

PRIVACY POLICY

Crosslink Professional Tax Solutions, LLC

Important Information: Please read this carefully as we have made updates to our Privacy Policy. This Privacy Policy goes into effect January 15, 2022 (“Effective Date”).

At Crosslink Professional Tax Solutions, LLC (“CPTS,” “us,” “we,” “our”), we pride ourselves on our commitment to protecting your privacy. This Privacy Policy is designed to answer your questions about the information CPTS collects on all websites and offerings by CPTS.

If you have questions or complaints regarding our Privacy Policy or practices, please contact us as detailed under the [How To Contact Us](#) heading below.

Scope of this Privacy Policy.

This Privacy Policy describes our privacy practices for individuals in the United States when we process:

- a) Personal information for the purposes of providing the benefits of a CPTS product or service which is collectively, all CPTS’ services, products, offerings, sites, experiences and software including through our mobile applications and desktop applications (hereinafter referred to as “Services”); and/or
- b) Personal information as necessary to manage, run and improve our business.

The Centralization of Your Information.

When you choose to share data with us or bring over information from third parties, we centralize and use that data together, not just within the individual offering(s) you’re using.

Information We Collect.

Information You Give Us.

The personal information that we receive about you depends on your interactions with CPTS, how you use and set up your account. Personal information that you provide may also depend upon what Services you use and applicable law.

- **Creating an account.** We collect information when you create an account or interact with the Services.
- **Identification information.** We collect information to verify your identity.
- **Customer support, training and feedback.** We may collect personal information when you reach out to us for support, give us feedback or training and you choose to share.
- **Social Media content.** We receive content you post on our social media pages.
- **Information about others.** Please see the heading, [Information Provided by Others](#), below.

Information We Get When You Use the Services.

We may collect certain information about you when you access or use our Services.

This may include:

- **Device information.** We may collect information about your device such as Internet Protocol (“IP”) addresses, log information, product usage, error messages, device type, and unique device identifiers.
- **Content.** We may receive information about your business, your finances, expenses, invoices, financial statements, details of your financial transactions, payroll details, payment details, tax return details, details about your customers or vendors or employees, income and wage information, and/or investment information.
- **Third-party service content.** We receive information about you when you sign into a third-party service with your account or when you connect your account to a third-party service.
- **Usage information.** We may collect usage information such as the pages you viewed, the features you use, your browser type and details about any links with which you interact.

Our Services may change over time, and we may introduce new features that may collect new or different types of information.

Information Provided By Others.

Our Services are designed to connect with other people and organizations. Therefore, others may be able to input information about you. You may also be able to input or process information about others. If you input information about others into our Services, you must only do so if you have first received the appropriate rights and permissions to do so, including by getting advanced written consent, if required by applicable law.

Other Information Sources.

We may also get information about you from others where permitted by applicable law. We protect and process information obtained from those parties as described in this Privacy Policy, consistent with any additional restrictions imposed by the source of the information. Our sources may vary over time and depend upon how you use the Services. For example, we receive information from:

- **Your service providers.** If you choose to sync to a non-CPTS account/service with your account, we will receive information from that account/service according to your settings with that account/service.
- **Supplemental information and identity verification providers.** Service providers who help us verify your identity, the specifics of your business and/or supplement the information you have provided and ensure the accuracy of your information.
- **Customer Support providers.** Service providers who provide us with information about you or your interaction with the Services for troubleshooting purposes.
- **Other users.** As described in sections “Information Provided By Others”, we may get information about you from other users.
- **Cybersecurity & anti-fraud providers.** We may receive information from service providers who help combat fraud, illegal activity and to help protect your personal information.
- **Communication providers & social networks.** If you give us permission, we may collect information from email providers, communication providers and social networks.
- **Joint offerings.** We may engage in joint-marketing activities with others.
- **Publicly-available Sources.** We collect information from publicly available sources.
- **Government agencies.** We receive information from government agencies, including from various tax agencies.

How We Use Personal Information.

We collect and process personal information from you only where:

- We have your consent to do so.
- We need the personal information to perform a contract with you or provide a service to you.
- Provide you with the benefits of the Services and operate our business.
- The processing is in our legitimate business interests.
- To comply with legal requirements, including applicable laws and regulations.

Personal information is used to operate our business, including but not limited to:

- Provide you with the Services and create your account.
- Improve our products and services.
- Run and manage our business, including resolving billing and financial disputes.
- Evaluate your eligibility for financial offers, products and services.
- Connect you with other users.
- Communicate with you.
- Advertise and market our services and experiences.
- Personalize your experience, including through the development of insights about you and your needs.
- Provide you with support and resolve disputes.
- Comply with our legal and regulatory requirements.
- Protect the rights, property, safety or security of CPTS, the Services, our customers, employees or others and prevent fraudulent or illegal activity.

