

# Website Privacy Policy

Your Privacy is Important to Us

LAST UPDATE: June 1, 2020

**John Samaan, CPA** (“We”, “our”, and “us”) respect your concerns about privacy and personal data protection and value our relationship with you. This Privacy Policy (the “Policy”) applies solely to personal information collected through the John Samaan website and services and web pages that post, specifically reference and incorporate this Privacy Policy (all of the foregoing, collectively, the “Site”), whether accessed via computer, mobile device or other device (collectively, “Device”).

This Policy describes the types of personal information we collect through the Site and how that personal information may be used and/or with whom it may be shared. This Policy also describes how you can reach us to update your personal information, access and control the use of the personal information, or get answers to questions you may have about our privacy practices at this Site. Please read this Policy carefully, because by accessing and using this Site you are acknowledging that you understand and agree to the terms of this Policy. In addition, please review our Terms of Use, which governs your use of this Site.

## 1. COLLECTION AND USE OF PERSONAL INFORMATION

### Personal Information You Provide

The privacy and security of the personal information that John Samaan, CPA collects from you is a priority for us. When you visit this Site you may be asked or choose to provide personal information that could reasonably be used to contact you or to identify you personally including, but not limited to, your first and last name, address, company name, email address, phone number, and inquiry information. You will be informed what personal information is required and what information is optional when asked to submit personal information to us. By submitting personal information to John Samaan, CPA at this Site, you hereby consent to John Samaan, CPA’s collection, use and disclosure of such personal information.

We may combine the personal information you submit directly through this Site with other personal information we have collected from you, whether on- or offline. We may also combine it with information we receive about you from other sources, such as other companies, publicly available information sources (including information from your publicly available social media profiles), and other third parties.

### Passive Information Collection and Use

As you navigate around this Site, certain information can be passively collected (that is, gathered without you actively providing the information), using various technologies. We and our third-party service providers passively collect and use information in a variety of ways, including:

Through your browser: Certain information is collected by most browsers, such as your Media Access Control (MAC) address, computer type (Windows or Macintosh), screen resolution, operating system version, and Internet browser type and version. We may collect similar information, such as your device type and identifier, if you access this Site through a mobile Device.

Cookies: Cookies are pieces of information stored directly on the computer you are using. Cookies allow us to collect information such as browser type, time spent on this Site, pages visited, and language preferences. We and our service providers use the information for security purposes, to facilitate

navigation, and display information more effectively. In addition, we use cookies to gather statistical information about Site usage in order to continually improve its design and functionality, understand how individuals use it, and to assist us with resolving questions regarding it.

You can choose to accept or decline cookies. Most web browsers automatically accept cookies, but you can usually modify your browser settings to decline cookies if you prefer. If you would prefer not to accept cookies, most browsers will allow you to: (i) change your browser settings to notify you when you receive a cookie, which lets you choose whether or not to accept it; (ii) to disable existing cookies; or (iii) to set your browser to automatically reject any cookies.

Pixel tags, Google analytics, web beacons, clear GIFs, or other similar technologies: These may be used in connection with some Site pages to, among other things, track the actions of Site users and compile statistics about Site usage and response rates.

IP Address: Your IP Address is a number that is automatically assigned to the computer that you are using by your Internet Service Provider. An IP Address is identified and logged automatically in our server log files whenever a user visits this Site, along with the time of the visit and the page(s) that were visited. Collecting IP Addresses is standard practice on the Internet and is done automatically by many web sites. We use IP Addresses for purposes such as calculating Site usage levels, helping diagnose server problems, and administering this Site.

Device Information: We may collect information about your Device, such as a unique device identifier.

Do Not Track Requests: At this time John Samaan, CPA does not respond to Do Not Track signal requests.

