

CountUp, Inc. Privacy Policy

Effective as of February 1, 2016

CountUp is committed to protecting the privacy of individuals who visit our Website (“Visitors”) or individuals who register to use the Service (“Users” or “You”). CountUp takes every reasonable effort including but not limited to non-disclosure agreement, terms of service and privacy policy, which Accountant Users acknowledge to ensure confidentiality but we cannot guarantee it. This Privacy Statement describes CountUp’s privacy practices in relation to the use of our Website and Service.

Unless specifically defined, terms used throughout this statement have the same definitions as those given in the CountUp Terms of Use, available at www.CountUp.io/termsfuse.

1. Information we collect

Information collected about Visitors: Like other website operators, CountUp collects information of the sort that web browsers and servers typically make available through the use of commonly-used information-gathering tools such as cookies (please see Section 4, “Our use of cookies,” for details). This non-personally identifying information (“User Non-Personal Information”) includes the visitor’s browser type, language preference, referring site, additional websites requested and the date and time of each Visitor request. We also collect potentially personally-identifying information like Internet Protocol (IP) addresses (please see Section 1, “Information we collect-Information collected about Users” for details about this collection procedure). CountUp’s purpose in collecting User Non-Personal Information is to better understand how our Visitors’ use our website to improve their user experience and to serve more relevant ads or promotional offers on our site or third parties’ sites based upon that information.

Becoming a User: You may visit our Website without creating an account, but you will not have full access to our Service. Visitors who wish to use the Service must create an account, thus becoming a User. To create an account, Users must either provide CountUp with personal contact information, such as name and email address or sign in to CountUp via Google’s authentication service (please see Section 5, “Gathering and protecting the information we collect,” for details about this form of authentication).

Information collected about Users: Either form of account creation may create any information about a User which could, alone or together with other personally-identifying information, personally identify him or her (“User Personal Information”). CountUp collects User Personal Information only with your consent which you express by using our Service after reviewing this Privacy Statement and CountUp’s Terms of Use. User Personal Information may include information you provide us directly, such as your email address, or information we collect through your use of our Services, such as your preferences or your search terms. User Personal Information may include, without limitation, your name, your email address, your billing address, your credit card or banking information, your State CPA license number (for Accountant Users), your profession, your

business or industry, your photograph, and other personal, professional, demographic and business information that you provide to us through your use of the Service. If you are an Accounting User we may also collect your credit card information, bank account information, photographs and professional and business information about you, your practice or specialty areas and your educational background. In addition, from time to time we may collect demographic, contact or other personal or demographic information you provide in connection with your participation in surveys, promotional offers, forums and other interactive areas of the Site.

We only gather the information you give us access to, and we only use it as described below. We only collect the minimum amount of personal information necessary or appropriate to fulfill the purpose of your interaction with us or to serve you more relevant ads or promotional offers.

User Personal Information does not include aggregated, non-personally identifying information. You may refuse to supply personally-identifying information; however, that refusal may prevent you from using CountUp's Service.

No information about children: CountUp does not knowingly collect information from, or direct any of our content specifically to, children or teenagers under the age of 18. If we learn or have reason to suspect that a User of our Service is under the age of 18, we will promptly delete any personal information in that User's account.

Location-based data: CountUp also makes use of location-based data for our Website. If you allow these Services, we will ask you to enter your general location. We use this information to provide Services to you or to serve you more relevant ads or promotional offers, not to personally identify you. If you choose not to allow CountUp to access your location, some or all functionality may not be available to you.

Confidentiality and Job Postings: In order to access the Service, Job Posters may post certain information via an online Job Form or by speaking with a CountUp employee. This information may include, among other things, a description of the Job Poster's business and accounting question(s). This posted Job will be viewed by those Accountant Users who have access to view posted Jobs and may be viewed by CountUp employees to ensure quality control and provide technical support.

2. How we use the information we collect

To provide the Services you request: CountUp uses User Personal Information to perform and provide the Services you request. For instance, we use User Personal Information to allow Job Posters to select the best Accountant User for their needs; facilitate communication between Accountant Users and Job Posters; and simplify invoicing and billing for Jobs. We use location-based data to allow Accountant Users to bid on Jobs in their local area and jurisdiction. We also use User Personal Information to populate online profiles.

