive personal data for an ordinary sales inquiry.

## HOW YOUR INFORMATION MAY BE USED

Subject to applicable law, and depending on the Services you request, we may use personal information to:

- Respond to inquiries, schedule consultations, and prepare estimates or proposals.
- Deliver and manage design, strategy, accessibility review, and other contracted services.
- Maintain client accounts, project records, contracts, payments, and related communications.
- Operate, troubleshoot, protect, and improve our websites, systems, and Services.
- Send service notices and, where permitted or consented to, marketing communications.
- Understand website performance and user experience where analytics are enabled.
- Protect against fraud, abuse, unauthorized activity, and security threats.
- Measure the effectiveness of promotional campaigns and communications, if those activities are undertaken.
- Analyze aggregated audience or service trends in a manner allowed by law.
- Coordinate with third-party providers selected or authorized by a client.
- Respond to job, contractor, partnership or professional collaboration inquiries.
- Comply with legal obligations, enforce agreements, and establish or defend legal claims.

Where laws such as the EU or UK GDPR apply, processing may rely on a legal basis such as performance of a contract, compliance with law, legitimate interests, or consent, depending on the circumstances. We do not treat consent as the basis for all processing, and you may withdraw consent where that is the applicable basis.

## LEGAL BASES FOR PROCESSING

Where the General Data Protection Regulation (GDPR), UK GDPR, or comparable law applies, the lawful basis for a specific use of information depends on the activity. A contract or steps requested before entering a contract may support proposals, onboarding, service delivery and billing. Legitimate interests may support proportionate client relationship management, internal administration, site security, fraud prevention and service improvement, subject to applicable balancing and objection rights. Legal obligations may require recordkeeping or cooperation with authorities. Consent may be used for optional tracking or direct marketing where legally necessary.

Where processing depends on consent, consent may be withdrawn without affecting processing already lawfully undertaken. The basis applicable to a particular activity may vary depending on the circumstances and your relationship with us.

## PURPOSES, DATA TYPES, AND LAWFUL BASES

The following table provides an additional overview for jurisdictions requiring disclosures about the purposes and lawful grounds of processing. A listed basis applies only when legally available and supported by the relevant circumstances; it is not an assertion that every activity or technology is in use.

## HOW YOUR INFORMATION MAY BE SHARED

We may disclose information only as needed for the purposes described in this policy, including to:

- **Service providers:** companies that assist with hosting, email, scheduling, analytics, security, payments, file storage, or project administration, subject to appropriate arrangements.
- **Authorized collaborators:** independent professionals or contractors helping deliver a requested service, subject to confidentiality and applicable safeguards.
- **Your chosen third parties:** platforms or collaborators you direct us to work with on your project.
- **Legal and safety recipients:** regulators, authorities, professional advisers, or other recipients where reasonably necessary to comply with law, respond to lawful process, or protect rights and safety.
- **Business-transition recipients:** parties involved in a potential merger, acquisition, financing, reorganization, or asset transfer, subject to applicable legal requirements.

When a project involves a client's website, the client may decide what information is collected and why, while Eleable handles certain information on documented client instructions. In those cases, requests about data on that client site may need to be directed to the client as the relevant controller or business.

We do not sell lists of client contact information for money. Certain advertising or analytics disclosures, if used, may be defined as a “sale,” “sharing,” or targeted advertising under some U.S. state laws even without a monetary payment. If applicable, you may contact us to exercise available opt-out rights.

## STORAGE AND RETENTION OF INFORMATION

We retain personal information for as long as reasonably needed for the purposes for which it was collected, including service delivery, recordkeeping, dispute resolution, security, and legal compliance. Retention periods may vary with the nature of the information, contractual requirements, and applicable law. When no longer needed, information is deleted, anonymized, or otherwise managed in accordance with applicable requirements.

Relevant factors in setting retention periods include the duration of client relationships, contractual commitments, financial and tax requirements, the age and sensitivity of records, potential disputes, and whether information is needed for security investigations. Backup copies may remain for a limited period under system retention schedules. A request for deletion may be limited by legal retention duties or other permitted exceptions.

## INFORMATION SECURITY

We use reasonable administrative, technical, and organizational safeguards appropriate to the information and risks involved. No internet transmission, storage system, or security measure can be guaranteed completely secure. Please notify us if you believe information associated with an interaction with Eleable has been compromised.

