

PRIVACY POLICY

Effective Date: January 26, 2020

This Privacy Policy describes information Efficient Tax, LLC (“Efficient Tax” or “we”) may collect when you visit a website, app, tool, or portal (the “Site”) owned by Efficient Tax or make a direct inquiry to Efficient Tax through electronic means. This Privacy Policy also applies to information otherwise collected by Efficient Tax in the course of its business with you. This Privacy Policy discloses how Efficient Tax collects, stores, uses, discloses, or shares that information.

Please read this Privacy Policy carefully. IF YOU DO NOT AGREE, PLEASE DO NOT ACCESS OR USE THE SITE. By accessing or using the Site, or by clicking “I agree,” you agree to this Privacy Policy. This Privacy Policy may change from time to time. Efficient Tax will post the modified version at this link. Your continued use of the Site after the Privacy Policy is modified is deemed to be acceptance of those modifications.

1. Scope.

- (a) This Privacy Policy applies to information collected when you use the Site, and in electronic communications transmitted through the Site. It also applies to information collected in the course of our business.
- (b) This Privacy Policy does not apply to information collected by third parties, including via websites that may be accessible from, link to, or are linked from this Site. This Privacy Policy does not apply to information collected by third parties, even if the Site is accessed through a third party website or app. EFFICIENT TAX IS NOT RESPONSIBLE FOR THE CONTENT OR PRIVACY PRACTICES OF ANY NON-EFFICIENT TAX WEBSITE TO WHICH THIS SITE LINKS.

2. Information We Collect. Efficient Tax collects personal information and non-personal information.

- (a) “*Non-personal Information*” is any information that does not identify you individually or does not permit a direct association with an individual. Non-personal Information may include information derived from Personal Information that has been de-personalized by removing unique identifiers and/or combining it with information about other users to form aggregated data.
- (b) “*Personal Information*” is information that is reasonably capable of being associated or could be linked, directly or indirectly, with a particular consumer or household.
- (c) Examples of information Efficient Tax collects include:
 - (i) Registration information you provide when you create an account, including your name, date of birth, mailing address, email address, company, phone number, security question and answer, username, and password;

- (ii) Transaction information, including credit card information when you subscribe through the Site;
- (iii) Information based on sales staff interactions;
- (iv) Information we obtain from a third party, such as a third party site, vendor, service provider, or other platform provider;
- (v) Location information, including location information provided by a mobile device or other device as you navigate our Site;
- (vi) Activity information about your use of the Site;
- (vii) Usage, viewing, technical, and device data when you visit the Site or interact with communications from our Site.

3. **How We Collect.** Efficient Tax collects information from and about you directly when you provide such information to Efficient Tax and automatically when you use the Site.

(a) Information You Provide. Efficient Tax collects information you provide when you register for an account or otherwise provide information through the Site. When you complete a transaction through the Site, you voluntarily provide certain Personal Information, which is processed by a third party website, and Efficient Tax receives the information provided through that third party website. If you voluntarily provide your Personal Information to us, we collect it. You choose whether to disclose Personal Information, but you may not be able to use the Site or conduct certain transactions without doing so.

(b) Information Collected Automatically. When you visit or otherwise use the Site, Efficient Tax collects details about your access and use of the Site automatically through cookies and other technology, including details about your device, internet connection, operating system, browser type, browsing actions, and the resources that you access and use on the Site, other traffic data, and, location data. The information Efficient Tax collects automatically may include personal information or Efficient Tax may associate it with personal information it collects in other ways or receives from third parties. If Efficient Tax associates such data with personal information, Efficient Tax will treat it as personal information, but if such data is not associated with other personal information, Efficient Tax will treat it as non-personal information.

4. **Cookies and Related Technology.** Efficient Tax may use the following technologies to collect data as you visit the Site. To learn more about Efficient Tax's use of cookies and your choices, please see Efficient Tax's [Cookie Policy](#).

(a) "Cookies" are small pieces of data that a website, when visited by a user, asks your browser to store on your device in order to remember information about you, such as your language preference or login information. Cookies can be either persistent or temporary. A persistent cookie retains user preferences for a particular website,

allowing those preferences to be used in future sessions and remains valid until its set expiry date (unless deleted by the user before the expiry date). Temporary cookies expire at the end of a user session when the browser is closed.

Most internet browsers are initially set to accept cookies. Cookies are classified in the following categories: Necessary Cookies, Performance Cookies, Functional Cookies, and Targeting Cookies. You cannot opt-out of Necessary Cookies, but you can opt out of the other cookie categories by clicking on the “cookie settings” button in your browser, in this policy, or in the applicable website cookie notice. If you decline the use of cookies or set your browser to refuse cookies, then you may not be able to access or use portions of this Site.

