

## **Privacy Policy**

Updated: April 14, 2023

Thank you for visiting our website. Our mission is to create a web based experience that makes it easier for us to work together. Here we describe how we collect, use, and handle your personal information when you use our websites, software, and services ("Services").

### **Types of Data We Collect & Why**

We collect and use the following information to provide, improve, and protect our Services:

- **Account information.** We collect, and associate with your account, the information you provide to us when you do things such as sign up for your account, opt-in to our client newsletter or request an appointment (like your name, email address, phone number, and physical address). Some of our Services let you access your accounts and your information via other service providers.
- **Your Stuff.** Our Services are designed to make it simple for you to store your files, documents, comments, messages, and so on ("Your Stuff"), collaborate with others, and work across multiple devices. To make that possible, we store, process, and transmit Your Stuff as well as information related to it. This related information includes your profile information that makes it easier to collaborate and share Your Stuff with others, as well as things like the size of the file, the time it was uploaded, collaborators, and usage activity. Our Services provide you with different options for sharing Your Stuff.
- **Contacts.** You may choose to give us access to your contacts (spouse or other company staff) to make it easy for you to do things like share and collaborate on Your Stuff, send messages, and invite others to use the Services. If you do, we'll store those contacts on our servers for you to use.
- **Usage information.** We collect information related to how you use the Services, including actions you take in your account (like sharing, viewing, and moving files or folders). We use this information to improve our Services, develop new services and features, and protect our users.
- **Device information.** We also collect information from and about the devices you use to access the Services. This includes things like IP addresses, the type of browser and device you use, the web page you visited before coming to our sites, and identifiers associated with your devices. Your devices (depending on their settings) may also transmit location information to the Services.
- **Cookies and other technologies.** We use technologies like cookies to provide, improve, protect, and promote our Services. For example, cookies help us with things like remembering your username for your next visit, understanding how you are interacting with our Services, and improving them based on that information. You can set your browser to not accept cookies, but this may limit your ability to use the Services.
- **Marketing.** We give users the option to use some of our Services free of charge. These free Services are made possible by the fact that some users upgrade to one of our paid

Services. If you register for our free Services, we will, from time to time, send you information about the firm or tax and accounting tips when permissible. Users who receive these marketing materials can opt out at any time. If you do not want to receive marketing materials from us, simply click the 'unsubscribe' link in any email.

- Basis for processing your data. We collect and use the personal data described above in order to provide you with the Services in a reliable and secure manner. We also collect and use personal data for our legitimate business needs. To the extent we process your personal data for other purposes, we ask for your consent in advance or require that our partners obtain such consent.

### Who is your data shared with?

We may share information as discussed below, but we won't sell it to advertisers or other third parties.

- Others working for and with Us. We use certain trusted third parties (for example, providers of customer support, eSign and IT services) to help us provide, improve, protect, and promote our Services. These third parties will access your information only to perform tasks on our behalf in compliance with this Privacy Policy, and we'll remain responsible for their handling of your information per our instructions. For a list of trusted third parties that we use to process your personal information, please see our third party vendors below.
- Other users. Our Services display information like your name, profile picture, device, and email address to other users in places like your user profile and sharing notifications. You can also share Your Stuff with other users if you choose. When you register your account with an email address on a domain owned by your employer or organization, we may help collaborators and administrators find you and your team by making some of your basic information—like your name, team name, profile picture, and email address—visible to other users on the same domain. This helps you sync up with teams you can join and helps other users share files and folders with you. Certain features let you make additional information available to others.
- Team Admins. If you are a user of a team, your administrator may have the ability to access and control your team account. Please refer to your organization's internal policies if you have questions about this. If you are not a team user but interact with a team user (by, for example, joining a shared folder or accessing stuff shared by that user), members of that organization may be able to view the name, email address, profile picture, and IP address that was associated with your account at the time of that interaction.
- Law & Order and the Public Interest. We may disclose your information to third parties if we determine that such disclosure is reasonably necessary to: (a) comply with any applicable law, regulation, legal process, or appropriate government request; (b) protect any person from death or serious bodily injury; (c) prevent fraud or abuse of our platform or our users; (d) protect our rights, property, safety, or interest; or (e) perform a task carried out in the public interest. Stewardship of your data is critical to us and a

responsibility that we embrace. We believe that your data should receive the same legal protections regardless of whether it's stored on our Services or on your home computer's hard drive. We'll abide by Government Request Policies when receiving, scrutinizing, and responding to government requests (including national security requests) for your data: be transparent; fight blanket requests; protect all users; and provide trusted services.

#### How is your data used and handled?

- Security. We have a team dedicated to keeping your information secure and testing for vulnerabilities. We also continue to work on features to keep your information safe in addition to things like blocking repeated login attempts, encryption of files at rest, and alerts when new devices and apps are linked to your account. We deploy automated technologies to detect abusive behavior and content that may harm our Services, you, or other users.
- User Controls. You can access, amend, download, and delete your personal information by logging into your account.
- Retention. When you sign up for an account with us, we'll retain information you store on our Services for as long as your account is in existence or as long as we need it to provide you the Services. If you delete your account, we will initiate deletion of this information after 30 days. But please note: (1) there might be some latency in deleting this information from our servers and back-up storage; and (2) we may retain this information if necessary to comply with our legal obligations, resolve disputes, or enforce our agreements.

#### Where is your data used?

- Around the world. To provide you with the Services, we may store, process, and transmit information in the United States and locations around the world—including those outside your country. Information may also be stored locally on the devices you use to access the Services.
- EU-U.S. Privacy Shield and Swiss-U.S. Privacy Shield. When transferring data from the European Union, the European Economic Area, and Switzerland, We rely upon a variety of legal mechanisms, including contracts with our customers and affiliates. We comply with the EU-U.S. and Swiss-U.S. Privacy Shield Frameworks as set forth by the U.S. Department of Commerce regarding the collection, use, and retention of personal information transferred from the European Union, the European Economic Area, and Switzerland to the United States.
- We are subject to oversight by the U.S. Federal Trade Commission. JAMS is the US-based independent organization responsible for reviewing and resolving complaints about our Privacy Shield compliance—free of charge to you. We ask that you first submit any such complaints directly to us via [contact@anomalycpa.com](mailto:contact@anomalycpa.com). If you aren't satisfied with our response, please contact JAMS at <https://www.jamsadr.com/eu-us-privacy-shield>. In the event your concern still isn't

addressed by JAMS, you may be entitled to a binding arbitration under Privacy Shield and its principles.

### Changes

If we are involved in a reorganization, merger, acquisition, or sale of our assets, your information may be transferred as part of that deal.

We may revise this Privacy Policy from time to time, and will post the most current version on our website. If a revision meaningfully reduces your rights, we will notify you.

### Your Right to Control and Access Your Information

You have control over your personal information and how it is collected, used, and shared. For example, you have a right to:

- Erase or delete all or some of Your Stuff in your portal account.
- Change or correct personal data. You can manage your account and the content contained in it, as well as edit some of your personal data, through your portal account setting.
- Access and take your data. You can download a copy of Your Stuff in a machine readable format by visiting the portal.

### Contact Information

Your personal information is controlled by Anomaly. Have questions or concerns about Anomaly, our Services, and privacy? Contact our Data Protection Officer at [contact@anomalycpa.com](mailto:contact@anomalycpa.com). If they can't answer your question, you have the right to contact your local data protection supervisory authority.