



California Privacy Notice and Notice of Collection

This California Notice at Collection and Privacy Notice (“California Privacy Notice”) is only applicable to California residents (“you”). It supplements the information contained in the [Vestwell Privacy Policy](#). It is delivered on behalf of Vestwell Holdings Inc. and our subsidiaries and affiliates (collectively, “Vestwell”) and governs certain personal information we collect from you. We have adopted this California Privacy Notice to comply with the California Consumer Privacy Act, Cal. Civ. Code §§ 1798.100 et seq. (“CCPA”). Please take the time to read and understand this California Privacy Notice.

Scope

This California Privacy Notice covers personal information we collect automatically from California-resident individuals who visit our Websites, as defined in our Privacy Policy, or who use our Services. In certain contexts, it also covers personal information we collect from California-resident representatives of individuals and institutions with whom we communicate, do business, or to whom we provide products or services.

There is other personal information that this California Privacy Notice does not cover. In some cases, that personal information may not be subject to the CCPA. In other cases, a different privacy notice may apply. Accordingly, this California Privacy Notice and/or the California privacy rights set out herein may not apply to you or to all of your personal information. For example, the following personal information is not covered by this California Privacy Notice, including personal information that is collected, processed, sold, or disclosed pursuant to the federal Gramm Leach Bliley Act (“GLBA”) and implementing regulations. To understand how we collect, use, and disclose your nonpublic personal information in accordance with the GLBA, please read our GLBA Notice on our Privacy Policies website.

Additionally, the personal information we have from California residents (1) in their capacity as current or former employees, personnel, or independent contractors of Vestwell; (2) who are emergency contacts of, or benefits recipients related to, current or former employees, personnel, or independent contractors of Vestwell; (3) in their capacity as current or former job applicants or prospective job applicants to Vestwell, please read our [California Resident Applicant and Prospective Applicant Privacy Notice](#). California residents who interact with us in their capacity as representatives of individuals enrolled in an Achieving a Better Life Experience (“ABLE”) program or other Vestwell savings products, please see our [Privacy Notice for California Resident Authorized Legal Representatives](#) for more information.

The following is not personal information for purposes of the CCPA: (i) publicly available information; (ii) lawfully obtained, truthful information that is a matter of public concern; (iii) deidentified consumer information about California residents; and (iv) aggregate consumer information about California residents (in each case, as those terms are used in the CCPA). This California Privacy Notice does not apply to such information.

Notice at Collection

The following table sets forth the categories of personal information we may collect from you as a business; the purposes for which we use it; and whether we “sell” or “share” it for purposes of the CCPA (as those terms are used in the CCPA). Our collection, use, and disclosure of personal information depends on your relationship with us and your interaction with us. For information on our receipt of personal information as a third party when we (i) conduct diligence on potential investments, and (ii) seek to identify new prospects and clients, please see Third Party Processing below.

Category of personal information	Purpose of Collecting the personal information	Whether We “Share” the Category of personal information for Cross-Context Behavioral Advertising	Whether We “Sell” the Category of personal information
Identifiers and Categories in Cal. Civ. Code 1798.80(e), such as name, unique personal identifier, online identifier, IP address, email address, account name, phone number or signature	<ul style="list-style-type: none"> ● To present our Website and its contents to you ● To deliver the information, products and services you requested from us ● To reach out to you about and market or promote new information to you ● To communicate with you ● To help us improve our Website and deliver a more personalized experience ● To deliver targeted advertising to you ● To verify or maintain the quality or safety of our services and to improve, upgrade or enhance our services ● To monitor the security of our offices 	Yes	No

	<ul style="list-style-type: none"> ● To verify or maintain the quality or safety of our services and to improve, upgrade or enhance our services ● To carry out our obligations and enforce our rights ● In any other way we describe when you provide the information, or otherwise at your direction or with your consent ● As permitted or required by law or as we may notify you 		
<p>Characteristics of Protected Classifications under California or Federal Law, such as gender</p>	<ul style="list-style-type: none"> ● To personalize communications that deliver the information, products and services you requested from us or provide information about products and services that we believe may be of interest to you ● To carry out our obligations and enforce our rights ● In any other way we describe when you provide the information, or otherwise at your direction or with your consent ● As permitted or required by law or as we may notify you 	No	No
<p>Commercial information, such as records of products or services purchased, obtained or considered, or other purchasing or consuming histories of tendencies</p>	<ul style="list-style-type: none"> ● To present our Website and its contents to you ● To deliver the information, products and services you requested from us ● To reach out to you about and market or promote new information to you ● To communicate with you ● To help us improve our Website and deliver a more personalized experience ● To deliver targeted advertising to you 	Yes	No