- (b) “Web beacons” are small bits of code embedded in web pages or emails that assist in delivering cookies. Web beacons help Efficient Tax determine whether a page on this Site has been viewed and, if so, how many times. Efficient Tax may also use web beacons in email messages to determine what the recipient has done with the message. Although you cannot decline to receive web beacons when visiting a web page, you can choose not to receive web beacons by email if you disable HTML images or refuse HTML email messages.

5. **How We Use.** Efficient Tax uses information that you provide and/or that Efficient Tax collects to present the Site to you, improve the Site, deliver more personalized services to you, to provide you with information, products, and/or services that you request from Efficient Tax, to market Efficient Tax’s products or services to you, to fulfill any other purpose for which you provide such information, to provide you with information you requested, in any other way Efficient Tax may describe when you provide the information, and for any other purpose with your consent. The way Efficient Tax uses such information is described in more detail in the chart below. Efficient Tax may aggregate the information you provide or that Efficient Tax collects from you with information collected from other users to allow Efficient Tax to evaluate its products and services. Efficient Tax may use the information it collects to contact you about Efficient Tax’s products and services that may interest you; and, if required by law, we will obtain your approval to do so. If you do not want Efficient Tax to use your information this way, please see *Section 7* below.

WHY EFFICIENT TAX PROCESSES YOUR INFORMATION	LEGAL BASIS FOR THE PROCESSING PURPOSE
To respond to your request, to provide you with your payment for completion of a sale, to complete your transaction, to fulfill the purpose for which you provide the information.	<ul style="list-style-type: none"> ○ Performance of a contract ○ Your consent
To personalize and improve your experience with the Site	<ul style="list-style-type: none"> ○ Legitimate interest
To ensure technical functionality and proper operation of the Site	<ul style="list-style-type: none"> ○ Legitimate interest

To improve our products and develop new products and services	<input type="radio"/> Legitimate interest
To communicate with you for services-related purposes, such as regarding support issues and customer service inquiries	<input type="radio"/> Performance of a contract <input type="radio"/> Legitimate interest <input type="radio"/> Consent
To communicate with you, for the following purposes: to respond to a request, marketing, research, or other promotional purposes, via email, notifications or other messages, consistent with any permissions you may have communicated to us	<input type="radio"/> Consent <input type="radio"/> Legitimate Interest
To comply with our legal obligations	<input type="radio"/> Legitimate Interest
To carry out our obligations and enforce our rights	<input type="radio"/> Legitimate Interest <input type="radio"/> Contract
In any other way described when the information is collected	<input type="radio"/> Legitimate interest <input type="radio"/> Consent

6. To Whom We Disclose.

- (a) **General.** Efficient Tax may disclose aggregated information about its users and information that does not identify any individual without restriction. Efficient Tax may disclose personal information that it collects or you provide as described in this Privacy Policy to Efficient Tax’s business partners, affiliates, contractors, distributors, or service providers as well as to other third parties Efficient Tax uses to support its business; to a purchaser or successor in the event of a merger, divestiture, restructuring, reorganization, dissolution, or other sale or transfer of some or all of Efficient Tax’s assets; to fulfill the purpose for which you provided the personal information; for any other purpose when you consent to such disclosure at the time you provide the information. Efficient Tax may also disclose your personal information to comply with any court order, law, or legal process, including to respond to any government or regulatory request, to enforce Efficient Tax’s terms of use and other agreements, and if Efficient Tax believes disclosure is necessary or appropriate to protect the rights, property, or safety of Efficient Tax, its customers, or others.
- (b) **Disclosure for Third Party Direct Marketing.** Efficient Tax does not share personal information it receives or collects from you with its business partners for their direct marketing purposes (to market their own goods or services directly to you). Efficient Tax will not do so in the future unless you have first consented and then only unless or until you withdraw your consent.

- (c) Google Analytics. The Site uses Google Analytics. Google Analytics assists Efficient Tax with collecting and monitoring data about traffic to the Site. Google Analytics collects visitation information via Google advertising cookies and identifiers. You can learn how Google collects and processes data by visiting the following website: www.google.com/policies/privacy/partners/. If you would like to opt-out of the collection of data by Google Analytics, visit <https://tools.google.com/dlpage/gaoptout/>. For information about how to opt out of Google Marketing Platform's use of cookies, visit <https://optout.networkadvertising.org/?c=1>. For more information about targeting and advertising cookies and how to opt out of those, visit optout.aboutads.info. This Site also uses Google Analytics Advertising, including Google Demographics and Interest Reporting, Google Display and Search Remarketing, and Google Display Impression Reporting. Google Analytics Remarketing uses cookies to track users who visit the Site and display ads when users are on other websites. If you would like opt-out of the Google Analytics Advertising Features, you can adjust your Ad Settings and Ad Settings for mobile apps. For information on how to adjust your Ad Settings, visit the following website: <https://support.google.com/accounts/answer/2662856?co=GENIE.Platform%3DAndroid&hl=en>. For more information about Google Analytics' currently available opt-outs, visit the following website: <https://tools.google.com/dlpage/gaoptout/>. For more information about how Google uses, stores, and discloses your personal information, visit Google's Privacy Policy: <https://policies.google.com/privacy>.

