

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 September 2020.

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

Our Role.

This Privacy Policy does not apply where CPTS processes personal information as a service provider on behalf of a customer or entity who alone or jointly with others determines the purposes and means of the processing of personal information (“Information Controller”), for example, the customers of our professional tax preparation solutions. When we act as a service provider, the privacy policy of the relevant Information Controller and our agreements with such business or entity will govern our processing of personal information.

In certain circumstances, there may be more than one Information Controller processing your information. In these situations, we act as an independent Information Controller over our processing activities – meaning that we, as an Information Controller, make determinations over how your personal information will be processed independently from the other Information Controller. The other Information Controller may have their own obligations under applicable information privacy law, and you may need to speak with the other Information Controller directly for questions on how they process your personal information.

The CPTS Services and Your CPTS Account.

CPTS Account Information.

In order to access the benefits we make available in the CPTS Services, data entered into one service or feature becomes a part of your CPTS Account.

The personal information contained within your CPTS Account is the combination of information that CPTS has about you. Your CPTS Account includes your credentials; your name and contact details; payment information; information about your activities, your interests and preferences; the content you place in our Services; information we have collected about you from third-party sources and insights that are associated with you.

The information in your CPTS Account will be shared across the CPTS Services to generate our various offerings, services and experiences and otherwise maximize the benefits to you of our Services.

Tax Preparation Information.

We understand that tax preparation information is special. Except as necessary to provide our CPTS Services or as authorized by law, we will not disclose tax preparation information without the appropriate consent.

We will only use tax preparation information to provide the CPTS Services or as authorized by law, unless the appropriate consent is given that we can use and/or share it for other purposes.

Types of Information We Collect.

Information You Give Us.

The personal information that we receive about you depends on the context of your interactions with CPTS, how you configure your CPTS Account and the choices that you make, including your privacy settings. Personal information that you provide may also depend upon what services or experiences you use, your location and applicable law.

- **Creating an account.** We collect information when you create an account or interact with our Services. Personal information may include your contact information (such as your name, address, phone number and email), profile photo, billing information (your payment information), usernames and credentials.
- **Identification information.** We collect information to verify your identity, including your name, social security number, driver's license numbers, government-issued identification details, for example to verify your identity as one of our customers or to help you file your tax return.
- **Customer support, product research, training and feedback.** We may collect personal information when you reach out to us for support, give us feedback, participate in optional surveys, product research or training and you choose to share ("Communication Information").
- **Social and community content.** We receive content you post on our social media pages and our community pages.
- **Information about others.** Please see the heading, [Information Provided by Others](#), below.

Information We Get When You Use the CPTS Services.

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

This may include:

- **Device information.** We may collect information about your device such as Internet Protocol ("IP") addresses, log information, error messages, device type, and unique device identifiers. For example, we may collect IP addresses from you as part of our sign in and security features.
- **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 CPTS Account or when you connect your CPTS 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.
- **Information from cookies and other technologies.** CPTS and our service providers may use commonly used tools such as cookies, web beacons, pixels, local shared objects and similar technologies (collectively "cookies") to collect information about you ("Cookie Information") so we can provide the experiences you request, recognize your visit, track your interactions, and improve your and other customers' experience. The CPTS Services are not currently configured to respond to browsers' "Do Not Track" signals because at this time no formal "Do Not Track" standard has been adopted. You have control over some of the information we collect from Cookies and how we use it. For more information, please contact CPTS support – see heading [How To Contact Us](#).
- **Information stored locally.** Some of our web-enabled desktop services and offerings synchronize with the information on your computer. We may also store personal information locally on your device.

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 help you connect with other people and organizations. As a result of those connections, 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.

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 CPTS Services on behalf of you, your family or your business (and we are processing such information as an Information Controller), you may ask to receive a copy of your information, even if you do not have an account with us. 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 receiving a copy of the information. For specific instructions on how to request a copy of your information, please contact CPTS support – see heading [How To Contact Us](#).

We also obtain information from outside parties or services to run our business. 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 CPTS Services. For a list of the categories of sources from whom we obtain information, please see the section “Other information sources” below).

Other Information Sources.

