

PRIVACY POLICY

Protecting Your Data

CapRelease Limited

71-75 Shelton Street, Covent Garden, London, WC2H 9JQ

Company Number: 15180252

FCA Registration Number: 1013575

Last Updated: February 2026

support@caprelease.com

1. Introduction

Hello. We are CapRelease Limited (known as “CapRelease”, “we”, “us”, or “our”). Here’s how we protect your data and respect your privacy.

This Privacy Policy applies to you if you are a CapRelease customer, a Shopify merchant using our app, a subscriber, or a visitor to our website. It describes how we collect, use, store, and share your personal data, and sets out your rights.

If you are a registered CapRelease customer or a visitor to our website, we act as the “data controller” of personal data. This means we determine how and why your data is processed.

2. Our Role in Your Privacy

Our Responsibilities

As data controller, we are responsible for ensuring your personal data is processed lawfully, fairly, and transparently. We implement appropriate technical and organisational measures to protect your data.

Your Responsibilities

- Read this Privacy Policy
- If you are our customer, also review the contracts between us, including the Data Processing Agreement (available upon request at support@caprelease.com), which may contain further details on how we collect and process your data
- If you provide us with personal information about other people, or if others give us your information, we will only use that information for the specific reason for which it was provided to us. By submitting the information, you confirm that you have the right to authorise us to process it on your behalf in accordance with this Privacy Policy

3. When and How We Collect Data

If you are only a visitor to our website, we do not collect any personal data before you request contact or information from CapRelease. We use Google Analytics to carry out website measurement.

From the moment you request contact, register for our services, or install our Shopify app, we start collecting data. Sometimes you provide us with data; sometimes data about you is collected automatically.

Data You Give Us

- When you register for or use CapRelease services
- When you install our Shopify app and grant permissions
- When you complete identity verification (KYC) via Onfido
- When you sign agreements via DocuSign
- When you contact us for customer support
- When you opt in to marketing communications

Data We Collect Automatically

- When you browse our website (via Google Analytics)
- When you use our platform or Shopify app

- When you receive and interact with our emails

Data Collected via Shopify

When you install the CapRelease Shopify app, we access certain data from your Shopify store via Shopify's APIs and through our integration partner Codat. This includes:

- Store information: store name, URL, owner contact details, and billing address
- Order data: order history, order values, fulfilment status, and shipping information
- Product and inventory data: product listings, stock levels, variants, and inventory valuations
- Customer data: buyer names, email addresses, delivery addresses, and phone numbers associated with orders, used to analyse purchasing patterns such as customer concentration and repeat versus new customer ratios
- Financial data: revenue summaries, refund rates, and sales performance metrics

We access this data to provide our services to you, including business analytics, performance monitoring, and reporting on your store's commercial health.

Data Collected via TrackStar

We use TrackStar to integrate with your warehouse management and inventory systems. Through TrackStar, we may access:

- Inventory levels, product data, and stock movements
- Warehouse and fulfilment data

This data is used to provide accurate, real-time visibility into your inventory and operations.

4. Types of Data We Collect

Contact Details

Your name, email address, phone number, role in your company, and business address.

Financial Information

Your bank account number, sort code, Direct Debit mandate details, revenue data, and other financial metrics relevant to the services we provide.

Identity Verification Data

Information collected during KYC checks via Onfido, including government-issued identity documents, facial biometric data (for document matching purposes only), and the results of verification checks.

Business and Inventory Data

Product listings, stock levels, order history, sales performance, supplier information, warehouse data, and other operational metrics accessed through your eCommerce platform, warehouse management system, or accounting software.

Buyer Data from Your Store

When you connect your Shopify store, we access personal data relating to your customers (buyers), including names, email addresses, delivery addresses, and phone numbers. We use this data solely to analyse purchasing patterns and commercial metrics for your store. We do not contact your customers, use their data for marketing, or share their personal data with any third party for purposes unrelated to the services we provide to you.

