



Privacy Policy

Edgewater Tax & Accounting
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Introduction

Edgewater Financial and Edgewater Tax & Accounting (“Edgewater”, “we”, “our” or “us”) are required by law to inform clients of company policies and procedures regarding the privacy of client information. We appreciate and value that our clients entrust us with their sensitive personal information, and we are personally and professionally committed to ensuring our clients have confidence in our professionalism and dedication to providing them with financial services. The following statement discloses the ways in which we collect, use, and disclose the personal information of our clients.

This Privacy Policy governs edgewateraccounting.com, its subdomains, and all portals, applications, products, services, events, and any interactive features, applications, or other services that post a link back to this Privacy Policy (the “Site”). This Privacy Policy also applies to information (including the “Personal Information” defined below) that we may collect from you in person at our physical office locations (each a “Location”), via phone calls or other communication with our personnel or in any instance when you contact us. We refer to all of the above as our “Services.”

Please note that if you voluntarily provide your information in the course of interacting with our Site, visiting our Locations, or otherwise using our Services, we will take that as your agreement to our collection, use, and disclosure of your information as set forth in this Privacy Policy. This Privacy Policy is incorporated into our Terms of Use which govern your use of this Site and is expressly made part of your Client Engagement Letter when you hire us.

By using our Site, contacting us to inquire about our Services, or visiting our Locations, you consent to our Privacy Policy and agree to our Terms of Use.

This Privacy Policy does not apply to any products, services, websites, or content that are offered by third parties (“Third Party Services”), which are governed by their respective privacy policies.

What Information We Collect

We collect personal information about you for the purpose of offering or furnishing our products and services to you. The types of personal information we collect may include the following types.

Information You Provide Us

We collect information you provide to us directly when you use our Services. This includes:

<i>Contact Information</i>	We are legally required to verify the identities of clients that engage our Services. If you engage our Services you will need to provide us with your first and last name, a mailing and email address, and a telephone or mobile number.
<i>Personal Information</i>	To provide many of our services we require, or are required to obtain, personal identifying information such as a social security numbers, a driver's license number, a passport number, your birthdate, marital status, as well as current or past employment and education information. This may also include other information that could reasonably be used to identify you personally or identify your household or device.
<i>Demographic Information</i>	Information such as your country, state, or county of residence or business operation.
<i>Account Information</i>	Some of our services require that you set up an account. If you create an account, your account will have a username, which you provide, or which is generated automatically. You may need to provide a password depending on how you register for these services.
<i>Financial Information</i>	As a financial services provider banking details and financial histories are regularly collected to make use of our services. This information includes credit or debit card numbers, bank account numbers, student financial information, mortgage and escrow account data, incomes, expenses, assets, debts, trades, and barbers.
<i>Documents</i>	When clients provide documents for the purposes of verification, compliance, and the use of Services, we retain those documents for various periods of time. Such documents may include paycheck stubs, earning statements, receipts, donor records, government issued identification, bank and brokerage statements, emails, prior year tax returns, and legal correspondence.
<i>Client Behaviors & Preferences</i>	We collect information about the actions you take when using the Services. This includes your interactions with our services such as usage frequency, timing, and duration of interactions.

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Other Information

You may choose to provide other information directly to us. For example, we may collect information when you fill out a form, survey, participate in promotions or programs, request support, or otherwise communicate with us.

Your decision to provide us with information is voluntary, but if you choose not to provides us with any requested information, you may or may not be able to take advantage of our Services.

Information We Collect Automatically

In addition to information that you choose to share with us, we and/or our service providers may automatically collect and/or store certain information when you visit or interact with the Site (“Usage Information”). This information may include:

Log and usage data

We may log information when you access and use the Services. This Usage Information may be stored and/or accessed from your personal computer, laptop, tablet, mobile phone or other device (a “Device”) whenever you visit or interact with our Site(s). This may include your IP address, user-agent string, browser type, operating system, referral URLs, device information, unique device identifier (“Device Identifier”), device settings, mobile carrier name, pages visited, links clicked, requested URLs, and search terms. Except for IP addresses used to sign documents, and setup accounts, Edgewater will delete any IP addresses collected after 180 days.

