

PRIVACY POLICY

Rutlen Associates (hereinafter referred to as “Rutlen” “we,” “us,” or “our,”) respects your privacy and appreciates the importance of your trust. As part of our efforts to help you understand how we handle the Personal Information you share with us, we have outlined our privacy practices below. “Personal Information” is information that can be used to identify you individually. This Website is governed by and operated in accordance with the laws of the State of California and the United States, and is intended for the enjoyment of residents of the United States.

If you are located outside of the United States, please be aware that information we collect will be transferred to and processed in the United States. In such cases, we will collect and use your Personal Information in compliance with the European Union General Data Protection Regulation 2016/679 (GDPR) and national laws implementing the GDPR, as well as equivalent data protection laws that apply to our operations in the European Economic Area (EEA), Switzerland, the United Kingdom (UK), and elsewhere in the world, as applicable. To this end, in many cases Rutlen will process your Personal Information acting as a Controller, as defined in the GDPR.

This Privacy Policy sets out how Rutlen collects, uses and protects the Personal Information that you provide to through this Website or elsewhere. We reserve the right to change this Privacy Policy at any time without notice. Any changes to this Privacy Policy shall be posted on this page and shall be effective immediately upon posting. If you do not agree to be bound by these Privacy Policy practices, you may not use this Website.

Please review the following terms carefully.

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1. What Data do We Collect?

We collect the following Personal Information:

- Name, home address, e-mail address, telephone number, demographic information, marital status, financial details/financial circumstances, and/or payment information, such as account or card number, if used to make a purchase from our Website, information about your transactions with us, and information which you have consented to us using.
- Information about how this Website is accessed and used (known as "Usage Information"). "Usage Information" may include the type of browser and device you used to access our Website, your operating system and application version, the web pages accessed by you, the time you accessed these web pages, preceding web page views, and your use of any features or applications on this Website. Statistical data like this helps us understand what is interesting and relevant to our customers, so we can best adapt our content for our customers' benefit.
- IP address or other unique identifier information from the computer, mobile device, technology or other device you use to access this Website. We may use this information to, amongst other things, administer this Website, help diagnose server problems, analyze trends, track web page movements, help identify you and your shopping cart, and gather broad demographic information for collected use.

2. How do we Collect Your Data?

You directly provide us with most of the data we collect. We collect Personal Information from you and process Personal Information when you:

- Interact with us through our Website. The type of Personal Information that we may collect depends on your use of this Website and what information you provide to us.
- Fill out a form, purchase a service, or communicate with us via email or social media.
- Use or view our Website via your browser's cookies (see more regarding cookies below).

In the provision of our services to you or parties related to you, we may receive Personal Information about you provided by others, e.g., employer, spouse and/or parent(s). For example, we may receive Personal Information about you (i) from your employer, if we are providing services to your employer and the employer authorizes us to provide services for you; (ii) from your spouse or family member, if we are preparing tax returns; or (iii) from banks, financial institutions, lawyers or other representatives (e.g., investment manager or estate planner) if you have authorized them to send us such information.

3. How will we Use Your Data?

We collect your data for the following purposes and lawful bases:

- To use your data as you have agreed or explicitly consented (you may withdraw your consent at any time);
- To perform services pursuant to a contract with you, including communicating with you about your contract(s) with us and activities on this Website, or to take steps at your request prior to entering into a contract with you;
- To prepare and file tax-related documents and the Report of Foreign Bank and Financial Accounts (FBAR of FinCen114) with US and/or State tax authorities on your behalf and at your request for the legitimate interest of fulfilling your legal obligation(s) to file these documents with such authorities;
- To verify information in your tax-related documents for the legitimate interest of complying with IRS due diligence requirements;
- To verify your identity for the legitimate interest of avoiding fraud;
- To respond to your questions for the legitimate interest of providing you with information about our services that you have requested;
- To send you emails and other marketing materials, including our whitepapers, publications and presentations, which you have requested and consented to receiving;
- To improve the Website for the legitimate interest of improving our customers' experience;
- To send notices or information for the legitimate interest of keeping you up to date on the progress of your tax returns;
- To comply with a legal obligation to which we are subject;
- To protect your "vital interests" in exceptional circumstances;
- Use for our legitimate interests such as managing our business including providing service information, securely communicating with clients and third-parties, conducting marketing activities, training and quality assurance, and strategic planning.