Data That Identifies You

Your IP address, login information, browser type and version, time zone setting, browser plug-in types, geolocation information, operating system, and version.

Data on How You Use CapRelease

Your URL clickstreams, pages viewed, page response times, download errors, how long you stay on pages, what actions you take, and how often.

Sensitive Data

We do not intentionally collect any “sensitive data” about you (such as racial or ethnic origin, political opinions, religious or philosophical beliefs, trade union membership, genetic data, health data, data about your sexual life or orientation, and offences or alleged offences). Biometric data collected by Onfido during identity verification is processed solely for the purpose of matching your identity document and is not retained by CapRelease.

5. How and Why We Use Your Data

Data protection law means that we can only use your data for certain reasons and where we have a legal basis to do so.

Purpose	Description	Legal Basis
Providing Our Services	Delivering the CapRelease platform, syncing store data, generating analytics and reports, managing your account	Contract / Legitimate Interests
Shopify Data Sync	Accessing store, order, inventory, and buyer data to provide business insights, performance analytics, and commercial reporting	Contract / Legitimate Interests
Identity Verification	Conducting KYC checks via Onfido to verify the identity of directors and beneficial owners as required by regulation	Legal Obligation
Contract Management	Sending, signing, and storing agreements and other documents via DocuSign	Contract
Improving CapRelease	Product analytics, testing features, and improving our platform and models	Legitimate Interests
Customer Support	Notifying you of changes to our service, resolving issues via email or phone	Legitimate Interests
Marketing	Sending emails and messages about new features, products, services, and content via Mailchimp (with your consent)	Consent
Transactional Communications	Sending system notifications, alerts, and operational emails via Mailgun and SendGrid	Contract / Legitimate Interests
Payment Collection	Collecting payments via GoCardless Direct Debit for services rendered	Contract
Legal and Regulatory	Complying with anti-money laundering regulations, FCA requirements, and other applicable laws	Legal Obligation

Legal Bases Explained

Consent: You have given clear consent for us to process your personal data for a specific purpose. You can withdraw consent at any time by emailing support@caprelease.com.

Legitimate Interests: Processing your data is necessary for our legitimate interests or those of a third party, provided those interests are not outweighed by your rights. These include: gaining insights from your behaviour on our website or app; delivering, developing, and improving the CapRelease service; enhancing, customising, or modifying our services and communications; determining whether marketing campaigns are effective; and enhancing data security.

Contract: Processing is necessary for the performance of a contract with you, or to take steps at your request before entering into a contract.

Legal Obligation: Processing is necessary for us to comply with a legal obligation, including anti-money laundering regulations, KYC requirements, and FCA rules.

6. How We Use Your Customers' (Buyer) Data

When you install the CapRelease Shopify app, we access personal data about your customers (the people who buy from your store). We want to be transparent about exactly how we use this data:

- **What we access:** Buyer names, email addresses, delivery addresses, phone numbers, and order details
- **Why we access it:** To analyse purchasing patterns, including customer concentration, repeat versus new customer ratios, average order values, and geographic distribution
- **What we do NOT do:** We never contact your buyers directly, we never use buyer data for our own marketing purposes, we never sell or share buyer personal data with third parties for their own purposes, and we never use buyer data for advertising
- **How long we keep it:** Buyer data is retained only for as long as necessary to provide our services to you. If you uninstall the app, buyer data is deleted in accordance with Shopify's data redaction requirements (see Section 11)
- **Buyer rights:** Your buyers can request access to, correction of, or deletion of their personal data by contacting you (the merchant) or by contacting us directly at support@caprelease.com. We will respond to all such requests within 30 days

7. Your Privacy Choices and Rights

Your Choices

- You can choose not to provide us with personal data. You can continue to browse our website, but we will not be able to provide our services without personal data.
- You can turn off cookies in your browser settings. If you turn off cookies, certain services may not work effectively.
- You can ask us not to use your data for marketing by emailing support@caprelease.com or using the unsubscribe link in any marketing email.

