

SUPPLEMENTAL NOTICE FOR CALIFORNIA RESIDENTS

Last Updated: January 26, 2021

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This Supplemental Privacy Notice for California Residents (this “Supplemental Notice”) supplements Efficient Tax’s Privacy Policy and applies to you if you reside in California. This Supplemental Notice is adopted to comply with the California Consumer Privacy Act of 2018 (the “CCPA”). It also addresses requirements of certain other California laws. Capitalized terms used without definition shall have the meanings ascribed to them in the Privacy Policy and other undefined terms shall have the meanings ascribed to them in the CCPA.

1. **Information We Collect.** The Site collects information that identifies, relates to, describes, references, is capable of being associated with, or could reasonably be linked to a consumer or personal device. For purposes of this Supplemental Notice, such information constitutes personal information.
 - (a) Personal Information Collected. Below are categories of personal information recognized by the CCPA along with examples (provided by the CCPA) of types of personal information in each category:
 - *Identifiers.* 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.
 - *CA Customer Records Statute categories.* Name, signature, Social Security number, physical characteristics or description, address, telephone number, passport number, driver's license or state identification card number, insurance policy number, education, employment, employment history, bank account number, credit card number, debit card number, or any other financial information, medical information, or health insurance information.
 - *Protected Class Characteristics.* Age (40 years or older), race, color, ancestry, national origin, citizenship, religion or creed, marital status, medical condition, physical or mental disability, sex (including gender, gender identity, gender expression, pregnancy or childbirth and related medical conditions), sexual orientation, veteran or military status, genetic information (including familial genetic information).
 - *Commercial Information.* Records of personal property, products or services purchased, obtained, or considered, or other purchasing or consuming histories or tendencies.
 - *Biometric Information.* Genetic, physiological, behavioral, and biological characteristics, or activity patterns used to extract a template or other identifier or identifying information, such as, fingerprints, faceprints, and voiceprints, iris or

retina scans, keystroke, gait, or other physical patterns, and sleep, health, or exercise data.

- *Internet/network activity.* Browsing history, search history, information on a consumer's interaction with a website, application, or advertisement.
 - *Geolocation data.* Physical location or movements
 - *Sensory data.* Audio, electronic, visual, thermal, olfactory, or similar information
 - *Professional/employment-related information.* Current or past job history or performance evaluations
 - *Non-public education information.* Education records directly related to a student maintained by an educational institution or party acting on its behalf, such as grades, transcripts, class lists, student schedules, student identification codes, student financial information, or student disciplinary records
 - *Inferences drawn from other personal information.* Profile reflecting a person's preferences, characteristics, psychological trends, predispositions, behavior, attitudes, intelligence, abilities, and aptitudes
- (b) Exclusions. Personal information does not include publicly available information from government records, deidentified or aggregated consumer information, and information excluded from the CCPA's scope (such as HIPAA-protected information and information protected by the Gramm-Leach Bliley Act). Personal information collected as part of a communication or transaction between Efficient Tax and a representative of a government agency or other business, where the transaction is made for providing or receiving a good or service to or from such government agency or other business or conducting due diligence in connection with the foregoing is also excluded from the scope of this Supplemental Notice except with respect to *Section 4(c)* (non-discrimination).
- (c) Sources. We obtain Personal Information from you, including from you directly when you provide Efficient Tax with the information, from you indirectly when you interact with the Site, and from you when you make electronic communications to Efficient Tax.

2. **Use of Personal Information.** Efficient Tax uses the personal information it collects in the ways described in *Section 5* of the Privacy Policy. Efficient Tax may use the personal information for commercial purposes as well as business purposes.