- To enforce, remedy or apply our terms and conditions or other agreements.
- For other purposes that are compatible with the disclosed purposes if and where this is permitted by applicable law.

How We Share Your Information.

From time to time, we may need to share your information in the following circumstances:

With your consent. We share your information with third parties when you have requested us to do so.

When you connect with a Partner. You may be provided with offers, products, and services from third-party companies who integrate with our Services (“Partner”). If you choose to interact with a Partner, apply for their services or offerings or otherwise link or sync your account to a Partner’s product or service, you consent and direct CPTS to share your information, including personal information, to the Partner providing the service or offering.

When you connect to your social media account. Some of our features enable you to connect to a social media platform. Any information you choose to share on social media will be subject to the social media provider's privacy policies (not this Privacy Policy).

For joint sales, promotions and events. We may share your information with third parties who are jointly providing sales initiatives, promotions or events with us.

With financial services providers. We may share personal Information with collection agencies, credit bureaus, financial product underwriters and payment card association members. We may also share your personal information with other companies, lawyers, credit bureaus, agents, government agencies, and card associations in connection with issues related to fraud, credit, or debt collection.

With service providers. We share personal information with our service providers or agents who provide services on our behalf for the purposes described in this Privacy Policy. Service providers are required to implement reasonable privacy and information protection controls to maintain the privacy and security of information provided to them consistent with the privacy practices outlined in this Privacy Policy.

When you publicly post the information. We may provide opportunities for you to publicly post reviews, questions, comments, suggestions or other content, which may include personal information, such as your name or username. Anything you share in a public forum is public, and you should think carefully before you decide to share.

For mergers and acquisitions. If we are involved with a merger, asset sale, financing, liquidation, bankruptcy, or the acquisition of all or part of our business to another company (collectively, a “Transaction”), we may share your information with that company and its advisors before and after the Transaction date.

Sales of personal information to third parties. We do not and will not sell personal information to third parties.

With our affiliates and subsidiaries. We may share your information with and among our affiliates and subsidiaries for everyday business purposes.

For legal reasons. We may share your information with third parties for legal reasons without your consent, and as permitted by law, including:

- When we reasonably believe disclosure is required in order to comply with a subpoena, court order, or other applicable law, regulation or legal process
- To protect the rights, property, or safety of CPTS, our customers or others
- To protect or defend against attacks
- To enforce, remedy, or apply any CPTS agreement
- To prevent fraud, cybersecurity attacks or illegal activity
- For debt collection
- With regulatory agencies, including government tax agencies, as necessary to help detect and combat fraud and/or protect our customers, and/or users.

Other Purposes. We may also use your personal information for other purposes that are compatible with the disclosed purposes if and where this is permitted by applicable law.

What You Can do to Manage Your Privacy.

You have choices when it comes to managing the privacy of your personal information. If you wish to manage any of the following please contact support - see heading [How To Contact Us](#).

- **Update your privacy settings.** You may update your privacy settings by visiting your account settings.
- **Manage marketing communications from us.** To update your marketing communication preferences.
- **Download a copy of your personal information.** You may request a copy of your personal information.
- **Correct your personal information.** You can edit and correct your personal information at any time.
- **Delete your personal information.** You may request for us to delete your personal information.
- **Your Right to Limit Information Sharing:** You have the right to limit our sharing of your information to both affiliates and third parties for marketing purposes.

Information Retention.

Information retention.

Unless you specifically ask us to delete your personal information, we retain your personal information as long as it is necessary to comply with our data retention requirements and provide you with Services. However, even if you request a deletion, we may be required to maintain your information for as long as necessary to:

1. comply with our legal or regulatory compliance needs;
2. to exercise, establish or defend legal claims; and/or
3. to protect against fraudulent or abusive activity on our service.

This means we may keep different information for different periods.

There may be occasions where we are unable to fully delete, anonymize, or de-identify your information due to technical, legal, regulatory compliance or other operational reasons. Where this is the case, we will take reasonable measures to securely isolate your personal information from any further processing until such time as we are able to delete, anonymize, or de-identify it.

Keeping Your Information Safe is Important to Us.

Security of personal information is extremely important to us. We employ security measures consistent with standard industry practice to prevent unauthorized access to your personal information collected.

For example, we:

- Constantly work to update our security practices to implement accepted best methods to protect your personal information and review our security procedures carefully.
- Comply with applicable laws and security standards.
- Securely transmit your sensitive personal information.
- Train our staff and require them to safeguard your data.

You play a critical role in protecting your information by maintaining up to date computer security protections and by not sharing your username, or password with anyone. Nevertheless, no data transmission over the Internet, or method of electronic storage, is 100% secure. Therefore, we cannot guarantee your information's absolute security.