We may also get information about you from others where permitted by applicable law. For example, we receive information from:

- **Your service providers.** If you choose to sync a non-CPTS account/service with your CPTS 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.
- **Support providers.** Service providers who provide us with information about you or your interaction with the CPTS Services. For example, we may obtain service and support information or technical issues you have raised with these third parties.
- **Credit bureaus.** We receive information, such as your credit report or credit score, from credit bureaus in order to provide you with financial offers.
- **Other users.** As described in sections “Information Provided By Others”, we may get information about you from other users, such as your accountant, bookkeeper, tax preparer, your spouse, your head of household or your employer.
- **Risk management, cybersecurity & anti-fraud providers.** We may receive information from service providers who help us assess risks associated with our offerings, including to help combat fraud, illegal activity and to help protect your personal information.
- **Content providers.** We may receive information from software providers that make user-generated content from their service available to others, such as local business reviews or public social media posts.
- **Communication providers & social networks.** If you give us permission, we may collect information from email providers, communication providers and social networks.
- **Joint offering partners.** We may offer co-branded services or experiences or engage in joint-marketing activities with others, including through our conferences or live events.
- **Publicly-available Sources.** We collect information from publicly available sources, such as open government databases.
- **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 CPTS 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 CPTS Services and create your CPTS 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.
- Conduct research, including by partnering with academic institutions.
- Comply with our legal and regulatory requirements.
- Protect the rights, property, safety or security of CPTS, the CPTS Services, our customers, employees or others and prevent fraudulent or illegal activity.
- To enforce, remedy or apply our terms and conditions or other agreements.

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.

For research. With appropriate controls, we may share information with third-parties for research purposes or to publish academic or policy-related materials. We only share information in a way that would not allow any individual to be identified.

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. Late payments, missed payments, or other defaults on your account may be reflected in your credit report and consumer report. 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 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.

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. We do share personal information with third-parties for the business purposes described in this Privacy Policy.

With our affiliates and subsidiaries. We may share your information with and among our affiliates and subsidiaries for everyday business purposes (as described in this Privacy Policy).

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.

Non-CPTS Services, Links and Integrations.

Other companies' products, services and applications may use or integrate with our CPTS Services, or otherwise be offered through our CPTS Services ("Non-CPTS Services"). If you choose to link, sync or otherwise use any of these Non-CPTS Services, you consent and direct CPTS to share your information, including personal information, to the company providing the Non-CPTS Services. Non-CPTS Services are subject to the applicable terms and privacy statement of the company providing the service.

Some of our features enable you to connect to a social media account or share information on social media platforms, like Facebook and Twitter. Any information you choose to share on social media may potentially be visible to a global audience and will be subject to the social media provider's privacy policies (not this Privacy Policy). You should take care only to share information on social media that you are comfortable sharing.

For Legal Reasons.

We may share your information with third-parties for legal reasons, 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, the CPTS Services, our customers or others.
- To protect or defend against attacks.
- To enforce, remedy, or apply our terms and conditions or other agreements.
- 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, users and/or the CPTS Services.

Your Information Rights and Choices.

Your Rights.

Regardless of your location, we believe that all persons should have privacy and information protection rights and choices. Depending on where you live, you may have certain state-specific legal rights with respect to your personal information that we collect and process. If you are an individual in the United States, you can file a request or take action on one of your rights by contacting us at the contact details provided under the heading [How To Contact Us](#).

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

If you are a California resident, you may have the following rights over your information (a more detail explanation of your rights under California law ("CCPA") is at the bottom of the Privacy Policy under the heading [Additional Information for California Residents](#)):

- For the period covering the 12 months preceding your request, you may request that we disclose to you the categories and specific pieces of information collected about you, the categories of sources from which we collected that information, and the purposes for which your information was collected.
- You may also request that we delete information we collected from you.
- You have the right not to be discriminated against for exercising your rights over your information.

You may submit a request to exercise your rights by contacting CPTS support - see heading [How To Contact Us](#) or Fill out the California Consumer Privacy Act of 2018 ("CCPA") Request Form by clicking on the following link: <http://www.crosslinktax.com/customer-resources/ccpa-form.asp>.

Please note that we may claim legal exemptions for certain types of personal information from all or certain parts of the CCPA pursuant to various CCPA exemptions.

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.**
- **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.
- **Cookies and other tracking technologies.** You can find information on changing your browser settings to opt-out of cookies in your browser settings or make changes to your cookies settings by using our cookie preferences tool. If you disable some or all of the cookies the service, or parts of the service may not work. Even if you opt-out of such cookies or otherwise opt-out of interest-based advertising, you will still receive advertisements, they just won't be tailored to your interests. If you opt-out and later delete your cookies, use a different browser, or buy a new computer, you may need to renew your opt-out choices.

Information Retention.

