

MY CLEVER CPA LLC — PRIVACY POLICY

Revised as of: December 17, 2025

My Clever CPA LLC (“My Clever CPA LLC,” “we,” “us,” or “our”) is committed to protecting your privacy and ensuring your personal information is handled with transparency, security, and respect. This Privacy Policy explains how we collect, use, store, disclose, and protect your information when you:

- Visit www.MyCleverCPA.com (the “Site”)
- Use our mobile applications (“Applications”)
- Engage our services (the “Services”)
- Communicate with us by phone, email, or any electronic method

This Policy complies with **Federal law, New York State privacy requirements, and Suffolk County consumer protection guidelines**, and incorporates IRS, FTC, GLBA, and state accounting/financial data standards.

By using the Site, Applications, or Services, you acknowledge that you have read and understood this Privacy Policy.

1. Your Use of Our Website and Services

Using our Site or Services constitutes your acceptance of this Policy. Submitting any personal information confirms your consent to:

- Collection
- Use
- Storage
- Disclosure
- Processing

...as described herein.

Our Services are intended for individuals and businesses in the United States.

We do **not** knowingly collect information from children under 13. However, tax filings may include dependent information supplied by you.

2. Information We Collect

We collect personal information that identifies, relates to, describes, or could reasonably be linked to you. This includes:

A. Information You Provide

Examples include:

- Name
- Email
- Address
- Telephone
- SSN / EIN / ITIN (for tax services)
- Date of birth
- Business name
- Tax documents (W-2, 1099, K-1, 1065, 1120, 1041, etc.)
- Banking information (for accounting reconciliation)
- Estate & trust documentation
- Non-profit organizational records
- Signatures and uploaded files
- Form responses and communications

B. Information Automatically Collected

Via browser, device, and tracking tools:

- IP address
- Cookies
- Browsing behavior
- Device identifiers
- Clickstream, timestamps, session data
- Location (approximate unless GPS is explicitly enabled)

- Application performance metrics

C. Sensitive Personal Information (SPI)

Collected **only** when necessary:

- Social Security Numbers
- Financial accounts / routing data
- Taxpayer identification
- IRS filings and historical tax records
- Estate, trust, and fiduciary documents
- Non-profit compliance documents
- Accounting ledgers and financial statements

D. Information from Third Parties

We may receive data from:

- Payment processors
- Payroll providers
- Accounting platforms (QuickBooks, Xero, Wave, etc.)
- Banks (via secure connections you authorize)
- Referral partners
- Public databases (business registrations, IRS EIN verification)

3. How We Use Your Information

We use your data lawfully and for legitimate business purposes, including:

A. Service Delivery

To:

- Set up and verify your account
- Prepare and file tax returns
- Perform bookkeeping, payroll, or accounting

- Provide estate & trust accounting services
- Provide non-profit accounting and compliance services
- Respond to inquiries
- Authenticate identity
- Deliver requested documents or reports

B. Communications

We may contact you to:

- Send required notices
- Request missing documents
- Provide service updates
- Schedule appointments
- Deliver invoices, receipts, or tax summaries

C. Website Experience

We improve the Site by analyzing:

- User behavior
- Session tracking
- Device types
- Login/usage patterns

D. Legal & Compliance Requirements

We may process your information to:

- Comply with IRS, Treasury, or state laws
- Maintain audit standards
- Document service provision
- Meet recordkeeping and retention laws

E. Marketing (without Consent)

You receive:

- Newsletters
- Promotions
- Updates

You may opt out at any time.

4. Information You Provide Directly

You actively provide information when:

- Registering for our services
- Completing tax organizers
- Uploading documents
- communicating via phone, SMS, or email
- Submitting forms through the client portal
- Scheduling appointments
- Paying for services

If you decline to provide required data, we may be unable to complete your tax filings, accounting, or other services.

5. Information We Collect Automatically (Browser, Device & App Data)

As you use the Site or Applications, we automatically collect:

A. Technical Data

- IP address
- Browser type/version
- Device identifiers
- Operating system
- Connection type

B. Usage Data

- Pages viewed

- Login timestamps
- Clickstream data
- Session duration
- How you interact with forms, menus, and portal features

C. Location Data

Collected only if you enable GPS-based features (e.g., mileage tracking).

D. Mobile App Data

If using our mobile features, we may collect:

- App performance metrics
- File upload logs
- Device crash information

This allows us to secure your account, prevent fraud, and improve the user experience.

6. Cookies and Tracking Technologies

We use cookies for:

A. Essential Purposes

To enable:

- Login sessions
- Secure client portal access
- Document uploads
- Payment processing
- Subscription services

Without these cookies, core website functions will not work.

