



PRIVACY NOTICE FOR CALIFORNIA RESIDENTS

The California Consumer Privacy Act ("CCPA" or "Act") grants residents of the State of California certain privacy rights in their personal information. This Privacy Notice for California Residents ("Notice") supplements the terms of our Online Privacy Policy explained above and should be read in conjunction with the terms of our Online Privacy Policy.

This Notice only applies to visitors and users of our website who are California residents (hereinafter "you" or "consumer"). This Notice does not apply to personal information collected from California-based job applicants, employees, owners, or contractors.

Information We Collect

As explained above in our Online Privacy Policy, the information we obtain from visitors to our website fall into two distinct categories—the personal information that visitors provide us and technical information provided by the browser of the computer, tablet or mobile device used when visiting our website. To understand your privacy rights under the CCPA, you need to understand what personal information is covered by the Act.

Personal Information

The CCPA defines personal information as information that identifies, relates to, describes, is reasonably capable of being associated with, or could reasonably be linked, directly or indirectly, with a particular consumer or household.

Personal information under the CCPA, however, does not include:



De-identified or aggregated consumer information.

Publicly available information from federal, state or local government records.

Other information is excluded from the scope of the CCPA:

Medical or health information covered by the Health Insurance and Portability and Accountability Act of 1966 ("HIPAA") and the California Confidentiality of Medical Information Act ("CIMIA").

Personal information covered by the Gramm-Leach-Bliley Act ("GLBA"), the California Financial Information Privacy Act ("FIPA").

Personal information Driver's Privacy Protection Act of 1994.

Personal information collected, processed, disclosed or sold for use in a report or by the user of a report under the Fair Credit Reporting Act ("FCRA").

The information immediately below identifies categories or examples of personal information covered by the CCPA, and identifies categories of information that we have collected from visitors to our website in the past twelve (12) months:

<p style="text-align: center;">CATEGORY OF PERSONAL INFORMATION</p>	<p>Personal Identifiers and Contact Information</p>
<p>Examples</p>	<p>Name, Address, Email</p>
<p>Business Purpose(s) for Which Information is Used</p>	<ul style="list-style-type: none"> • Providing professional services in accordance with our agreements, agreements with other clients, or otherwise providing or discussing professional services to or with you • Communicating with you in connection with the provision of professional services including sending any billing statements and invoices, and to deal with any inquiries and complaints made by or about you relating to the professional services • Promoting our professional services through various marketing or promotional communications • Complying with any legal or ethical obligations such as conducting conflict checks for potential new clients • Responding to inquiries, including but not limited to, those made by telephone, email and/or website

	<ul style="list-style-type: none"> • Verifying and responding to consumer requests
Categories of Sources from Which Information is Received	<ul style="list-style-type: none"> • Our clients, or records and information provided by our clients • Visitors of our website
Categories of Third Parties to Whom Information was Disclosed in the Last 12 Months	We do not share this information with any third party unless required to do so by law or government agency, for the purpose of defending or prosecuting legal claims, for advising and counseling our clients, or for safekeeping and storing the information (such as electronic databases managed or hosted by third parties).
Category of Personal Information	Commercial Information
Examples	Credit card numbers, expiration dates, CVV codes; bank account information; wiring instructions; tax forms
Business Purpose(s) for Which Information is Used	<ul style="list-style-type: none"> • Processing payments from you to Bennett Thrasher • Communicating with you in connection with payments for services and transfers of money between you and Bennett Thrasher • Verifying and responding to consumer requests
Categories of Sources from Which Information Received	From you or your authorized agent or representative



<p>Categories of Third Parties to Whom Information was Disclosed in the Last 12 Months</p>	<p>We do not share this information with any third party unless required to do so by law or government agency, or for the purpose of defending or prosecuting legal claims.</p>
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<p>Category of Personal Information</p>	<p>Employment Information</p>
<p>Examples</p>	<p>Employment and wage history; leave of absence records, garnishments, benefits information and documentation of licenses and certifications for business purpose</p>
<p>Business Purpose(s) for Which Information is Used</p>	<ul style="list-style-type: none"> • Providing professional services in accordance with our agreement with you, or in accordance with our agreement with our client, or otherwise providing or discussing our professional services to/with you • Communicating with you in connection with the provision of professional services • Complying with any legal or ethical obligation such as conducting conflict checks for potential new clients and maintaining your information to run future conflict checks