Information collected from cookies and similar technologies

We may receive information from cookies, which are pieces of data your browser stores and sends back to us when making requests, and similar technologies. We use this information to deliver and maintain our Services, improve your experience, understand user activity, personalize offers, measure advertising and referral effectiveness, and improve the quality of our Services. For example, we store and retrieve information about your preferred language and other settings. See our Cookie Notice for more information about how Edgewater uses cookies.

Location Information

We may receive and process information about your location. We may receive location information from you when you choose to share such information on our Services. For example, we may derive an appropriate location based on your IP address.

If you no longer wish for us or our service providers to collect and use location information, you may disable the location features on your device. Consult your device manufacturer settings for instructions. Please note that if you disable such features, your

ability to access certain features, Services, content, promotions, or products may be limited or disabled.

Information Collected from Other Sources

We may receive information about you from other sources, including from third parties, and combine that information with the other information we have about you. For example, we may receive demographic or interest information about you from third parties, including governments, marketing platforms, and credit reporting agencies, and combine it with data you have provided to Edgewater, using a common account identifier such as a hash of an email address or a mobile-device ID. You can control how we use this information to personalize our Services to you by contacting us.

Linked Services

If you authorize or link a third-party service (e.g. Intuit QuickBooks) to your client profile, Edgewater receives information from that service using your authorization. Linking services may also cause the other service to send us information about your account with that service. For example, if you link your client profile with Intuit QuickBooks or another accounting software provider, that provider may share an email address with us.

Information collected from integrations

We also may receive information about you, including logs, usage data, and cookie information, from third-party sites that we integrate with. For example, if you use Thumbtack or Messenger to contact us, we may receive contact information and limited usage information on their site or app, such as whether you opened a file, or your contact information.

Information Collected by Third Parties

Integrated Services

Edgewater provides some third-party software to augment its own Services. For example, Edgewater provides Intuit QuickBooks subscriptions and Dropbox Folders to upload financial documents. In general, Edgewater does not control how third-party services collect data when they serve you their products directly. As a result, integrated services are not covered by this privacy policy but by the policies of the service from which the product is used.

How We Use Information

We use information about you to:

- Provide, maintain, and improve the Services;
- Personalize services, and offerings, to match your activities, and preferences;
- Help protect the safety of Edgewater and our clients, which includes blocking suspected spammers and fraudsters, addressing abuse, enforcing Edgewater Client Engagement Letters and our other terms and policies, as well as comply with applicable law;
- Provide, optimize, and improve the effectiveness of our marketing and outreach programs;
- Research and develop new services;
- Send you technical notices, updates, security alerts, invoices, and other support and administrative messages;
- Provide client support;
- Communicate with you about products, services, offers, promotions, events, and programs;
- Provide other news and information we think will be of interest to you;
- Monitor and analyze trends, usage, and activities in connection with our Services.

How We Share Information

As a general rule, we do not disclose Personal Information about our current or former clients to anyone. However, to the extent permitted by law and any applicable state Code of Professional Conduct, certain nonpublic information about you may be disclosed in the following situations:

- *With your consent.* We may share information about you with your consent and at your direction .
- *To comply with the law.* We may share information if we believe it is within accordance of a validly issued and enforceable subpoena or summons.
- *In the course of a review of our firm's practices.* When under the authorization of a state or national licensing board, or as necessary to properly respond to an inquiry or complaint from such a licensing board of organization.

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- *In the event of a material change in ownership.* In conjunction with a prospective purchase, sale, or merger of all or part of our practice, provided that we take appropriate precautions (for example, through a written confidentiality agreement) so the prospective purchaser or merger partner does not disclose information obtained in the course of the review.
- *To defend our rights.* As a part of any actual or threatened legal proceedings or alternative dispute resolution proceedings either initiated by or against us, provided we disclose only the information necessary to file, pursue, or defend against the lawsuit and take reasonable precautions to ensure that the information disclosed does not become a matter of public record.
- *With our service providers.* We may share information with vendors, consultants, and other service providers who need access to such information to carry out work for us. Their use of such information will be subject to appropriate confidentiality and security measures. A few examples: (i) payment processors who process payments on our behalf, (ii) cloud providers who host our data and services, (iii) legal professionals retained to assist us represent you during an audit, and (iv) an outside service bureau to process tax returns.