We do not Knowingly Collect Information from Minors.

Services are intended for and directed to adults. Our Services are not directed to minors, and we do not knowingly collect personal information from minors. If we learn we have collected or received personal information from a child without verification of parental consent, we will delete that information.

Changes to our Privacy Policy.

We may make changes to this Privacy Policy from time to time. The "Effective Date" at the top of this page shows when this Privacy Policy was last revised. Any changes will become effective when we post a revised version of

this Privacy Policy on this website. We encourage you to review this Privacy Policy periodically to remain informed about how we are protecting your data.

Links to Other Websites.

CPTS' website(s) may contain links to other websites. Please be aware that we, CPTS, are not responsible for the privacy practices of such other websites. We encourage our users to be aware when they leave our website(s) and to read the privacy policy of each website that collects personally identifiable information.

Third Party Payment Processor.

We may use a third-party payment processor for payments. CPTS does not store credit card details and instead relies on our third-party payment processor for this. Furthermore, in connection with the processing of such payments, we do not retain any personally identifiable information or any financial information such as credit card numbers. Rather, all such information is provided directly to our third-party processor whose use of your personal information is governed by their privacy policy. Please contact CPTS support for third party payment processor information – see heading [How To Contact Us](#).

Your Information Rights and Choices.

Your Rights.

At CPTS, we believe that you have rights to information that pertains to you, your household and/or your business. If another person has input or processed information in the Services on behalf of you, your family or your business, you may ask to receive a copy of your information, even if you do not have an account with us. Depending on where you live, you may have certain state-specific rights with respect to your personal information that we collect and process. For more information, see below or please contact CPTS support – see heading [How To Contact Us](#).

Verification.

To help protect privacy and the security of your information, you may be asked to provide additional information to verify your identity and/or ownership rights prior to us exercising your data rights. If we are unable to verify your identity or ownership rights to the data, we may not be able to provide you with data rights until you are able to provide us with proper documents.

If you are a resident of the United States, you may have the following rights:

If you are a Vermont resident, you may have the following rights:

CPTS will not share your non-public personal information with unaffiliated third parties unless you authorize us to make those disclosures without your consent, other than as permitted by law.

If you are a California resident, you may have the following rights:

Access. You may have the right to access:

- the categories of personal information we have collected about you,
- the sources from which that information was collected,
- the business or commercial purpose for collecting your personal information,
- the categories of third parties with whom we share your personal information,
- the specific pieces of personal information we have collected about you,
- the categories of personal information we sold about you,
- the categories of third parties to whom we sold personal information about you, and
- the categories of personal information we disclosed for a business purpose.

Deletion. You may have the right, under certain circumstances, to request that we delete the personal information you have provided to us.

Non-discrimination. You have the right to be free from discrimination related to your exercise of any of your California privacy rights.

Verification. To protect your personal information from unauthorized access or deletion, we may require you to verify your credentials before you can submit a rights request. If you do not have an account with us, or if we suspect that your account has suffered fraudulent or malicious activity, we may ask you to provide additional personal information for verification.

Authorized agents. You may use an authorized agent to submit a rights request. If you do so, the authorized agent must present signed written authorization to act on your behalf, and you will also be required to independently verify your own identity directly with us and confirm with us that you provided the authorized agent permission to submit the rights request. This verification process is not necessary if your authorized agent provides documentation reflecting that the authorized agent has power of attorney to act on your behalf under Cal. Prob. Code §§ 4121 to 4130.

Right to Know. You have the right to know the categories of personal information, categories of sources, and/or categories of third parties related to the processing of your personal information. See below chart.

CATEGORY OF PERSONAL INFORMATION COLLECTED	CATEGORIES OF THIRD PARTIES TO WHOM WE DISCLOSE PERSONAL INFORMATION FOR A BUSINESS PURPOSE
Identifiers such as a real name, alias, postal address, unique personal identifier, online identifier, internet protocol address, email address, account name, social security number, driver’s license number, passport number, or other similar identifiers.	<ul style="list-style-type: none"> • Our affiliates or subsidiaries • Our service providers • Product and service fulfillment companies • Government authorities and regulators
Financial information such as credit card number, debit card number or bank account number.	<ul style="list-style-type: none"> • Our affiliates or subsidiaries • Our service providers • Payment processors and banks
Commercial information, including records of personal property, products or services purchased, obtained, or considered, or other purchasing or consuming histories or tendencies.	<ul style="list-style-type: none"> • Our affiliates or subsidiaries • Our service providers • Product and service fulfillment companies
Internet or other electronic network activity information, including, but not limited to, browsing history, search history, and information regarding a consumer’s interaction with an Internet website, application, or advertisement.	<ul style="list-style-type: none"> • Our affiliates or subsidiaries • Our service providers • Product and service fulfillment companies
Professional or employment-related information.	<ul style="list-style-type: none"> • Our affiliates or subsidiaries • Our service providers • Product and service fulfillment companies

If you would like to submit a request or have additional questions about your information rights and choices, please contact CPTS support – see heading [How To Contact Us](#). Please note that we may claim legal exemptions for certain types of personal information from all or certain parts of the California Consumer Privacy Act of 2018 (“CCPA”) pursuant to various CCPA exemptions.