To communicate with Users: CountUp may also use User Personal Information to communicate with Users. For instance, CountUp may use information you provide to send you information regarding our Services, such as promotions or events; to provide you with technical support; to solicit feedback about our Service; or to notify you if our policies change.

To improve our Service: CountUp may use aggregated, non-personally identifying information gathered from our web server to operate, improve, and optimize our Website and Service.

Serving more relevant ads: We may use Personal or Non-Personal Information to serve you more relevant ads or promotional offers.

3. How we share the information we collect

In general: CountUp takes every reasonable effort including but not limited to non-disclosure agreement, terms of service and privacy policy, which Accountant Users acknowledge to ensure confidentiality but we cannot guarantee it. We do not disclose User Personal Information outside CountUp, except as described below or in Section 6, "Compelled Disclosure."

With your consent which you express by using our Service after reviewing this Privacy Statement and CountUp's Terms of Use: CountUp may share User Personal Information with your consent to perform services you have requested, including displaying the information you have chosen to share in order to post or bid on a Job. Only CountUp Accountant Users may review Job postings. CountUp employees may review Job postings from time to time to ensure quality.

If you upload a document: If you choose to upload a document by using our documents feature, only CountUp Accountant Users may review such documents. All documents shared are available in "View Only," mode to such Accountant Users.

To our employees, other affiliates and third party service providers: CountUp discloses User Personal Information only to those of our employees, third party contractors (e.g., our email service providers and payment processors), and affiliated organizations that need to know this information in order to process it on our behalf or to provide or improve our Service. In addition, our employees and other affiliates have agreed not to disclose this information to others, in accordance with terms and conditions at least as restrictive as this Privacy Statement. Some of our employees, contractors, and affiliated organizations may be located outside of your home country; by using CountUp's Service, you consent to the transfer of such information to them. Please see Section 5, "Gathering and protecting the information we collect," for more details.

In a merger: CountUp may share User Personal Information if we are involved in a merger, sale, or acquisition. If any such change of ownership happens, we will seek to continue to ensure the confidentiality of User Personal

Information, and we will notify you on our Website before any transfer of User Personal Information. The purchaser will have to honor any promises we have made in this Privacy Statement or in our Terms of Use.

Advertising; Third-party tracking, re-targeting or analysis: CountUp may from time to time share, sell, rent, or trade User Personal and/or Non-Personal Information with third parties or permit third-party tracking, re-targeting or data analysis across our Website or Service for their or our promotional purposes (e.g., to serve you more relevant advertisements or promotional offers). These third parties may collect more information than CountUp collects.

General information about Users: CountUp may disclose aggregated User Non-Personally Identifiable Information about how our Users, collectively, use our Service, so that we may share general information about our Service, such as statistics about the average cost of accounting services.

4. Our use of cookies

Cookies, generally: CountUp uses cookies to make interactions with our Website easy and meaningful and to serve you more relevant advertisements or promotional offers. A cookie is a small piece of text that our web server stores on your computer or mobile device, which we can then retrieve as needed. Cookies do not necessarily identify you if you are merely visiting the CountUp Website; however, a cookie may store a unique identifier for each logged in User.

Temporary cookies: CountUp uses temporary, or “session-based,” cookies, which are removed when you close your web browser or reboot your computer or device. We use session-based cookies to provide Services to you while you navigate our Website; remember that you are logged in during your visit; keep track of your progress as you post or bid on a Job; and increase Website security.

Persistent cookies: CountUp uses permanent, or “persistent,” cookies, which remain stored on your computer or device until deleted, or until they reach a specified date of expiration. We use persistent cookies to enable us to remember you each time you visit our Website; keep track of your preferences in relation to your use of our Website; allow you to log in without re-entering your password every time you visit; and serve you more relevant advertisements or promotional offers.

The cookies CountUp sets are essential for the operation of the Website, are used for performance or functionality; or serve you more relevant advertisements or promotional offers. By using our Website, you agree that we can place these types of cookies on your computer.