We may aggregate, de-identify, and/or anonymize any information collected through the Site or Services such that such information is no longer linked to you personally identifiable information. We may use and share this aggregated and anonymized information (non-personal information) for any purpose, including without limitation, for research and marketing purposes, and may also share such data with our affiliates and third parties, including advertisers, promotional partners and others.

Finally, we also may share your information, including your Personal Information, with our affiliates and other third parties, such as companies with whom we have marketing or other relationships, for direct marketing purposes. (If you are a California resident, you have the right to request additional information regarding the “sale” of your information. Please see the Section entitled “Your California Privacy Rights” below about these rights.) In addition, we may share the information we have collected about you, including Personal Information, as disclosed at the time you provide your information and as described in this Privacy Policy.

How We Protect Your Information

We take measures to help protect information about you from loss, theft, misuse and unauthorized access, disclosure, alteration, and destruction. For example, we use HTTPS while information is being transmitted. We also enforce technical and administrative access controls to limit which of our employees have access to non-public personal information.

We store the information we collect for as long as it is necessary for the purpose(s) for which we originally collected it. We may retain certain information for legitimate business purposes and/or if we believe doing so is in accordance with, or as required by, any applicable law.

Your Rights and Choices

You have choices about how to protect and limit the collection, use, and sharing of information about you when you use the Services. If you would prefer that we not share your name and mailing address with third parties (other than with our affiliates) to receive promotional offers, you have the option to opt-out of such sharing. To do so, please email us at admin@edgewateraccounting.com. Your choice will not affect our ability to share information in the other ways described in this Privacy Policy.

If you do not wish to receive e-mails about special offers, events, and other promotions from us email us at admin@edgewateraccounting.com to opt-out or click the link in the email to “unsubscribe.” If you do not wish to receive other marketing materials by regular mail from us, please write us at:

Edgewater Tax & Accounting
P.O. BOX 75
Riverton, UT 84065

Please note that certain of your personal information, such as your name or other identifying information, may remain in our database even after a deletion request in order to maintain the integrity and historical record of our database and systems, or to comply with applicable laws and regulations.

Do Not Track Disclosures

Do Not Track (“DNT”) is a web browser setting that requests that a web application disable its tracking of an individual user. When you choose to turn on the DNT setting in your browser, your browser sends a special signal to websites, analytics companies, ad networks, plug-in providers, and other web services you encounter while browsing to stop tracking your activity. Various third parties are developing or have developed signals or other mechanisms for the expression of consumer choice regarding the collection of information about an individual consumer’s online activities over time and across third-party websites or online services (e.g., browser do not track signals), but there is no universally-agreed upon standard for what a company should do when it detects a DNT signal. Currently, we do not monitor or take any action with respect to these signals or other mechanisms. You can learn more about Do Not Track at allaboutdnt.com. (This links to a third-party site not controlled by us.)

Visitors to the Site Outside of the United States

If you are visiting the Site from a location outside of the U.S., your connection will be through and to servers located in the U.S. All information you receive from the Site will be created on servers located in the U.S., and all information you provide will be maintained on web servers and systems located within the U.S. The data protection laws in the United States may differ from those of the country in which you are located, and your information may be subject to access requests from governments, courts, or law enforcement in the United States according to laws of the United States. By using the Site or providing us with any information, you consent to the transfer to, and processing, usage, sharing and storage of your information in the United States and in other countries, as set forth in this Privacy Policy.

Updating Personal Information

We prefer to keep your Personal Information accurate and up to date. If you would like to change your contact information, please contact us at admin@edgewateraccounting.com.

If so, we will make good faith efforts to make the requested changes in our then-active databases as soon as reasonably practicable (but we may retain prior information as

business records). Please note that it is not always possible to completely remove or delete all of your information from our databases and that residual data may remain on backup media or for other reasons, such as a legitimate business reason.

In addition, please note that if you implement a deletion request but later sign up for information or Services, your most recent request will control our information relationship with you.