	<ul style="list-style-type: none"> • To verify or maintain the quality or safety of our services and to improve, upgrade or enhance our services • To carry out our obligations and enforce our rights • In any other way we describe when you provide the information, or otherwise at your direction or with your consent • As permitted or required by law or as we may notify you 		
<p>Internet or other electronic network activity information, such as browsing history, search history or information regarding interaction with a website, app or advertisement</p>	<ul style="list-style-type: none"> • To present our Website and its contents to you • To deliver the information, products and services you requested from us • To reach out to you about and market or promote new information to you • To communicate with you • To help us improve our Website and deliver a more personalized experience • To deliver targeted advertising to you • To verify or maintain the quality or safety of our services and to improve, upgrade or enhance our services • To carry out our obligations and enforce our rights • In any other way we describe when you provide the information, or otherwise at your direction or with your consent • As permitted or required by law or as we may notify you 	<p>Yes</p>	<p>No</p>
<p>Geolocation data, such as the state or country associated with your IP address</p>	<ul style="list-style-type: none"> • To present our Website and its contents to you • To deliver the information, products and services you requested from us 	<p>Yes</p>	<p>No</p>

	<ul style="list-style-type: none"> ● To reach out to you about and market or promote new information to you ● To communicate with you ● To help us improve our Website and deliver a more personalized experience ● To deliver targeted advertising to you ● To verify or maintain the quality or safety of our services and to improve, upgrade or enhance our services ● To carry out our obligations and enforce our rights ● In any other way we describe when you provide the information, or otherwise at your direction or with your consent ● As permitted or required by law or as we may notify you 		
<p>Audio, electronic, visual, thermal, olfactory or similar information, such as a recording of your voice or photo or video of you</p>	<ul style="list-style-type: none"> ● To deliver the information, products and services you requested from us ● To communicate with you ● To verify or maintain the quality or safety of our services and to improve, upgrade or enhance our services ● To monitor the security of our offices ● To carry out our obligations and enforce our rights ● In any other way we describe when you provide the information, or otherwise at your direction or with your consent ● As permitted or required by law or as we may notify you 	No	No
<p>Professional or employment information, such as</p>	<ul style="list-style-type: none"> ● To present our Website and its contents to you 	No	No

<p>your job title or employer</p>	<ul style="list-style-type: none"> ● To deliver the information, products and services you requested from us ● To reach out to you about and market or promote new information to you ● To communicate with you ● To help us improve our Website and deliver a more personalized experience ● To deliver targeted advertising to you ● To monitor the security of our offices ● To verify or maintain the quality or safety of our services and to improve, upgrade or enhance our services ● To carry out our obligations and enforce our rights ● In any other way we describe when you provide the information, or otherwise at your direction or with your consent ● As permitted or required by law or as we may notify you 		
<p>Inferences drawn from the information listed above to create a profile about a California resident reflecting their preferences, characteristics and other attributes</p>	<ul style="list-style-type: none"> ● To present our Website and its contents to you ● To deliver the information, products and services you requested from us ● To reach out to you about and market or promote new information to you ● To communicate with you ● To help us improve our Website and deliver a more personalized experience ● To deliver targeted advertising to you ● To verify or maintain the quality or safety of our services and to improve, upgrade or enhance our services 	<p>Yes</p>	<p>No</p>

	<ul style="list-style-type: none"> ● To carry out our obligations and enforce our rights ● In any other way we describe when you provide the information, or otherwise at your direction or with your consent ● As permitted or required by law or as we may notify you 		
--	--	--	--

We do not collect sensitive personal information from you pursuant to this California Privacy Notice. To opt out of our sharing your personal information for cross-context behavioral advertising purposes, please email us at Legal@vestwell.com.