How To Contact Us.

If you have questions or comments about this Privacy Policy, please contact us. We want your feedback and comments.

a) **Via Email.** Please contact us by email at support@crosslinktax.com.

b) **Via Telephone.** Please call us at (800) 345-4337.

c) **Via Direct Mail.**

Crosslink Professional Tax Solutions, LLC

Attention: Legal Dept.

2000 N. Alafaya Trail #450,

Orlando, FL 32826

d) **California Consumer Privacy Act of 2018 (“CCPA”) Request Form:** <http://www.crosslinktax.com/customer-resources/ccpa-form.asp>.

SPECIFIC PRIVACY INFORMATION.

Tax Professional Products—CrossLink Software.

CPTS offers a portfolio of professional tax preparation solutions (software and web-based applications) known through-out the industry as “CrossLink Software”. In addition to what’s described in our Privacy Policy above, the following is more detail about how we collect, share, and use information, including personal information, when you use CrossLink Software.

a) **Information Collection.** We may collect information, including personal information, from tax professionals as well as from clients of tax professionals.

If you are a tax professional: We collect information, including personal information, about you that you provide to us. We collect information, including personal information, about your clients that you provide. We may use this information for purposes such as facilitating the preparation and filing of your clients’ tax returns and helping you manage your tax business. We may also collect information about your clients that may be provided to us directly by your clients, financial institutions, governmental agencies or other third parties (e.g., document storage solutions). The information we collect may include, e.g.:

- Identification and contact info (e.g. name, social security number, phone, address, email address);
- Income and wage information;
- Investment information;
- Payment information;
- Electronic signatures; and
- Financial or other information needed to prepare, complete or file a tax return.

In certain cases, we may collect information, including personal information, from you or from other tax professionals within your firm about your firm or about other tax professionals with whom you work. We also may collect information, including personal information, you import into our tax software from other CPTS products or services or other third-party products. We may use the information we collect for purposes such as setting up and administering your user account and/or your firm’s account and providing you with the CrossLink Software.

If you are a client of a tax professional: We collect information, including personal information, about you when your tax preparer or you enter such information into the CrossLink Software. We may use this information for purposes of preparing your tax return with our CrossLink Software or providing information to or communicating with you or your tax professional. We may collect information directly from you, your tax

preparer or from your financial institution or a governmental entity. The information we collect may include, e.g.:

- Identification and contact info (e.g. name, Social Security Number, phone, address, email address);
- Income and wage information;
- Investment information;
- Payment information;
- Electronic signatures; and
- Financial or other information needed to prepare, complete or file a tax return.

b) **Information Sharing.** We may share the information we collect through our CrossLink Software for the following reasons:

- **For our everyday business purposes.** We may share information about tax professionals and clients to process transactions, maintain account(s), respond to court orders and legal investigations, or report to the IRS or state revenue agencies. As part of the electronic filing process, the Internal Revenue Service ("IRS") requires us to request the email address of the person electronically filing a tax return and provide it to the IRS. In addition, we will also share certain technical information, such as your IP address, device ID number, date, time of transmittal) with the IRS. We share this information to help detect and combat fraud. You may not opt-out of this type of sharing.
- **To enable communication between tax professionals and clients.** We may share information to enable tax professionals and clients to communicate and exchange tax documents, such for a tax professional to obtain a client's electronic signature.
- **To collect payment from clients on behalf of tax professionals.** We may share information with third party financial institutions to facilitate a client's payment for their tax professional's tax preparation services.

Mobile Applications.

Some of our Services are available through mobile applications ("Applications"). These mobile applications allow you to use and access your account and other functions on your mobile device in accordance with the Terms and Conditions and other Application specific agreements. This Privacy Policy applies to any personal information or other information that we may collect through our Applications. When you interact with us through these Applications, we may collect information, such as unique device identifiers, your screen resolution, other device settings, information about your location, contacts, and storage, and analytical information about how to use your mobile device. We may ask your permission before collecting certain information through the Applications.

We only collect this data with your consent. Depending on the Services you use, we may also collect other information about your mobile phone, such as the type of your phone, your carrier, and other data such as software version so that we can improve our Services. By necessity, your requests/messages from your mobile devices may go through your/our mobile carrier's network. This means that your carrier may have access to your requests and messages, and our/your carrier's privacy policies apply.