#### Integrated Accounts and Social Media Information

We may implement applications or "widgets" from third party providers (e.g., Facebook, Twitter, Instagram, LinkedIn, etc.) that allow interaction, integration or content sharing with third party services. These widgets or applications may be visible on a page you visit on our Site or may require log-in through the third-party provider's service. The third party providing the widget or integration may offer controls for you to manage your interactions. Any interaction with a third-party widget or application typically allows the third party to collect some information about you (whether through cookies, registration information or otherwise). These third parties may even track you when you do not interact with the widget. If you have engaged any of these third-party service providers, their respective privacy policies will govern their tracking and collection of information. You should review these third-party policies to understand these practices.

#### How We Use and Disclose Information

We use and disclose personal information you provide to us as described to you at the point of collection, such as when you (1) register for a user account, (2) submit your name and e-mail address to receive updates and marketing information, and (3) send e-mail messages or feedback, or transmit other information by e-mail. When you elect to engage in such activities, we may ask that you provide us personal information, such as your first and last name, employer, mailing address (including zip code), e-mail address, mobile telephone numbers, and payment information.

We also use and transfer personal information from or about you:

to respond to your inquiries and fulfill your requests, such as to send you documents you request or e-mail;

to send you important information regarding our relationship with you or regarding this Site, changes to our terms, conditions, and policies and/or other administrative information;

for our business purposes, such as marketing new services, data analysis, developing new services, enhancing our Site, improving our services, identifying Site usage trends, and determining the effectiveness of our Site;

to our third-party service providers who provide services such as website hosting and moderating, mobile application hosting, data analysis, infrastructure provision, credit card processing, data portals, IT services, e-mail services, marketing services, and other services, in order to enable them to provide services; and

to a third party in the event of any reorganization, merger, sale, joint venture, assignment, transfer, or other disposition of all or any portion of our business, assets, or stock (including in connection with any bankruptcy or similar proceedings).

In addition, we use and disclose personal information collected through this Site as we believe to be necessary or appropriate: (a) as permitted by applicable law, including laws outside your country of residence; (b) to comply with any legal process; (c) to respond to requests from public and government authorities, including public and government authorities outside your country of residence; (d) to enforce our Terms of Use; (e) to protect our operations or those of any of our affiliates; (f) to protect our rights, privacy, safety, or property, and/or that of our affiliates, you, or others; and (g) to allow us to pursue available remedies or limit the damages that we may sustain. We may also use and disclose personal information collected through this Site in other ways, with your prior consent.

We also use and disclose information we collect passively as described above, under "Passive Information Collection and Use," and for any other purpose, except where we are required to do otherwise under applicable law (for example, if we are required to treat such information as personal information). In addition, we may use and disclose information that is not in personally identifiable form (such as anonymized, masked or de-identified information) for any purpose. If we combine information that is not in personally identifiable form with information that is (such as combining your name with your geographical location), we will treat the combined information as personal information as long as it is combined.

## **2. GENERAL PRINCIPLES FOR THE PROCESSING OF PERSONAL INFORMATION**

Personal information will be collected, stored, processed and transmitted in accordance with John Samaan, CPA's established policies and applicable federal, state, local and foreign laws, rules and regulations.

The principles of John Samaan, CPA with respect to the processing of personal information are as follows: (1) personal information will be processed fairly and lawfully, (2) personal information will be collected for specified, explicit, and legitimate purposes and not further processed for incompatible purposes, (3) personal information collected by John Samaan, CPA will be adequate, relevant, and not excessive in relation to the purposes for which it is collected, (4) personal information collected by John Samaan, CPA will be accurate and, where necessary, kept up to date to the best of our ability, and (5) personal information collected by John Samaan, CPA will be retained as identifiable data for no longer than necessary to serve the purposes for which the personal information was collected.

If John Samaan, CPA engages in the processing of personal information for purposes other than those specified in this Policy, John Samaan, CPA will provide notice of these changes, the purposes for which the personal information will be used, and the recipients of personal information.

