# **Privacy Policy**

This Privacy Policy applies to primetrics.cpa (the "Site") and all other websites owned and operated by Primetrics. The term "Primetrics," "our," "we," and "us" includes Primetrics and our affiliates and partners.

By using our site, you agree to the collection and use of the information you provide on this website. This Policy also describes the choices available to you regarding the use of, your access to, and how to update and correct your personal information.

"Personal Information" means information that alone or when in combination with other information may be used to readily identify, contact, or locate you, such as: name, address, phone number or email address. We do not consider Personal Information to include information that has been anonymized such that it does not allow a third party to easily identify a specific individual.

We collect Personal Information when you choose to provide it to us including when you:

**Complete a contact form.** The Site gives you the option of providing us your contact information so that we make contact you to evaluate either our services will be a good fit for your company or organization.

**Request a quote.** We collect information you submit to the Site. For example, then you request a quote, we use the information collected to evaluate the services that may benefit you and may be used in the scoping of the engagement and pricing of the services provided.

**Communicate with us.** We may also collect Personal Information from you when you communicate with us. For example, you may send us Personal Information by writing an email to us, asking a question through the "chat" button on the Site, subscribing to the Primetrics newsletter or podcast, or registering for an event hosted by Primetrics. If you contact us, we may keep a record of that correspondence.

Collection and Use of SMS Information (using your phone number to text you)

Consent to send you SMS messages is required for Primetrics to send you messages, your consent to receive messages and phone numbers provided will never be shared or sold. When you opt-in to receive SMS notifications from us, we may collect personal information such as your phone number, name, and other relevant details. This information will be used solely for the purpose of sending you updated messages you have requested, alerts, and other relevant messages related to your services with Primetrics. We will use SMS to communicate with staff and clients of the firm. Mostly informational. SMS communication is used for operational purposes of the business

and not <u>for mass marketing</u>. At no time will we sell this information to 3<sup>rd</sup> parties for the purposes of marketing to you or collecting personal data on you.

**Consent:** By providing your phone number and opting in to receive SMS communications, you consent to receive text messages from us. Your consent to receive these messages is not a condition of any purchase.

**Frequency:** The frequency of SMS messages will vary based on your subscription preferences and the nature of the updates. They will not be excessive, and you can always opt out.

**Data Security:** We are committed to ensuring that your information is secure. To prevent unauthorized access or disclosure, we have put in place suitable physical, electronic, and managerial procedures to safeguard and secure the information we collect.

**Opt-Out:** You may opt-out of receiving SMS messages at any time. To stop receiving messages, reply with the word "STOP" to any message you receive from us. After opting out, you will no longer receive SMS messages unless you opt-in again.

**Data Retention:** We will retain your personal information for as long as necessary to fulfill the purposes for which it was collected, including to comply with legal, accounting, or reporting requirements.

**Changes to This Policy:** We may update our SMS Privacy Policy from time to time. We will notify you of any changes by posting the new policy on our website. You are advised to review this policy periodically for any changes.

Passive collection. The Site collects and stores information that is generated automatically as you use it, including your preferences and anonymous usage statistics. This information may include Internet protocol (IP) addresses, browser type, Internet service provider (ISP), referring/exit pages, the files viewed on our site (e.g., HTML pages, graphics, etc.), operating system, date/time stamp, and/or clickstream data. We use this data to analyze trends in the aggregate and administer the site. Non-personal information that we passively collect may be combined with other information about you, including Personal Information.

**Tracking technologies.** Primetrics and its partners use cookies, pixels (sometimes also referred to as "web beacons"), server logs, and other similar technology to analyze trends, administer the website, track users' movements around the website, and to gather demographic information about our user base as a whole. You can control the use of cookies at the individual browser level, but if you choose to disable cookies, it may limit your use of certain features or functions on our website or service. Non-personal information that we collect using these technologies may be combined with other information about you, including Personal Information. Again, this is for internal use.

