



# Privacy Policy

Taxly, LLC and its affiliates (collectively, “our,” “us,” or “we”) operate websites, and provides products and services through mobile and other applications. We refer to these as “site(s),” “service(s),” or “our sites and services.” This privacy policy applies to our sites and services on which we display or post a direct link to this privacy policy.

This privacy policy applies to all users of our sites and services and covers what information we collect and why we collect it, how we use the information we collect, and the choices you have to access and update that information. Please familiarize yourself with our practices and let us know if you have any questions.

By using our sites and services, you expressly consent to our collection, use, disclosure, and retention of your personal information as described in this privacy policy. Each time you use our sites and services, the current version of this privacy policy will apply. If you do not agree to this privacy policy, please do not use our sites or services.

## **Section 1. Personal Information that You Provide to Us**

Personal information is information that can be used to identify, locate, or contact an individual, and includes other information that may be associated with personal information. When you interact with our sites and services, depending on the site or service, we may collect the following personal information directly from you:

- a) *Account or Registration Information* where needed to use our sites and services, and may include your name, address, email address, telephone number, birthday, user account name, and password;
- b) *Contact Information*, which generally includes your name, addresses, email addresses, social media website user account names, or telephone numbers;
- c) *Payment Information* where needed to process payments and generally includes your credit or debit card number, expiration date, and card verification number;
- d) *Personal Profile or Service Information*, which may include areas of interest, information from social media interactions (such as Facebook, Twitter, or Google+), preferences, physical characteristics (such as height, weight), photographs, and biographical, health information or demographic information (such as gender);
- e) *Transaction Information*, which may include information about how you interact with and use our sites and services, email, other communications, and applications, and how you interact with merchants, business partners, and service providers;
- f) *Geographic Location Information*, but only if your device transmits location data or your IP address and you have activated a location-enabled site or service;
- g) *Survey Data* where needed for the functionality of certain services and generally includes survey questions and responses, and may allow you to import email addresses and names in order to send surveys or to allow us to send surveys on your behalf;
- h) *Appointment Information*, where needed to schedule an appointment or consultation through our online appointment or consultation services and may include the requested

appointment information, which may be linked with health or legal information that you choose to provide to us;

- i) *Access to Your Data*, but only if you use certain services, interactive tools, or authorize us to retrieve information from another database, user, or other third-party on your behalf, such as integrating a practice management system with your services; and
- j) *Your Submissions*, which generally includes information you voluntarily provide through free form text boxes, forums, document upload, or data retrieval or import;

In each of the above instances, you will know what personal information we collect through our sites and services because you voluntarily and directly provide it to us.

## **Section 2. Other Information We Automatically Collect through Cookies and Other Technologies**

We or our third-party service providers may collect and store certain technical information when you use our sites and services. For example, our third-party service provider may receive and automatically collect information about your computer and browser, including, for instance, your IP address, browser type, domain name from which you accessed the site or service, device size and other software or hardware information. If you access our sites and services from a mobile or other device, we may collect a unique device identifier assigned to that device (UDID), type of device, general GPS location, or other transactional information for that device in order to serve content to it and to improve your experience in using the sites or services.

In addition, we or our third-party service providers may collect information about how you use of our sites, including but not limited to, the date and time you visit the sites, the areas or pages of the sites that you visit, the amount of time you spend viewing the sites, the number of times you return to the sites, visits to sites outside our network, preferred language, and other click-stream data.

### **2.1. Cookies**

We or our third-party service providers may use cookies and other tracking technologies (including browser cookies, pixels, beacons, mobile application identifiers, and Adobe Flash technology) to help us recognize you across different sites and services, improve your experience, increase security, and measure use and effectiveness of our services. You can control cookies through your browser settings and other tools. For more information about our use of cookies, please read our Cookie Policy.

By visiting our sites and services, you consent to the placement of cookies and beacons in your browser and HTML-based emails in accordance with this privacy policy and our Cookie Policy.

## **Section 3. Our Legal Bases for Processing**

We will only collect and process personal information, including sharing it with third-parties, where we have a legal basis for such collection and processing. We rely on several legal bases, including:

- a) Our legitimate interests in providing and improving our sites and services;
- b) Our legitimate interests in keeping our sites and services safe and secure;
- c) Our third-party service providers' legitimate interests as described in "Other Information We Automatically Collect Through Cookies and Other Technologies" above;
- d) Your consent to the processing of your personal information, which you can revoke at any time;
- e) Where the processing of personal information is necessary for the performance of a contract to which you are a party to, such as our Terms of Use, Service Agreement, and License Agreement;
- f) Where the processing of your personal information is required to protect your vital interests or those of another person, such as other users of our sites and services; and
- g) Where the processing of personal information is necessary to comply with a legal obligation such as a law, regulation, search warrant, subpoena, or court order.