B. Performance and Analytics Cookies

Used to:

- Measure traffic

- Improve page speed
- Evaluate navigation behavior
- Optimize content

C. Personalization Cookies

Used to:

- Remember your preferences
- Store account settings
- Customize dashboard features

D. Third-Party Cookies

Third parties may collect data for:

- Analytics (Google Analytics, Microsoft Clarity, etc.)
- Fraud prevention
- Advertising relevance (if you opted into marketing)

We **do not** allow third parties to collect sensitive personal data such as SSNs, tax documents, or financial statements.

7. Disabling Cookies

You may disable cookies through your browser settings:

- Chrome
- Firefox
- Edge
- Safari
- Opera

Warning:

Disabling essential cookies may break:

- Login sessions
- Document uploads

- Client portal access
- Online tax tools
- Payment and subscription features

8. Information Received from Third Parties

We may receive information from:

A. Referral Partners

Name, email, phone number, or business details.

B. Financial Institutions

Only when you authorize:

- Bank feed connections
- Transaction downloads
- Payroll provider integrations

C. Accounting Software

When connected:

- Chart of accounts
- Ledger entries
- Vendor lists
- Historical transactions

D. Government Entities

We may receive:

- IRS transcripts
- EIN verification
- State tax account data

(but only when you authorize access via POA or form 8821)

E. Public Databases

We may verify:

- Business registrations
- Corporate filings
- Not-for-profit IRS status
- Professional licenses

9. Sharing of Information with Third Parties

We **do not sell** your personal data.

We share personal data only for legitimate business and compliance reasons:

✓ 1. Service Providers

Tax software providers
Cloud storage providers
Cybersecurity vendors
Payment processors
E-signature platforms

✓ 2. Contracted Professionals

With your authorization, CPAs, accountants, or enrolled agents assisting with your file.

✓ 3. Government Agencies

Only when required or authorized:

- IRS
- State tax authorities
- State corporate divisions
- Courts (if legally compelled)

✓ 4. Analytics Providers

These providers see only non-sensitive analytics data.

✓ 5. Legal or Safety Requirements

We may disclose information if necessary to:

- Comply with subpoenas or court orders
- Prevent fraud
- Enforce our Terms of Service
- Protect the rights or safety of users

✓ 6. Corporate Transactions

If My Clever CPA LLC is sold, merged, or reorganized, your data may transfer to the successor business.

✓ 7. International Transfers (Limited)

We **store and process information in the United States.**

We do not transmit sensitive tax data outside the U.S. unless you explicitly authorize such transfer.

10. Security

We use industry-standard data security practices compliant with:

- FTC Safeguards Rule (GLBA)
- IRS Publication 4557
- NY Shield Act
- Suffolk County security expectations
- NIST Cybersecurity Framework

Our protections include:

- Encrypted storage (AES-256)
- Encrypted transmission (TLS 1.2 or 1.3)
- Multi-factor authentication for staff
- Access controls based on job role
- Zero-trust internal network protocols
- Continuous monitoring and logging
- Cybersecurity audits as required by law

- Secure shredding of physical documents
- Offsite encrypted backups

No system is 100% secure, but we maintain security protocols exceeding IRS and GLBA requirements.

11. Links to Other Websites and Social Media

Our Site may link to external websites.

We are **not responsible** for how other sites handle your data.

Social Media:

If you use:

- Facebook
- Instagram
- LinkedIn
- X/Twitter
- Youtube

...your interactions are governed by those platforms' privacy policies.

We do not control:

- Their data collection
- Their tracking tools
- Their security standards

12. International Data Transfers

My Clever CPA LLC stores and processes information **only in the United States**.

If rare exceptions occur (e.g., global cloud infrastructure), we ensure:

- U.S.-equivalent privacy protections
- Contractual safeguards
- Restricted employee access

- Encryption before transfer

We **do not** offshore tax preparation, bookkeeping, or data-entry services outside the United States unless required by law and authorized by you.

13. Your Privacy Rights

Depending on where you live and applicable laws, you may have rights regarding your personal information.

This Policy incorporates rights required under:

- **Federal law (FTC, GLBA, IRS Publication 4557, IRS privacy rules)**
- **New York State SHIELD Act**
- **New York Consumer Protection statutes**
- **Suffolk County consumer privacy expectations**
- **California Consumer Privacy Act / CPRA (for any California clients)**

You may exercise your rights through our **Data Request Form** (see Section 17 below).

