PRIVACY POLICY

This Privacy Policy describes Innovation Refunds LLC's and IR Advance LLC's (collectively, "Innovation Refunds," "we," "us," "our") policies regarding the collection, use, and disclosure of personal information about you when you visit our website or use our platform at https://www.innovationrefunds.com/, use our app(s) (e.g., the Innovations Refunds App), or otherwise interact with us concerning your actual or potential tax refund (collectively, "Services"). "Personal information" is non-public information that identifies, relates to, describes, is reasonably capable of being associated with, or could reasonably be linked to an individual. When you use our Services, you agree to our collection, use, and disclosure of personal information about you as described in this Privacy Policy. If you do not provide us with personal information we request, we may not be able to provide you with our Services or your experience when using those Services may be impaired.

A link to a Portable Document Format (PDF) version of this privacy policy can be found here: Privacy Policy.

Scope

Our Services and this privacy policy are intended for U.S. companies and their owners/employees acting in their professional capacity. Our Services and this privacy policy are not intended for individuals in their personal capacity. **If you are an employee of one of our customers**, please do not submit any of your non-business-related personal information to us. Similarly, this website is not intended for children. We do not knowingly sell or share the personal information of consumers under 16 years of age.

What Personal Information We Collect, How, and Why

The personal information we collect generally includes: (1) information needed to provide the Services (e.g., processing, or evaluating eligibility for, a tax refund or evaluating potential means for you to access your tax refund sooner); and (2) information that assists us in providing, improving, and marketing our Services or services of related companies. In the last 12 months, we have collected the following personal information from the sources, and for the purposes, described below.

Personal Information We Collect	Where We Get It	Why We Collect It	
Identifiers and contact information, such as	Directly from you and	To provide and market	
your name, IP address, Social Security Number	from our marketing	our Services or the	
("SSN"), other similar identifiers, postal	partners	services of related	
address, email address, and phone number		companies, enforce our	
		rights, and comply with	
		our legal obligations	
Any categories of personal information	Directly from you and	To provide and market	
described in Cal. Civ. Code § 1798.80(e), such	from our marketing	our Services, enforce our	
as identifiers, contact information, and	partners	rights, and comply with	
signature		our legal obligations	
Internet or other electronic network activity	From our marketing	To maintain, improve,	
information, including, but not limited to,	partners and digital	and market our Services	
browsing history, search history, and	technologies when you		
information regarding a consumer's interaction	interact with our website,		
with an Internet website, application, or	platform, or app(s)		
advertisement	(additional information in		
	the Digital Technologies		

	section of this Privacy Policy)	
Audio, electronic, visual, thermal, olfactory, or similar information (call recordings)	Directly from you when you consent to speak with us via a monitored or recorded phone line	To maintain, provide, and improve our Services
Professional or employment-related information	Directly from you and from our marketing partners	To provide and market our Services, enforce our rights, and comply with legal obligations
Inferences drawn from any of the information identified in this chart to create a profile about a consumer reflecting the consumer's preferences, characteristics, psychological trends, predispositions, behavior, attitudes, intelligence, abilities, and aptitudes	From our marketing partners	To improve and market our Services

For purposes of the above chart:

- when we collect personal information directly from you, this includes, for example, when you
 input the information into a form you provide us, enable one of our many integrations, or upload
 documents to us;
- our marketing partners include third-party data sellers, lead generators, joint marketing partners, and digital advertising partners (e.g., Google, Meta, other social media platforms); and
- providing our Services includes, for example, filing for a tax refund on your company's behalf, facilitating providing you access to your tax refund sooner, and/or maintaining our website, platform, or app(s).

In addition to the above personal information, we also collect anonymous, de-identified, and/or aggregate data that is not linked to a particular individual. Our use or disclosure of such information is outside the scope of this privacy policy. We only maintain and use such data in a way that does not identify a particular individual, and we will not attempt to re-identify it, except to test our de-identification process and ensure it cannot be associated with any individual.

Personal Information We Disclose and Why

The below chart summarizes how we have disclosed personal information in the last 12 months, and why.