**Information provided by third parties.** Primetrics may collect information about you from third parties or supplement the information we collect from you with additional records received from third parties. We also collect information from third parties in order to enhance our ability to serve you, to customize our content to you, and to offer you information that we believe may be of interest to you.

# **How Primetrics uses your information**

We use Personal Information to facilitate and improve our services, and communicate with you.

**Internal and service-related usage.** We use and retain information, including Personal Information, to improve and facilitate the Site and our services to you. This

**Communications.** We may send email to the email address you provide to us to verify your account and for informational and operational purposes, such as account management, customer service, policy updates, or system maintenance.

**Marketing.** We may use information about you, including Personal Information, to send you information about Primetrics services. This will be in direct response to your request for this information. We may include you on the Firm's newsletter if we think it will be of use to you. Again, you can always opt-out by emailing info@primetrics.cpa or by selecting the unsubscribe link at the bottom of all communications.

**Non-Personal Information.** We may use anonymized aggregated data that is not Personal Information for any purpose, including marketing. These uses may include but are not limited to analyzing interactions with and performance of the Site, enabling us to improve our Site and services, and sharing such information with our business partners, affiliates, or any other third party. Similarly, we may enhance any such anonymized and aggregated data collected via our Site with other information collected from our business partners.

**Internal business purposes.** We may use your personal information to extrapolate trends. For example, we may use your data to understand where clients are located, how they found us, or the services they are inquiring about.

**Displaying to other users.** The content you post to the Site may be displayed on the Site. Other users of the Site may be able to see some information about you, such as your name if you submit a review, along with your review. We are not responsible for privacy practices of the other users who will view and use the posted information.

**As required by law and similar disclosures.** We may access, preserve, and disclose your Personal Information, other account information, and content if we believe doing so is required

or appropriate to comply with law enforcement requests and legal process, such as a court order, government request, or subpoena. We may also access, preserve, and disclose your

Personal Information, other account information, and content if we believe in good faith that disclosure is necessary to protect yours', ours' or others' rights, property, or safety, or investigate fraud.

Merger, sale, or other asset transfers. If we are involved in a merger, acquisition, financing due diligence, reorganization, bankruptcy, receivership, sale of company assets, or transition of service to another provider, then your information may be sold or transferred as part of such a transaction as permitted by law and/or contract. The use of your Personal Information following any of the foregoing events should be governed by the provisions of the Privacy Policy in effect at the time such Personal Information was collected.

This might sound obvious, but we may also disclose your Personal Information with your permission.

## **Accessing your Personal Information**

Upon request, Primetrics will provide you with information about whether we hold any of your Personal Information. If you would like to access, update, correct, or delete any information that you have provided to us through your use of the Site, you may contact us at info@primetrics.biz We will respond to your request within a reasonable timeframe. We reserve the right to save transaction data as is necessary to comply with legal obligations or for purposes of standard business operations.

#### **Your Choices**

As noted above, you may stop or restrict the placement of cookies on your computer or remove them from your browser by adjusting your web browser preferences. Please note that cookie-based opt-outs are not effective on mobile applications. However, on many mobile devices, application users may opt out of certain mobile ads via their device settings.

To manage our advertising on other sites, we engage third-party advertising partners. These third-party partners may use technologies such as cookies to gather information about your activities on the Site and other sites in order to provide you advertising based upon your browsing activities and interests. Certain of our third-party advertising partners participate in self-regulatory organizations, and those organizations operate websites that give you the ability to opt-out of receiving targeted ads from those partners. You can access these websites, and also learn more about targeted advertising and privacy, at Network Advertising or AboutAds.

You can also choose not to be included in Google Analytics here.

To be clear, whether you are opting out by adjusting your browser/device settings or by using a website established by a self-regulatory group, these cookie-based opt-outs must be performed on each device and browser that you wish to have opted-out. For example, if you have opted out on your computer browser, that opt-out will not be effective on your mobile device. You must separately opt out on each device.

