

PRIVACY POLICY

Effective Date: December 1, 2020

At Pennell CPA PLC ("Pennell"), we respect our customers' privacy. This privacy policy ("Policy") applies to all Pennell activities, including, but not limited to our brands' websites, and all other websites, mobile sites, services, applications, platforms and tools where this Policy appears or is linked (collectively, our "Website"). This Policy is to inform you about how we collect, use, share, and protect personal information. Please take a minute to read this Policy so that you can better understand our Website information practices. By providing information to us (by any means, whether in correspondence, via our Website or otherwise) you consent to our use of the information you provide in accordance with this Policy. Any reference to our Website includes its e-mail, text, live chat, and other electronic messages. If you have questions about this Policy, please contact us as described below. If you are a California resident, please also see the "California Residents" section below, for further information on our collection and use of your information.

If you do not agree with this Policy or our practices, you may not use our Website. This Policy may change from time to time and your continued use of our Website constitutes your acceptance of those changes. We encourage you to review this Policy periodically.

Information Collected

We will collect and use the following personal information by which you may be personally identified: (a) contact information (including but not limited to full name, home address, phone number, email address, company, title, telephone number), (b) payment information (e.g. credit card number, expiration date, authorization number or security code, and billing address); (c) information regarding your preferences related to us or our Website; (d) usernames and/or passwords; (f) customer service information (e.g. customer service inquiries and contact us requests); and/or (g) information regarding how you became aware of our Website ("Personal Information"). Personal information also includes information about an individual's activities, such as information about his or her activity within our Website, and demographic information, gender, geographic area, and preferences, when any of this information is linked to personal information that identifies that individual.

Automated Decision Making

Additionally, when you visit our Website or interact with our related tools, widgets or plug-ins, we may collect some basic information by automated means such as cookies, web beacons and web server logs. The information we collect in this manner may include your browser type, IP address, Internet service provider's domain name, which pages you accessed on our Website, and when, unique device identifier, browser characteristics, domain and other system settings, search queries, device characteristics, operating system type, language preferences, referring URLs, actions taken on our Website, dates and times of Website visits, metadata and other information associated with other files stored on your device. Through these automated collection methods, we obtain "clickstream data," which is a log of the links and other content on which a visitor clicks while browsing a website. We may link certain data elements we have collected through automated means, such as your browser information, with other information we have obtained about you for the purposes described below, and to let us know, for example, whether you have opened an email we sent to you. While you can change your cookies settings in your browser,

please note, however, that without cookies you may not be able to use all of the features of our Website.

How Data is Used/Third Parties

We will use your Personal Information as follows:

- to provide the service or product requested;
- to manage your account;
- for the performance of a contract;
- to manage your requests;
- to present the Website and the contents to you;
- to fulfill any other purpose for which you provide it;
- to notify you about changes to the Website or any products or services we offer or provide through it;
- to collect information about your experience with our Website;
- to enable billing and shipping;
- to improve our website;
- to communicate with you to notify you of actions taken in the system, or when your attention is needed to view or complete an item;
- for the development of new products and services;
- for systems administration and troubleshooting purposes,
- to prevent and detect fraud and other unlawful activity, claims and other liabilities;
- to carry out our obligations and enforce our rights;
- to store data and backup that data, for the purposes of marketing and accounting;
- to comply with and enforce applicable legal requirements, relevant industry standards, contractual obligations and our policies;
- in any other way we may describe when you provide the information and for any other purpose with your consent.

Do Not Track

We do not track users across the web and therefore do not respond to web browser “do not track” signals.

We do not authorize third parties to collect Personal Information from visitors of the Website for third party use without the visitor’s consent.

Security Measures

We provide commercially reasonable physical, electronic, and procedural safeguards to protect your Personal Information. For example, we limit access to this information to authorized employees, service providers, and contractors who need access to perform the activities described in this Policy. While we strive to safeguard your Personal Information, we cannot guarantee the security of any information you disclose or transmit to us.

Data Retention

We will retain your Personal Information for as long as your account is active, as needed to provide you services, or as required by applicable law. If you close your account, we will retain

your Personal Information for a period where it is necessary to continue operating our business effectively, to maintain a record of your transactions for reporting purposes until this purpose no longer exists, and to retain as necessary to comply with our legal obligations, resolve disputes and enforce our agreements.

Information We Share

We do not disclose Personal Information we collect about you, except as described in this Policy.

Pennell Parties

Personal Information that you provide will be available to us and our agents, representatives, co-branding partners, and licensees (collectively, the "Pennell Parties"). By submitting Personal Information, you grant to the Pennell Parties a license to use such Personal Information for the purposes described in this section. The Pennell Parties may also use your Personal Information, alone or in combination with the information submitted by other users, to improve Website navigation or infrastructure, in internal marketing analyses or reviews, and for other administrative purposes. Additionally, unless you notify us to the contrary, any Pennell Party may use your Personal Information in the future to provide you with information on products, services, special offers and/or deals. If you do not wish to receive these types of communications or allow a Pennell Party to use your Personal Information in such a manner, please contact us in the manner identified in the "Opt-Out" section below.

We may also share information or data in a form that cannot be used to uniquely identify or contact an individual person ("non-personal information"). We may collect, use, transfer, and disclose this non-personal information for any purposes. Non-personal information that we collect may include information regarding your activities on the Website, which may be aggregated and used to help us provide more useful information to our customers and to understand which parts of the Website are of most interest.