Additional Information for EEA and UK Users

If you are a resident of or located within the European Economic Area (“EEA”), you have certain additional data protection rights. These rights include:

- The right to access, update or delete the information we have on you. Whenever made possible, you can access, update or request deletion of your Personal Information directly within your account settings section. If you are unable to perform these actions yourself, please contact us to assist you.
- The right of rectification. You have the right to have your information rectified if that information is inaccurate or incomplete.
- The right to object. You have the right to object to our processing of your Personal Information.
- The right of restriction. You have the right to request that we restrict the processing of your personal information.
- The right to data portability. You have the right to be provided with a copy of the information we have on you in a structured, machine-readable and commonly used format.
- The right to withdraw consent. You also have the right to withdraw your consent at any time where Edgewater Financial relied on your consent to process your personal information.

Legal Basis for Processing Personal Information Under GDPR

Edgewater Tax & Accounting’s legal basis for collecting and using the Personal Information described in this Privacy Policy depends on the Personal Information we collect and the specific context in which we collect it.

We may process your Personal Information because:

- We need to fulfill an engagement or perform a contract with you;
 - You have given us permission to do so;
 - The processing is in our legitimate interests and it is not overridden by your rights;
- or
- To comply with the law.

Retention of Information

Edgewater Financial will retain your Personal Information only for as long as is necessary for the purposes set out in this Privacy Policy. We will retain and use your Personal Information to the extent necessary to comply with our legal obligations, resolve disputes and enforce our legal agreements and policies.

Edgewater Financial will also retain Usage Data for internal analysis purposes. Usage Data is data collected automatically either generated by the use of the Site or from the Site infrastructure itself (for example, the duration of a page visit). Usage Data is generally retained for a shorter period of time, except when this data is used to strengthen the security or to improve the functionality of our Site or we are legally obliged to retain this data for longer periods.

Transfer of Information

Your information, including Personal 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 from those of your jurisdiction.

If you are located outside the United States and choose to provide information to us, please note that we transfer the data, including Personal Information, to the United States and process it there. Your consent to this Privacy Policy followed by your submission of such information represents your agreement to that transfer.

Edgewater Financial will take all the steps reasonably necessary to ensure that your Personal Information is treated securely and in accordance with this Privacy 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 data and other personal information, including data processing agreements (“DPAs”) incorporating Standard Contractual Clauses, where necessary.

Disclosure of Personal Information

Disclosure for Law Enforcement – Under certain circumstances, Edgewater Financial may be required to disclose your Personal Information if required to do so by law or in response to valid requests by public authorities (e.g. a court or a government agency).

Legal Requirements

Edgewater Financial may disclose your Personal Information in the good faith belief that such action is necessary to:

- To comply with a legal obligation.
- To protect and defend the rights or property of Edgewater Financial.
- To prevent or investigate possible wrongdoing in connection with the Service.
- To protect the personal safety of clients of the Service or the public.
- To protect against legal liability

Security of Information

Please note that we may ask you to verify your identity before responding to such requests.

Should you wish to raise a concern about our use of your information (and without prejudice to any other rights you may have), you have the right to do so with your local supervisory authority; however, we hope that we can assist with any queries or concerns you may have about our use of your Personal Information first.

For more information, please contact your local data protection authority in the EEA.

Additional Information for California Users

This Privacy Notice is for California Residents and applies solely to all visitors, users, and others who reside in the State of California (“Consumers”). We adopt this Notice to comply with the California Consumer Privacy Act of 2018 (“CCPA”). Any terms defined in the CCPA have the same meaning when used in this Section.

Edgewater Financial collects certain types of personal information about you during your relationship with Edgewater Tax & Accounting as a user, resident, owner, or visitor. In particular, our Site has collected the following categories of Personal Information from its consumers within the last twelve (12) months:

Category	Collected
A Identifiers.	YES
B Personal information categories listed in the California Customer Records statute (Cal. Civ. Code § 1798.80(e)).	YES
C Protected classification characteristics under California or federal law	YES
D Commercial information.	YES
E Biometric information.	NO
F Internet or other similar network activity.	YES
G Geolocation data.	YES
H Sensory data.	YES
I Professional or employment-related information.	NO
J Non-public education information (per the Family Educational Rights and Privacy Act (20 U.S.C. Section 1232g, 34 C.F.R. Part 99)).	YES
K Inferences drawn from other personal information.	YES

For purposes of the CCPA, Personal information does not include:

- Publicly available information from government records.
- Deidentified or aggregated consumer information.
- Information excluded from the CCPA’s scope, like:

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- Health or medical information covered by the Health Insurance Portability and Accountability Act of 1996 (HIPAA) and the California Confidentiality of Medical Information Act (CMIA) or clinical trial data;
- Personal information covered by certain sector-specific privacy laws, including the Fair Credit Reporting Act (FCRA), the Gramm-Leach-Bliley Act (GLBA) or California Financial Information Privacy Act (FIPA), and the Driver's Privacy Protection Act of 1994.