Third Party Processing

We may act as a third-party recipient of personal information about California-resident directors and officers of companies on which we or our affiliates are conducting pre-investment diligence. The categories of personal information we receive about such individuals may include: (i) identifiers and Categories in Cal. Civ Code 1798.80(e), such as name or email address; (ii) internet or other network activity, such as information regarding interaction with a social media website or app; (iii) geolocation data, such as physical or mailing address; (iv) professional or employment information, such as current and former job title and employer; and (v) inferences drawn from the above. We use each category of personal information to conduct pre-investment diligence on the company associated with the California-resident individual, or as otherwise permitted by law. In connection with conducting diligence, we do not “share” or “sell” this personal information, as such terms are defined in the CCPA.

We may act as a third-party recipient of personal information about California-resident individuals or representatives of companies with whom we believe we may be interested in doing business. The categories of personal information we receive about such individuals may include: (i) identifiers and Categories in Cal. Civ Code 1798.80(e), such as name, online identifier, or email address; (ii) geolocation data, such as physical or mailing address; (iii) internet or other network activity, such as information regarding interaction with a social media website or app; (iv) professional or employment information, such as current and former job title and employer; and (v) inferences drawn from the above. We use each category of personal information to contact such individuals about products and services we believe may be of interest to them, or as otherwise permitted or required by law. We do not “share” or “sell” this personal information, as such terms are defined in the CCPA.

Data Retention

We will retain your personal information for as long as necessary to fulfill the purposes for which it was collected and processed, including to satisfy any legal, regulatory, accounting, or reporting requirements. To determine the appropriate retention period for your personal information, we will consider the amount, nature, and sensitivity of the personal information, the potential risk from unauthorized use or disclosure, the purposes for which we process personal information, and whether we can achieve those purposes through other means, and applicable legal requirements.

Our Prior Collection, Use, and Disclosure of Personal Information During the Preceding 12 Months

The CCPA requires us to give you specific information about the categories of personal information we collect about you, the sources from which we have obtained that information, the purposes for which we collect it and the categories of entities to whom we disclose it. Our practices regarding the collection, use, and disclosure of personal information depend on your relationship with us and your interaction with us. The chart below explains our prior collection, use, and disclosure for the last 12 months.

CATEGORY OF PERSONAL INFORMATION	CATEGORIES OF SOURCES FROM WHICH COLLECTED	BUSINESS OR COMMERCIAL PURPOSE FOR COLLECTING PI	CATEGORIES OF THIRD PARTIES AND OTHER ENTITIES TO WHOM WE MAY DISCLOSE
Identifiers and Categories in Cal. Civ. Code 1798.80(e), such as name, unique personal identifier, online identifier, IP address, email address, account name, phone number or signature	<ul style="list-style-type: none">• Directly from you, such as when you visit our Website, via written forms or our enrollment process• From your employer• Via social media platforms and other third party services• Via email or other correspondence with you• Via cookies and other tracking technologies	<ul style="list-style-type: none">• To present our Website and its contents to you• To deliver the information, products and services you requested from us• To reach out to you about and market or promote new information to you• To communicate with you• To help us improve our Website and deliver a more	<ul style="list-style-type: none">• Our affiliates• Entities that provide marketing services• Our business partners, service providers and vendors• Legal authorities as required by law or to protect our rights• Advertising networks and analytics providers

		<p>personalized experience</p> <ul style="list-style-type: none"> • To deliver targeted advertising to you • To monitor the security of our offices • To verify or maintain the quality or safety of our services and to improve, upgrade or enhance our services • To carry out our obligations and enforce our rights • In any other way we describe when you provide the information, or otherwise at your direction or with your consent • As permitted or required by law or as we may notify you 	<ul style="list-style-type: none"> • Social media platforms • Affiliated and nonaffiliated third party as may be permitted by law (such as in connection with the sale or restructuring of all or part of our business)
<p>Characteristics of Protected Classifications under California or Federal Law, such as gender</p>	<ul style="list-style-type: none"> • Directly from you, such as via written or online forms, or when you open an account with us • From your employer, financial adviser, representative, or consultant • Via email or other correspondence with you 	<ul style="list-style-type: none"> • To personalize communications that deliver the information, products and services you requested from us or provide information about products and services that we believe may be of interest to you • To carry out our obligations and enforce our rights 	<ul style="list-style-type: none"> • Our affiliates • Our business partners, service providers and vendors • Legal authorities as required by law or to protect our rights • Affiliated and nonaffiliated third party as may be permitted by law (such as in connection with the Sale or

