

Eight 31 Capital

Legal & Compliance

Privacy Policy

Effective Date: March 13, 2026

1. Scope

ATLAS (Accounting, Treasury, Ledger & Administration System) is a proprietary internal financial operations platform operated by Eight 31 Capital. ATLAS is used exclusively by authorized employees and personnel of Eight 31 Capital for accounting workflows, treasury monitoring, and financial oversight across multiple entities. ATLAS is not available to the general public.

2. Information We Access

ATLAS may access certain financial and operational data through authorized integrations with third-party services on behalf of authorized users.

Through Intuit QuickBooks Online APIs, ATLAS may access accounting data including chart of accounts and balances, invoices, bills and transaction records, vendor and customer contact information, and company financial reports.

ATLAS may also access financial account information through Plaid Inc., including bank account balances, account metadata such as institution name and account type, and transaction information where authorized by the user.

ATLAS accesses only the information necessary to support accounting operations, treasury monitoring, and financial reporting functions.

3. How We Use Information

Data accessed through integrations such as QuickBooks Online and Plaid is used solely for internal accounting, treasury, and financial reporting functions within Eight 31 Capital. Information retrieved through these services is not sold, rented, or shared with third parties for marketing purposes.

4. Data Storage

Operational data within ATLAS is stored using secure cloud infrastructure operated by approved service providers. Financial integrations communicate directly with authorized APIs such as Intuit QuickBooks Online and Plaid and retrieve only the information necessary for operational purposes.

5. Data Retention

Financial and operational data is retained only as long as necessary to support internal accounting operations, reporting requirements, and applicable regulatory obligations. Access to stored data is restricted to authorized personnel within Eight 31 Capital.

6. Security

Access to ATLAS is restricted to authenticated Eight 31 Capital personnel. Role-based access controls are used to limit access to financial information based on operational responsibilities.

All communication with ATLAS services is encrypted in transit using industry standard TLS protocols. Sensitive credentials and API tokens are encrypted at rest.

When bank accounts are connected through Plaid, financial institution credentials are handled exclusively by Plaid and are never stored by Eight 31 Capital or the ATLAS platform.

7. Third-Party Services

ATLAS integrates with external service providers to retrieve authorized financial data. These services currently include Intuit QuickBooks Online for accounting system integration and Plaid Inc. for secure bank account connectivity.

Use of these services is subject to the privacy policies of the respective providers.

8. Contact

For questions regarding this Privacy Policy or ATLAS data practices, please contact:

Eight 31 Capital dane@eight31capital.com