Your Rights

You can exercise your rights by sending an email to support@caprelease.com:

- **Right of Access:** Request information about what personal data we hold about you and how we process it
- **Right to Rectification:** Request correction of any inaccurate personal data
- **Right to Erasure:** Request deletion of your personal data where it is no longer necessary for us to hold it
- **Right to Data Portability:** Receive a copy of your data in CSV or JSON format, or request direct transfer to another service where technically possible
- **Right to Object:** Object to us using your data for profiling or automated decision-making
- **Right to Restrict Processing:** Request that we limit how we use your data in certain circumstances
- **Right to Complain:** Lodge a complaint with the ICO (ico.org.uk) if you are unsatisfied with how we handle your data. Please contact us first so we have a chance to address your concerns.

We will respond to your request within one month, unless doing so would adversely affect the rights and freedoms of others.

8. How Secure Is the Data We Collect?

We have physical, electronic, and managerial procedures to safeguard and secure the information we collect. These include:

- Encryption of data in transit (TLS/SSL) and at rest
- Access controls and role-based permissions for staff and systems
- Regular security reviews and vulnerability assessments
- Secure cloud infrastructure hosted by Microsoft Azure in the UK (UK South region)
- Multi-factor authentication for access to sensitive systems
- Microsoft 365 security and compliance features for internal communications and documents

Please remember: you provide personal data at your own risk. Unfortunately, no data transmission is guaranteed to be 100% secure. If you believe your privacy has been breached, please contact us immediately at support@caprelease.com.

9. Where Do We Store the Data?

The personal data we collect is primarily stored on our Microsoft Azure servers in the UK (UK South region). We also process data through third-party service providers located in the UK, EU, and US.

By submitting your personal data, you agree to this transfer, storing, or processing. If we transfer or store your information outside the UK, we take steps to ensure that your privacy rights continue to be protected, including through the use of UK International Data Transfer Agreements (IDTAs), Standard Contractual Clauses (SCCs) approved by the European Commission, and encryption of all data in transit.

10. How Long Do We Store Your Data?

We will archive and stop actively using any personally identifiable information about you within 3 months from the last time you used CapRelease. We will delete your personal data from our archives no later than 6 years from the last time you used CapRelease, or as agreed with you in a separate contract.

Identity Verification Data

Biometric data collected by Onfido during identity verification is processed by Onfido and is not stored by CapRelease. Verification results and document records are retained in accordance with anti-money laundering record-keeping requirements (typically 5 years after the end of the business relationship).

Shopify App Data Retention

If you uninstall the CapRelease Shopify app:

- We will cease accessing your Shopify store data immediately upon uninstallation
- We will respond to Shopify’s mandatory data deletion webhooks within 30 days
- Data required for active or recently concluded service agreements may be retained for the period necessary to fulfil our contractual and legal obligations, after which it will be deleted
- Aggregated and anonymised data that cannot identify you or your customers may be retained for analytics and platform improvement purposes

11. Shopify Data Compliance

As a Shopify public app, CapRelease implements and responds to Shopify’s mandatory compliance webhooks:

- **customers/data_request:** When a merchant requests data about a specific buyer, we will provide all personal data we hold relating to that buyer within 30 days
- **customers/redact:** When a merchant requests deletion of a buyer’s data, we will delete or anonymise all personal data relating to that buyer within 30 days, except where retention is required by law
- **shop/redact:** Within 48 hours of a merchant uninstalling our app, Shopify sends us a redaction request. We will delete all store and buyer data within 30 days, subject to any legal or contractual retention obligations

Merchants can also contact us directly at support@caprelease.com to make data requests or raise any data protection concerns.

12. Third Parties Who Process Your Data

We partner with third parties who we believe are the best in their field. When we do this, it is sometimes necessary to share your data with them. Your data is shared only when strictly necessary and according to the safeguards detailed in this Privacy Policy.

