

PRIVACY POLICY

CROSSLINK FAMILY OF COMPANIES

Important Information: Please read this carefully as we have made updates to our Privacy Policy. This Privacy Policy goes into effect January 1, 2025 (“Effective Date”).

This Privacy Policy describes the information that the Crosslink Family of Companies including CrossLink Professional Tax Solutions, LLC, CrossLink Tax Tech Solutions, LLC, and Audit Allies, LLC (collectively “CrossLink”, “we”, “us”, “our”) collects from you, or that you may provide through your interactions with www.crosslinktax.com, www.crosslinktaxtech.com, www.auditallies.com, and other websites and applications owned or controlled by CrossLink that link to this Privacy Policy (collectively, the “Sites”), as well as services and products offered by CrossLink. For certain offerings on our Sites, there may be additional notices about our information practices and choices. Please read those additional privacy disclosures to understand how they apply to you.

To contact us, see the section “How To Contact Us” below.

Scope of this Privacy Policy.

This Privacy Policy describes our privacy practices for individuals in the United States. We meet all rules and regulations relating to data protection and security promulgated by the Internal Revenue Service and its Security Summit and comply with the Gramm-Leach-Bliley Act. In compliance with applicable laws, we collect and store your personal information to provide our products and services and for the purposes outlined in this Privacy Policy.

Our Privacy Policy does not apply where CrossLink processes your information in our role as a service provider or data processor on behalf of a business or entity that acts as the data controller, who alone or jointly with others determines the purposes and means of the processing of personal information. When we act as a service provider or data processor, the privacy policy of the data controller will govern the processing of your personal information, defined as information that identifies, relates to, describes, or is reasonably capable of being associated with or linked to you. In certain circumstances, there may be more than one data controller processing your information. In these situations, we act as an independent data controller over our processing activities.

This Privacy Policy explains CrossLink’s collection, use, retention, disclosure and security of information about you. It also describes your choices regarding the use, access, and correction of your personal information. By using our Sites, products, and services, you agree to the collection and use of information in accordance with this Privacy Policy.

Since your privacy is a priority to us, CrossLink will not share nonpublic information about you with third parties outside of the CrossLink Family of Companies without your consent, except as explained in our Privacy Policy.

The Centralization of Your Information.

We use the information you choose to share with us across our platform. Here’s what we mean by “platform” – when you choose to share data with us or bring over information from third parties, we use that data together, not just within the individual offering(s) you’re using. In other words, data entered into one service or product becomes a part of your “CrossLink Account”. Your CrossLink 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 Sites, products and services; information we have collected about you from third-party sources and insights that are associated with you. The information in your CrossLink Account will be shared across the CrossLink Family of Companies to generate our various offerings, services and experiences and otherwise maximize the benefits to you of our platform.

Information We Collect.

We collect information from you directly, the devices that you use to interact with us, and certain third-parties including analytics providers.

Information You Give Us.

The personal information that we receive depends on your interactions with CrossLink, and how you use and set up your account. Personal information that you provide may also depend upon what Sites, products and services you use and applicable law. You may provide the following information to us directly when you enter and use our Sites, contact us for support, or purchase products and services:

- Creating an account or purchasing details. We collect information when you create an account, interact with our Sites, or purchase or use our products and services. Information may include your contact information (such as your name, address, phone number and email), profile photo, bank, billing or payment information (collected by us or our third-party payment processor), usernames and credentials.
- Identification information. We collect information to verify your identity, including your name, social security number, social insurance number, driver's license numbers, government-issued identification details, for example, to verify your identity or to help you file tax returns.
- 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.
- 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 if you electronically file a tax return or 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 in to a third-party service with your CrossLink Account or when you connect your CrossLink Account to a third-party service. For example, you may choose to connect your CrossLink Account with your bank accounts. To sync your financial account information, we must access your financial account information.
- 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.
- Location information. Certain features in our Sites, products and services may collect your precise location information, device motion information, or both, if you grant permission to do so in your device settings.
- Information from cookies and other technologies. CrossLink and our service providers may use commonly used tools such as cookies, web beacons, pixels, local shared objects and similar technologies to collect information about you.
- Tax Return Information. When you choose to prepare or file a tax return using our services or Sites, we collect personal information, including the following ("Tax Return Information"): Social Security Number, date of birth, income, employment status, marital status, claimed deductions, credits, and any other information necessary to accurately complete a tax return.
- Information that you make available to us via a social media platform, including content that you post on our social media pages and community pages.
- Information you submit to inquire about or apply for a job with us.
- Information you provide when you provide testimonials or feedback; post comments on our blog or community forums; or participate in our surveys, promotions, marketing events, trade shows, webinars, conferences, training, or product research.
- Any other information you submit to us.