Personal Information We Collect	To Whom We Disclose It	Why We
		Disclose It
Identifiers and contact information, such as your name, IP	Service providers and	Providing and
address, SSN, other similar identifiers, postal address,	contractors (e.g., tax	marketing our
email address, and phone number	preparers), the IRS (to file	Services, or as
	for your return), and	requested by
	marketing partners	you
Any categories of personal information described in <u>Cal.</u>	Service providers and	Providing and
Civ. Code § 1798.80(e), such as identifiers, contact	contractors (e.g., tax	marketing our
information, and signature	preparers), the IRS (to file	Services, or as

	for your return), and marketing partners	requested by
Internet or other electronic network activity information, including, but not limited to, browsing history, search history, and information regarding a consumer's interaction with an Internet website, application, or advertisement	Service providers and contractors (e.g., internet technology ("IT") help) and marketing partners	Maintaining, providing, improving, or marketing our Services
Audio, electronic, visual, thermal, olfactory, or similar information (e.g., call recordings)	Service providers and contractors (e.g., call recording or analytics vendors)	Maintaining, providing, and improving our Services
Professional or employment-related information	Service providers and contractors (e.g., tax preparers), the IRS (to file for your return), and marketing partners	Providing and marketing our Services or as requested by you
Inferences drawn from any of the information identified in this chart to create a profile about a consumer reflecting the consumer's preferences, characteristics, psychological trends, predispositions, behavior, attitudes, intelligence, abilities, and aptitudes	Service providers and contractors (e.g., analytics providers) and marketing partners	Maintaining, providing, improving, or marketing our Services, or as requested by you

We may also disclose the above personal information in the event of a corporate transaction (e.g., a sale, merger, financing), as requested by you, or for legal purposes.

Selling/Sharing

Although we do not disclose your personal information for any monetary consideration, our use and disclosure of the categories above (i.e., identifiers and contact information, categories of personal information described in <u>Cal. Civ. Code § 1798.80(e)</u>, Internet or other electronic network activity information, professional or employment-related information, and inferences drawn from such information) to marketing partners within the last 12 months, could fall within California's definitions of "selling" or "sharing." "Sharing" is referred to as "targeted advertising" in some states.

To the extent we use your personal information across non-Innovation Refunds businesses, websites, and applications for targeted advertising purposes, you may opt-out of such use ("opt-out of selling/sharing"). To do so, you may email your request to privacy@innovationrefunds.com, complete this form, or use an opt-out preference signal, such as the Global Privacy Control (GPC) on browsers and/or browser extensions that support such a signal. To download and use a browser supporting the GPC browser signal, click here: https://globalprivacycontrol.org/orgs. If you choose to use the GPC signal, you will need to turn it on for each supported browser or browser extension you use.

If you do not have an Innovation Refunds account or if you are not logged into your Innovation Refunds account, your request to opt-out of selling/sharing will be linked to your browser identifier only and not linked to any account information because the connection between your browser and the account

is not known to us. If you would like us to make the connection between your browser and your account, and you have not yet opted-out of selling/sharing your personal information, please submit this form.

Your decision will not alter the number of advertisements you see, only whether those advertisements are tailored to you.

We do not use or disclose your sensitive personal information for any purposes other than those permitted by law (e.g., as necessary to file for your refund or for legal compliance purposes), and we do not disclose personal information to third parties for those third parties' direct marketing purposes unless you consent.

Digital Technologies

Innovation Refunds and its marketing partners may use various online tracking technologies such as pixels, web beacons, session replay technology, social sharing widgets, software developer kits, third-party libraries, cookies, and other similar online tracking technologies (collectively, "online tracking technologies") to gather information when you interact with our websites, platforms, app(s), and email communications, as well as when you interact with other websites, apps, or advertisements.

We use online tracking technologies to maintain our Services (e.g., improving security, fixing bugs), improve your experience (e.g., preventing website crashes, saving your preferences), and guide our marketing efforts (e.g., generating leads and tailoring our marketing efforts). When you visit certain websites or use an app (including our website, platform, and app(s)), the online tracking technologies may collect identifiers (e.g., your Internet Protocol address or other online identifier), categories of personal information described in <u>Cal. Civ. Code § 1798.80(e)</u>, Internet or other electronic network activity information, and inferences about you. Our partners (e.g., social media networks) may also supplement this data with information about your professional or employment-related information (e.g., job title) and other demographics. Our marketing partners disclose such information to us, and where we collect such information, we disclose it to them, for marketing purposes (e.g., targeting advertisements so individuals view more relevant ads).