	<ul style="list-style-type: none"> • Verifying and responding to consumer requests • Verification and review in conjunction with employment applications
Categories of Sources from Which Information Received	<ul style="list-style-type: none"> • Records provided by you, including but not limited to proof of identity, banking information and paperwork documenting wage and time records or other benefits information • Our clients or records provided by our clients
Categories of Third Parties to Whom Information was Disclosed in the Last 12 Months	We do not share this information with any third party unless required to do so by law or government agency, for the purpose of defending or prosecuting legal claims, for advising and counseling our clients, or for safekeeping and storing the information (such as electronic databases managed or hosted by third parties)
Category of Personal Information	Documentation and information about our professional engagement
Examples	Records provided by you (which may include personal identifiers, protected classifications, commercial data, internet activity, geo location data, mobile device data, or financial employment data); fee agreements, tax returns, correspondence

	<p>(including e-mail correspondence) with you or relating to your professional engagement; timekeeping and payment records related to your professional engagement; documents and communications with vendors or other third parties relating to your professional engagement (such as taxing authorities or other regulatory agencies)</p>
<p>Business Purpose(s) for Which Information is Used</p>	<ul style="list-style-type: none"> • Providing professional services in accordance with our agreement with you or in accordance with our agreement with our client • Communicating with you in connection with the provision of professional services including sending billing statements and invoices • Inquiries and complaints made by or about you relating to the professional services • Complying with our ethical obligations
<p>Categories of Sources from Which Information Received</p>	<ul style="list-style-type: none"> • Our clients, our information and records or other property provided by our clients

	<ul style="list-style-type: none"> • Documentation and records created by our employees
Categories of Third Parties to Whom Information was Disclosed in the Last 12 Months	We do not share this information with any third party unless required to do so by law or government agency, upon your expressed permission, for the purpose of defending or prosecuting legal claims, for advising and counseling our clients, or for safekeeping and storing the information (such as electronic databases managed or hosted by third parties).
Category of Personal Information	Computer, electronic device, network and internet activity
Examples	Date and time of your visit to our website; dates, times and websites visited; links clicked on web pages visited; browser ID; browser type; device ID; operating system; form information downloaded; the mainframe from which our site was accessed; cookies
Business Purpose(s) for Which Information is Used	<ul style="list-style-type: none"> • Improving the website, network and internet experience for all visitors • Understanding the demographics of our website visitors • Operating and maintaining the website and our network • Detecting security incidents

	<ul style="list-style-type: none"> • Debugging to identify and repair errors that impair existing and intended functionality of the website • Protecting against malicious or illegal activity • Verifying and responding to consumer requests
Categories of Sources from Which Information Received	<ul style="list-style-type: none"> • Individuals using company electronic or digital resources such as our internet, network or digital platforms and the device and browser used during such activities • Individuals sending emails to an address in the company domain • Visitors to our website and the device and browser used to access the website
Categories of Third Parties to Whom Information was Disclosed in the Last 12 Months	We do not share this information with any third party unless required to do so by law or government agency, for the purpose of defending or prosecuting legal claims or for advising and counseling our clients
Category of Personal Information	Geo Location Data
Examples	IP addresses
Business Purpose(s) for Which Information is Used	<ul style="list-style-type: none"> • Improving the website experience for all visitors

	<ul style="list-style-type: none"> • Understanding the demographics of our website visitors • Detecting security incidents • Debugging to identify and repair errors that impair existing or intended functionality of the website • Protecting against malicious or illegal activity • Verifying and responding to consumer requests
<p>Categories of Sources from Which Information Received</p>	<ul style="list-style-type: none"> • Visitors of our website and the device and browser used to access the website • Individuals using company electronic or digital resources such as our internet or digital platforms and the device and browser used during such activities
<p>Categories of Third Parties to Whom Information was Disclosed in the Last 12 Months</p>	<p>We do not share this information with any third party unless required to do so by law or government agency, for the purpose of defending or prosecuting legal claims or for advising and counseling our clients.</p>



Our Use and Sharing of Personal Information

How we use and share personal information obtained by visits to our website is disclosed above in our Online Privacy Policy.

