CORPORATE TAX ADVISORS, INC. PRIVACY POLICY

Corporate Tax Advisors, Inc. (“CTA”) believes in protecting your privacy and the confidentiality of your Personal Information. The CTA website is designed to be a robust portal and collaboration tool which allows for the free flow of information between CTA, its partners, its members, and visitors to the Site. We acknowledge that you may have privacy and security concerns with respect to the information we collect, use, and disclose to third parties for the purpose of allowing us to offer and provide our products and services to you. To this end, we have developed this Privacy Policy to balance the functionality of the Site with your control over your Personal Information.

Personal information is any combination of information, in the possession of or likely to come into the possession of CTA, that can be used to identify, contact, or locate a discrete individual (“Personal Information”) and will be treated in accordance with this Privacy Policy. Any information which cannot be used to identify a discrete individual (such as aggregated statistical information) is not Personal Information.

By using this Site, or providing your personal information to the CTA, you hereby consent to the transfer of your Personal Information to the US, for the purposes described in this Privacy Policy.

PURPOSE FOR COLLECTION, USE AND DISCLOSURE OF PERSONAL INFORMATION

CTA collects, uses and discloses your Personal Information in its normal course of business for the following purposes:

- Establishing and maintaining communications with you
- Where you have requested content or services from CTA:
- Responding to your inquiries about content and other services;
- Making proposals for future service needs;
- Allowing our partners, affiliates, and sponsors, to notify you of certain products, services, or events offered by them;
- Making your resume available to prospective employers;
- Processing transactions through service providers;
- Registration for conferences, training, and other events;
- Meeting legal, security, processing and regulatory requirements;
- Protecting against fraud, suspicious or other illegal activities;
- Compiling statistics for analysis of our sites and our business.

WHAT INFORMATION WE COLLECT

The information gathered by CTA from this Site falls into two categories: (1) information voluntarily supplied by visitors to our Site and (2) tracking information gathered as visitors navigate through our Site.
Information voluntarily provided by you

When using this Site, you may choose to provide us with information to help us serve your needs. The Personal Information that we collect will depend on how you choose to use this Site.

Where you request content

If you request content (such as best practices, research, etc.) or further information from us, we require you to submit your name, e-mail address, the name of your organization, job title and the country in which you are based so we may send you the material you have requested, and to enable us to identify if you are an existing patron of CTA.

Following an inquiry into receiving content or services from us, if you decide to proceed, we will collect Personal Information necessary to proceed with the transaction, such as your name, address, postal code, contact telephone number, e-mail address, billing address or payment details, as relevant to the product or service. We will use your Personal Information to administer your account, fulfill registrations, etc. and generally manage your relationship with us.

Where you register with us and/or join the CTA as a member

If you register with the Site, request a service available on the Site (such as registration for a conference), or become a member of the CTA, we may ask you for your name, e-mail address, country, telephone number and the reason for your communication, as well as information about your position and organization and such other information as is reasonably necessary so that we can provide you with the service or identify what would be of most interest to you. On the data submission form, we shall indicate by way of an asterisk, which information is optional and which information is mandatory.

Any Personal Information that you send us will be used for the purpose indicated on the Site or in this Privacy Policy.

Where you submit content

Finally, if you submit content through our Site, we will ask for your name and e-mail address, so that, if you choose, we can update you by e-mail when others also comment on the content, and also so that we can manage the content in line with our Statement of Ethics. You should be aware that the information you provide there will be made publicly available to CTA employees, members and other users of the Site.

Where you submit a Resume

We operate a Career Center that enables you to store your resume in our database. When you create a resume, you have the option of making the resume searchable or non-searchable and confidential or non-confidential. Not allowing your resume to be searchable means that you can use it to apply for a job online, but employers and recruiters will not have access to search it
through our resume database product. If you choose to make your resume searchable, then all employers and recruiters who pay for access to our resume database product will have access to your resume. In addition to making your resume searchable or non-searchable, you may designate specific information contained within your resume as confidential. Such confidential information will not be shared with employers and recruiters who search the resume database or to whom you deliver your resume.

We use our best efforts to grant access to the resume database only to paying employers, recruiters, hiring managers, and human resource professionals, but cannot guarantee that other parties will not, without our consent, gain access to this database. You may remove your resume from our searchable database at any time. However, employers and recruiters who have paid for access to the database, and other parties who have otherwise gained access to the database, may have retained a copy of your resume in their own files or databases. We are not responsible for the retention, use, or privacy of resumes in these instances, or for the use or privacy of resumes by any of such parties while resumes are in the database.