## CHILDREN'S PRIVACY

Our business-facing Services are not directed to children under 13, or to children below a different age threshold established by applicable law. We do not knowingly seek to collect personal information from children through ordinary marketing or inquiry forms. If you believe a child has submitted personal information improperly, please contact us so we can review the situation and take appropriate steps.

## YOUR PRIVACY RIGHTS

Depending on where you live and the laws that apply, you may have rights to request access to, correction of, deletion of, or a copy of certain personal information; object to or limit particular processing; withdraw consent; or appeal a decision about a privacy request. Some rights are subject to exceptions, identity-verification requirements, and other legal limitations.

To submit a request, email legal@eleable.com with "Privacy Request" in the subject line. Please describe the request and the relevant interaction with Eleable. We will respond within the time required by applicable law. You may also have the right to complain to a relevant privacy or data protection authority.

**Verification and authorized agents.** We may take proportionate steps to verify a request and an agent's authority to act. Depending on governing law, we may ask for limited additional details, explain if a request must be denied, and provide an appeal or complaint route where required. We aim to avoid requesting more personal information than is reasonably necessary to process the request.

**EEA and UK residents.** Applicable rights may include access, rectification, erasure, restriction, portability, objection to certain processing, and rights concerning solely automated decisions with legal or similarly significant effects. Individuals may lodge a complaint with their local supervisory authority. Such rights are subject to legal conditions and exceptions.

**California and other U.S. state residents.** Depending on state law and whether that law applies to Eleable, rights may include knowledge or access, correction, deletion, portability, opting out of sale, sharing or targeted advertising, and freedom from unlawful discrimination for exercising rights. Some states provide an appeal right. Sensitive personal data rights and treatment of recognized opt-out preference signals depend on the laws and technologies that apply. For requests concerning applicable opt-out rights, please contact legal@eleable.com.

You may unsubscribe from marketing emails by using the unsubscribe link provided in those messages, if applicable. Unsubscribing from marketing does not necessarily stop essential project, billing, security, or legal communications.

## COOKIES AND SIMILAR TECHNOLOGIES

Cookies are small files stored on a browser or device. Related technologies may include local storage, tags, pixels, software development kits, and measurement identifiers. Depending on configuration, Eleable's sites may use technology that is strictly necessary for security and core functionality, saves preferences, measures website performance, or helps assess the effectiveness of outreach.

Some services may set their own cookies when a page includes third-party video, scheduling widgets, social-media content, analytics, or other embedded functions. Those services can have independent privacy practices. You may adjust browser settings to block or remove cookies; some functions may no longer work as intended. Where required by law, we seek consent for non-essential technologies.

For general information about browser cookie controls, consult your browser's support documentation. You may contact us for additional information about cookies or similar technologies used in connection with our Services.

## DIGITAL ADVERTISING

Online advertising providers may, when configured on a site, use cookies or similar identifiers to measure ad performance, recognize return visits, limit repeated ads, or deliver interest-based advertising across services. Such practices can involve third-party processing and, under certain U.S. privacy laws, may constitute targeted advertising, a sale, or sharing even if no cash payment is received.

If applicable law gives you a right to opt out of such activities, you may submit a request to legal@eleable.com. We will process valid requests and recognized preference signals as required by law. Device and browser settings, provider-specific preferences, and industry tools may offer additional controls, but they do not necessarily opt you out of every advertisement or all data collection.

General industry resources include Digital Advertising Alliance opt-out information and Your Online Choices. These services are independently operated; their availability and effect depend on your region and the participating providers. They do not replace an Eleable-specific opt-out mechanism where one is required.

## THIRD-PARTY WEBSITES AND CLIENT SERVICES

Our website may link to independent sites and services, including client websites, professional networks, embedded media, appointment platforms or external applications. Their privacy practices are governed by their own notices, not this policy. Similarly, Eleable's accessibility assessments and design work do not make Eleable the privacy controller for every client-operated website. Clients generally remain responsible for their own policies and decisions about information collected through the sites they operate, subject to the parties' specific agreements and applicable law.

## INTERNATIONAL DATA TRANSFERS

Because Eleable may work with clients and service providers in multiple countries, personal information may be processed in jurisdictions other than the one where you reside. Where applicable law restricts international transfers, we will use a lawful transfer mechanism or other appropriate safeguard. This may include contractual protections or another legally recognized transfer method where required and applicable.