## **3. THIRD-PARTY SITES AND SERVICES**

This Policy does not address, and we are not responsible for, the privacy, information, or other practices of any third parties, including any third party operating any site or web property (including, without limitation, any application) that is available through this Site or to which this Site contains a link. The

availability of, or inclusion of a link to, any such site or property on this Site does not imply endorsement of it by us or by our affiliates.

#### **4. CHOICES AND ACCESS**

We give you choices regarding our use and disclosure of your personal information. You may opt-out of our collection of your personal information at any time by contacting us as specified below in the CONTACTING US section. We will seek to comply with your request(s) as soon as reasonably practicable.

##### **How You Can Access, Change, or Delete Your Personal Information**

If applicable and you would like to review, correct, update, or delete the personal information that you have provided via this Site, please contact us as specified below in the CONTACTING US section. We will try to comply with your request as soon as reasonably practicable.

#### **5. ACCURACY**

It is your responsibility to provide John Samaan, CPA with accurate personal information. Except as otherwise set forth in this Policy, John Samaan, CPA shall only use personal information in ways that are compatible with the purposes for which it was collected or subsequently authorized by you. To the extent necessary for these purposes, John Samaan, CPA shall take reasonable steps to ensure that personal information is accurate, complete, current and relevant to its intended use.

#### **6. RETENTION PERIOD**

We retain your personal information for the period necessary to fulfill the purposes outlined in this Policy, unless a longer retention period is required or allowed by law or to otherwise fulfill a legal obligation.

#### **7. SECURITY**

We use reasonable organizational, technical, and administrative measures to protect personal information under our control. Unfortunately, no data transmission over the Internet or data storage system can be guaranteed to be 100% secure. If you have reason to believe that your interaction with us is no longer secure, please immediately notify us of the problem by contacting us in accordance with the CONTACTING US section below.

#### **8. USE OF SITE BY MINORS**

The Site is not directed to individuals under the age of 13 and we request that these individuals not provide personal information through this Site.

#### **9. COMPLIANCE WITH LOCAL LAWS**

This Policy is meant to guide John Samaan, CPA with respect to personal information collected from or about you at this Site. While this Policy applies to personal information generally, the local laws, rules and regulations of jurisdictions that are applicable to John Samaan, CPA (“Local Laws”) may require standards which are stricter than this Policy and, in such event, John Samaan, CPA will comply with applicable Local Laws. Specific privacy policies may be adopted to address the specific privacy requirements of particular jurisdictions.

#### **10. CROSS-BORDER TRANSFER**

Your personal information may be stored and processed in any country where we have facilities or service providers, and by using our Site or by providing consent to us (where required by law), you specifically acknowledge and agree to the transfer of information to countries outside of your country of residence, including to the United States, which may provide for different data protection rules, and a lower standard of required protection, than in your country.

## **11. UPDATES TO THIS PRIVACY POLICY**

We may change this Policy. Please take a look at the LAST UPDATE legend at the top of this page to see when this Policy was last revised. Any changes to this Policy will become effective when we post the revised Policy on this Site. Your use of this Site following these changes means that you accept the revised Policy.

## **12. COMPLIANCE**

John Samaan, CPA will use a self-assessment approach to verify compliance with this Policy and periodically verify that the Policy is accurate, comprehensive for the information intended to be covered, prominently displayed, implemented and accessible.

If you believe that your personal information has been processed or disclosed in violation of this Policy, John Samaan, CPA encourages you to raise any concerns using the contact information provided in this Policy. John Samaan, CPA will investigate and attempt to resolve any complaints and disputes regarding use and disclosure of personal information.

## **13. CREDIT CARD PROCESSING**

Credit card and payment information is processed by a secure third party, and John Samaan, CPA will never store, access, or manage your credit card and payment information.

## **14. CONTACTING US**

If you have any questions about this Policy, please contact us via one of these methods:

On this Site, via the Contact Us section or via e-mail at [John@johnsamaan CPA.com](mailto:John@johnsamaan CPA.com) or please write to the following address: John Samaan, CPA, PO Box 10758, Westminster, CA 92685