## **Section 4. How We Use Personal Information**

### **4.1. Personal Information that You Provide to Us**

We may use the personal information that you provide in one or more of the following ways:

- a) To carry out our obligations arising from your purchase of, or subscription to, our services or any other contract entered into between you and us;
- b) To enable site features such as geographically specific pricing or logging, and retrieving and providing analysis of data;
- c) To send you important notices, such as communications about changes to your account, and our sites' and services' terms, conditions, or policies;
- d) To process payments and to send you emails, invoices, receipts, notices of delinquency, alerting you if we need different or updated payment card information or other communications in connection with processing and collecting payments;
- e) To solicit input and feedback to improve our sites and services and customize your user experience;
- f) To enable you to communicate with other site or service users via private messaging or other service specific communication channels;
- g) To contact you via email, telephone, text or chat in a manner required by law;
- h) To meet contractual obligations;
- i) To send you reminders, technical notices, updates, security alerts, support and administrative messages, and service bulletins;
- j) To inform you about new products or promotional offers, or other opportunities which we feel will be of interest to you, and to provide advertisements to you through our sites, email messages, text messages, applications, or other methods of communication;
- k) To manage our sites' and services' administration, forum management, or fulfillment;
- l) To provide customer service and technical support;
- m) To administer surveys, sweepstakes, giveaways, contests, or similar promotions or events sponsored by us or our partners;

- n) To prevent fraud or potentially illegal activities, enforce our sites' Terms of Use, or to comply with applicable law;
- o) For internal purposes such as auditing, data analysis, and research to improve our products, services, and communications;
- p) To allow you to apply for a job or sign-up for special offers from third-parties through our sites and services;
- q) To help you contact or schedule an appointment with a legal professional listed in one of our directories and to remind you of upcoming or follow-up appointments;
- r) To perform services in conjunction with interactive tools, such as integrating practice management systems, or making a referral; and
- s) To run (or authorize third-parties to run) statistical research on individual or aggregate trends.

In addition to the uses described above, we may use personal information that we collect for other purposes that are disclosed to you at the time we collect the information, or with your consent.

#### **4.2. Other Information We Automatically Collect Through Cookies and Other Technologies**

We may use information collected from you through cookies and other tracking technologies in one or more of the following ways:

- a) To remember you when you return to our sites;
- b) To understand and analyze trends, to monitor usage, and learn about user behavior;
- c) To gather demographic information about our user base as a whole;
- d) To customize ads, content, or offers on our sites and services; and
- e) To conduct market research and measurement in order to improve our sites, content, and services and to make our sites, content, and services more useful for users.

#### **Section 5. Sharing Personal and Non-Personal Information**

We may share your personal information with third parties in the following circumstances:

- a) When we engage third-parties to perform services on our behalf, such services include maintenance, hosting, data storage, security, analytics and data analysis, payment processing, marketing, email and text message distribution, customer service, and surveys and sweepstakes;
- b) When you communicate with us by email, submit an online form through our sites and services, request a quote or information, purchase a product or service, or otherwise submit a request through our sites and services, the personal information you provide may be shared with third-parties to process or respond to your request, provide you with the products or services you requested, or complete a transaction, including a third-party broker, aggregator, or other referral service to share or sell your information to a lender, dealer, or other financial institution in connection with your online request.

- c) When you schedule an appointment with a legal professional, we may share your contact data with such legal professional;
- d) Where necessary to operate our sites and services, your personal information and the contents of all of your online communications on or through our sites and services may be accessed and monitored:
  - i. To satisfy any applicable laws or regulations,
  - ii. To defend ourselves in litigation or a regulatory action,
  - iii. In order to protect the rights or property of Taxly, LLC and any of our subsidiaries and corporate affiliates, including to enforce our sites' or services' Terms of Use.
  - iv. When we have a good-faith belief that we are required to disclose the information in response to legal process (e.g., a subpoena, court order, or search warrant),
  - v. Where we believe our sites and services are being used in the commission of a crime, including to report such criminal activity or to exchange information with other companies and organizations for the purposes of fraud protection and risk management, and
  - vi. When we have a good-faith belief that there is an emergency that poses a threat to the health or safety of you, another person, or the public generally;
- e) In the event of a merger, acquisition, debt financing, restructure, sale of Taxly, LLC's assets by or with another company, or a similar corporate transaction, we may need to disclose and transfer all information about you, including personal information, to the successor company;
- f) We may share information about you with Taxly, LLC's subsidiaries and affiliates and companies acquired by or merged with Taxly, LLC and its affiliates, including without limitation, to enable such acquired or merged companies to advertise to you products and services in which you may be interested; or
- g) When you register to use a service co-branded by Taxly, LLC and other companies with which we partner, we may share the personal information you provide with such companies; in this instance, both our privacy policy and the partner's privacy policy will apply;

