

# **Privacy Policy**

Effective 6/1/2024

Colorado Sales Tax Assistance ("CO Sales Tax Assistance", "COSTA", "We", "Us") is a provider of services and products designed to educate and simplify Colorado sales tax filing, remittance and management.

We take Your privacy very seriously. This Privacy Policy describes the policies and procedures regarding the collection, use and disclosure of Your information in connection with Your engagement of Us for content, products, or services made available by Us. We receive information about You from various sources, including without limitation: (i) if You register for the Services; (ii) Your use of the Services generally; and (iii) in the event of COSTA filing sales tax returns, any information available within any state or local sales tax filing platform or method. In order to provide You with the Services, We will collect, transfer, manipulate, store, disclose, and use Your information as described in this Privacy Policy. We encourage You to read this Privacy Policy carefully. It will help You make informed decisions about sharing Your personal information with us.

The defined terms in this Privacy Policy, if not defined herein, shall have the same meaning as in the Inukshuk Online Terms of Service, available at <u>(COSTA Terms of Service)</u> (the "Terms of Service" and together with the Privacy Policy, the "Terms"). You should read the Terms before accessing or using the Services. By accessing and using our Services, You consent to the terms of this Privacy Policy, and agree to be bound by it and our Terms. Please note that with respect to the COSTA Services, this Privacy Policy applies instead of any other privacy agreement You may have with us.

### We collect Your Personal Information.

The COSTA Services include online back office business, bookkeeping services designed for businesses and other accounting providers. The information We gather enables us to personalize, improve and continue to operate the Services. In connection with certain aspects of the Services, We may request, collect and/or display some of Your Personal Information. "Personal Information" is information about an identifiable individual, and may include information such as the individual's name, email address, telephone number, payment information, taxation details, and accounting and financial information. We may collect Personal Information directly from You when You:

- register to use the Services,
- use the Services,
- pay for the Services,
- contact the COSTA team

You can always choose not to provide Your Personal Information, but it may mean that We are unable to provide You with the Services.

#### We may receive Personal Information from You about others.

Through Your use of the Services, We may also collect information from You about someone else. If You provide us with Personal Information about someone else, You warrant and represent that You are authorized to disclose that information to us and that We may collect, use and disclose such information for the purposes described in this Privacy Policy.



## **Privacy Policy**

Effective 6/1/2024

This means that You must take reasonable steps to ensure the individual concerned is aware of and/or consents to the various matters detailed in this Privacy Policy, including the fact that their Personal Information is being collected, the purposes for which that information is being collected, the intended recipients of that information, the individual's right to obtain access to that information, our identity, and how to contact us.

## We collect, hold, and use Your Personal Information for limited purposes,

We collect Your Personal Information so that We can provide You with the Services. In doing so, We may use the Personal Information We have collected from You for lawful purposes that may be related to the Services, including but not limited to:

- verify Your identity and perform client screening,
- administer the Services,
- notify You of new or changed services offered in relation to the Services,
- carry out marketing or training relating to the Services,
- assist with the resolution of technical support issues or other issues relating to the Services,
- comply with applicable rules, laws and regulations, and
- communicate with You.

By using the Services, You consent to Your Personal Information being collected, held and used in this way and for any other use You authorize. We will only use Your Personal Information for the purposes described in this Privacy Policy or otherwise in accordance with Your express consent.

Note that We collect financial information, such as Your bank account or credit card number, credit card type and expiration date, and other such information ("Financial Information") for payment of Your Membership Fee. When You register for Your Account or pay Your invoices, Your financial information is collected and stored on our secure servers.

# When using Your Data for other purposes, You will not be identified as the source of the information.

COSTA may, with the assistance of third parties, use the information provided to Us for purposes such as improving the delivery or quality of services or technology to You and other clients, thought leadership projects, to allow You and other clients to evaluate various business transactions and opportunities, and for use in presentations to You, other clients and non-clients. When Your information is used outside of COSTA or such third parties assisting them, You will not be identified as the source of the information. For example, Your information may be aggregated or anonymized so that it is not personally identifiable.

#### We take steps to protect Your personal information.



## **Privacy Policy**

Effective 6/1/2024

We are committed to protecting the security of Your Personal Information and We take all reasonable, industry-standard precautions to protect it from unauthorized access, modification or disclosure. Your Personal Information is stored on third party secure servers and all Data transferred between You and the Services is encrypted. However, the Internet is not in itself a secure environment and We cannot give an absolute assurance that Your Personal Information will be secure at all times. Transmission of Personal Information over the Internet is at Your own risk and You should only input, or instruct the inputting of, Personal Information to the Services within a secure environment. You are responsible for preventing unauthorized access to Your account and Personal Information, including, for example, by protecting Your account credentials and limiting access to devices on which You access the Services.

We will advise You as soon as reasonably possible, in accordance with applicable laws, upon discovering or being advised of a security breach where Your Personal Information is lost, stolen, accessed, used, disclosed, copied, modified, or disposed of by any unauthorized persons or in any unauthorized manner.