Among other cookies, we use Google Analytics. You can learn more about how those cookies work by visiting "How Google Uses Data When You Use Our Partners' Sites or Apps," located at www.google.com/policies/privacy/partners/. If you prefer not to have the benefits of cookies, your internet browser or other third party software on your workstation can be adjusted to treat cookies in different ways. Depending upon the type of browser you are using, you might be able to configure your browser: (i) to prompt you to accept or reject cookies on an individual basis; or (ii) to prevent your browser from accepting any cookies at all. You should refer to the supplier or manufacturer of your web browser for specific details about cookie security. For general information about how to manage cookies, visit www.allaboutcookies.org/manage-cookies/ (please note that this website is not connected to us and we are not responsible for its content). Rejecting cookies might affect your ability to perform certain transactions on our Website and our ability to recognize your browser from one visit to the next.

For more information about your choices with regard to interest based advertising, you may wish to visit the Digital Advertising Alliance's Consumer information page: http://www.aboutads.info/consumers/.

Communication Preferences

Please see below for additional options available to you.

Email. To stop receiving promotional emails, click the "unsubscribe" link in any of our marketing emails.

<u>Direct Mail</u>. To stop receiving promotional postal mail, email us at <u>privacy@innovationrefunds.com</u> or write to us at: Innovation Refunds LLC, Regency West 8, 4350 Westown Pkwy, Ste 300, West Des Moines, IA 50266.

<u>App Push Notifications</u>. To adjust your notifications, please adjust your selections in the app's "Notification Settings."

How Long We Keep Your Personal Information

We will not retain your personal information for longer than reasonably necessary for the purpose(s) we collected it. The retention period depends on criteria such as the nature of our relationship with you, whether we filed for a tax refund for you, when you last interacted with us, the type of personal information at issue, and legal considerations.

How We Protect Your Personal Information

Although no website, app, platform, or business is 100 percent secure, the security and confidentiality of your personal information is important to us. We do take administrative, technical, and physical measures to protect the information you provide to us.

Your Choices

In addition to the choices described above, we provide you with the:

- ability to know what personal information we have collected about you, including the
 categories of personal information, categories of sources from which we collected the
 personal information, the purpose for our collection, selling, or sharing of your personal
 information, the categories of third parties to whom we disclose personal information
- ability to access the specific pieces of personal information we have collected about you;
- ability to correct inaccurate personal information that we maintain about you;
- ability to <u>delete</u> personal information we have collected from you, subject to exceptions (like our legally required recordkeeping);
- ability to opt-out of the sale or sharing of your personal information; and
- ability to not receive discriminatory treatment for exercising your privacy choices.

How to Submit a Request to Know, Access, Correct, or Delete

If you would like to submit a request to know, access, correct, or delete your personal information, you or your authorized agent may complete <u>this webform</u> or email your request to <u>privacy@innovationrefunds.com</u>.

Once you submit your request, we will take commercially reasonable steps to verify your identity (e.g., via your Innovation Refunds account or asking you to provide us with information matching the information in our files about you (e.g., your email address and phone number)). If you are an

authorized agent submitting a request on behalf of another individual, we will also verify that you have authority to act for the data subject (e.g., a signed authorization).

Once we have verified your request, we will make good faith efforts to evaluate and act on your request, but there may be circumstances in which we might not grant your request (e.g., if you submit a request to delete that would violate our recordkeeping obligations). If we deny your request, we will tell you why and provide you information regarding your ability to appeal that decision, if any.

Links to Third-Party Websites

Our website, platform, and app(s) contain links to third party websites, applications, or materials and integrations to enhance the Services and your experience. These items may have their own privacy policies, or no policies at all. You should seek and review these third party's policies before providing them information. We do not guarantee and are not responsible for the privacy or security of these other websites, apps, or integrations, including the accuracy, completeness or reliability of their information.

Contact Us

If you have any questions or comments about this privacy policy, please contact us via email at privacy@innovationrefunds.com or write to us at: Innovation Refunds LLC, Regency West 8, 4350 Westown Pkwy, Ste 300, West Des Moines, IA 50266.

Privacy Policy Updates

This privacy policy replaces all previous privacy policies and cannot be modified orally. We may amend this privacy policy at any time in our sole discretion. Please re-visit this page periodically to stay aware of any changes. If we modify this privacy policy, we will post the updated privacy policy to our website and app(s) and update the effective date below. Your continued use of our website, platform, app(s), or Services after a revised privacy policy becomes effective indicates that you have read, understood and agreed to the revised privacy policy.

Effective Date

This Privacy Policy is effective, and was last updated on December 29th, 2023