We may share your Personal Information as described below:

- With trusted third-parties that we use to support the legitimate interest of completing and transmitting tax-related documents and payments for clients, including the Internal Revenue Service (IRS), our vendors, consultants, agents,

- contractors, employees, and other service providers, processors, or sub-processors;
- To provide you with any information or services that you request;
 - To comply with our legal obligations, including responding to subpoenas, court orders, and other legal process, or as otherwise required by law;
 - To exercise our legal rights or to defend ourselves against legal claims, to enforce our contracts, to investigate, respond to and resolve problems or inquiries (including governmental inquiries), or to permit us to pursue available remedies or limit the damages that we may sustain;
 - In connection with an actual or potential merger, sale, acquisition, assignment, or transfer of all or part of our assets, affiliates, lines of business, or products and services, including at bankruptcy;
 - With our affiliates, subsidiaries, or parent companies; and
 - With your consent.

Third parties we share your data with will keep it secure and respect your privacy under the law and we take steps to ensure the companies we work with also comply with the GDPR, UK GDPR, and Swiss Data Protection Act. If you would like to subscribe to the current list of our sub-processors with whom we share Personal Information, please send an email to info@rutlen.com.

We may also use and disclose any information that is aggregated or de-identified so that it does not identify you personally, in our discretion.

4. Implications of Not Providing Your Data

If you do not provide information/data, we may not be able to:

- Provide you with services that you are requesting or contracting for, or
- Continue to provide and/or renew existing services to you.

5. How do we Store Your Data?

We, and our processors, use reasonable safeguards to protect Personal Information against loss, unauthorized use, disclosure or destruction and when transferring information for processing. However, please note that no electronic data transmission or storage of information can be absolutely secure. We cannot completely ensure or warrant the security of any information you transmit to us.

6. Retention and Destruction

We will not retain your personal information for longer than required. We will keep your personal information until we no longer have a valid legal or business reason for keeping it or you request us to stop using it. Please note that we may keep just enough of your personal information to ensure that we comply with your request not to use your personal

information or comply with your right to erasure. For example, we must keep your request to be erased even if it includes your personal data until such time as you are no longer our customer.

In addition, Federal law requires that we retain, for the IRS, electronic filed tax return data for a period of at least 6 years. It is our policy that we will generally keep the tax return information you provide for at least 6 years or longer. In some cases, your data may be anonymized for research purposes and used indefinitely. If your data no longer meets any of the above criteria, Personal Information will be deleted or otherwise disposed of in a safe and secure manner.

7. Marketing

The above-referenced Personal Information may be used to send you marketing communications about our business or services. The legal basis for this type of processing is either consent or our legitimate interest in growing our business. We may send you such communications, which generally consist of our whitepapers, publications and presentations, if you requested it and/or if you agreed to receive such communications. You may opt-out of such communications at any time through the “unsubscribe” button in each email or contacting us at info@rutlen.com.

8. What are your Data Protection Rights? (EU/EEA/UK/Switzerland Data Subjects Only)

In accordance with the GDPR, UK GDPR, and Swiss Data Protection Act, you have several enhanced rights in relation to how we use your information. We would like to make sure you are fully aware of all your data protection rights. Every user is entitled to the following:

- **The right to data access** – You have the right to request copies of your Personal Information from Rutlen. We may charge you a small fee for this service.
- **The right to rectification** – You have the right to request that Rutlen correct any of your Personal Information that you believe is inaccurate. You also have the right to request that Rutlen complete Personal Information about you that you believe is incomplete.
- **The right to erasure** – You have the right to request that Rutlen erase your Personal Information, under certain conditions.
- **The right to restrict processing** – You have the right to request that Rutlen restrict the processing of your Personal Information, under certain conditions.
- **The right to object to processing** – You have the right to object to Rutlen’s processing of your Personal Information, under certain conditions.
- **The right to data portability** – You have the right to request that Rutlen transfer the Personal Information we have collected about you to another organization, or

directly to you, under certain conditions. Please note that this right applies only when the lawful basis for the processing of your Personal Information is your consent or for the performance of a contract, or if the processing is performed by automated means.

- **The right to withdraw consent** – Subject to clause 6 above, you have the right to withdraw consent where we have processed your Personal Information based on your consent.

If you make a request, we have 1 month to respond to you. If you would like to exercise any of these rights, please contact us:

- Via email at: info@rutlen.com.
- Via phone at: (650) 868-9282 (USA)
- Via mail at: Rutlen Associates
1100 Broadway St #7216
Redwood City, CA 94063
United States of America

9. What are Cookies?

Cookies are text files placed on your computer or device to collect standard Internet log information and visitor behavior information. When you visit our Website, we may collect information from you automatically through cookies or similar technology.

For further general information about cookies, visit allaboutcookies.org.

10. How do we Use Cookies?

Like many sites, our Website employs cookies, JavaScript tags and Web beacons (also known as clear GIF technology or "action tags") to speed your navigation of our Website, recognize you and your access privileges, and track usage of our Website.

