

WWW.DIMERCURIOADVISORS.COM PRIVACY POLICY

This Privacy Policy was last modified on December 26, 2021.

This Privacy Policy describes DiMercurio Advisors, LLC's ("DA") practices regarding personal information and data. This policy applies to personal information and data received from you through our Services (as defined in our Terms of Service), by email, by text messages, and through our social media accounts (collectively, the "Service"). When you access or use the Services in any manner, including, but not limited to, visiting or browsing the Site or any of the Services use the Service, you agree to the terms in this Privacy Policy.

Except as specifically defined in this Privacy Policy, terms defined in the Terms of Service shall have the same meaning herein.

THE CATEGORIES OF PERSONAL INFORMATION WE COLLECT

Service Information: When you access or use any of the Services in any manner, we may collect information from you. Some of it may be personal information. This information can include, but is not limited to, search history, IP address, screen resolution, browser used, operating system and settings, access times and referring URL. If you are using a mobile device, we may also collect data that identifies your device, your settings and your location.

Scheduling or Contact Information: If you schedule an appointment or use the "Contact Us" feature through the Services, we collect additional information from you. This information may include your name, your business entity name, email address, telephone number, and billing address.

Document Upload Information: If you use our "Secure Upload" tool, we will collect additional information from you. This information will include all information provided to us in the documents you upload.

Team Support Information: If you choose to contact us by phone, email, text messages, social media, or the messaging services on our Site, we will also collect any information that you may submit to our team.

When you give us personal information, you are telling us that the information is true, accurate, complete and current. You are also telling us that you have the authorization to provide it to us.

HOW WE COLLECT YOUR PERSONAL INFORMATION

Personal information you give to us: We collect your personal information directly from you. For example, when you provide us your personal information when you schedule an

appointment, use the “Contact Us” feature, use our “Secure Upload” tool, or contact our team for support.

Personal information we collect passively: We also collect your personal information passively. For example, we collect information about you over time and across different websites when you access or use this platform. We also use tracking tools like cookies and beacons. To learn more about these tools and how to control them, view our cookie policy on our legal center at www.DiMercurioAdvisors.com/legal.

Features of our Services may make use of your device attributes and settings that will allow us to determine your physical location. Such technologies may include IP address mapping, WiFi, GPS signals, cell tower positioning or other technologies. We use this information to enhance and personalize your experience and provide you with offers and services that may be of interest to you. We do not have control over your device settings, but we do recommend enabling location services on your device so you can take advantage of the location-based features and functionality offered.

Personal information we receive from third parties: We may sometimes collect your personal information from third parties. This can include when you log in using a third-party platform, such as Facebook, or if you come to our Site from any other third-party website. In addition, we also integrate third party software (i.e. Google’s Invisible CAPTCHA) that collects information about users for security reasons.

WHY WE USE YOUR PERSONAL INFORMATION

Your personal information may be used in the following ways:

Improving our services: To provide you with and improve our Services, to better understand the users of our Service, and to secure and protect our Site, the Services, and our other property.

Marketing activities: We use your information for marketing purposes. These activities may include sending you information about our offerings, updates about new content and resources on the Site, and for other purposes relating to marketing our professional services.

Communication: To communicate with you, including as follows:

- To send scheduling confirmations and reminders;
- To send upload confirmations;
- To send alerts and notifications you have subscribed to, including to your mobile device;
- To solicit reviews;
- To communicate with you if you have contacted any member of our team; and
- To send you information servicing and administrative emails

Legal purposes: In certain cases we may need to use your information to handle and resolve legal disputes, for regulatory investigations and compliance or to enforce the terms of use of the Services.

Performance of a contract: The use of your personal information may be necessary to perform the Services and provide you with professional services that you have formally engaged us to provide to you.

Consent: We may rely on your consent to use your data for certain direct marketing purposes. You can withdraw your consent anytime by contacting us or updating your preferences using the “Manage Preferences” or “Unsubscribe” link on any marketing email we have sent you.