Information We Get Automatically.

We and partners working on our behalf may use cookies, web beacons, pixels, tags, or other digital tracking technologies to collect the following information from the device you use to interact with our Sites, products and services:

- **Internet Service Provider.**
- **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.
- **Operating system and browser type.**
- **Usage information.** We may collect analytical information about how you interact with our Sites, products and services including usage information such as the pages you viewed, mouse clicks, movements, and scrolling activity, the features you use and details about any links with which you interact.

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

For more information about cookies see “Cookies and Other Tracking Technologies” below.

You may be able to limit access of some of these technologies at the individual browser or device level; however, this limitation may disable or limit some of the features offered.

Information Provided by Others.

Our Sites, products and 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 Sites, products and 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 other sources, 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 our Sites, products and services. For example, we receive information from:

- **Your service providers.** If you choose to sync to a non-CrossLink 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 our Sites, products and services for troubleshooting purposes.
- **Other users.** As described in the section “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.** 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 various federal and state tax agencies.

How We Use Your Personal Information.

We may use the personal information we collect from you for the following purposes:

- **Tax preparation and related services:** Section 7216 of the Internal Revenue Code specifically governs the use and disclosure of Tax Return Information. Some states may also have additional laws and regulations related to the use and disclosure of the same information. We use Tax Return Information only in accordance with those applicable laws and regulations to prepare and assist in preparing a tax return, to provide services associated with preparing a tax return, and to provide you with other products and services you specifically request or consent to, unless otherwise allowed under applicable law.
- **Service functionality:** To complete purchases of products and services you request, including processing payments, fulfilling orders, and service communications, as well as to conduct general business operations, such as accounting, and send you information related to our products and services, including confirmations, invoices, notifications, updates, security alerts, training and support, and administrative messages.
- **Service improvement:** As permitted by law, to improve our Sites, products and services, analyze our customer base and purchasing trends and the effectiveness of our marketing.
- **Customer support:** As permitted by law, to address questions submitted to our customer or technical support systems and to send updates, notifications, or security alerts.
- **Marketing, advertising, and promotions:** As permitted by law, to send marketing messages; to provide notification of new or related products and services, enhancements and promotions; and to personalize advertisements that you see on our Sites and third-party online platforms and to measure the effectiveness of our advertising. For example, we may use your personal information, such as your email address or phone number, to contact you about products or information we think might be of interest to you.
- **Personalization:** To personalize your online experience, such as by recording your preferences and settings.
- **Security and fraud prevention:** To monitor and investigate fraud, identity theft, and other illegal activity; to protect your rights and the safety of others; and to protect and secure our Sites, products and services, assets, network, and business operations.
- **Legal compliance:** To comply with legal process, such as subpoenas, court orders, warrants, and other lawful regulatory or law enforcement requests, and to comply with legal requirements. 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.

Unless allowed by applicable law and we have your consent, we do not:

- Sell your personal information for money;
- Use Tax Return Information to market products or services unrelated to tax preparation; or
- Share your personal information with third parties for use in their own business.

How We Share Your Personal Information.

The privacy and security of your personal information is important to us. We may share your personal information with the following types of entities or in the following circumstances:

- **As You Direct:** We disclose personal information, including information regarding tax returns, in accordance with your requests, such as when you direct us to file a tax return with the IRS or to a state taxing authority or when you provide your express consent to disclose information to a third party offering its own product or service.
- **Legal Compliance, Law Enforcement, and Regulatory Requests:** We may be required to preserve and disclose personal information, including tax return information, to the IRS or state taxing authorities, law enforcement, government agencies, and other parties to comply with any applicable law, regulation, or legal process, such as subpoenas, court orders, or other judiciary proceedings; to carry out investigations; to protect and defend our rights and property or the rights or safety of other parties; to prevent potential

crimes such as stolen identity refund fraud (SIRF) or cyber security threats; or as otherwise required by any applicable law, rule, or regulation.

