

## PRIVACY POLICY

Crosslink Professional Tax Solutions, LLC

Last Updated: January 2020

At Crosslink Professional Tax Solutions, LLC (“CPTS”), we pride ourselves on our commitment to protecting your privacy. This Privacy Policy describes in greater detail the privacy practices of CPTS and its affiliates and subsidiaries, meaning companies related by common ownership or control (“us,” “we,” “our”) responsible for collecting and maintaining certain information collected about you.

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.

**1. WHEN THIS PRIVACY POLICY APPLIES. If a Service you're using links to this Privacy Policy or references CPTS' Privacy Policy, this Policy applies to you.**

This Privacy Policy (“Policy”) applies to our sites, products, and services (collectively, “Services”) that link to this Policy or references CPTS’ Privacy Policy. CPTS is the responsible party for all Personal Information subject to this Privacy Policy for our Services targeted to US customers.

**2. WHAT WE DO WITH YOUR INFORMATION. We want to be clear about what information we collect and how we use it to deliver our Services to you, operate our business, and help make our Services useful, more intelligent, and work better for you. We do not sell or share your Personal Information with third parties for their own commercial uses without your consent.**

**a) Types of Information We Collect.** In connection with accessing our Services, we may collect information from you which can be used to identify you (“Personal Information”), such as your name, shipping/billing address, email address, phone, username and password.

We collect information when you register or open an account, sign in, pay a bill, purchase a Service, call us for support, or give us feedback. We may also get information from other companies or third parties, such as when you sync a third-party account or product/service with your CPTS Service, or when we may use service providers to supplement the Personal Information you give us (e.g., validate your mailing address) to help us maintain the accuracy of your data and provide you with better service. Finally, we also collect content or other information that you may provide or create when you interact with our Services.

We may also automatically collect certain usage information when you access our Services (“Usage Data”), such as Internet Protocol (“IP”) addresses, log files, unique device identifiers, pages viewed, browser type, any links you click on to leave or interact with our Services, and other usage information collected from cookies and other tracking technologies. For example, we collect IP addresses to track and aggregate non-personal information, such as using IP addresses to monitor the regions from which users navigate to our Services. We also collect IP addresses from users when they log into the Services as part of our log-in and security features. We may also, when you enable location-based Services, collect Global Positioning System (GPS) location data and/or motion data.

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

**b) How We Use Your Information.** We may use your information, including your Personal Information, for the following purposes:

*Account Registration.* We may use your name, address, phone number, and email address to register your account for certain Services we provide and to communicate important information to you. We may obtain additional Personal Information about you, such as address change information, from commercially available sources, to keep our records current. If you set up an administrator account that may be accessed by people other than you, please note that they may see and have the ability to change or delete your Personal Information.

To Provide Our Services and Operate Our Business. We may use your information to operate our business, including providing Services you requested, provide you with support related to our Services, and to help us protect our Services, including to combat fraud and protect your information.

Customer Service and Technical Support. We may use your name, address, phone number, email address, how you interact with our Services, and information about your computer configuration to resolve questions you may have about our Services and to follow up with you about your experience. We also offer various Internet chat services, for example, to speak with an CPTS support representative.

Communicate with You and Tell You About Other Services. We may use your information to communicate with you about our Services and to give you offers for third party products and services that we think may be of use to you. Please see below under “What You Can Do to Manage Your Privacy” for choices you have regarding these communications.

To Improve Services and Develop New Services. We will use your information to personalize or customize your experience and the Service, develop new features or services, and to improve the overall quality of CPTS' Services.

Feedback. We may use any information you volunteer in surveys you answer for us and combine them with answers from other customers in order to better understand our Services and how we may improve them. Answering any survey is optional.

Research, Including Publishing or Sharing Combined Information from Many Users, But Only in a Way that Would Not Allow You or Any Other Person to be Identified. Only in a way that would not allow you or any other person to be identified, we may prepare and share information about our customers with third parties, such as advertisers or partners, for research, academic, marketing and/or promotional purposes. For example, we may share demographic data that describes the percentage of our customers who use mobile services or who use a particular operating system. We or our third-party partners may publicly report the aggregated findings of the research or analysis, but only in a way that would not allow you or any other person to be identified.

**c) How We Share Your Personal Information.** From time to time, we may need to share your Personal Information with others.