		<ul style="list-style-type: none"> ● In any other way we describe when you provide the information, or otherwise at your direction or with your consent ● As permitted or required by law or as we may notify you 	<p>restructuring of all or part of our business)</p>
<p>Commercial information, such as records of products or services purchased, obtained or considered, or other purchasing or consuming histories of tendencies</p>	<ul style="list-style-type: none"> ● Directly from you, such as when you visit our website, via written forms, or open an account with us ● From your financial adviser, representative, or consultant ● Via social media platforms and other third party services ● Via email or other correspondence with you ● Via cookies and other tracking technologies 	<ul style="list-style-type: none"> ● To present our Website and its contents to you ● To deliver the information, products and services you requested from us ● To reach out to you about and market or promote new information to you ● To communicate with you ● To help us improve our Website and deliver a more personalized experience ● To deliver targeted advertising to you ● To verify or maintain the quality or safety of our services and to improve, upgrade or enhance our services ● To carry out our obligations and enforce our rights ● In any other way we describe when you 	<ul style="list-style-type: none"> ● Our affiliates ● Entities that provide marketing services ● Our business partners, service providers and vendors ● Legal authorities as required by law or to protect our rights ● Advertising networks and analytics providers ● Social media platforms ● Affiliated and nonaffiliated third party as may be permitted by law (such as in connection with the Sale or restructuring of all or part of our business)

		<p>provide the information, or otherwise at your direction or with your consent</p> <ul style="list-style-type: none"> As permitted or required by law or as we may notify you 	
<p>Internet or other electronic network activity information, such as browsing history, search history or information regarding interaction with a website, app or advertisement</p>	<ul style="list-style-type: none"> Directly from you, such as when you visit our Website or open an account with us Via social media platforms and other third party services Via email or other correspondence with you Via cookies and other tracking technologies 	<ul style="list-style-type: none"> To present our Website and its contents to you To deliver the information, products and services you requested from us To reach out to you about and market or promote new information to you To communicate with you To help us improve our Website and deliver a more personalized experience To deliver targeted advertising to you To verify or maintain the quality or safety of our services and to improve, upgrade or enhance our services To carry out our obligations and enforce our rights In any other way we describe when you provide the 	<ul style="list-style-type: none"> Our affiliates Entities that provide marketing services Our business partners, service providers and vendors Legal authorities as required by law or to protect our rights Advertising networks and analytics providers Social media platforms Affiliated and nonaffiliated third party as may be permitted by law (such as in connection with the Sale or restructuring of all or part of our business)

		<p>information, or otherwise at your direction or with your consent</p> <ul style="list-style-type: none"> As permitted or required by law or as we may notify you 	
<p>Geolocation data, such as the state or country associated with your IP address</p>	<ul style="list-style-type: none"> Directly from you, such as when you visit our website, via written forms, or when you open an account with us From your employer or its payroll provider Via social media platforms and other third party services Via email or other correspondence with you Via cookies and other tracking technologies 	<ul style="list-style-type: none"> To present our Website and its contents to you To deliver the information, products and services you requested from us To reach out to you about and market or promote new information to you To communicate with you To help us improve our Website and deliver a more personalized experience To deliver targeted advertising to you To verify or maintain the quality or safety of our services and to improve, upgrade or enhance our services To carry out our obligations and enforce our rights In any other way we describe when you provide the information, or otherwise at your 	<ul style="list-style-type: none"> Our affiliates Entities that provide marketing services Our business partners, service providers and vendors Legal authorities as required by law or to protect our rights Advertising networks and analytics providers Social media platforms Affiliated and nonaffiliated third party as may be permitted by law (such as in connection with the Sale or restructuring of all or part of our business)

		<p>direction or with your consent</p> <ul style="list-style-type: none"> As permitted or required by law or as we may notify you 	
<p>Professional or employment information, such as your job title or employer</p>	<ul style="list-style-type: none"> Directly from you, such as via written forms, or vendor management portals From your brokerage or financial advisory firm, financial adviser or consultant Via social media platforms and other third party services Via email or other correspondence with you 	<ul style="list-style-type: none"> To present our Website and its contents to you To deliver the information, products and services you requested from us To reach out to you about and market or promote new information to you To communicate with you To help us improve our Website and deliver a more personalized experience To deliver targeted advertising to you To monitor the security of our offices To verify or maintain the quality or safety of our services and to improve, upgrade or enhance our services To carry out our obligations and enforce our rights In any other way we describe when you provide the 	<ul style="list-style-type: none"> Our affiliates Entities that provide marketing services Our business partners, service providers and vendors Legal authorities as required by law or to protect our rights Social media platforms Affiliated and nonaffiliated third party as may be permitted by law (such as in connection with the Sale or restructuring of all or part of our business)