Where relevant, safeguards for transfers from the EEA or UK may include an adequacy decision, applicable standard contractual clauses, a UK addendum or other approved transfer mechanism, together with any additional measures required by law. The mechanism actually used depends on the providers and countries involved. You may contact us to request information about relevant safeguards where entitled by law.

## ADDITIONAL JURISDICTION-SPECIFIC INFORMATION

Residents of certain U.S. states, the European Economic Area, the United Kingdom, and other jurisdictions may have additional rights. The scope of those rights depends on Eleable's operations, applicable thresholds, the type of information involved, and whether Eleable acts as a controller or a service provider/processor. Nothing in this policy limits rights that cannot be waived under applicable law.

Where applicable law grants rights concerning sensitive information, targeted advertising, the sale or sharing of information, or significant automated decisions, you may contact us to exercise those rights. Legal exceptions may apply.

## AUTOMATED DECISION-MAKING AND PROFILING

Website analytics or business research may involve grouping data by interest, service type, or site activity, if those tools are used. Such grouping is not necessarily an automated decision with legal or similarly significant effects. If a decision with legal or similarly significant effects is made solely through automated processing, applicable laws may provide additional notice and rights.

## BUSINESS CHANGES AND LEGAL REQUESTS

Information may be transferred or reviewed in connection with a proposed or completed restructuring, business combination, acquisition, sale of assets or similar transaction, subject to applicable law and protections. We may also preserve, access, or disclose information to comply with valid legal process, enforce agreements, investigate misuse, protect the rights and safety of individuals, or defend legal claims when lawfully permitted or required.

## U.S. STATE PRIVACY NOTICE

This supplemental notice is intended for people whose data is subject to an applicable U.S. state consumer privacy statute, including California and other states that provide comparable rights. A particular statute may not apply to Eleable or to a specific interaction due to statutory thresholds, exemptions, processing roles, and other limits. Where it applies, its mandatory rights and definitions control over any inconsistent general description here.

**Categories of information.** During interactions described in this policy, categories potentially involved include identifiers, professional or commercial information, financial transaction records, internet or network activity, approximate geolocation derived from IP, visual or electronic communications, employment-related information, and inferences about business service preferences. We do not suggest that Eleable collects every category in every instance.

**Sources and purposes.** Sources include you or your authorized representatives, business clients, service providers, referrals, and professional sources. The purposes appear under “How Your Information May Be Used” and in the processing table above, including service delivery, security, business operations, customer communications, and optional advertising where actually used.

The preceding table describes possible disclosure categories rather than attesting that every disclosure occurred in the prior 12 months. Any statutory 12-month lookback, precise sale/share accounting, or sensitive-data disclosure must be validated against actual systems and records.

**Sale, sharing and targeted advertising.** Eleable does not describe ordinary vendor payments as selling a contact list. Nevertheless, some laws define a “sale” or “sharing” broadly enough to encompass certain cookie, pixel, cross-context advertising or other disclosures. If Eleable engages in covered activities, individuals may have applicable opt-out rights, including through recognized universal opt-out signals when required by law. Email legal@eleable.com with “Opt-Out Request” as the subject to request applicable controls. An email request alone does not replace any website-based preference mechanism that must be deployed under law.

**Consumer rights.** Where applicable, you may request to know or access categories and specific pieces of personal information, correct inaccurate records, delete information subject to exceptions, receive portable information, opt out of covered sale, sharing, targeted advertising or qualifying profiling, and limit certain sensitive-information uses. You may also be entitled to non-discrimination for exercising your rights and to appeal a denial.

**Submitting and verifying requests.** Submit a request through legal@eleable.com and identify the right you wish to exercise. We may verify your identity, the scope of our relationship, and whether an exception applies. Verification may

involve reply to a verified email account or other proportionate evidence. Please do not email government-issued identification unless specifically requested through a secure process.

**Authorized agents and appeals.** An authorized agent may contact us on behalf of a person where allowed by law; proof of authority and additional identity verification may be requested. To appeal a denied request where an appeal right exists, email the same address with “Privacy Appeal” in the subject line and describe the original request and the reasons for the appeal. We will provide the responses, explanations, and further complaint options required by governing law.