- **Financial Services Providers:** We may share personal information with collection agencies, credit bureaus and loan service providers, 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 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.
- **Acquiring Businesses:** Personal information may be disclosed in connection with an actual sale, merger, acquisition, dissolution, or transfer of all or a portion of our business or relevant operating unit. We reserve the right to transfer your information as part of the transaction.
- **Affiliates:** We may share information about you and the products and services you have purchased from us to members of the CrossLink Family of Companies, all of whom follow this Privacy Policy, for everyday business purposes (as described in this Policy) as well as for marketing purposes.
- **Service Providers:** In some cases, personal information may be disclosed to our service providers to complete a product purchase, to fulfill a service you request, or to market one of our products or services. Our service providers include companies that use Web analytics software or tools, deliver downloadable products, offer online software applications, or send emails on our behalf. Not all service providers may be applicable to you. Some service providers are only relevant if you use certain tax forms or otherwise prepare a tax return using our software. While these relationships may require us to share information, our service providers are prohibited from using your information other than to act on our behalf.
- **Joint Marketing and Custom Label Partners:** We may provide information to individuals or companies with whom we have a joint marketing arrangement and/or that custom-label our products and services. We require all marketing and custom-label partners to have written contracts with us that require them to safeguard your information and prohibit them from selling, retaining, using, or disclosing your information for any purpose other than performing the contract. We only share Tax Return Information as permitted under Section 7216.
- **Online Advertising Partners:** We partner with companies that assist us in advertising our services, including partners that use cookies and online tracking technologies to collect information to personalize, retarget, and measure the effectiveness of advertising.
- **Social Media Platforms:** If you interact with us on social media platforms, the platform may be able to collect information about you and your interaction with us. If you interact with social media objects on our Sites, both the social media platform and your connections on our Sites may be able to view that activity. To control the sharing of information, please review the privacy policy of the relevant social media platform.
- **Other Visitors:** We may post customer testimonials on our Sites. These testimonials may contain personal information such as a customer's name. We will obtain your consent to use your name prior to posting your testimonial. If you wish to update or delete your testimonial, contact us. Our Sites also offer publicly accessible blogs and/or community forums. Any information you provide in these areas may be read, collected, and used by others who access them. To request the removal of your personal information from our blog or community forum, contact us.
- **Integrated Third Party Products and Services:** Other companies' products, services and applications may use or integrate with our Sites, products and services ("Non-CrossLink Services"). If you choose to link, sync or otherwise use any of these Non-CrossLink Services you consent and direct us to share your information, including personal information, to the company providing the Non-CrossLink Services. Non-CrossLink Services are subject to the applicable terms and privacy statement of the company providing the service.
- **Third-Party Event Partners.** When you register for or attend one of our events, we may share the information you provide at registration or with us during the event with our event partners. These third parties may use your information to provide you with information about their own products and services.
- **Third-Party Content or Advertising Partners.** When you use our Sites, products and services, third parties that provide content, advertising, or functionality to the Sites, products and services may collect or receive information about you and/or your use of the Sites, products and services, including through the use of cookies, beacons, and similar technologies. These third parties may use your information to provide you with advertising that is based on your interests and to measure and analyze ad performance, on our Sites,

products and services or other websites or platforms, and combine it with information collected across different websites, online services, and other devices. These third parties' use of your information will be based on their own privacy policies.

Links to Other Websites and Interactive Features.

Links to Other Websites: Our Sites may contain links to other websites. Please be aware that we are not responsible for the privacy practices of such other websites. We encourage our users to be aware when they leave our Sites and to read the privacy policy of each website that collects personally identifiable information.

Interactive Features: We may engage vendors to provide certain interactive features on our Sites. Your use of these interactive features is voluntary, and we may retain the information that you submit through these features. For example, we may offer an interactive chat feature on our Sites to answer questions and for other customer service purposes. When you participate in the interactive chat, either with a virtual or live agent, the contents of the chat may be captured and kept as a transcript. By using these features, you understand that our vendors may process the information obtained through the feature to provide the service on our behalf.

Third-Party Payment Processor.

We may use a third-party payment processor for payments. CrossLink 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 CrossLink support for third-party payment processor information.

Information Retention, Storage, and Transfer.

