

CPApp Privacy Statement

Important Information: Please read this Statement carefully as we have recently updated it.

Last Updated: November 13th, 2017

At CPApp LLC, we pride ourselves on our commitment to protecting your privacy. This Privacy Statement describes the privacy practices of CPApp LLC ("CPApp", "us", "we", "our") responsible for collecting and maintaining certain information collected about you.

If you have questions or complaints regarding our Privacy Statement or practices, please contact us as detailed on our [Contact](#) page.

1 WHEN THIS PRIVACY STATEMENT APPLIES. If a Service you're using links to this Privacy Statement, this Statement applies to you. This Privacy Statement ("Statement") applies to our sites, products, and services (collectively, "Services") that link to this Statement.

2 WHAT WE DO WITH YOUR INFORMATION. We want to be clear about what information we collect and how we use it to deliver our Services to you, improve your financial life, operate our business, and help make our Services useful, more intelligent, and work better for you. We do not sell or share your Personal Information with third parties for their own commercial uses without your consent.

a **Types of Information We Collect.** In connection with accessing our Services, we may collect information from you which can be used to identify you ("Personal Information"), such as your name,

shipping/billing address, email address, phone, username and password. We collect information when you register or open an account, sign in, pay a bill, purchase a Service, use a Service, call us for support, or give us feedback. We or our third-party billing service will collect your credit card number, billing address, and other payment-related information. We may also get information from other companies or third parties, such as when you sync a third party account or service with your CPApp Service, or when we may use service providers to supplement the Personal Information you give us (e.g., validate your mailing address) to help us maintain the accuracy of your data and provide you with better service. Finally, we also collect content or other information that you may provide or create when you interact with our Services. For example, when you use the Service, you may enter information about your clients, such as their names, information about their taxes, notes from client phone calls, etc. We may also automatically collect certain usage information when you access our Services ("Usage Data"), such as Internet Protocol ("IP") addresses, log files, unique device identifiers, pages viewed, browser type, any links you click on to leave or interact with our Services, and other usage information collected from cookies and other tracking technologies. For example, we collect IP addresses to track and aggregate non-personal information, such as using IP addresses to monitor the regions from which users navigate to our Services. We also collect IP addresses from users when they log into the Services as part of our log-in and security features. We may also, when you enable location-based Services, collect Global Positioning System (GPS) location data and/or motion data. Our Services may change over time and we may introduce new features that may collect new or different types of information.

b **How We Use Your Information.** We may use your information, including your Personal Information, for the following purposes: Account Registration. We may use your name, address, phone number, and email address to register your account for certain Services we provide and to communicate important

information to you. We may obtain additional Personal Information about you, such as address change information, from commercially available sources, to keep our records current. If you set up an administrator account that may be accessed by people other than you, please note that they may see and have the ability to change or delete your Personal Information. To Provide Our Services and Operate Our Business. We may use your information to operate our business, including providing Services you requested, provide you with support related to our Services, and to help us protect our Services, including to combat fraud and protect your information. Customer Service and Technical Support. We may use your name, address, phone number, email address, how you interact with our Services, and information about your computer configuration to resolve questions you may have about our Services and to follow up with you about your experience. We also offer various Internet chat services, for example, to speak with a CPApp support representative. Internet Chat transmissions are encrypted but you should not supply more Personal Information, including tax data, than is required to address your specific issue. A transcript of the session is retained to resolve questions or issues related to our Services. Communicate with You and Tell You About Other Services. We may use your information to communicate with you about our Services and to give you offers for third party products and services that we think may be of use to you. We will use your information to personalize or customize your experience and the Service, develop new features or services, and to improve the overall quality of CPApp's Services. We may use any information you volunteer in surveys you answer for us and combine them with answers from other customers in order to better understand our Services and how we may improve them. Answering any survey is optional. Research, Including Publishing or Sharing Combined Information from Many Users, But Only in a Way that Would Not Allow You or Any Other Person to be Identified. Only in a way that would not allow you or any other person to be identified, we may prepare and share information about our customers with third

parties, such as advertisers or partners, for research, academic, marketing and/or promotional purposes. For example, we may share demographic data that describes the percentage of our customers who use mobile services or who use a particular operating system. We or our third party partners may publicly report the aggregated findings of the research or analysis, but only in a way that would not allow you or any other person to be identified.