7. **Your Choices.** You have some choices about how personal information you provide to us or that we collect is used.

- (a) Do Not Track. Efficient Tax's Site does not respond to web browser Do Not Track (DNT) signals.
- (b) Tracking Technologies. You may set your browser to refuse some or all browser cookies, or to alert you when cookies are being sent. To learn how to manage Flash cookie settings, visit the Flash player settings page on Adobe's website. If you disable or refuse cookies, please note that parts of the Site may not be accessible or may not function properly.
- (c) Updating Information. You may contact Efficient Tax at the contact information set forth below to request access to, correct, or delete certain personal information that you have provided to Efficient Tax. Efficient Tax may not accommodate a request to change information if Efficient Tax believes the change would violate any law or legal requirement or cause the information to be incorrect.
- (d) California Residents. You may see the Supplemental Notice applicable to California residents [here](#).

8. **For Residents of EEA.** If you reside in the European Economic Area (the "EEA"), the following provisions apply to you:

- (a) Access. You may request access to your personal information and the following information regarding our use of it: (i) purpose of the use, (ii) categories of personal information used, and (iii) to whom we have disclosed your personal information.
- (b) Correction. You may request that Efficient Tax correct any inaccurate personal information we have.
- (c) Right to Be Forgotten. You may request that Efficient Tax erase your personal information when Efficient Tax no longer needs such data.
- (d) Withdraw Consent. If Efficient Tax's ability to use your personal information depends on consent you have given, you may withdraw such consent.
- (e) Restriction. You may request that Efficient Tax restrict (or suspend) use of your personal information.
- (f) Object. You may object to Efficient Tax's use of your personal information to perform services you have not requested.
- (g) Copies and Portability. You may request copies of your personal information that Efficient Tax possesses in a structured, commonly used, and machine readable format and you may request that this be transmitted to another controller.
- (h) Complaint. You may lodge a complaint with the supervising authority of your country.

9. **Data Transfer**. Efficient Tax stores your personal information in the United States. The privacy protections in the United States may not be the same as in your home country. If you are located in a country outside the United States and submit personal information to Efficient Tax, you consent to the general use and disclosure of such information as provided in this Privacy Policy and to the transfer and/or storage of that information to the United States

10. **Data Retention and Security**.

- (a) Data Retention. Efficient Tax may store your personal information as long as you use Efficient Tax's services and/or request Efficient Tax's products in order to provide you with such goods and services and for a legitimate business purposes. Efficient Tax may store your personal information to the extent required to comply with Efficient Tax's legal, accounting, and/or reporting requirements and to provide information about Efficient Tax's products or services that you may request. Additionally, Efficient Tax may continue to store your personal information contained in standard backups. Upon your request, Efficient Tax will delete or de-identify your personal information unless Efficient Tax is legally required or allowed to maintain such personal information.
- (b) Data Security. Efficient Tax has implemented some measures designed to secure your personal information from accidental loss and from unauthorized access, use,

alteration, and disclosure. Unfortunately, the transmission of information via the internet is not completely secure. Efficient Tax cannot guarantee the security of your personal information transmitted to or through the Site. Any transmission of personal information is at your own risk. Efficient Tax is not responsible for circumvention of any privacy settings or security measures contained in the Site.

11. **Changes to Privacy Policy.** Changes to the Privacy Policy 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 Privacy Policy was last revised appears at the top of the Privacy Policy. You are responsible for ensuring Efficient Tax has a current email address for you and for periodically visiting the Site and the Privacy Policy to check for any changes.
12. **Children.** The Site is not for children. Efficient Tax does not knowingly collect personal information from children under the age of 18 through the Site. If Efficient Tax learns that it has collected or received such information, it will delete that information. If you believe we might have information from or about a child under the age of 18, please let us know by contacting us using the information set forth in *Section 15*.
13. **Nevada Residents.** Under Nevada law, Nevada residents may submit a request directing us not to make certain disclosures of personal information we maintain about them. If you are a Nevada resident and wish to exercise this right, you may contact us by email at support@efficienttax.com or by phone at (800) 280-3962.
14. **Third Party Access.** If you are accessing the Site through a third party website or platform, that third party's privacy policy may apply.
15. **Contact Information.** If you have any questions or comments about this Privacy Policy and Efficient Tax's privacy practices, please contact Efficient Tax at:

Efficient Tax, LLC
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