Unless you specifically ask us to delete your personal information as explained in the heading [Your Information Rights and Choices](#), above, we retain your personal information as long as it is necessary to comply with our data retention policies and obligations. For example, we may maintain your CPTS Account for our legal or regulatory compliance needs (e.g. maintaining records of transactions you have made with us), to exercise, establish or defend legal claims and to protect against fraudulent or abusive activity on our service.

There may be occasions where we are unable to fully delete or de-identify your information due to technical 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 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.

CPTS 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 Statements.

From time to time we may change or update our Privacy Policy. We reserve the right to make changes or updates at any time. More information about how we will notify you is below.

If we make material changes to the way we process your personal information, we will provide you notice via our Services or by other communication channels, such as by email or website post. Please review any changes carefully. If you object to any of the changes and no longer wish to use our Services, you may close your account(s). All changes are effective immediately upon posting and your use of our Services after a notice of material change or posting of an updated Privacy Policy shall constitute your consent to all changes.

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 and every website that collects personally identifiable information.

Third Party Payment Processor.

We may use a third-party payment processor for any and all 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](#).

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

SPECIFIC PRIVACY INFORMATION

If you are a user of any of these CPTS Services, please see the relevant section to find out more about how we may collect, use or share your information, including personal information, for the specific Services we offer.

Tax Professional Products—CrossLink Professional Tax Software.

CPTS offers a portfolio of professional tax preparation solutions (software and web-based applications) known through-out the industry as “CrossLink Professional Tax 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 Professional Tax 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 Professional Tax 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 Professional Tax Software. We may use this information for purposes of preparing your tax return with our CrossLink Professional Tax 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 Professional Tax 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.

ADDITIONAL INFORMATION FOR CALIFORNIA RESIDENTS

Pursuant to California law, we are providing additional information to California residents. Please read this information together with our Privacy Policy.

Under California law, certain organizations need to disclose whether the following categories of "personal information" are collected or disclosed for an organization's "business purpose" as those terms are defined under California law.

Below please find the categories of personal information about California residents that we collect or disclose to third parties or service providers. Note that while a category may be included below that does not necessarily mean that we have or collect information in that category about you. The personal information we collect depends on the nature of our interaction with you and the CPTS Services you may use. We do not sell personal information.

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
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We and our third-party service providers collect personal information from the following sources:

- **Direct interactions**, such as, when you register for our Services or make a purchase.
- **Data from third parties**, such as, information on third-party websites or other information you may have made publicly available or information provided by third party sources, including but not limited to government entities and data resellers.
- **Automated tracking technologies**, such as, information automatically collected about your interaction with our Services and websites using various technologies such as cookies, web logs and beacons and internet tags.

Depending on how you interact with us and our Services, we may use and disclose personal information for the following business purposes:

- Detecting security incidents, protecting against malicious, deceptive, fraudulent, or illegal activity,
- Detecting and repairing errors,
- Performing services,
- Processing or fulfilling orders and transactions,
- Processing payments,
- Conducting internal research for product and service development, and
- Improving, upgrading, and enhancing our services.

In addition to sharing personal information for the business purposes identified within the California Consumer Privacy Act, we also share personal information as needed, or required, with the following additional third parties:

- organizations involved in business transfers, e.g. to a purchaser or successor entity in the event of a sale or any other corporate transaction involving some or all of our business;
- other parties, e.g. as needed for compliance, risk management, corporate development and/or corporate governance related matters,
- business partners as directed by an individual, or as needed to process an individual’s request; and
- governmental authorities and regulators, as required under applicable law.

Exercising Rights to Request Access and Request Deletion

Subject to certain exceptions, California residents have the right to request access, deletion and portability of their personal information as further described in the Privacy Policy. If you would like to submit a request or have additional questions about the personal information that we have about you, please contact CPTS support – see heading **How To Contact Us** or Fill out our California Consumer Privacy Act of 2018 (“CCPA”) Request Form by clicking the following link: <http://www.crosslinktax.com/customer-resources/ccpa-form.asp>.

When you submit your request, we will take steps to attempt to verify your identity. We will seek to match the information in your request to the personal information we maintain about you. As part of our verification process, we may ask you to submit additional information, use identity verification services to assist us, or if you have set up an account on our website, we may ask you to sign in to your account as part of our identity verification process.

Please understand that, depending on the type of request you submit, to protect the privacy and security of your personal information, we will only complete your request when we are satisfied that we have verified your identity to a reasonable degree of certainty.

We do not discriminate against individuals who exercise their rights under applicable law.

If we receive a request from an authorized agent, we have the right to verify with the data subject that the data subject indeed wants to take the action requested by the agent and will do so by contacting the data subject directly.