3. **Disclosure of Personal Information.**

- (a) Disclosure. Efficient Tax uses the personal information it collects in the ways described in *Section 6* of the Privacy Policy. Efficient Tax has shared or disclosed Personal Information within the past twelve months as described below. The following chart identifies the categories of personal information recognized by the CCPA and collected by Efficient Tax, provides examples of the types of personal information within each category collected by Efficient Tax, indicates whether Efficient Tax has collected such categories of personal information during the

past twelve months, the source of such personal information, how Efficient Tax uses such personal information, and to whom Efficient Tax has disclosed such personal information within the past twelve months:

Category of Personal Information	Source	Business Purpose	To Whom Disclosed (categories)
Identifiers	-provided directly by you -direct interaction with you -technologically gathered from you -service providers - clients -business partners	-facilitate transactions -marketing/ communications -fulfill requests -provide support -provide goods/services -fulfill contractual obligations	-service providers -carriers -business partners
CA Customer Records Statute categories	-provided directly by you -direct interaction with you -service providers -clients -business partners	-facilitate transactions -marketing/ communications -fulfill requests -provide support -provide goods/services -fulfill contractual obligations	-service providers -carriers -business partners
Protected Class Characteristics	n/a	n/a	n/a
Commercial Information	-provided directly by you -direct interaction with you -service providers -clients -business partners	-facilitate transactions -provide goods and services to clients - create benchmarking data - improve goods and services -fulfill contractual obligations	-service providers -clients -business partners
Biometric Information	n/a	n/a	n/a
Internet/network activity	-your interaction with Site	-improve Site -personalize Site -improve Site experience	-service providers -internet cookie recipients
Geolocation data	-your interaction with Site	-improve Site -personalize Site -improve Site experience	-service providers -internet cookie recipients
Sensory data	n/a	n/a	n/a
Professional/employment-related information	n/a	n/a	n/a
Non-public education information	n/a	n/a	n/a
Inferences drawn from other personal information	-clients -business partners -service providers	-providing services -marketing/ communications	-clients (return same information in reorganized form) -service providers

- (b) Sale. Efficient Tax does not sell personal information, including of minors under 18 years of age.

4. **California Rights.** The CCPA provides you with specific rights as a California resident. This section identifies those rights and how to exercise them.

- (a) Access and Data Portability. Subject to certain exceptions, you have the right to request certain information about Efficient Tax's collection, use, and/or disclosure of your personal information over the past 12 months. After receipt of a verifiable consumer request from you, Efficient Tax will disclose to you the categories of personal information collected, categories of sources for the categories of personal information collected, business or commercial purpose for collecting such personal information, categories of third parties with whom Efficient Tax shared such personal information, and specific pieces of personal information collected about you.
- (b) Deletion. Subject to certain exceptions, you may request that Efficient Tax delete Personal Information about you that it has collected and retained.
- (c) Non-Discrimination. You have the right not to receive discriminatory treatment for the exercise of your privacy rights under the CCPA.
- (d) Opt-Out. You have the right not to have your information disclosed, shared, or sold. If you are a California resident and wish to exercise this right, you may contact us by email at support@efficienttax.com or by phone at (800) 280-3962.

5. **California Request Process.**

- (a) Instructions. If you reside in California, only you or someone legally authorized to act on your behalf may make a verifiable consumer request related to your personal information. You may also make a verifiable consumer request on behalf of your minor child. You may make a verifiable consumer request for access or data portability no more than twice within a 12-month period. Such a request must provide sufficient information to allow Efficient Tax to reasonably verify that you are (or are an authorized representative of) the person about whom Efficient Tax collected the personal information, and describe your request with sufficient detail to allow Efficient Tax to properly understand, evaluate, and respond to it. Please note that Efficient Tax cannot respond to your request or provide you with information if Efficient Tax cannot verify your identity or authority to make the request and confirm the personal information relates to you. Making a verifiable consumer request does not require you to create an account with Efficient Tax. Efficient Tax will only use personal information provided in a verifiable consumer request to verify your identity or authority to make the request. If you reside in California, you may exercise your personal information rights by submitting verifiable consumer request by contact Efficient Tax by phone toll free at (800) 280-3962 or by submitting a request using any of the contact information set forth in *Section 18* below.