11. What Types of Cookies do we Use?

We use both persistent cookies and third-party cookies. Persistent and third-party cookies enable us to track and target the interests of our customers to enhance your experience on our Website. Persistent cookies are used to make it easier for you to navigate our Website, and remain on your hard drive for an extended period of time. Third party cookies are only used for short-term tracking.

12. How to Manage Cookies

Most Internet browsers are initially set up to accept cookies. You may download an opt-out cookie to disable any and all cookies we employ to track and enhance your user experience— however, your ability to use the website will be then limited and/or unavailable. As different computers and different Internet browsers all require their own version of the opt-out cookie, you must perform this opt-out process on all computers and browsers that you wish to be opted-out.

13. Do Not Track (DNT)

Some browsers allow you to automatically notify websites you visit not to track you using a “Do Not Track” (DNT) signal. There is no consensus among industry participants as to what DNT means in this context. Like many websites and only services, we currently do not alter our practices when we receive a DNT signal from a visitor’s browser. To find out more about DNT, you may wish to visit www.allaboutdnt.com.

14. Privacy Policies of Other Websites

Our Website contains links to other websites. Our Privacy Policy applies only to our Website, so if you click on a link to another website, you should read their privacy policy.

15. Changes to Our Privacy Policy

We keep our Privacy Policy under regular review and place any updates on this web page. This Privacy Policy was updated on March 7, 2024.

We may change this Privacy Policy at any time without prior notice to you. Any changes that we make will be effective immediately upon our posting of the revised Privacy Policy on this Website. Your continued use of this Website constitutes your consent to any changes made. We will use your Personal Information in a manner consistent with the Privacy Policy in effect at the time you submitted your Personal Information, unless you later consent to a revised policy. We encourage you to periodically review this page for the latest information on our privacy practices.

16. International Transfers

Our Website is hosted on servers located in the United States, and we may also use service providers located in the United States and other countries. If you access our Website from outside of the United States, you consent to the transfer of your Personal Information to the United States. In addition, your data may be transferred to other countries and by using the Website, you consent to the transfer of information to countries outside your country

of residence. If you are located in the EEA, Switzerland, or the UK, we may store and share your Personal Information with companies outside of these jurisdictions.

We apply equal rigor to the security of data held and processed by us or on our behalf outside of the EEA, Switzerland, or the UK. We have thus taken steps to ensure that our affiliates, vendors, and others who process data on our behalf enter into standard contractual clauses approved by the European Commission, to safeguard the Personal Information which is transferred to and from the EEA, Switzerland, the UK, and beyond.

As some of our data processing locations are in the US, transfer of our data outside of the EEA, Switzerland, and the UK is necessary to enable us to provide the services in our engagement letter we hold with each client or to operate this Website. To the extent that any Personal Information is provided to carefully selected, trusted third parties outside the EEA, Switzerland, and the UK, or who will access the information outside of these jurisdictions, we take steps to ensure that approved safeguards are in place, such as the approved standard contractual clauses, the EU-US Privacy Shield, Swiss-US Privacy Shield, or similar adequacy decision frameworks/mechanisms, as applicable, and/or other appropriate safeguards, such as binding corporate rules, as described in the GDPR. You may always request information on how and where your data is processed and stored.

17. Collection of Data from Children

This Website is not directed to children under the age of thirteen (13). Children may not use our Website or purchase our products, and we do not knowingly collect any personal information from children under the age of thirteen (13). We have no way of distinguishing the age of individuals who access our Website. If a child has provided us with personal information, the parent or guardian should contact us to remove the information and opt out of promotional opportunities using the contact link provided below.

18. Anti-SPAM

We comply with Anti-Spam laws, including the Controlling the Assault of Non-Solicited Pornography And Marketing Act of 2003 (CAN-SPAM Act). If you opt-in to receive our whitepapers, publications, presentations, newsletter, marketing, or other communications or direct marketing, the option to unsubscribe will be included in every email. If we sell or transfer any of our business or assets, certain information about our clients may be a part of that sale or transfer. In the event of such sale or transfer results in a material change to this Privacy Policy, we will notify you.

19. How to Contact Us

If you have any questions about our Privacy Policy, the data we hold on you, or you would like to exercise one of your data protection rights, please do not hesitate to contact us:

- Via email at: info@rutlen.com.
- Via phone at: (650) 868-9282 (USA)
- Via mail at: Rutlen Associates LLC
1100 Broadway #7216
Redwood City, CA 94063
United States of America

20. Complaints

Should you wish to report a complaint or if you feel that Rutlen has not addressed your concern in a satisfactory manner, or if you consider our processing to infringe data protection laws, you have the right to lodge a complaint with a supervisory authority in your country or member state.