c **How We Share Your Personal Information.** From time to time, we may need to share your Personal Information with others. Third Party Service Providers. We may share your information, including Personal Information and Usage Data, with third party service providers who perform various functions to enable us to provide our Services and help us operate our business, such as website design, sending email communications, fraud detection and prevention, customer care, or performing analytics. Our contracts with these third parties require them to maintain the confidentiality of the Personal Information we provide to them, only act on our behalf and under our instructions, and not use Personal Information for purposes other than the product or service they're providing to us or on our behalf. Response to Subpoenas and Other Legal Requests. We may share your information with courts, law enforcement agencies, or other government bodies when we have a good faith belief we're required or permitted to do so by law, including to meet national security or law enforcement requirements, to protect our company, or to respond to a court order, subpoena, search warrant, or other law enforcement request. Protection of CPApp and Others. We may share account information, Personal Information and Usage Data when we believe it is appropriate to enforce or apply our products' Terms of Service and other agreements; or protect the rights, property, or safety of CPApp, our Services, our users, or others. This includes exchanging information with other companies and organizations for fraud protection and credit risk reduction.

This does not include selling, renting, sharing, or otherwise disclosing Personal Information of our customers for commercial purposes in violation of the commitments set forth in this Privacy Statement. Reporting to Credit Bureaus. We may share your information with credit bureaus, consumer reporting agencies, and card associations. Late payments, missed payments, or other defaults on your account may be reflected in your credit report and consumer report. We may also share your information with other companies, lawyers, credit bureaus, agents, government agencies, and card associations in connection with issues related to fraud, credit, or debt collection. Information Sharing Between CPApp and related Entities. We share your information, including your Personal Information, with and among our affiliates and subsidiaries, except where prohibited by law. Affiliates and subsidiaries means companies related by common ownership or control. The reasons why we share your information include for our everyday business purposes, such as to: process your transactions, maintain your accounts, operate our business, facilitate CPApp, etc. We will also share your information in order for us to be able to offer our products and services to you. We may also share information about your creditworthiness, your transactions and experience so that we can operate our business effectively, detect and prevent fraud, and improve our Services. Sale of Our Business. If we sell, merge, or transfer any part of our business, we may be required to share your information. If so, you will be asked if you'd like to stop receiving promotional information following any change of control. With your Consent. Other than as set out above, we will provide you with notice and the opportunity to choose when your Personal Information may be shared with other third parties.

d **CPApp Login.** CPApp Login allows you to sign-in to CPApp Services. We will collect certain information for security purposes in order to verify your authorized access to an account or to reset your password if you cannot access your CPApp account. Some Services may require added security and may be asked to provide additional

information. The email address and password that you use to sign up for a CPApp account are your "credentials" that you will use to authenticate with our network. We assign a unique ID number to your credentials to track you and your associated information. CPApp Services do not allow sharing of accounts between users or individuals.

3 WHAT YOU CAN DO TO MANAGE YOUR PRIVACY. You can view and edit information that identifies you online through your CPApp Service. How you can access and control information that identifies you will depend on which Services you use. You have a choice about the use of information that identifies you, marketing communications you receive from us, and our use of cookies and other tracking technologies.

a **Updating Your Personal Information.** In connection with your right to manage your Personal Information you provide to us, you may access, update, change, correct or request deletion of your information either through the Service or through our customer support. You can reach our customer support by using the contact information provided on our [Contact](#) page.

b **Managing Marketing Communications From Us.** We will honor your choices when it comes to receiving marketing communications from us. You have the following choices if you have been receiving marketing communications from us that you no longer wish to receive:

Click the "unsubscribe" link in the email or newsletter you received.

Adjust your preferences in your CPApp account settings.

For SMS messages, reply "STOP" or follow the instructions in the message or settings to discontinue the Service.