Business Transactions

If Pennell is involved in a merger, acquisition or asset sale, your Personal Information may be transferred. We will provide notice before your Personal Information is transferred and becomes subject to a different Privacy Policy.

Third Party Providers

We may share Personal Information with service providers who perform services on our behalf ("Third Party Providers"). These Third Party Providers are permitted to use or disclose the information only as necessary to perform services on our behalf or comply with legal requirements. Examples of these service provider include entities that process credit card payments, manage and reduce our credit risk, verify information, fulfill orders, and provide web hosting, analytics and marketing services.

By submitting Personal Information, you grant to the Third-Party Providers a license to use such Personal Information for the purposes described in this section. The Third-Party Providers may also use your Personal Information, alone or in combination with the information submitted by other users, to improve Website navigation or infrastructure, in internal marketing analyses or reviews, and for other administrative purposes.

Law Enforcement and Other Legal Requirements

Further, we may release your Personal Information if we are required to do so by law or court order or if we believe in good faith that such release is necessary or appropriate to:

- protect the rights, property, or safety of our company, customers, affiliates, or others;
- comply with a legal obligation
- prevent or investigate possible wrongdoing in connection with the services
- protect against legal liability

Transfer of Your Personal Information

Your information, including Personal Information, is processed at the Pennell's operating offices and in any other places where the parties involved in the processing are located. It means that this information may be transferred to and maintained on computers located outside of your state, province, country or other governmental jurisdiction where the data protection laws may differ than those from your jurisdiction.

Your consent to this Policy followed by your submission of such information represents your agreement to that transfer.

Pennell will take all steps reasonably necessary to ensure that your data is treated securely and in accordance with this Policy and no transfer of your Personal Information will take place to an organization or a country unless there are adequate controls in place including the security of your Personal Information.

Opt Out

If you choose to opt-out from allowing the Pennell Parties to use your Personal Information in the future to provide you with special offers/marketing communications, simply click the "Opt-out" box at the time you provide Personal Information. You may also contact us directly at info@pennellcpa.com. Additionally, opt-out instructions are contained in each special offer/marketing communication sent to you. Upon receipt and processing of an opt-out request, we will, within a commercially reasonable amount of time, remove your information from any listings used to provide you with special offers/marketing communications from Pennell Parties in the future. Please note that we may occasionally contact you for administrative purposes even if you unsubscribe from our email list.

California Residents

If you are a California resident, you may have certain rights related to the Personal Information we have collected from you, which may or may not be granted based on the circumstances, but only in compliance with applicable law. These rights may include the following under the California Civil Code Sections 1798.100, 1798.105, 1798.110, 1798.115, and 1798.125:

- The right to ask us to confirm if we are processing your Personal Information.
- The right to ask for access to your Personal Information.
- The right to ask us to delete your Personal Information.
- The right to ask us to disclose the categories and specific pieces of Personal Information we have collected, the categories of sources from which the Personal Information is

collected, and the commercial purpose for collecting or selling the Personal Information, the categories of third parties with whom we share Personal Information.

- The right to ask us to help you move your Personal Information to other companies. You have a right to ask that we provide your Personal Information in an easily readable format to another company.
- The right to ask us to stop using your Personal Information.
- The right to equal service and price by prohibiting discrimination against you because you exercised their rights under the applicable law.
- The private right of action in connection with certain unauthorized access and exfiltration, theft, or disclosure of your nonencrypted or nonredacted Personal Information.

Controlling or Changing Your Information

In accordance with applicable law, you may object to any of our uses of your Personal Information described in this Policy, including our marketing activities.

You may request access to, review, change, or request the deletion of your Personal Information and preferences at any time by contacting us at info@pennellcpa.com. We will then take all reasonable efforts to correct or remove your Personal Information from our active database. We cannot delete your Personal Information except by also deleting your user account. We may not accommodate a request to change information if we believe the change would violate any law or legal requirement or cause the information to be incorrect. Further, we may deny a request in accordance with applicable law. In the event we are unable to accommodate your request we will provide you with the applicable reason.

Children

We are committed to protecting the privacy of children. Our website is not intended for use by children under the age of 13. We do not knowingly collect Personal Information from children under the age of 13. If you are under 13 do not use our Website or provide any information about yourself including, without limitation, your name, address, email address or any screen name or user name you may use. If we learn that we have collected or received Personal Information from a child under 13 without verification of parental consent, we will delete that information. If you believe we may have received any information from a child under 13 about a child under 13, please contact us at the address above. Please visit the FTC's website at www.ftc.gov for tips on protecting children's privacy online.

Links to Other Websites

Our Website may contain links to other websites that are not operated by Pennell. If you click on a third party link, you will be directed to that third party's site. We strongly advise you to review the Privacy Policy of every site you visit.

We have no control over and assume no responsibility for the content, privacy policies or practices of any third party sites or services.

Modifications to this Policy

We will modify this Policy if our privacy practices change. We will notify you of such changes by posting the modified version on our Website and indicating the date it was last modified, and, if the changes are significant, we will provide a more prominent notice (including by email in certain instances). The date this Policy was last modified is as first stated above.

Contact Us

If you have any questions about this Policy, you can contact us:

By Email: info@pennellcpa.com

By Phone: (616) 285-7050

By Mail: Pennell CPA, 5005 Cascade Road SE, Suite A, Grand Rapids, MI 49546