## We disclose Your Personal Information in limited circumstances.

We will only disclose the Personal Information You have provided to us to other parties if it is necessary and appropriate to facilitate the purpose for which Your Personal Information was collected pursuant to this Privacy Policy, including the provision of the Services. We will not otherwise disclose Your Personal Information to a third party unless You have provided Your express consent. However, notwithstanding the foregoing, We do reserve the right to access, read, preserve, and disclose any information as We reasonably believe is necessary to (i) satisfy any applicable law, regulation, legal process or governmental request; (ii) enforce this Privacy Policy and our Terms of Service, including investigation of potential violations hereof; (iii) detect, prevent, or otherwise address fraud, security or technical issues; (iv) respond to user support requests or (v) protect our rights, property or safety, our users and the public. This includes exchanging information with other companies and organizations for fraud protection and spam/malware prevention. Where possible and appropriate, We will notify You if We are required by law to disclose Your Personal Information.

We may employ and contract with people and other entities that perform certain tasks on our behalf and who are under our control (our "Agents"). We may need to share Personal Information with our Agents in order to provide the Services to You. Unless We tell You differently, our Agents do not have any right to use Personal Information or other information We share with them beyond what is necessary to assist us. You hereby consent to our sharing of Your Personal Information with our Agents.

Finally, We may choose to buy or sell assets. In these types of transactions, user information is typically one of the transferred business assets. Moreover, if We, or substantially all of the assets relating to COSTA, were acquired, or if the COSTA business is discontinued or We go out of business or enter bankruptcy, user information would be one of the assets that is transferred or acquired by a third party. You acknowledge that such transfers may occur, and that any acquirer of us or our assets may continue to use Your Personal Information as set forth in this Privacy Policy.

You may request access to Your Personal Information.



# **Privacy Policy**

Effective 6/1/2024

It is Your responsibility to ensure that the Personal Information You provide to us is accurate, complete and up-to-date. You may request access to the Personal Information We hold about You, or request that We update or correct any Personal Information We hold about You, by setting out Your request in writing and sending it to us at support@inukshuk.online.

We will process Your request as soon as reasonably practicable, provided We are not otherwise prevented from doing so on legal grounds. If We are unable to meet Your request, We will let You know why. In some circumstances, it may be necessary for us to seek to arrange access to Your Personal Information through a mutually agreed intermediary (for example, the Subscriber).

We'll only keep Your Personal Information for as long as We require it for the purposes of providing You with the Services. However, We may also be required to keep some of Your Personal Information for specified periods of time, for example under certain laws relating to corporations, money laundering, and financial reporting legislation, and to comply with professional standards.

California Privacy Rights: Under California Civil Code sections 1798.83-1798.84, California residents are entitled to ask us for a notice identifying the categories of personal customer information which We share with our affiliates and/or third parties for marketing purposes, and providing contact information for such affiliates and/or third parties. If You are a California resident and would like a copy of this notice, please submit a written request to the following address: Inukshuk Online, 7515 W 17<sup>th</sup> Ave., Suite C, Lakewood, CO 80214.

#### The COSTA Services use cookies.

In providing the Services, We may utilize "cookies." A cookie is a small text file that is stored on Your computer for record-keeping purposes. A cookie does not identify You personally or contain any other information about You but it does identify Your computer.

We and some of our affiliates and third-party service providers may use a combination of "persistent cookies" (cookies that remain on Your hard drive for an extended period of time) and "session ID cookies" (cookies that expire when You close Your browser) on the Website to, for example, track overall site usage, and track and report on Your use and interaction with ad impressions and ad services.

You can set Your browser to notify You when You receive a cookie so that You will have an opportunity to either accept or reject it in each instance. However, You should note that refusing cookies may have a negative impact on the functionality and usability of the Website.

#### You can opt-out of any communications.

We send billing information, product information, Services updates and Services notifications to You via email and/or SMS text messaging. Our emails and text messages will contain clear and obvious instructions describing how You can choose to be removed from any mailing or messaging lists not essential to the Services. We will remove You from mailings relating to Inukshuk Online at Your request. Please read the applicable unsubscribe instructions carefully. Please note that requesting to be removed



# **Privacy Policy**

Effective 6/1/2024

from one mailing or messaging list may not result in Your being removed from all mailing or messaging lists to which You are subscribed. You may need to send separate requests to be removed from each specific mailing or messaging list to which You are subscribed.

#### You are responsible for transfer of Your data to third-party applications.

The Services may allow You, the Subscriber, or another Authorized User within the relevant subscription to the Services to transfer Data, including Your Personal Information, electronically to and from third-party websites, services and applications. This Privacy Policy does not apply to the practices of such third parties that We do not own or control. While We attempt to facilitate access only to those third-party websites, services, and applications that share our respect for Your privacy, We have no control over, and takes no responsibility for, the privacy practices or content of these websites, services, and applications. You are responsible for checking the privacy policy of any such applications so that You can be informed of how they will handle Your Personal Information.

#### You may contact us regarding any privacy concerns.

If You have questions or comments about our administration of Your personal data, please contact us at <a href="mailto:support@inukshuk.online">support@inukshuk.online</a>

or via US Mail at Teresa Schiel, c/o TLS Enterprises, LLC, 7515 W 17th Ave., Suite C, Denver, CO 80214

#### This Privacy Policy may be updated from time to time.

We may amend this Privacy Policy from time to time. Use of information We collect now is subject to the Privacy Policy in effect at the time such information is collected. If We make changes in the way We collect or use information, We will notify You by posting an announcement on the Services or sending You an email 30 days prior to the effective date. A user is bound by any changes to the Privacy Policy when he or she uses the Services after such changes have been first posted.

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