**Retention and incentives.** The applicable retention criteria are described above. This policy does not announce a financial incentive or loyalty program tied to selling personal information. If one is introduced, additional disclosures will be supplied where legally required.

**California-specific matters.** California residents may also have rights concerning sensitive personal information, statutory notices, or disclosures of information to third parties for those parties’ own direct marketing, if those provisions apply. We will address valid requests under the relevant law. We do not knowingly solicit personal information from children to support cross-context behavioral advertising.

**Do Not Track and preference signals.** Browser “Do Not Track” settings differ from legally recognized universal opt-out preference signals. Because implementations vary, a browser-level DNT signal by itself does not establish that all third-party tracking has been disabled. Where required, a qualifying universal opt-out signal must be honored for covered activities; separately, cookie consent choices may be available through implemented website controls.

## EUROPEAN ECONOMIC AREA, UNITED KINGDOM AND SWITZERLAND

Where the GDPR, UK GDPR or corresponding Swiss law applies, individuals may have rights of access, rectification, erasure, restriction, data portability, objection, and withdrawal of consent, as well as protections relating to certain solely automated decisions. Rights and exceptions depend on applicable law. An individual may lodge a complaint with the competent data protection authority.

**Controller versus processor.** For decisions about Eleable’s own website, client communications and business operations, Eleable may act as controller. For work conducted under a customer’s instructions, the customer may be the controller and Eleable may be its processor. When we act as processor, requests regarding the client’s information may need to be handled by that client, with our assistance as appropriate.

**Lawful bases.** Depending on the activity, processing may rely on contractual necessity, steps requested before contract, legal obligations, legitimate interests subject to applicable balancing and objection rights, or valid consent. The activities table above provides illustrative mapping. Consent, where required, can be withdrawn without affecting previous lawful processing.

**Cross-border safeguards.** Information may be processed in the United States or in countries where appropriate vendors or collaborators operate. Where required, restricted transfers are supported by an adequacy finding, standard contractual clauses, a UK addendum or other valid legal mechanism and supplementary safeguards where necessary. Eleable does not claim certification under the EU-U.S. Data Privacy Framework or participation in an independent dispute-resolution program by virtue of publishing this notice.

**Contact and complaints.** Privacy requests may be sent to legal@eleable.com. If relevant law requires a locally established representative or a designated data protection officer for Eleable’s actual operations, the required contact information must also be made available through the applicable notice or communication.

## ANALYTICS, AI-ASSISTED WORK AND STRATEGIC RESEARCH

Digital design psychology and strategy may involve research concerning websites, audiences, consumer behavior, accessibility barriers, creative performance or campaign measurement. Such work may use aggregated statistics, business information, survey responses, user-experience observations, publicly available materials, and, where authorized, client-provided information. We distinguish design research and marketing analysis from clinical psychological services or individual medical assessments.

If automated systems, AI-assisted tools or third-party analytics are used for a project, their role, input data, access arrangements and retention obligations depend on the service and relevant agreements. Client materials and personal information should not be submitted to an external tool absent a lawful basis, necessary permissions and appropriate safeguards. This policy does not represent that Eleable routinely trains its own AI models on visitors' personal information or makes legally significant automated decisions about individuals.

Where a service involves audience clustering, optimization, prediction, or personalization, privacy rights may apply to personal information used in that process. We will address applicable legal requirements for notice, consent, objection or opt-out, as appropriate.

## DISPUTE RESOLUTION AND REGULATORY CONTACTS

If you have concerns about Eleable's handling of personal information, please first contact legal@eleable.com with sufficient detail for us to investigate. We may ask for limited information needed to understand and address the matter and will respond in accordance with applicable law. Nothing in this notice restricts the right to file a complaint with a competent regulator or exercise a non-waivable statutory right. Any contractual dispute resolution terms applicable to a client engagement are separate from the rights granted by privacy law.

## CHANGES TO OUR PRIVACY POLICY

We may update this Privacy Policy as our operations, technologies, or legal obligations change. The updated version will be posted with a revised "Last updated" date. Where law requires additional notice or consent for a material change, we will provide it.

## QUESTIONS OR COMPLAINTS

If you have any questions about this Privacy Policy or how Eleable handles information, contact legal@eleable.com. We aim to address privacy concerns fairly and in accordance with applicable law.

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