Any information we collect about you may be stored, transferred, processed, and accessed by us in the United States or, where permitted by law, in any other country where we or our vendors operate. Please note that your personal information may be transferred to and maintained on computers outside your state or country, where privacy laws may differ and could be less protective than those in your location. If you are located outside the United States and consent to our collection of your personal information, you acknowledge that we may transfer your data to the United States for processing and storage. By allowing us to collect your personal information, you consent to its transfer, processing, and storage in the United States.

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 our products and 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.

The security of personal information is extremely important to us. We employ security measures consistent with standard industry practices to prevent unauthorized access to your personal information collected. In addition,

CrossLink meets all rules and regulations relating to data protection and security for the tax industry promulgated by the Internal Revenue Service and its Security Summit.

For example, we:

- Constantly work to review and update our security practices and procedures and implement accepted best methods to protect your personal information.
- 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 THE ABSOLUTE SECURITY OF YOUR INFORMATION.**

We do not Knowingly Collect Information from Children.

Our Sites, products, and services are not targeted at children of any age, and we do not collect information from children under age 13. If we learn we have collected or received personal information from a child under 13 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 the Sites. We may provide you with additional notice at our discretion, including but not limited to by email or by means of a notice on the Sites. We encourage you to review this Privacy Policy periodically to remain informed about our information privacy practices and how we are protecting your data.

Generative Artificial Intelligence, Machine Learning, and Related Tools.

We may use generative artificial intelligence, machine learning, automated processing, or related tools, such as chatbots or digital assistants (“AI Tools”) to improve, develop, and deliver our products and services. This section outlines how we protect your personal information in our use of such AI Tools.

We use AI Tools to analyze how our services are used and interacted with and to process content provided to us by customers in their use of our services. We conduct data analytics to develop insights about customer usage, needs, and preferences, allowing us to make more informed predictions and recommendations to enhance our products and services. If AI Tools are to be utilized, we will provide additional notice and the opportunity to opt out when appropriate. We will not use AI to subject you to decisions based solely on automated processes that have a significant impact on you without providing additional notice as necessary.

In using the AI Tools, we may collect, analyze, and process various types of personal information, including, but not limited to: a) Contact information (e.g., full name, email address, telephone number, job title, and company name), b) Identification and background information (e.g., driver's license, social security number), c) Financial data (e.g., W-2 forms, bank or financial account statements and details), and d) Any other personal information collected for tax preparation services.

Our AI Tools utilize language models licensed from Anthropic PBC. Importantly, none of the data processed by our AI Tools is used to enhance Anthropic’s AI products. We act as the data controller for any personal information processed through our AI Tools, which are designed to handle personal information securely, while Anthropic serves as the data processor. We have an agreement with Anthropic to ensure your personal information is protected

and remains accessible only to us. For more information on the data privacy and security of the Anthropic’s AI products used by CrossLink, please visit Anthropic’s data privacy page [here](#).

Notwithstanding any other consent provided regarding the processing of your data, you acknowledge that the AI tools may access personal data you input into our services and/or software. You consent to (or have obtained informed consent from the data subject for) such personal data being processed by these AI tools.

Cookies and Other Tracking Technologies.

How We Use Cookies

We, or our vendors, may use cookies or similar technologies to analyze trends, administer our Sites, track users’ movements on our Sites, products and services, mobile applications, co-branded offerings and other third-party sites, and gather demographic information about our user base as a whole.

We may receive reports based on the use of these technologies on an individual as well as an aggregated basis. We use cookies for remembering user settings. Users can control the use of cookies at the individual browser level. If you reject cookies, you may still use the Sites, but your ability to use some features or areas of our Sites, products, and services may be limited. As is true of most websites, we gather certain information automatically and store it in log files. This information may include internet protocol (IP) addresses, browser type, internet service provider (ISP), referring/exit pages, operating system, date/time stamp, and/or clickstream data. We may combine this automatically collected log information with other information we collect about you. We do this to improve our Sites, products and services and to deliver relevant ads and track ad campaign performance and efficiency. We work with third parties to provide services on or help us improve our Sites. To disable or reject third-party technologies, please refer to the relevant third party’s website.

How to Manage Your Cookies

You can also set your Internet browser to warn you each time a cookie is being sent or to turn off all cookies (except Flash cookies). Use the links below to learn how to manage cookies from your browser or navigate to your browser’s Help menu for more information.