**Website Navigational Information**

As you navigate the Site, we may also collect information through the use of commonly-used information-gathering tools, such as cookies and web beacons (collectively “Website Navigational Information”). Website Navigational Information includes standard information from your web browser (such as browser type and browser language), your Internet Protocol (“IP”) address, and the actions you take on the Site (such as the web pages viewed and the links clicked).

**Cookies**

Like many companies, we may use cookies on this Site. Cookies are pieces of information shared between your web browser and a website. Use of cookies enables a faster and easier experience for the user. A cookie cannot read data off your computer's hard drive.

There are different kinds of cookies with different functions:

(i) Session cookies: these are only stored on your computer during your web session. They are automatically deleted when the browser is closed. They usually store an anonymous session ID allowing you to browse a website without having to log in to each page. They do not collect any information from your computer.

(ii) Persistent cookies: a persistent cookie is one stored as a file on your computer, and it remains there when you close your web browser. The cookie can be read by the website that created it when you visit that website again.

(iii) First-party cookies: the function of this type of cookie is to retain your preferences for a particular website for the entity that owns that website. They are stored and sent between CTA’s servers and your computer’s hard drive. They are not used for anything other than for personalization as set by you. These cookies may be either Session or Persistent cookies.
Third-party cookies: the function of this type of cookie is to retain your interaction with a particular website for an entity that does not own that website. They are stored and sent between the Third-party’s server and your computer’s hard drive. These cookies are usually Persistent cookies.

We use cookies for the following purposes:

Where strictly necessary

These cookies are essential in order to enable you to move around the Site and use its features, such as accessing secure areas of the Site. Without these cookies, services you have asked for, such as obtaining a quote or logging into your account, cannot be provided. These cookies do not gather information about you that could be used for marketing or remembering where you have been on the internet.

Performance

These cookies collect information about how visitors use a Site, for instance which pages visitors go to most often, and if they get error messages from web pages. They also allow us to record and count the number of visitors to the Site, all of which enables us to see how visitors use the Site in order to improve the way that our Site works. These cookies do not collect information that identifies a person, as all information these cookies collect is anonymous and is used to improve how our Site works.

Functionality

These cookies allow our Site to remember choices you make (such as your user name, language or the region you are in) and provide enhanced features. For instance, a Site may be able to remember your log in details, so that you do not have to repeatedly sign in to your account when using a particular device to access our Site. These cookies can also be used to remember changes you have made to text size, font and other parts of web pages that you can customize. They may also be used to provide services you have requested such as viewing a video or commenting on an article. The information these cookies collect is usually anonymized. They do not gather any information about you that could be used for advertising or remember where you have been on the internet.

This Site does use Google Analytics, a web analytics service provided by Google, Inc. (“Google”). Google Analytics uses cookies to help the website analyze how users use the site. The information generated by the cookie about your use of the website (including your IP address) will be transmitted to and stored by Google on servers in the United States. Google will use this information for the purpose of evaluating your use of the website, compiling reports on website activity, and providing other services relating to website activity and internet usage for CTA and its affiliates. Google may also transfer this information to third parties where required to do so by law, or where such third parties process the information on Google's behalf. Google will not associate your IP address with any other data held by Google. You may refuse the use of cookies by selecting the appropriate settings on your browser, however, please note that if you...
do this you may not be able to use the full functionality of this website. By using this website, you consent to the processing of data about you by Google in the manner and for the purposes set out above.

**Advertising**

We use cookies and tracking technologies to help us develop our understanding of your interests and what content and services may be relevant to you. In addition, we have a number of partners who also use cookies and similar technologies to determine what products and services of theirs may be relevant to you.

The major browsers have attempted to implement the draft “Do Not Track” (“DNT”) standard of the World Wide Web Consortium (“W3C”) in their latest releases. As this standard has not been finalized, CTA’s Sites are not compatible with DNT.

For information on all of these categories of cookies, and for more information generally on cookies please refer to www.aboutcookies.org.

**Web Beacons**

The Site may also use web beacons (including web beacons supplied or provided by third parties) alone or in conjunction with cookies to compile information about users’ usage of the Site and interaction with e-mails from CTA. Web beacons are clear electronic CTAs that can recognize certain types of information on your computer, such as cookies, when you viewed a particular Site tied to the web beacon and a description of a Site tied to the web beacon. We use web beacons to operate and improve the Sites and e-mail communications. We may use information from web beacons in combination with other data we have about our clients to provide you with information about CTA and our services. We will conduct this review on an anonymous basis.