We may share personal information about you for any other purpose(s) disclosed to you at the time we collect your information or with your consent.

Non-personal information may be shared with our partners who referred you to our site(s) and who may use the data for their market research and measurement purpose. User information may also be shared with our partners who help us deliver ads to you on websites not controlled by us; for instance, when we put a pixel on a conversion page on our site and a marketing partner uses that pixel to optimize the traffic that they send to us.

## **Section 6. User Generated Content, Online Communities and Forums, Profiles, Surveys, Reviews and Ratings**

You may choose to publicly disclose personal information about yourself and others in the course of (i) contributing user-generated content (for instance articles, blogs, surveys, reviews, ratings, or podcasts), (ii) communicating with others in our online forums, communities, or chat

rooms, (iii) creating user profiles for public view, or (iv) posting images, photos, or videos. Be aware, information that you voluntarily disclose in any of these areas of our sites or services is unencrypted, public information and, therefore, there can be no expectation of privacy or confidentiality, except if the terms of use of the site or service specifically limit use of the content (for example, we may let you know how such survey and rating responses will be used and if anonymity is an option). Any personal information you submit in the course of interacting in these public activities can be read, collected, or used by other users. Prior to posting in these areas, we encourage you to read the specific site's or service's terms of use, as we are not responsible for the personal information you choose to make public in any of these areas and strongly recommend against sharing any personal health or other sensitive information that could directly or indirectly be traced to any individual, including yourself.

### **Section 7. Accessing and Updating Personal Information**

We encourage you to keep your personal information up-to-date and accurate. The methods for accessing, viewing, correcting, and deleting your personal information will depend on which sites or services you use and their features. For instance:

- a) To view and change the personal information that you directly provided to us, you can return to the web page on our site where you originally submitted the data and follow the instructions on that web page;
- b) To correct or update your account information, you can log into the site or service where you are registered and navigate to your account;
- c) To close your account, you can log into the site or service where you are registered and navigate to your account; or
- d) To change your email preferences, you can visit the email preferences page for the relevant site or follow the opt-out or unsubscribe instructions included in each email (for more information about email preferences, please see "Email and Other Communications" below).

You can also manage certain aspects of information collection and use, including disabling geo-location, by going to the settings of your mobile device and reviewing the permissions of each application.

Protecting your privacy and security is important and we also take reasonable steps to verify your identity before granting access to your data.

Please be aware that certain records and information will be retained for specific purposes such as legal, payment, accounting, technical, dispute resolution, enforcement of our sites' and services' Terms of Use, or customer service. If you have posted comments or user generated content on our site, we may not be able to delete it. Further, we take no responsibility for removing or editing any of your public activities or any submissions or content that is a result of your public activities. We may reject requests that are unreasonably repetitive or impractical, require disproportionate technical effort, or risk the privacy of others.

## **Section 8. Storing Personal Information**

We retain your personal information while your account is active or as needed to provide you services. Additionally, we may retain personal information even after your account has been closed if retention is reasonably necessary to comply with our legal or regulatory obligations, resolve disputes, prevent fraud and abuse, enforce our Terms of Use or any other contract entered into between you and us, or if it is not technically feasible to delete your personal information.

## **Section 9. Email and Other Communications**

Our sites and services may allow us or other users to communicate with you or other users through our in-product instant messaging services, service-branded emails, SMS, and other electronic communication channels.

### **9.1. Opting Out of Requested Communications**

Requested communications include, for instance, email newsletters and software updates that may be expressly requested by you or which you consented to receive. After you request such communications, you may “opt-out” of receiving them by using one of the following methods:

- a) Selecting the email “opt-out” or “unsubscribe” link, or following the opt-out instructions included in each email communication; or
- b) returning to the web page(s) where you originally registered your preferences and following the opt-out instructions.