- [Google Chrome](#)
- [Microsoft Edge](#)
- [Microsoft Internet Explorer](#)
- [Mozilla Firefox](#)
- [Safari \(on Mac\)](#)

You can also use third-party tools to identify and make additional choices about many technologies, including cookies. Flash cookies are different from browser cookies because of the amount of, type of, and how data is stored. Please note that cookie management tools provided by certain browsers will not remove Flash cookies. To learn how to restrict and block Flash cookies, visit the Adobe website [here](#). As with any cookie, if you do restrict Flash cookies, there may be some features that you won’t be able to use.

Most mobile devices allow you to manage how other technologies, such as unique identifiers, are set and used. Please reference your mobile operating system support documentation to learn more.

The following websites provide more information about your choices to opt-out of tracking through certain third-party advertising and analytics cookies:

- **Digital Advertising Alliance:** DAA’s [opt-out page](#) provides information on companies that participate in its WebChoices tool and how to opt out using its browser tool.
- **Network Advertising Initiative:** NAI’s [opt-out page](#) provides information on its member companies that deliver tailored online ads and your choices to opt-out of receiving them.
- **TrustArc:** TrustArc’s [opt-out page](#) allows you to send requests to the companies that place cookies in your browser.

Please note: Even if you opt out of cookies or targeted advertising, you will still receive advertisements, but they may not be tailored to your interests. The choice to opt out of certain technologies may affect, alter, or eliminate the functionality of certain features of the products and services offered by CrossLink.

Your Information Rights and Choices.

We offer certain choices related to your personal information, including how it's collected, used, and shared. You have the right to access any information held by CrossLink that you either input directly or information collected as described above, subject to our information retention policy. You may have additional rights based on the laws of the state in which you reside, which are provided below.

If you wish to manage any of the following, please follow the directions below or contact us using the contact information provided in "How to Contact Us" below. If you have a registered account with us, you can also sign in to your account to access or update your information.

Access, Change, or Delete your Personal Information.

Upon request, CrossLink will provide you with certain personal information you specifically request. You may additionally request to update any inaccuracies in your personal information, or to have the information deleted.

Opt-Out of the Sale or Sharing of Personal Information.

You may elect to add your name to our "Do Not Sell or Share My Personal Information" list by visiting the appropriate link on our website and filling out the required form.

Opt-Out of Technologies, including Cookies and Tracking Technologies.

You may choose to opt out of certain technologies used on our Sites, including those used for online advertising purposes. However, the choice to opt out of certain technologies may affect, alter, or eliminate the functionality of certain features of the products and services offered by CrossLink. For more information about managing these preferences, please see our "Cookies and Other Tracking Technologies" section above.

If you exercise these options, please be aware that you may still see advertising, but it will not be personalized.

Opt-Out of Email and Text Communications.

To unsubscribe from receiving general marketing messages from us, please contact us. You may also choose to stop receiving our newsletter, marketing emails, or text messages by following the unsubscribe instructions included in those emails or text messages. If you choose to stop receiving email or text communications, we will continue to send you necessary service and transactional communications.

Verification.

To help protect the privacy and 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.

Non-Discrimination.

We will not discriminate against you for exercising your rights under applicable laws. Please note that the collection and retention of certain personal information is necessary to effectively use our services. For instance, if you choose to delete your information, your account will be deactivated, which will prevent you from using our goods and services. However, this does not prevent you from creating a new account in the future.

California Residents

This describes the rights of residents of California under the California Consumer Privacy Act of 2018, which was amended by the California Privacy Rights Act of 2020 (together, "CCPA"). The CCPA requires businesses like us to provide certain information to California consumers. This contains the following four parts:

- You Can Opt Out of Our Sharing Your Personal Information. We Do Not Sell Your Personal Information.
- Your CCPA Rights

- The CCPA Categories of Personal Information We Collect and the Sources
- The CCPA Categories of Personal Information We Disclose for a “Business Purpose”

You Can Opt Out of Our Sharing Your Personal Information. We Do Not Sell Your Personal Information.