Third Party Service Providers. We may share your information, including Personal Information and Usage Data, with third party service providers who perform various functions to enable us to provide our Services and help us operate our business, such as website design, sending email communications, fraud detection and prevention, customer care, or performing analytics. Our contracts with these third parties require them to maintain the confidentiality of the Personal Information we provide to them, only act on our behalf and under our instructions, and not use Personal Information for purposes other than the product or service they're providing to us or on our behalf.

Response to Subpoenas and Other Legal Requests. We may share your information with courts, law enforcement agencies, or other government bodies when we have a good faith belief we're required or permitted to do so by law, including to meet national security or law enforcement requirements, to protect our company, or to respond to a court order, subpoena, search warrant, or other law enforcement request.

Protection of CPTS and Others. We may share account information, Personal Information and Usage Data when we believe it is appropriate to enforce or apply our Services' Terms and Conditions and other agreements; or protect the rights, property, or safety of CPTS, our Services, our users, or others. This includes exchanging information with other companies and organizations for fraud protection and credit risk reduction. This does not include selling, renting, sharing, or otherwise disclosing Personal Information of our customers for commercial purposes in violation of the commitments set forth in this Privacy Policy.

Reporting to Credit Bureaus. We may share your information with credit bureaus, consumer reporting agencies, and card associations. 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 information with other companies, lawyers,

credit bureaus, agents, government agencies, and card associations in connection with issues related to fraud, credit, or debt collection.

*Information Sharing Between CPTS Entities.* We share your information, including your Personal Information, with and among our affiliates and subsidiaries, except where prohibited by law. The protections provided in this Privacy Policy apply across all CPTS entities. Affiliates and subsidiaries means companies related by common ownership or control. The reasons why we share your information include for our everyday business purposes, such as to: process your transactions, maintain your accounts, operate our business, etc. We will also share your information in order for us to be able to offer our products and services to you. We may also share information about your creditworthiness, your transactions and experience so that we can operate our business effectively, detect and prevent fraud, and improve our Services.

*Sale of Our Business.* If we sell, merge, or transfer any part of our business, we may be required to share your information.

*With your Consent.* Other than as set out above, we will provide you with notice and the opportunity to choose when your Personal Information may be shared with other third parties.

#### **d) Syncing, Linking, Connecting Your Bank Account or Other Third-Party Services with Your CPTS Service.**

You may choose to sync certain CPTS Services with information from other financial accounts. To sync your financial account information, we must access your online account with your financial institution. We will request your user name, password, and any other login bank data that you have set up with your financial institution to enable access. We use this information to update and maintain the account information you download, to assist with the download process, and to enhance the Services we may provide in the future.

We work with other companies or developers to offer you products and services and you may choose to sync, link or connect other third-party services with your CPTS Service. Sometimes CPTS may let you know about the service or product, or another company may let you know about a CPTS service or product. It will be clear who is referring the service or product, and who is providing the service or product. If you choose to accept these services, providing your consent to either the third party or to us, we may exchange your information, including your Personal Information, as well as information about how you interact with each company's service or product. This exchange of information is necessary to maintain business operations and to provide the ongoing service you've requested. By requesting or accepting these products or services, you are permitting us to provide your information, including your Personal Information, to the other party.

### **3. WHAT YOU CAN DO TO MANAGE YOUR PRIVACY. You can view and edit information that identifies you online through your CPTS Service. How you can access and control information that identifies you will depend on which Services you use. You have a choice about the use of information that identifies you, marketing communications you receive from us, and our use of cookies and other tracking technologies.**

**a) Managing Marketing Communications From Us.** We will honor your choices when it comes to receiving marketing communications from us.

You have the following choices if you have been receiving marketing communications from us that you no longer wish to receive:

- Click the "unsubscribe" link in the email or newsletter you received.
- Contact CPTS' customer support team.
- Adjust your preferences in your CPTS account settings.
- For SMS messages, reply "STOP" or follow the instructions in the message or settings to discontinue the Service.

- Subject to your control, our mobile applications may send push notifications to your mobile device. If you are receiving push notifications and no longer wish to receive these types of communications, you may turn them off at the device level.
- Remember that even if you choose not to receive marketing communications from us, we will continue to send you mandatory service or transactional communications.

**b) Updating Your Personal Information.** In connection with your right to manage your Personal Information you provide to us, you may access, update, change, correct or request deletion of your information either through the Service or through our customer support. You can reach our customer support by using the contact information provided in the "**How to Contact Us**" section of this Privacy Policy.

**c) Cookies and Other Tracking Technologies.** The following is a high-level summary of our practices and your controls for cookies and other tracking technologies.