As we explained above in our Online Privacy Policy and reiterate here, we do not and will not sell personal information we receive from visitors to our website.

Your Rights as a California Consumer

If you are a California resident, you have the following rights:

1. The right to request, up to 2 times in a 12-month period, that we identify to you: (1) the categories of personal information we have collected, disclosed or sold about you in the last 12 months, (2) the categories of sources from which the personal information was collected, (3) the business purpose for which we use this information, and (4) the categories of third parties with whom we share or have shared your personal information in the last 12 months;
2. The right to request, up to 2 times in a 12-month period, that we disclose to you, free of charge, the specific pieces of personal information we have collected about you in the last 12 months;
3. The right to request, up to 2 times in a 12-month period, that we delete personal information that we collected from you, subject to certain exceptions;



4. The right to opt-out of the sale of your personal information to third parties;
5. The right to designate an authorized agent to submit one of the above requests on your behalf;
6. The right to not be discriminated against in receiving different or less favorable pricing, service or financial incentive for exercising any of the above rights.

How to submit a request

If you have any questions about our Privacy Policy, or would like to share any comments with us, please contact Allison Lavelle, 3300 Riverwood Parkway, Suite 700, Atlanta, GA 30339, Allison.lavelle@btcpa.net, 770-396-2200.

How we will verify that it is really you submitting the request

When you submit a consumer request through one of the methods provided above, we will ask you to provide some information in order to verify your identity and respond to your request. Specifically, we will ask you to verify information that can be used to link your identity to particular records in our possession, which depends on the nature of your relationship and interaction with us. For example, if your sole interaction with us was as a website visitor, then in order to verify your identity, we will need to ask you to provide your name, email, phone number, IP address, device ID, browser ID, and/or cookie ID.



How to authorize an agent to act on your behalf

You can authorize someone else as an Authorized Agent who can submit a consumer request on your behalf. To do so, you must either (a) execute a valid, verifiable, and notarized Power of Attorney or (b) provide other written authorization that we can then verify. When we receive a consumer request submitted on your behalf by an Authorized Agent, that person will be asked to provide written proof that they have your permission to act on your behalf, and we will also contact you and ask you for information to verify your own identity directly with us and not through your Authorized Agent.

Responding to your consumer requests

We endeavor to respond to a verifiable consumer request within forty-five (45) days of its receipt. If we require more time (up to 45 days or 90 days total from the date we receive your request), we will inform you of the reason and extension period in writing. We will deliver our written response by mail or electronically, at your option. Any disclosures we provide will only cover the 12-month period preceding our receipt of your verifiable consumer request. The response we provide will also explain the reasons we cannot comply with a request, if applicable. We do not charge a fee to process or respond to your verifiable consumer request unless it is excessive, repetitive, or manifestly unfounded. If we determine that the request warrants a fee, we will tell you why we made that decision and provide you with a cost estimate before completing your request.

Children under the age of 16

Our Website is not intended for children under 16 years of age. No one under age 16 may provide any personal information on the Website. We do not knowingly collect personal information from children under 16. If you are under 16, do not use or provide any information on this Website. If we learn we have collected or



received personal information from a child under 16 without verification of parental consent, we will delete that information. If you believe we might have any information from or about a child under 16, please contact us at the email address below.

How we protect the information that we collect

The protection of the information that we collect about visitors to this Website is of the utmost importance to us and we take every reasonable measure to ensure that protection, including:

- We keep automatically collected data and voluntarily collected data separate at all times.
- We use internal encryption on all data stores that house voluntarily captured data.
- We use commercially reasonable tools and techniques to protect against unauthorized access to our systems.
- We restrict access to private information to those who need such access in the course of their duties for us.

Consent to Terms and Conditions

By using our professional services, accessing our Website, or otherwise engaging in activities described above, you consent to all Terms and Conditions expressed in this California Privacy Policy.

Changes

From time to time we may modify and/or update this California Privacy Policy and so we encourage you to check back on our Website at



www.btcpa.net/privacy-policy/ on a regular basis to determine if any changes have been made.