**IP Addresses**

When you visit our Sites, CTA collects your Internet Protocol (“IP”) addresses to track and aggregate non-Personal Information. For example, CTA uses IP addresses to monitor the regions from which users navigate the Sites. IP addresses will be stored in such a way so that you cannot be identified from the IP address.

**DISCLOSURE OF INFORMATION TO OTHERS**

We do not disclose any Personal Information about you to any third parties except as stated in this Privacy Policy, as otherwise permitted by law, or authorized by you.

Third parties to whom we disclose information are required by law and contractual undertakings to keep your Personal Information confidential and secure and to use and disclose it for purposes that a reasonable person would consider appropriate in the circumstances, in compliance with all applicable legislation, which purposes are as follows:
• To provide the products and services you have requested from us;
• To notify you or allow our affiliated companies to notify you of certain products or services offered by our affiliated companies;
• To process transactions through data processing service providers;
• If the information is a credit card number, to process credit card payments—through third party payment processing, clearing and settlement systems in association with various banks;
• To affiliates and partners with whom we have joint marketing agreements.

If these third parties wish to use your Personal Information for any other purpose, they will have a legal obligation to notify you of this and, where required, to obtain your consent. Contact us at mikew@corporatetaxadvisors.com for more information on these third parties.

Affiliate Sharing

In the normal course of performing services for our clients, Personal Information may be shared within CTA and its affiliates for research and statistical purposes, system administration and crime prevention or detection. When you supply us with information containing third party Personal Information (names, addresses, or other information relating to living individuals), we will hold and use that Personal Information to perform general insurance and other services for you on the understanding that the individuals to whom the Personal Information relates have been informed of the reason(s) for obtaining the Personal Information, the fact that it may be disclosed to third parties such as CTA, and have consented to such disclosure and use.

Service Providers

Because a number of the service providers we use are located in the United States, including certain CTA affiliates, your Personal Information may be processed and stored inside the United States, and the U.S. government, courts, or law enforcement or regulatory agencies may be able to obtain disclosure of your Personal Information under US laws.

CTA's service suppliers adhere to the same protections regarding the collection, use, and retention of data as we do.

Business Transactions

As we continue to develop our business, we might sell or buy assets. In such transactions, user information, including Personal Information, generally is one of the transferred business assets. Also, if either CTA itself or substantially all of CTA assets were acquired, your Personal Information may be one of the transferred assets. Therefore, we may disclose and/or transfer your Personal Information to a third party purchaser in these circumstances.

Other Legally Required Disclosures

CTA reserves the right to disclose without your prior permission any Personal Information about you or your use of this Site if CTA has a good faith belief that such action is necessary to: (a)
protect and defend the rights, property or safety of CTA, employees, other users of this Site, or the public; (b) enforce the terms and conditions that apply to use of this Site; (c) as required by a legally valid request from a competent governmental authority; or (d) respond to claims that any content violates the rights of third-parties. We may also disclose Personal Information as we deem necessary to satisfy any applicable law, regulation, legal process or governmental request.

In this Privacy Policy, the purposes identified above and in “Collection, Use and Disclosure of Personal Information” will be referred to as the “Identified Purposes.”

Public Forums

This website may make public chat rooms, forums, message boards, and/or news groups available to you from time to time. We impose terms of use regarding content and activity at such public areas. Further, we monitor and/or edit posts to those areas. Please remember that any information that is disclosed in these areas becomes public information and you should exercise caution when deciding whether to disclose any personal information via such forum.

CONSENT

Your knowledge of and consent to CTA’s collection, use and disclosure of your Personal Information is critical. We rely on the following actions by you as indications of your consent to our existing and future Personal Information practices:

- Your voluntary provision of Personal Information to us directly;
- Your express consent or acknowledgment contained within a written, verbal or electronic application or claims process;
- Your verbal consent solicited by CTA (or our agent) for a specified purpose.

Where CTA relies on consent for the fair and lawful processing of Personal Information, the opportunity to consent will be provided when the Personal Information in question is collected. Your consent may be given through your authorized representative such as a legal guardian, agent or holder of a power of attorney.