- (b) Verifying Requests. Efficient Tax will confirm receipt of your request within the time period prescribed by the CCPA and/or its regulations, let you know how Efficient Tax will process the request, and let you know Efficient Tax' verification process and anticipated timeframe for response. Efficient Tax may try to verify your request by asking you to provide certain information and matching it to the information Efficient Tax maintains about you. Efficient Tax will request at least two data points about you. Depending on the nature of your request, Efficient Tax may require more data points to match and/or may require you to sign a declaration confirming under penalty of perjury that you are the consumer whose personal information is the subject of the request.
- (c) Authorized Agent. If you are a California resident, you may designate an authorized agent to make requests on your behalf to exercise your personal information rights. The authorized agent must be registered with California's Secretary of State. The authorized agent making any request on your behalf to know or delete certain personal information about you must submit a copy of the written permission you granted them to act as authorized agent or a copy of the document showing you granted them a power of attorney for this purpose. If the authorized agent does not have a power of attorney in compliance with California's probate law, you must also directly verify your identity with Efficient Tax. If adequate proof is not presented, Efficient Tax may deny the request.
- (d) Response Timing and Format. Efficient Tax will try to respond to a verified consumer request within forty five (45) days of receipt, but if Efficient Tax requires more time to respond, it will let you know how long and why in writing. Efficient Tax will respond to you by mail or electronically at your option. Any disclosures Efficient Tax provides in response to your request will pertain only to the 12-month period immediately preceding receipt of the verifiable consumer request. If Efficient Tax is unable to respond to the request, Efficient Tax will explain why, if applicable. If Efficient Tax is unable to verify your identity in connection with a request for specific pieces of information about you, Efficient Tax will let you know (but will not disclose the specific pieces of information) and will evaluate the request as though it were a request for categories of personal information disclosed to third parties during the past 12 months. If Efficient Tax denies a request due to conflict with federal or state law or an exception to the CCPA, Efficient Tax will explain the basis for the denial. If Efficient Tax cannot verify your identity in connection with a request to disclose categories of information disclosed to third parties, Efficient Tax will let you know, and will provide you information about its general business practices regarding collection, maintenance, and sale of personal information. If Efficient Tax cannot verify the identity of an individual requesting deletion of personal data, Efficient Tax will deny your request and will treat the request as a request to opt-out of sale. Efficient Tax has no obligation to provide you with specific personal information if such disclosure creates a substantial, articulable, and unreasonable risk to security. For any data portability requests, Efficient Tax will provide your personal information in the following format: by pdf. Unless your request is excessive, repetitive, or manifestly unfounded, Efficient Tax will not charge a fee

to process or respond to your request. If Efficient Tax determines that a fee is warranted, Efficient Tax will explain why it reached that decision and provide you with a cost estimate before responding.

6. **Changes to Privacy Policy.** Changes to the Supplemental Notice will be posted on this page. If Efficient Tax makes material changes to the way it treats users personal information, it may choose to notify you by email or through a notice in addition to posting. The date the Supplemental Notice was last revised appears at the top of the Supplemental Notice. You are responsible for ensuring that Efficient Tax has a current email address for you and for periodically visiting the Site and the Supplemental Notice to check for any changes.
7. **Third Party Marketing.** California Civil Code Section 1798.83 permits users of the Site who are California residents to request certain information regarding our disclosure of Personal Information to third parties for their direct marketing purposes. To make such a request, please contact Efficient Tax at the contact information set forth in *Section 8* below.
8. **Contact.** If you have any questions or comments about this Supplemental Notice and Efficient Tax's privacy practices, or if you wish to exercise your rights as a California resident, please contact Efficient Tax at: Attn: David Gottstein, 1007 West 3rd, Suite 203, Anchorage, Alaska, 99501, Ph: (800) 280-3962; email: support@efficienttax.com.