In accordance with applicable law, CPTS and our service providers may use commonly-used tools to recognize your visit and track your interactions with our Services such as cookies, web beacons, pixels, local shared objects, and similar technologies (collectively, "Cookies"). Sometimes this tracking is necessary in order for us to provide you the Service you requested. Other times, we combine Usage Data collected from Cookies with that of other customers to improve your and other customers' experience. You have control over some of the Usage Data we collect from Cookies and how we use it. Information on changing your browser settings to opt out of Cookies can be found in your browser settings.

CPTS may also use advertising networks and other third parties to display advertising on our website or to manage our advertising on other sites. These third-party partners may place Cookies on our Services and unaffiliated websites in order to serve advertisements that may be relevant to you based on your browsing activities and interests, and to determine the effectiveness of such advertisements.

You also have the choice to opt-out of certain tracking through Cookies. For more information, you can reach our customer support by using the contact information provided in the "**How to Contact Us**" section of this Policy. Please note that 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. Also, 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.

**d) Do Not Track.** Like most other companies, our 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.

**e) Social Media Features.** Our Services may use social media features, such as Facebook sharing ("Social Media Features"). These features may collect your IP address and which page you are visiting within our Service, and may set a cookie to enable the feature to function properly. Social Media Features are either hosted by a third party or hosted directly on our Services. Your interactions with these features are governed by the privacy policy of the company providing the relevant Social Media Features.

#### **4. DATA RETENTION AND YOUR ACCESS RIGHTS**

**a) Data Retention.** In accordance with and as permitted by applicable law and regulations, we will retain your information as long as necessary to serve you, to maintain your account for as long as your account is active, or as otherwise needed to operate our business. When you close your account, we may continue to communicate with you about our Services, give you important business updates that may affect you, and let you know about products and services that may interest you, unless you have opted out of receiving marketing communications. We may also continue to use some of your information for business purposes and to improve our offerings or in some cases to develop new ones. We will retain and use your information as required by applicable regulations and CPTS' records and information management policies to comply with our legal and reporting obligations, resolve disputes, enforce our agreements, complete any outstanding transactions and for the detection and prevention of fraud.

**b) Your Access Rights.**

If you have created an online account with us and would like to update the Personal Information you have provided to us, you can access your account to view and make changes or corrections to your Personal Information. If you wish to request access, to limit use, or to limit disclosure, please contact us at [support@crosslinktax.com](mailto:support@crosslinktax.com) or the mailing address provided under "[How to Contact Us](#)" and please provide the name of the CPTS customer who submitted your Personal Information to our services. We will refer your requests to that customer, and will support them as needed in responding to your request.

**5. SECURITY OF YOUR INFORMATION. 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.

**6. COLLECTION AND USE OF CHILDREN'S PERSONAL INFORMATION. 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.

**7. YOUR CALIFORNIA PRIVACY RIGHTS.**

If you are a California resident, California law may provide you with additional rights regarding our use of your Personal Information. To learn more about your California privacy rights, visit the [CCPA Policy Statement](#).

**8. CHANGES TO OUR PRIVACY POLICY. 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 Service 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 Service after a notice of material change or posting of an updated Privacy Policy shall constitute your consent to all changes.

**9. 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.

**10. THIRD PARTY PAYMENT PROCESSOR.** We use a third-party payment processor, WorldPay for all payments. CPTS does not store credit card details and instead relies on WorldPay 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, WorldPay, whose use of your Personal Information is governed by their privacy policy, which may be viewed at <https://www.worldpay.com/en-gb/privacy-policy>.

**11. 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](mailto: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

## **ADDITIONAL CPTS SERVICE SPECIFIC PRIVACY INFORMATION**

**If you are a user of any of these 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 Service(s) we offer.**

1. **Tax Professional Products—CrossLink Professional Tax Software.** CPTS offers a portfolio of professional tax preparation solutions (software and web-based) 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/Social Insurance Number, phone, address, email address);
- Income and wage information;
- Investment information;
- Payment information;
- Electronic signatures; and
- Other financial 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 you use the CrossLink Professional Tax Software. We may use this information for purposes such as providing you with the CrossLink Professional Tax Software or providing information to or communicating with your tax professional. We may collect information from you directly 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/Social Insurance Number, phone, address, email address);
- Income and wage information;
- Investment information;
- Payment information;
- Electronic signatures; and
- Other financial 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.

## 2. 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 Service 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.