Under California law, if you are a resident of California, under certain circumstances, you have the right to request certain information that we collect about you, including:

1. The categories of Personal Information we have collected from you;
2. The categories of sources from which we collected the Personal Information;
3. The business purpose we have for collecting or sharing that Personal Information;
4. The categories of third parties with whom we share such Personal Information;
5. The specific pieces of Personal Information we have collected about you.

In addition, you may request that we provide you with:

1. The categories of Personal Information that we sold about you, and the categories of third parties to whom the personal information was sold, by category or categories of Personal Information for each category of third parties to whom the information was sold;
2. The categories of Personal Information that we have disclosed about you for a business purpose;
3. The category or categories of consumers' Personal Information that we have sold, or if we have not sold consumers' Personal Information; and
4. The category or categories of consumers' Personal Information that we have disclosed for a business purpose, or if we have not disclosed that information for a business purpose.

Please note that if we collected information about you for a single one-time transaction and do not keep that information in the ordinary course of business, that information will not be retained for purposes of a request under this section. In addition, if we have de-identified or anonymized data about you, we are not required to re-identify or otherwise link your identity to that data if it is not otherwise maintained that way in our records.

We will not discriminate against you for exercising any of your CCPA rights. Unless permitted by the CCPA, we will not:

- Deny you goods or services.
- Charge you different prices or rates for goods or services, including through granting discounts or other benefits, or imposing penalties.
- Provide you a different level or quality of goods or services.
- Suggest that you may receive a different price or rate for goods or services or a different level or quality of goods or services.

However, we may offer you certain financial incentives permitted by the CCPA that can result in different prices, rates, or quality levels. Any CCPA-permitted financial incentive we offer will reasonably relate to your personal information's value and contain written terms that describe the program's material aspects. Participation in a financial incentive program requires your prior opt-in consent, which you may revoke at any time.

As a California resident, you also have the right, at any time, to tell us not to sell Personal Information – this is called the “right to opt-out” of the sale of Personal Information.

You may make a written request to us to request this information. We may require you to confirm your identity and your residency in order to obtain the information, and you are only entitled to make this request twice a year. You may call, email or write us with your request at the contact information below. Please include “California Privacy Rights” as the subject line. You must include your full name, email address, and attest to the fact that you are a California resident by including a California postal address in your request. We will respond to your request within 45 days or let you know if we need additional time.

Children's Privacy

Edgewater Tax & Accounting recognizes the importance of children's safety and privacy. The Site(s) are not designed to attract children and are not intended for use by children under the age of 13. We do not request, or knowingly collect, any personally identifiable information from children under the age of 13. Minors under the age of 16 (but older than 12) may use the Site(s) only under the supervision of a parent or legal guardian who agrees to be bound by the Site's Terms of Use. If you are the parent or legal guardian of a child under the age of 13 who has provided his or her information to us, please contact us at admin@edgewateraccounting.com to request deletion of that information.

Changes to This Policy

We may change this Privacy Policy from time to time. If we do, we will let you know by revising the date at the top of the policy. If the changes, in our sole discretion, are material, we may also notify you by sending an email to the address associated with your account (if you have chosen to provide an email address) or by otherwise providing notice through our Services. We encourage you to review the Privacy Policy regularly to stay informed about our information practices and the ways you can help protect your privacy. By continuing to use our Services after Privacy Policy changes go into effect, you agree to be bound by the revised policy.

Contact Us

If you have other questions about this Privacy Policy, please contact us at:

Postal Address

Edgewater Tax & Accounting
P.O. BOX 75
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Email Address

admin@edgewateraccounting.com

Phone Number

(801) 367-1877