If you receive an unwanted email from us, you can use the unsubscribe link found at the bottom of the email to opt out of receiving future emails. We are not responsible for removing your personal information from the lists of any third party who has previously been provided with your information in accordance with this policy.

## Third party sites

The Site may contain links to other websites and other websites may reference or link to our Site. These other domains and third-party websites are not owned or controlled by us. We encourage our users to read the privacy policies of each and every website and application that they interact with. We do not endorse, screen or approve, and are not responsible for the privacy practices or content of such other websites or applications. Visiting these other websites or applications is at your own risk. We try to work only with Third Party Services that share our respect for your privacy, but we cannot take responsibility for their practices, content, or privacy policies.

The Site also contains links and interactive features with various social media platforms, such as LinkedIn, Facebook, Twitter, and Instagram. These platforms are not owned or controlled by us. If you already use these platforms, their cookies may be set on your device when using our Site. You should be aware that Personal Information which you voluntarily include and transmit online in a publicly accessible blog, chat room, social media platform or otherwise online, or that you share in an open forum may be viewed and used by others without any restrictions. We are unable to control such uses of your information when interacting with a social media platform, and by using such services you assume the risk that the Personal Information provided by you may be viewed and used by third parties for any number of purposes.

## **Security of your information**

We take reasonable steps to ensure that your information is treated securely and in accordance with this Privacy Policy. We follow generally accepted standards to protect Personal Information submitted to us, both during transmission and once it is received. Unfortunately, the Internet cannot be guaranteed to be 100% secure, and we cannot ensure or warrant the security of any information you provide to us. We do not accept liability for unintentional disclosure.

By using the Site or providing Personal Information to us, you agree that we may communicate with you electronically regarding security, privacy, and administrative issues relating to your use

of the Site. If we learn of a security system's breach, we may attempt to notify you electronically by posting a notice on the Site or sending an e-mail to you. You may have a legal right to receive this notice in writing. To receive free written notice of a security breach (or to withdraw your consent from receiving electronic notice), please email.

We will retain your information for as long as your account is active or as needed to provide you services. We will retain and use your information as necessary to comply with our legal obligations, resolve disputes, and enforce our agreements.

# Children's privacy

We do not knowingly collect, maintain, or use Personal Information from children under 13 years of age, and no part of the Site is directed to children under the age of 13. If you learn that your child has provided us with Personal Information without your consent, you may alert us at info@primetrics.biz. If we learn that we have collected any Personal Information from children under 13, we will promptly take steps to delete such information and terminate the child's account.

#### International users

By using the Site, you will transfer data to the United States.

By choosing to visit the Site or otherwise provide information to us, you agree that any dispute over privacy or the terms contained in this Privacy Policy will be governed by the law of the State of New York and the adjudication of any disputes arising in connection with Primetrics or the Site will be in accordance with the Terms.

If you are visiting from the European Union or other regions with laws governing data collection and use, please note that you are agreeing to the transfer of your information to the United States and processing globally. By providing your information you consent to any transfer and processing in accordance with this Policy.

## **California Privacy Rights**

If you are a California resident, you also have the ability to ask us for a notice identifying the categories of personal information, as defined by California Civil Code Section 1798.83, we share with our affiliates and/or third parties for their direct marketing purposes and the contact information for such affiliates and/or third parties (under California Civil Code Sections 1798.83-1798.84). If you are a California resident and would like a copy of this notice, please submit a written email request.

#### **Questions**

If you have questions or suggestions for improving this Privacy Policy, we're all ears, and please send an email.

# **Changes to our Privacy Policy**

We may revise this Privacy Policy, so please review it periodically. If you continue to visit this Site and use the services made available to you after such changes have been made, you hereby provide your consent to the changes.

Posting of Revised Privacy Policy. We will post any updates to the Privacy Policy on this web page, and the revised version will be effective when it is posted. If you are concerned about how your information is used, please bookmark this page and read this Privacy Policy periodically.

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Effective June, 17th 2024