Where personal data is transferred to a third party outside the UK, we ensure appropriate safeguards are in place, including UK International Data Transfer Agreements (IDTAs) and Standard Contractual Clauses (SCCs). All data transfers are encrypted.

Infrastructure & Hosting

Provider	Data Shared	Purpose	Location
Microsoft Azure	Contact details, business data, financial data, identifiers	Cloud hosting and data storage	UK (UK South)

Microsoft 365	Contact details, internal communications, documents	Email, productivity, and collaboration tools	UK / EU
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Platform Integrations

Provider	Data Shared	Purpose	Location
Shopify Inc.	Store data, order data, inventory data, buyer data	eCommerce platform integration for data sync and analytics	US / Canada
Codat Limited	Financial data, commerce data, accounting data	Data aggregation and normalisation from merchant platforms	UK
TrackStar	Inventory data, product data, warehouse data	Inventory and warehouse management system integration	US

CRM & Sales

Provider	Data Shared	Purpose	Location
Salesforce, Inc.	Contact details, business data	Customer relationship management and partner portal	US
Apollo.io	Contact details, business data	Sales prospecting and lead management	US
ChilliPiper	Contact details	Meeting scheduling and routing	US

Identity & Legal

Provider	Data Shared	Purpose	Location
Onfido Ltd	Identity documents, facial biometric data, verification results	KYC and identity verification of directors and beneficial owners	UK / EU
DocuSign, Inc.	Contact details, contract documents	Electronic signature and document management	US / EU

Communications & Marketing

Provider	Data Shared	Purpose	Location
Mailgun (Sinch)	Contact details, email content	Transactional email delivery	US / EU
SendGrid (Twilio)	Contact details, email content	Transactional email delivery	US

Mailchimp (Intuit)	Contact details, marketing preferences	Marketing email campaigns and newsletters	US
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Payments

Provider	Data Shared	Purpose	Location
GoCardless Ltd	Contact details, bank account details, Direct Debit mandates	Payment collection via Direct Debit	UK / EU

Website & Analytics

Provider	Data Shared	Purpose	Location
Webflow, Inc.	Contact details (via forms)	Website hosting and contact forms	US
Google Analytics (Google LLC)	Anonymised usage data, cookies, identifiers	Website analytics and measurement	US

13. Cookies

We use Google Analytics on our website, which uses cookies to help us understand how visitors interact with our site. You can opt out of Google Analytics by installing the Google Analytics Opt-out Browser Add-on.

When you interact with CapRelease as a registered user, we (and certain third parties) may issue cookies unless you adjust your browser settings to refuse them. These may be “session” cookies (which delete themselves when you leave CapRelease) or “persistent” cookies (which remain and help us recognise you when you return).

How to Block Cookies

You can block cookies by activating a setting on your browser allowing you to refuse cookies. You can also delete cookies through your browser settings. If you block cookies, certain parts of our website or services may not function fully.

Cookies We Use

Provider	Key Cookies	Purpose
Google Analytics	_ga, _ga_*, _gid	Tracks unique visitors and sessions to measure website traffic and usage patterns

14. Data Protection

For any data protection queries, requests, or concerns, please contact us at:

- Email: support@caprelease.com

- Post: CapRelease Limited, 71-75 Shelton Street, Covent Garden, London, WC2H 9JQ

If you are unsatisfied with our response, you have the right to lodge a complaint with the Information Commissioner's Office (ICO) at ico.org.uk or by calling their helpline.

15. Changes to This Policy

We may update this Privacy Policy from time to time. We will post any changes on this page. Significant changes will be notified to you by email.

This policy was last updated in February 2026.

16. Contact Us

If you have any questions about this Privacy Policy or how we handle your data, please contact us:

- Email: support@caprelease.com
- Address: CapRelease Limited, 71-75 Shelton Street, Covent Garden, London, WC2H 9JQ
- Company Number: 15180252
- FCA Registration Number: 1013575