You can opt out of us sharing your personal information by contacting us or filling out the Do Not Sell or Share My Personal Data Form which is located on our Sites’ main page. The CCPA requires us to disclose if we share your personal information. We may share your personal information, including information about your visits to our Sites, with our partners in order to market CrossLink’s products and services to you on other platforms.

We do not sell your personal information.

Your Rights Under the CCPA

The CCPA provides Californians with the following rights:

Your Right to Know and Access the Personal Information Collected.

You (or your authorized agent) can request a copy of your personal information. Under the CCPA, you can also request that we disclose how we have collected, used, and disclosed your personal information over the past 12 months, including the categories of personal information we collected and our purposes for doing so; the categories of sources for that information; the categories of third parties with whom we shared it or disclosed it for a business purpose and our purposes for doing so. Companies that sell personal information (we do not) must make additional disclosures.

Your Right to Opt-Out of the Sale or Sharing of Personal Information.

Under the CCPA, you can opt out of the sharing of your personal information with third parties for the purpose of cross-context behavioral advertising. You can direct us not to share your personal information as described above. Because we do not sell personal information, we do not have an opt-out feature.

Your Right to Limit the Use and Disclosure of Sensitive Personal Information.

Under the CCPA, you can limit a business’s use and disclosure of your sensitive personal information to certain purposes specified by law (e.g., providing you with services you request or preventing fraud, or for other purposes that do not involve deriving your attributes). We only use sensitive personal information for such permitted purposes, so we do not have an opt-out feature.

Nondiscrimination for Exercising Your CCPA Rights.

The CCPA prohibits businesses from discriminating against you for exercising your rights under the law. Such discrimination may include denying services, charging different prices or rates for services, providing a different level or quality of services, or suggesting that you will receive a different level or quality of goods or services as a result of exercising your rights.

Your Right to Correct Inaccurate Personal Information.

You can edit much of your personal information through your account with us (such as your profile information). If you do not have a registered account with us, you can contact us to request that we correct inaccurate personal information.

Your Right to Delete Personal Information.

You can request that we delete your personal information by requesting that we delete your CrossLink Account or by requesting we delete specific information about you. We honor such requests unless an exception applies, such as when the information is necessary to complete the transaction or contract for which it was collected or when information is being used to detect, prevent, or investigate security incidents, comply with laws, or identify and repair bugs.

The CCPA Categories of Personal Information We Collect and the Sources

Our Privacy Policy describes the information we collect and its sources. The chart below organizes the personal information categories set forth in the CCPA.

CCPA Personal Information Categories and corresponding sources of this information:

CCPA Personal Information Category	Sources of this Information
Identifiers (e.g., 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)	Information you provide directly or through your interactions with our Sites, services or products, service providers, or vendors that provide information to help us serve relevant ads and understand the ads’ effectiveness.
Characteristics of protected classifications under California or Federal law (e.g., your gender or age) (“Characteristics of Protected Classifications”)	Information you provide to us directly, your interactions with our Sites, products and services and inferences we make based on that information.
Commercial information (e.g., information regarding products or services purchased, obtained, or considered)	Information you provide to us directly and your interactions with our Sites, products and services, including through the use of cookies and tracking technologies.
Internet or Other Electronic Network Activity Information (e.g., browsing history, search history, and information regarding your interactions with our Services)	Your interactions with our Sites, products and services and from the devices used to access our Sites, products and services, including through the use of cookies and tracking technologies.
Geolocation Data	Information you provide to us directly or through your interactions with our Sites, products and services and from the devices used to access our Sites, products and services.
Professional or Employment-Related Information	Information you provide to us directly.
Inferences drawn from other Personal Information, such as profiles reflecting a person’s preferences, characteristics, predispositions, behavior, etc.	We process inferences based on other information collected as part of marketing efforts.

CCPA Personal Information Category	Sources of this Information
Personal Information described in Cal. Civ. Code §1798.80(e)(such as name, address, telephone number, education, employment history, credit card or debit card number)	Information you provide directly or through your interactions with our Sites, products and services.
Sensory data, such as audio, electronic, visual or similar information	N/A
<p>Sensitive personal information, which may include:</p> <ul style="list-style-type: none"> - Data generated when you communicate on our Sites, products and services. - Data used to secure your account (e.g., login information or proof of identification if you are unable to verify your account) - Data you add to your profile or submit via your settings. 	Information you provide to us directly or through your interactions with our Sites, products and services.