Subject to your control, our mobile applications may send push notifications to your mobile device. If you

are receiving push notifications and no longer wish to receive these types of communications, you may turn them off at the device level.

c Remember that even if you choose not to receive marketing communications from us, we will continue to send you mandatory service or transactional communications.

d **Cookies and Other Tracking Technologies.** The following is a high level summary of our practices and your controls for cookies and other tracking technologies. In accordance with applicable law, CPApp and our service providers may use commonly-used tools to recognize your visit and track your interactions with our Services such as cookies, web beacons, pixels, local shared objects, and similar technologies (collectively, "Cookies"). Sometimes this tracking is necessary in order for us to provide you the Service you requested. Other times, we combine Usage Data collected from Cookies with that of other customers to improve your and other customers' experience. You have control over some of the Usage Data we collect from Cookies and how we use it. Information on changing your browser settings to opt out of Cookies can be found in your browser settings. In accordance with the [Digital Advertising Alliance Principles](#).

e Please note that even if you opt-out of such Cookies or otherwise opt-out of interest based advertising, you will still receive advertisements, they just won't be tailored to your interests. Also, if you opt-out and later delete your Cookies, use a different browser, or buy a new computer, you may need to renew your opt-out choices.

f **Do Not Track.** Like most other companies, our Services are not currently configured to respond to browsers' "Do Not Track" signals because at this time no formal "Do Not Track" standard has been adopted. Click [here](#) for more information on "Do Not Track."

- g **Social Media Features.** Our Services may use social media features, such as Facebook sharing ("Social Media Features"). These features may collect your IP address and which page you are visiting within our Service, and may set a cookie to enable the feature to function properly. Social Media Features are either hosted by a third party or hosted directly on our Services. Your interactions with these features are governed by the privacy statement of the company providing the relevant Social Media Features.

4 DATA RETENTION AND YOUR ACCESS RIGHTS.

- a **Data Retention.** In accordance with and as permitted by applicable law and regulations, we will retain your information as long as necessary to serve you, to maintain your account for as long as your account is active, or as otherwise needed to operate our business. When you close your account, we may continue to communicate with you about our Services, give you important business updates that may affect you, and let you know about products and services that may interest you, unless you have opted out of receiving marketing communications. We may also continue to use some of your information for business purposes and to improve our offerings or in some cases to develop new ones. We will retain and use your information as required by applicable regulations and CPApp's records and information management policies to comply with our legal and reporting obligations, resolve disputes, enforce our agreements, complete any outstanding transactions and for the detection and prevention of fraud.
- b **Your Access Rights.** As required by applicable law, you may contact us to confirm whether we maintain, or process on behalf of a third party, any of your Personal Information and to review it in order to verify its accuracy and the lawfulness of our processing of such Personal Information. Where you have determined that the Personal Information we collected about you is inaccurate or

processed in violation of applicable law, you may also request that your Personal Information be corrected, amended, or deleted. Requests for access to your Personal Information and to have it corrected, amended, or deleted should be sent to support@CPApp.com or to the mailing address provided on our [Contact](#) page.

5 SECURITY OF YOUR INFORMATION. Keeping your Information safe is important to us. We provide reasonable and appropriate security measures in connection with securing Personal Information we collect. For example, we:

- a Constantly work to update our security practices to implement accepted best methods to protect your Personal Information, and review our security procedures carefully.
- b Comply with applicable laws and security standards.
- c Securely transmit your sensitive Personal Information.
- d Train our staff and require them to safeguard your data.
- e Transmit, store, protect, and access all cardholder information in compliance with the Payment Card Industry's Data Security Standards.

6 HOW TO CONTACT US. If you have questions or comments about this Privacy Statement, please contact us. We want your feedback and comments.

- a **Via Email.** If you have questions or complaints regarding our Privacy Statement or practices, please contact us by email at support@CPApp.io.
- b **Via Direct Mail.** CPApp LLC, 100 Corporate Drive Suite-A204, Trumbull CT 06611.

7 CHANGES TO OUR PRIVACY STATEMENTS. From time to time we may change or update our Privacy Statements. We reserve the right to make changes or updates at any time. **More information about how we will notify you is below.** If we make material changes to the way we process your Personal Information, we will provide you notice via our Service or by other communication channels, such as by email or community post. Please review any changes carefully. If you object to any of the changes and no longer wish to use our Services, you may close your account(s). All changes are effective immediately upon posting and your use of our Service after a notice of material change or posting of an updated Privacy Statement shall constitute your consent to all changes.