		<p>information, or otherwise at your direction or with your consent</p> <ul style="list-style-type: none"> As permitted or required by law or as we may notify you 	
<p>Inferences drawn from the information listed above to create a profile about a California resident reflecting their preferences, characteristics and other attributes</p>	<ul style="list-style-type: none"> Directly from you, such as when you visit our website, via written forms, or vendor management portals From your brokerage or financial advisory firm, financial adviser or consultant Via social media platforms and other third party services Via email or other correspondence with you Via cookies and other tracking technologies 	<ul style="list-style-type: none"> To present our Website and its contents to you To deliver the information, products and services you requested from us To reach out to you about and market or promote new information to you To communicate with you To help us improve our Website and deliver a more personalized experience To deliver targeted advertising to you To verify or maintain the quality or safety of our services and to improve, upgrade or enhance our services To carry out our obligations and enforce our rights In any other way we describe when you provide the information, or 	<ul style="list-style-type: none"> Our affiliates Entities that provide marketing services Our business partners, service providers and vendors Legal authorities as required by law or to protect our rights Advertising networks and analytics providers Social media platforms Affiliated and nonaffiliated third party as may be permitted by law (such as in connection with the Sale or restructuring of all or part of our business)

		<p>otherwise at your direction or with your consent</p> <ul style="list-style-type: none"> • As permitted or required by law or as we may notify you 	
--	--	---	--

We do not collect sensitive personal information from you pursuant to this California Privacy Notice.

How We Disclose Personal Information

In the past twelve months, we have disclosed the following categories of personal information for business purposes as set out above:

- Identifiers
- Categories of personal information described in Cal. Civ. Code Section 1798.80(e)
- Characteristics of Protected Classifications under California or Federal Law
- Commercial Information
- Internet or other electronic network activity information
- Geolocation data
- Professional or employment information
- Inferences drawn from other personal information

Sales of personal information

We do not sell your personal information for purposes of the CCPA and have not done so in the past twelve months.

Sharing of personal information for Cross-Context Behavioral Advertising

In the past 12 months, we have shared the following categories of personal information with third-party companies for purposes of cross-context behavioral advertising, in an effort to serve targeted, interest-based advertisements to you:

- Identifiers
- Categories of personal information described in Cal. Civ. Code Section 1798.80(e)
- Commercial Information
- Internet or other electronic network activity information
- Geolocation data
- Inferences drawn from other personal information

Minors Under the Age of 16

We do not have actual knowledge that we sell or share the personal information of minors under the age of 16.

Your Rights as a California Resident

As a California resident, you may have certain rights in relation to your personal information.

Right to Know

You may have the right to know how we have collected, used, and disclosed your personal information.

Specifically, you may have the right to know:

- The categories of personal information we have collected about you.
- The categories of sources from which we have collected your personal information.
- The business or commercial purpose for which we collect, sell or share your personal information.
- The categories of third parties to whom we have disclosed your personal information.
- The categories of personal information that we have sold or shared about you and the categories of third parties to whom it was sold or shared
- The categories of personal information we have disclosed about you for a business purpose and the categories of persons to whom we have disclosed it.

In addition, you may have the right to know the specific pieces of personal information we have collected about you. Subject to certain limitations, you may request that we provide this information dating back to January 1, 2023.

Right to Make a Deletion Request

You may have the right to request that we delete your personal information that we have collected or received. Subject to certain exceptions, we must delete your personal information and direct our service providers and contractors to delete your personal information.

Right to Correct Inaccurate Personal Information

You may have the right to request that we correct inaccurate personal information about you, taking into account the nature of the personal information and the purposes of the processing of the personal information.

Right to Opt-Out of Sales of Personal Information

If we were to sell your personal information for purposes of the CCPA, you may have the right to opt-out of the sale of your personal information.