14. Your Rights Under Federal Law

A. IRS Data Protection Rules

We comply with:

- IRS Publication 4557 – Safeguarding Taxpayer Data
- IRS Publication 1345 – Security for Electronic Filing
- GLBA (Gramm-Leach-Bliley Act) Safeguards Rule

You have the right to:

- Know how your tax data is protected
- Require secure transmission of sensitive data
- Receive copies of tax returns or records prepared by us
- Restrict disclosure of tax return information to third parties
- Request information about data breaches affecting your tax records

B. GLBA Consumer Rights (Financial Services Law)

For applicable services, you have the right to:

- Receive a clear privacy notice
- Limit sharing of nonpublic personal information
- Opt out of some third-party disclosures
- Access your personal financial data our firm maintains

15. Your Rights Under New York State Law (NY SHIELD Act)

New York requires businesses to:

- Maintain “reasonable safeguards”
- Ensure vendors meet security standards
- Notify consumers of breaches promptly
- Retain data only as long as necessary

Under NY law, you may:

- ✓ Request a description of the data we maintain about you
- ✓ Request correction of inaccurate information
- ✓ Request deletion of information (unless retention is legally required)
- ✓ Request details about any data breach affecting your information

We may deny deletion requests for:

- IRS retention rules
- Tax preparation regulations
- Required bookkeeping records
- Fraud prevention & security
- Legal claims or defense

16. Your Rights Under Suffolk County Consumer Standards

Suffolk County emphasizes:

- Transparent disclosure practices
- Consumer access to data
- Clear consent for marketing and SMS communications
- Reasonable protection of financial and personal data

Therefore, we provide:

- A dedicated **Data Request Form**
- Clear SMS & call consent language
- Localized data breach notification compliance
- Local venue & jurisdiction for legal matters (see Terms of Service)

17. Your Rights Under California (CPRA/CCPA) if applicable

If you reside in California, you may request:

- Access to categories and specific pieces of personal data collected
- Deletion of personal data (subject to legal exceptions)
- Correction of inaccurate information
- Opt-out of selling/sharing personal data
- Opt-out of automated decision-making (not used by us)
- Limit use of sensitive personal information

We **do not sell personal information**, including tax or financial data.

18. Exercising Your Rights — Data Request Form

To exercise ANY privacy right (access, correction, deletion, restrictions), submit a request via:

 **Email:**

privacy@myclevercpa.com

 **Required Information**

To protect your privacy, we must verify your identity.

Include:

1. Full Legal Name
2. Email Address Associated with Your Account
3. Phone Number
4. Description of Your Request (choose one or more):
 - Access my data
 - Correct my data
 - Delete my data
 - Limit sharing
 - Request categories of data
 - Request specific pieces of data
 - Request details about third-party disclosures

Response Time

We will respond:

- Within **45 days** (standard)
- Up to **90 days** if extended (you will be notified)

We may deny requests if:

- Identity cannot be verified
- Information is legally required to be retained
- It violates IRS, federal, or state recordkeeping laws

19. Data Retention Policy

We retain information **only for as long as necessary** under:

- IRS and Treasury regulations
- State tax authority requirements

- Accounting and audit compliance laws
- Federal and NY State statutes of limitations
- Legal or contractual obligations

Typical retention timelines:

Data Type	Retention Duration
Tax returns & supporting documents	3–7 years (IRS requirement)
Business and bookkeeping records	7 years
Estate & Trust documentation	7–10 years
Non-profit accounting records	7 years
Client communications	Minimum 3 years
Legal, audit & compliance records	As required
User accounts	Until deleted or inactive for 5 years

After retention periods expire, data is securely:

- Deleted
- Shredded
- Wiped
- Anonymized

20. Data Security

We maintain security safeguards exceeding IRS & FTC requirements.

Includes:

- End-to-end encrypted client portal
- Encryption at rest (AES-256)
- Secure encrypted transmission (TLS 1.2/1.3)
- Multi-factor authentication

- Role-based access controls
- Cybersecurity audits
- Background checks for employees with access
- Secure hardware and device management
- Offsite encrypted backups

No system is perfectly secure, but we follow **best practices** and **regulatory standards**.

21. Data Breach Notifications

We comply with:

- IRS & Treasury guidelines
- NY SHIELD Act
- Federal breach rules
- Suffolk County notification timelines

If a breach occurs involving your personal data, we will notify you:

- As quickly as practicable
- Using the most recent contact information we have
- With details of what happened, what was affected, and what steps you should take

22. Changes to This Privacy Policy

We may update this Policy periodically.

If material changes occur, we will:

- Post updates on the Site
- Update the “Revised as of” date
- Notify active clients via email

Your continued use of the Site or Services means you accept the updated Policy.

23. Contact Information

For questions, concerns, or requests:

 **Email:**

privacy@mylevercpa.com

 **Mailing Address:**

My Clever CPA LLC
ATTN: Privacy Office
30 Lincoln St.
Sag Harbor, NY 11963

 **Website:**

www.MyCleverCPA.com