Subject to certain legal or contractual restrictions and reasonable notice, you may withdraw this consent at any time. CTA will inform you of the consequences of withdrawing your consent. In some cases, refusing to provide certain Personal Information or withdrawing consent for CTA to collect, use or disclose your Personal Information could mean that we cannot obtain insurance coverage or other requested products, services or information for you.

If you wish to withdraw your consent please refer to the Questions or to Withdraw Consent section below.

However, there are a number of instances where CTA does not require your consent to engage in the processing or disclosure of Personal Information. CTA may not solicit your consent for the processing or transfer of Personal information for the purposes which have a statutory basis, such as:
- The transfer or processing is necessary for the performance of a contract between you and CTA (or one of its affiliates);
- The transfer or processing is necessary for the performance of a contract, concluded in your interest, between CTA (or one of its affiliates) and a third party;
- The transfer or processing is necessary or legally required, on important public interest grounds, for the establishment, exercise, or defense of legal claims, or to protect your vital interests;
- The transfer or processing is required by applicable law.

**LIMITING COLLECTION AND RETENTION OF PERSONAL INFORMATION**

CTA will collect, use, or disclose Personal Information that is necessary for the Identified Purposes or as permitted by law. If we require Personal Information for any other purpose, you will be notified of the new purpose, and subject to your consent (where appropriate), that new purpose will become an Identified Purpose.

CTA will collect Personal Information by fair and lawful means. We will normally retain Personal Information as long as necessary for the fulfillment of the Identified Purposes. However, some Personal Information may be retained for longer periods as required by law, contract, or auditing requirements.

**SAFEGUARDS**

We have in place physical, electronic and procedural safeguards appropriate to the sensitivity of the information we maintain. Safeguards will vary depending on the sensitivity, format, location, amount, distribution and storage of the Personal Information. They include physical, technical, and managerial measures to keep Personal Information protected from unauthorized access. Among such safeguards are the encryption of communications via SSL, encryption of information while it is in storage, firewalls, access controls, separation of duties, and similar security protocols. However, due to the nature of the Internet and related technology, we cannot absolutely guarantee the security of Personal Information, and CTA expressly disclaims any such obligation.

**EXTERNAL LINKS**

CTA Sites may include links to other websites whose privacy policies we do not control. Once you leave our servers (you can tell where you are by checking the URL in the location bar on your web browser), use of any Personal Information you provide is governed by the privacy policy of the operator of the website you are visiting. That policy may differ from ours. If you can't find the privacy policy of any of these websites via a link from the website's homepage, you should contact the website directly for more information.

**ACCURACY, ACCOUNTABILITY, OPENNESS AND CUSTOMER ACCESS**

Our knowing about changes to some of your Personal Information (e.g. email address) may be key to effectively communicating with you at your request. If any of your details change you can
update us by e-mailing us at info@corporatetaxadvisors.com. Please keep us informed of changes to your Personal Information.

You have the right to access your Personal Information and request rectification of any Personal Information in the file that may be obsolete, incomplete or incorrect. However, to secure your Personal Information, CTA does not provide online access to its customers to view or amend Personal Information in its database.

A copy of this Privacy Policy (and any significant changes) can be obtained from our Web site at www.corporatetaxadvisors.com. CTA is responsible for all Personal Information under its control and has designated a privacy officer who is accountable to Management for CTA’s compliance with this Privacy Policy.

QUESTIONS OR TO WITHDRAW CONSENT

You may exercise your right to withdraw your consent to applicable uses or disclosures of your Personal Information (which may limit or terminate the products and services that CTA provides to you) either a) making changes to your profile via our on-line portal, or b) by writing or sending an email to us at the following address:

Corporate Tax Advisors, Inc.

7501 Memorial Parkway S. Suite 213

Huntsville, AL 35802

Tel: 256-970-7129

Mike Woeber mikew@corporatetaxadvisors.com

We will need to validate the identity of anyone making such a request to ensure that we do not provide your information to anyone who does not have the right to such information.

Normally we will respond to access requests within 30 days.

CHANGES TO THIS PRIVACY POLICY

If there is any material change to your rights under this Privacy Policy, CTA will provide you with notice of such change 30 days prior to the changes going into effect. As part of this notice, CTA may post a notice of the change on the site in a clear and conspicuous manner for the 30 day notice period. CTA may also communicate the change via email or postal mail if this is the way that CTA normally corresponds with you. Please note that your continued use of the Site or Services once this 30 day period are over indicates your agreement to the changes which were the subject of the notice.