Right to Opt-Out of Sharing of Personal Information

You may have the right to opt-out of us sharing your personal information for cross-context behavioral advertising purposes.

Right to Limit Use and Disclosure of Sensitive Personal Information

Subject to certain exceptions, you may have the right to limit our use and disclosure of your sensitive personal information. We do not collect sensitive personal information from you pursuant to this California Privacy Notice.

[Right to Non-Discrimination](#)

You have the right not to be discriminated against by us for choosing to exercise your rights under the CCPA.

[How to Exercise Your California Privacy Rights](#)

If you wish to exercise your right to know, delete, or correct inaccuracies in your personal information, please submit a request to us by emailing us at Legal@vestwell.com, call us at (917) 979-5258. If you maintain an account with us, we may require you to submit a request through that account. To opt-out of the sharing of your personal information for cross-context behavioral advertising purposes, please email Legal@vestwell.com. If you opt-out of cross-context behavioral advertising using this tool, an “opt-out cookie” will be placed on your device. Opt-out cookies are device- and browser-specific, meaning that you must opt-out across all of your devices and browsers in an effort to opt-out of cross-context behavioral advertising with PIMCO. If you clear your cache or delete cookies from your browser, the opt-out cookie will also be deleted, meaning you will need to opt-out again.

[“Do Not Track” Signals and Global Privacy Control \(“GPC”\) Signals](#)

We rely on a third-party service provider to implement a tool in an effort to recognize and honor “do not track” and Global Privacy Control signals as requests to opt-out of “sharing” of personal information for cross-context behavioral advertising purposes.

[Information for Authorized Agents](#)

You can authorize a person (“Authorized Agent”) registered with the California Secretary of State to exercise your California privacy rights on your behalf. An Authorized Agent can also include a person who has power of attorney or is acting as a conservator. To submit a request to Vestwell on behalf of another person as an Authorized Agent, please submit a request to us by emailing us at Legal@vestwell.com calling us at (917) 979-5358.

[Verifying Your Requests](#)

We only respond to your requests to know, access the specific pieces of personal information we have about you, delete and correct inaccurate personal information when we can verify that you are a California resident exercising your rights regarding your personal information. We may need to ask you for personal information to verify your request so we can match it to the personal information we already have about you. We may also need to obtain additional information about you that we do not already have. If you provide us with new personal information that we do not already have about you, we will use it solely for the purpose of verifying your request. We will let you know via email if we need more information from you to verify your request. Please reply to our requests promptly. We will communicate

with you about your requests via email. We will use the email address you provided when submitting your request. If we cannot verify your identity, we will let you know.

Responding To Your Requests

We aim to promptly verify and respond to your requests within 45 days of receipt but may require a total of up to 90 days to respond to your requests. If we require additional time beyond the initial 45 days after we receive your request, we will let you know within the first 45 days. We do not ordinarily charge a fee for our response to your requests. However, we may do so to the extent your request(s) are excessive, repetitive, or manifestly unfounded. If we determine that charging a fee is warranted, we will let you know and will provide you with an estimate of the associated costs of responding to your request(s). If we determine that we cannot or will not take the action that you requested, we will let you know. We will inform you of our reasons for not taking action and any rights you may have to appeal the decision. Unless you tell us that you would like to receive a response via postal mail, we will respond to you via email regarding your requests to know and to access the specific pieces of personal information we have about you. We will contact you at the email address you provided when submitting your request(s). If you would like to receive responses to a request to know or access personal information via postal mail rather than email, please let us know when submitting your request(s).

Limitations

The CCPA does not apply in full to all personal information we collect from California residents. As set out in "Scope" above, the CCPA is not fully applicable to much of the personal information we collect from California residents. Therefore, even if you are a California resident and submit a verifiable request, we may not be required to comply with your request. We are only required to respond to certain requests twice in any twelve-month period. We are not required to provide you access to specific pieces of personal information more than twice in any twelve-month period. Similarly, we are not required to comply with your "requests to know" more than twice in any twelve-month period.

Changes to Our California Privacy Notice

From time to time, Vestwell may update or revise this California Privacy Notice. If there are changes to the terms of this California Privacy Notice, documents containing the revised policy on the relevant website(s) will be updated.

How to Contact Us

If you have any questions or concerns about this California Privacy Notice, please contact us at Legal@vestwell.com.