### **9.2. Opting Out of Transactional or Relationship Communications**

Communications that are sent by or on behalf of a user are indicated as being from that user. Communications that are sent by us are indicated as being from us or one of our account or support specialists. Either type of communication may be “real time” communications or communications triggered automatically upon the occurrence of certain events or dates, such as appointment reminders. Email communications received from users and our administrative announcements are often transactional or relationship messages, such as appointment requests, reminders, and cancellations. You may not be able to opt-out of receiving certain email messages, although our services may provide a means to modify the frequency of receiving them.

### **9.3. Opting Out of General or Promotional Communications**

General communications provide information about products, services, or support and may include special offers, new product information, or invitations to participate in market research. You may opt-out of receiving these general communications by selecting the email “opt-out” or “unsubscribe” link, or by following the opt-out instructions included in each email communication.

## **Section 10. Protecting Personal Information**

Our company is hosted on the Wix.com platform, a third-party service provider. Wix.com provides us with the online platform that allows us to offer or sell our products and services to you. Your data may be stored through Wix.com's data storage, databases and the general Wix.com applications. They store your data on secure servers behind a firewall. See [Wix.com's Privacy Policy](#) for more information.

All direct payment gateways offered by Wix.com and used by our company adhere to the standards set by PCI-DSS as managed by the PCI Security Standards Council, which is a joint effort of brands like Visa, MasterCard, American Express and Discover. PCI-DSS requirements help ensure the secure handling of credit card information by our store and its service providers.

It is important to remember, however, that no system can guarantee 100% security at all times. Accordingly, we cannot guarantee the security of information stored on or transmitted to or from our services. We cannot assume responsibility or liability for unauthorized access to our servers and systems. When disclosing any personal information, you should remain mindful of the fact that it is potentially accessible to the public and, consequently, can be collected and used by others without your consent. Thus, you should carefully consider if you want to submit sensitive information that you would not want disclosed to the public and should recognize that **your use of the Internet and our sites and services is solely at your risk**. You are ultimately responsible for maintaining the secrecy for all your personal information.

## **Section 11. Linked Websites and Services**

Our sites and services may link to other sites or services operated by our affiliates or third-parties, and may carry advertisements or offer content, functionality, newsletters, contests or sweepstakes, or applications developed and maintained by third-parties. We do not exercise control over third-party sites or services. We are not responsible for the privacy practices of any such third-parties. Once you leave our sites or services via a link, enable a third-party service, or click an advertisement, you should check the applicable privacy policy of the third-party's site or service. The fact that we link to a website or present a banner ad or other type of advertisement is not an endorsement, authorization, or representation of our affiliation with that third party nor is it an endorsement of their privacy or information security policies or practices.

We may also provide social media features on our sites and services that enable you to share personal information with your social network(s) and to interact with our sites and services. Depending on the features, your use of these features may result in the collection or sharing of personal information about you. We encourage you to review the privacy policies and settings on the social media site(s) with which you interact.

## **Section 12. International Users**

We are headquartered in the United States. Our sites and services are intended for users in the United States and hosted and administrated in the United States or hosted with cloud service providers who are headquartered in the United States and in other countries. If you are located



outside the United States, be aware that information you provide to us or that we obtain as a result of your use of our sites and services may be processed in, transferred to, and stored in the United States and in any other countries from where our cloud service providers operate. Please be aware that the privacy laws and standards in certain countries may differ from those that apply in the country in which you reside. By using our sites and services or providing us with your information, you consent to the transfer of your information for processing and storage to the United States and any other country from where our cloud service providers operate.

### **Section 13. Contacting Us**

If you have any questions or concerns about this privacy policy or our practices you can contact us by email at [support@taxly.org](mailto:support@taxly.org) or write to us at Taxly, LLC, ATTN: Privacy Office, 2721 Pinebrook Road, Hyattsville, Maryland 20785. Please be sure to identify the specific website, software, or service about which you have a question or concern and how we can contact you.

### **Section 14. Changes to This Privacy Policy**

We may revise this privacy policy from time to time and, if we do, we will update it on this page and modify the “Last Updated” date. If our information practices change in a significant way, you will be provided notice by means of notice on our sites or otherwise in writing. Because our privacy policy can change at any time, we encourage you to reread it periodically to see if there have been any changes that affect you. If you disagree with any changes to this privacy policy and do not wish your information to be subject to the revised privacy policy, you will need to deactivate your account or terminate your services. Your use of our sites and services following any such change constitutes your agreement that all information collected from or about you through our sites and services after the revised privacy policy is posted will be subject to the terms of the revised privacy policy.

**Last Updated: January 6, 2021**