We determine the retention period for each of the categories of personal information listed above in the chart based on (1) the length of time we need to retain the information to achieve the business purpose for which it was obtained, (2) any legal or regulatory requirements applicable to such information, (3) internal operational needs, and (4) any need for the information based on any actual or anticipated investigation or litigation.

The CCPA Categories of Personal Information We “Share”

While we do not sell your personal information, we may engage in “sharing” under the CCPA, which broadly defines this term as disclosing personal information for purposes of cross-context behavioral advertising, which is defined to include instances where companies target advertising based on personal information obtained from a consumer’s activity across distinctly-branded websites or services. CrossLink’s practices and the categories of data we share are described in the Section titled, “You Can Opt Out of Our Sharing Your Personal Information”. We do not share sensitive personal information.

As described above, you can opt out of “sharing”.

The CCPA Categories of Personal Information We Disclose for a “Business Purpose”

The CCPA requires us to describe the “business purposes” for which we may disclose your personal information. We may disclose your personal information to support our own operational purposes in providing our Sites, products and services to you. In addition, we may disclose personal information at your direction.

Security and Integrity.

In order to secure our Sites, products and services, including to detect, prevent, and investigate security incidents or violations of our policies or applicable laws, we may disclose the types of personal information listed in the chart above with our partners, service providers, law enforcement, and related companies.

Service Improvements.

In order to improve our Services (such as to identify bugs, repair errors, or ensure that services function as intended) or conduct internal research and analysis to improve our technology, we may disclose the types of personal information listed in the chart above with our partners, service providers, and related companies.

Service Providers and Other Notified Purposes.

We may disclose the types of personal information listed in the chart above with Service Providers, as defined by the CCPA, in order to have them perform services specified by a written contract or with others for a notified purpose permitted by the CCPA (e.g., to respond to law enforcement requests).

Marketing and Advertising.

Except as noted above, we may disclose the types of personal information listed in the chart above with our partners, service providers, and related companies, in order for them to provide marketing and advertising services on our behalf as permitted by the CCPA (e.g., sending you communications).

Colorado, Connecticut, Delaware, Iowa, Maryland, Minnesota, Montana, New Hampshire, New Jersey, Oregon, Tennessee, Utah, and Virginia Residents

Scope.

This section supplements the information in the Privacy Policy above and describes the rights of residents of Colorado, Connecticut, Delaware, Iowa, Maryland, Minnesota, Montana, New Hampshire, New Jersey, Oregon, Tennessee, Utah, and Virginia. In the event of any conflict between this section and our Privacy Policy, this section will govern for residents of the states listed herein. We have adopted this section to comply with the corresponding state privacy laws (collectively referred to as “Applicable State Privacy Laws”), including:

- Colorado Privacy Act
- Connecticut Data Privacy Act
- Delaware Personal Data Privacy Act
- Iowa Senate File 262
- Maryland Online Data Privacy Act
- Minnesota Consumer Data Privacy Act
- Montana Consumer Data Privacy Act
- New Hampshire Senate Bill 255
- New Jersey Senate Bill 332
- Oregon Consumer Privacy Act
- Tennessee Information Protection Act
- Utah Consumer Privacy Act
- Virginia Consumer Privacy Act

Terms defined in the Applicable State Privacy Laws carry the same meaning in this Privacy Policy. Please note that we may claim legal exemptions for certain types of personal information and certain CrossLink companies from all or certain parts of the Applicable State Privacy Laws. If you have any questions, please contact us using the information provided below.

Personal Information We Collect.

The personal information we collect may include data, derived data, and unique identifiers that are linked to or reasonably linkable to a consumer or to a device associated with one or more consumers in a household. We may also collect sensitive personal information for limited purposes, as described in the "CCPA Categories of Personal Information We Collect" section of our Privacy Policy and in this section, depending on your access to and/or use of our services.

Use and Disclosure of Your Personal Information.

We may use or disclose your Personal Information as outlined in this Privacy Policy. Under the Applicable State Privacy Laws, a "sale" of Personal Information does not necessarily involve a direct purchase or exchange of money. It also includes disclosures of Personal Information to third parties for valuable consideration. As described in the "Cookies and Other Tracking Technologies" section above, we may utilize interest-based advertising services from vendors on our Sites. When you interact with our Sites, some of your personal information may be shared, where legally permitted, with these vendors for targeted advertising. You have the right to opt out of the "sale" of your personal information and targeted advertising, as detailed below. Personal information may be sold or shared for marketing and advertising purposes with third parties, including our affiliates, advertisers, marketing partners, data analytics providers, data aggregators, and social media networks.