5. Gathering and protecting the information we collect

Industry standards in data security: CountUp takes all measures reasonably necessary to protect User Personal Information from unauthorized access, alteration, or destruction; maintain data accuracy; and help

ensure the appropriate use of User Personal Information. We follow generally accepted industry standards to protect the User Personal Information submitted to us, both during transmission and once we receive it. No method of transmission, or method of electronic storage, is 100% secure. Therefore, we cannot guarantee its absolute security.

No responsibility for third party service providers' security: In addition, while we take measures reasonably necessary to ensure that our third party service providers, such as our payment processing and data tracking, re-targeting or data analysis services, keep your information secure, these organizations' practices are ultimately beyond our control. By using our Service, you acknowledge that you understand and agree to assume these risks.

Documents, in general: CountUp uses third party service providers to transmit, store, encrypt, process and display uploaded documents on our behalf. CountUp has taken measures reasonably necessary to ensure that these services keep uploaded documents private and secure, but these organizations practices are ultimately beyond our control. By using the documents feature, you acknowledge that you understand and agree to assume the risks.

Some of our service providers include:

- Amazon Web Services (web hosting)
- Stripe (payments)

International data transfer: Information that we collect may be stored and processed in and transferred between any of the countries in which we operate in order to enable us to use the information in accordance with this privacy policy. By using the Service, you agree that we can store, process and transfer your information in this manner.

6. Compelled Disclosure

CountUp discloses potentially personally-identifying and personally-identifying information in response to a subpoena, court order or other governmental request, or when we believe in good faith that disclosure is reasonably necessary to protect the property or rights of CountUp, third parties, or the public at large.

In complying with court orders and similar legal processes, CountUp strives for transparency. When permitted, we will make a reasonable effort to notify Users of such disclosure.

However, if you have engaged an Accountant User through the Service (for example, by accepting a proposal and promising to pay or paying any required fees or costs), CountUp considers communications and documents shared with Consultant Users who are accountants to be privileged accountant-client communications and, to the extent legally permissible, may notify the engaged Accountant User of the subpoena, court order, or governmental request so that they may respond to the request. Furthermore, if an Accountant User has been engaged, CountUp may no longer disclose information on a "good faith" belief.

7. Your access to and control of the information we collect

Access to User Information: As an CountUp User, you may access, update, alter, or delete your basic User profile information by editing your user profile or contacting info@CountUp.io.

Data retention: Subject to the conditions set forth in the next paragraph entitled 'Deletion of User Information', CountUp will retain User Personal Information for as long as your account is active or as needed to provide you Services.

Deletion of User Information: If you wish to cancel your account, delete your User Personal Information, or request that we no longer use your User Personal Information to provide you Services, please contact info@CountUp.io. We will retain and use your User Personal information as necessary to comply with our legal obligations, resolve disputes, and enforce our agreements, but barring legal requirements, we will seek to delete your full profile within 30 days.

Control of communications from us: CountUp may occasionally send Users an email to tell you about new features, solicit feedback, notify you of important changes, or just keep you up to date with what's going on with CountUp and our products. You may manage your receipt of these communications by clicking on the "unsubscribe" link located on the bottom of CountUp's emails. Additionally, you may send a request specifying your communications preferences to info@CountUp.io. Please note that if you do opt out of promotional mailings, we may still send you important administrative emails, such as notices that affect your rights.

8. Changes to this Privacy Statement

CountUp may change its Privacy Statement from time to time, and in CountUp's sole discretion. We will provide notification to Users of material changes to this Privacy Statement (i) by sending a notice to the primary email address specified in your account, which will take effect immediately upon our sending of this email, and/or (ii) through our Website by posting a notice on our home page, which will take effect no sooner than 30 days from the date of the posting. Non-material changes to this Privacy Statement will take effect immediately. We encourage visitors to frequently check this page for any changes to our Privacy Statement. Your continued use of the Service after the effective date of a revised version of this Privacy Statement constitutes your acceptance of its terms.

9. Contacting CountUp

Questions regarding CountUp's Privacy Statement or information practices should be directed to info@CountUp.io.