NON-PERSONAL/ ANONYMIZED INFORMATION

Personal information is information you provide us which personally identifies you, such as your name, physical address, email address, phone number, credit card number and type (but only where we are processing payments at your request), bank account routing number and account number (but only where we are processing payments at your request), password, age/birthday, phone number, social media identifiers, email or other personally identifying information. We do not intentionally collect any personal information about your race, ethnicity, or political affiliations.

Aggregated non-personal information (also known as de-identified information or anonymized information) is different from personal information. Aggregated non-personal information is information about our users, their computers or devices and/or use of our Services that are collected into groups so that it no longer reflects or references an individually identifiable user. This information may include, without limitation, information about use of our Services, web pages viewed or used, content accessed or used, IP addresses and device identifiers, information about hardware or software used to access the Services, user location information, page views, app usage, customization settings relating to the Services, and other types of information we collect that cannot reasonably be used to identify you personally. We may collect and use aggregated non-personal information to improve the Services or for any other reason, at its sole discretion.

COOKIES

To learn more about how we use cookies, you can visit our Cookies Policy on our legal center at www.DiMercurioAdvisors.com/legal.

HOW WE SHARE YOUR PERSONAL INFORMATION

Accountant-Client Privilege Preserved: If you have signed an engagement letter or statement of work with us to provide you with professional services, nothing in this Privacy

Policy is intended to modify or waive the accountant-client privilege as provided by the terms Fla. Stat. § 95.5055.

Corporate affiliates and change of control: We may share your personal information with our corporate affiliates and if DA itself (or part of its business) is sold or otherwise changes control, owners would have access to your personal information for the uses set out herein.

Service providers: We may share your personal information with suppliers who perform services on our behalf and have agreed in writing to protect and not further disclose your information. If you contact our team, they may need to share information about your request with the relevant vendor in order to assist you.

Payment service providers: If you make a payment through the Site, we may share your personal information with our payment service provider. This third party will process your personal information as data controllers in accordance with its own privacy policies.

Business partners: We may share your personal information with various business partners with whom we may jointly offer products or services, or whose products or services may be offered on our Site. Some of these business partners may use your personal information for online behavioral advertising purposes, or to offer you services or products that we believe you may be interested in. We may also share anonymous aggregated usage information with partners.

Information shared in public: If you provide us a review, you authorize us to publish it on all our Services under either the screen name you provided or your first name with last initial. You also authorize us to aggregate it with other reviews.

Authorities: We may disclose personal information if required by law, for example to law enforcement or other authorities. This includes court orders, subpoenas and orders arising from legal processes, and administrative or criminal investigations. We may also disclose your personal information if the disclosure is necessary for the prevention, detection or prosecution of criminal acts or to prevent other damage, or in response to a legal action or to enforce our rights and claims.

Other collection and use: We may also share or use your information as otherwise described to you at the time of collection. We may also share anonymous aggregated information with others.

HOW WE STORE AND PROTECT YOUR PERSONAL INFORMATION

Our servers and data centers are located in the U.S. and our service providers may be located there or in other countries. By providing us personal information, you agree that your personal information may be transferred to and stored in these countries. These countries may have different and/or less stringent privacy/data protection and data

security rules than those of your own country. As a result, your personal information may be subject to access requests from governments, courts, or law enforcement in those countries according to laws in those countries. Subject to the applicable laws in such other countries and their jurisdiction over data held by us, we will provide the necessary safeguards to maintain protections of your personal information.

DA has a security program intended to keep the personal information stored in our systems protected from unauthorized access and misuse. Our systems are configured with data encryption, or scrambling technologies and firewalls constructed to industry standards. We also use Secure Socket Layer (SSL) technology that protects the data you send over the Internet. Personal information may only be accessed by persons within our organizations, or our third parties to carry out the uses indicated in this policy. In addition, information collected by Google's Invisible CAPTCHA is held in accordance with the Google Privacy Policy. We will use all commercially reasonable methods to keep personal information securely in our files and systems. With current technology, however, we cannot guarantee the security of your data from all possible attacks or intrusions on our servers or guarantee the security of your data as it travels over the Internet. Thus, you hereby release DA from liability for any such possible attacks or intrusions that might compromise the security of your data.