Your Privacy Rights.

As a resident of Colorado, Connecticut, Delaware, Iowa, Maryland, Minnesota, Montana, New Hampshire, New Jersey, Oregon, Tennessee, Utah, or Virginia, you may have the rights listed below. However, these rights are not absolute, and in certain cases we may decline your request to exercise these rights as permitted by law.

Your Right to Access and Obtain Personal Information.

You have the right to request that we confirm whether we are processing or have processed personal information about you, as well as a right to obtain a copy of such personal information in a portable format, where technically feasible. You may also request a list of third parties to which we disclosed personal information. You may exercise these rights by contacting us at support@crosslinktax.com.

Your Right to Delete Personal Information.

You have the right to request that CrossLink delete any personal information that we collected about you and retained, subject to certain exceptions, by contacting us at support@crosslinktax.com. Once we receive and confirm your verifiable consumer request, we will delete (and, where applicable, direct our processors to delete) your personal information from our records, unless an exception applies.

Your Right to Correct Inaccurate Personal Information.

You have the right to request that CrossLink correct certain inaccurate or incomplete personal information we have about you by contacting us at support@crosslinktax.com. Once we receive and confirm your verifiable request, we will provide a response that may include self-service tools that enable you to update your personal information, unless an exception applies.

Your Right to Opt Out of the Sale or Sharing of Personal Information for Targeted Advertising.

You have the right to direct us not to process your personal information for targeted advertising or sell your personal information to third parties. You may elect to add your name to our "Do Not Sell or Share My Personal Information" list by clicking on the "Do Not Sell or Share My Personal Information" link at the bottom of any CrossLink Site and then filling out the required form. Certain web browsers allow users to opt out of tracking by websites and online services by enabling an opt-out preference signal, such as Global Privacy Control. If you choose to enable an opt-out preference signal, you will only be opted out of online targeted advertising of sales of your Personal Information and will need to turn it on for each browser you use. For more information, see the "Cookies and Other Tracking Technologies" section above.

Your Right to Opt Out of Profiling.

We do not profile consumers in furtherance of decisions that produce legal effects or effects of similar significance.

Your Right to Appeal.

If we deny or are unable to fulfill your state privacy rights request, and you believe we denied it in error, you may appeal for reconsideration of your request by emailing us at legal@crosslinktax.com.

Request Submissions.

To exercise rights under the Applicable State Privacy Laws, please submit a consumer request to support@crosslinktax.com. If you have any questions about this process, including regarding requests we are unable to fulfill, you may contact us at the information provided in the Contact Information section. If you submit certain

requests, we may request additional information to verify your identity, which may require you to log into your account or to provide 2-3 pieces of Personal Information that we will match against our records. We will use Personal Information provided in a verifiable consumer request to verify the requestor's identity or authority to make the request. Requests may also be submitted by an agent authorized to act on your behalf. Such privacy rights requests may have to undergo our verification process, which includes verifying the identity of the agent and their authorization to make the request. An authorized agent may submit a request on your behalf using the online form linked here. These requests must:

- Provide sufficient information that allows us to reasonably verify you are the person about whom we collected Personal Information or an authorized representative.
- Describe your request with sufficient detail that allows us to properly understand, evaluate, and respond to it. We cannot respond to your request or provide you with Personal Information if we cannot verify your identity or authority to make the request and confirm the Personal Information relates to you.

Response Format.

If you have an account with us, we will deliver our written response to that account. If you do not have an account with us, we will deliver our written response using the contact information you have provided electronically.

Accessibility.

We are dedicated to ensuring our Privacy Policy is accessible to individuals with disabilities. If you use assistive technology (such as a Braille reader, screen reader, or text enlargement programs) and encounter any issues accessing the Privacy Notice, please contact us at support@crosslinktax.com. Include a description of your accessibility challenge, your preferred format for the Privacy Policy, and your contact information so we can assist you effectively.

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 legal@crosslinktax.com or 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 #350,
Orlando, FL 32826