RETENTION PERIODS

We will retain your personal information as necessary to comply with our legal obligations, resolve disputes and enforce our contracts.

OTHER WEBSITES

You may find advertising or other content on our Services that link to the sites and services of our partners, suppliers, advertisers, sponsors, licensors and other third parties. We do not control the content or links that appear on these sites and are not responsible for the practices employed by websites linked to or from our Services. In addition, these sites or services, including their content and links, may be constantly changing. These sites and services may have their own privacy policies and consumer service policies. Browsing and interaction on any other website, including websites which have a link to our Services is subject to that website's own terms and policies.

MINORS

The Site and the Service are not directed to individuals under the age of eighteen (18), and we do not knowingly collect personal information from minors. If we become aware that a minor is attempting to submit personal information, we will remove this information from our records. If you are the parent/legal guardian of a minor who has given us personal information, please contact us so we can delete it.

CHANGES TO THIS POLICY

We may modify this Privacy Policy at any time and without prior notice. We will notify you of major changes to how we use your personal information prior to implementing them. We may notify you about such a material change by email or notice on our Site. By accessing or using the Site and/or Services in any way after we post these changes, you indicate you accept them.

RIGHTS WITH RESPECT TO PERSONAL INFORMATION

Certain jurisdictions provide their citizens with additional rights relating to data. Although the laws in these jurisdictions may not apply to us, we will, where reasonably possible, provide the following services for users in jurisdictions where such rights apply:

- **Access:** You may be entitled at any time to obtain information about your personal information that we store, in accordance with applicable law and without any fee. However, in exceptional cases we ask you to pay reasonable fee before we provide the information if permitted by applicable law.
- **Rectification:** You may request that we rectify any of your personal information that is incomplete or incorrect.
- **Deletion:** You may request that we delete your personal information, also known in some jurisdictions as the “right to be forgotten.”
- **Objection:** You may object, at any time, to your personal information being processed for direct marketing purposes
- **Restrictions of processing:** You may ask us to cease processing of your personal information for example if you have objected to the processing and the existence of a legitimate ground is still under consideration.
- **Data portability:** You may request us to send you your personal information and data in a commonly used and machine-readable format which shall be decided on in our sole discretion.
- **Right to withdraw consent:** You may have the right to withdraw your consent at any time, without affecting the lawfulness of our processing based on such consent before it was withdrawn.

We may request proof of your identity before acting upon any request. We may not be able to allow you to access certain personal information in some cases. For example, if your personal information is connected with personal information of other persons, or for legal reasons. In such cases, we will provide you with an explanation why you cannot obtain this information. We may also deny your request for deletion or rectification of your personal information, especially information affecting or related to our accounting, processing of claims, and mandatory data retention, which may prohibit deletion or

anonymization, or if you are from a jurisdiction that does not provide the rights stated above.

HOW TO CONTACT US OR MAKE A COMPLAINT

We control the processing of personal information on our Services, except to the extent such information is processed by a third-party. To exercise your rights, or if you have questions about our privacy practices or need assistance with exercising or understanding your privacy choices, please contact us using one of the following:

Email: legal@DiMercurioAdisors.com

Call: 407-906-4376

Write: DiMercurio Advisors LLC, Attn: Legal Services, P.O. Box 2748, Orlando, FL 32802

“DO NOT TRACK” SIGNALS

Some browsers have a “do not track” feature that lets you tell websites that you do not want to have your online activities tracked. These features are not yet uniform, so we are not currently set up to respond to those signals. If you have any questions on our use of tracking tools, please contact us using the information above.

GOVERNING LAW AND INTERNATIONAL USERS

Unless otherwise stated in a part of the Services, the Services are controlled, operated and administered by DA from its office in Florida, United States of America and this policy is provided in accordance with and subject to applicable U.S. law and the law of the State of Florida. If you are based outside the State of Florida and decide to access the Service from your location outside of the State of Florida, you hereby agree to be subject to this notice and waive all privacy-related rights in other jurisdictions that conflict with Florida Law or this Privacy Policy. You should not provide us with any personal information unless you consent to the application of Florida law, and to the use and disclosure of your information in accordance with the terms of this Privacy Policy.