

MBB BUSINESS SERVICES LLC

NOTICE OF PRIVACY PRACTICES

THIS NOTICE DESCRIBES HOW PROTECTED PERSONAL AND FINANCIAL INFORMATION ABOUT YOU MAY BE USED AND DISCLOSED AND HOW YOU MAY GAIN ACCESS TO THIS INFORMATION.

PLEASE REVIEW IT CAREFULLY

The Gramm-Leach-Bliley Act of 1999 (GLBA) requires financial institutions – companies that offer consumers financial products or services like loans, financial or investment advice, or insurance – to explain their information-sharing practices to their customers and to safeguard sensitive data. The federal government has privacy rules which require, under this act, that we, a financial institution, must protect your information that we collect and provide you with information on how we might use or disclose your identifiable financial information. We are required by the federal government to give you our **Notice of Privacy Practices**.

OUR PRIVACY COMMITMENT TO YOU

For convenience in this Notice, we shall collectively refer to MBB Business Services LLC as “MBB”.

This Notice applies to records of your service created or maintained by MBB Business Services LLC that are subject to the GLBA. As a professional business/finance preparation firm, MBB uses your confidential business/financial information and create records regarding that information in order to provide you with quality service and to comply with certain business/financial requirements on ours and your behalf. MBB understands that this information is personal and is dedicated to maintaining your privacy rights under Local, State and Federal law. MBB is required by law to: (1) make sure we have reasonable processes in place to keep your business and financial information private; (2) give you this Notice of our legal duties and privacy practices with respect to your business/financial information; and (3) follow the terms of this Notice that are currently in effect.

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USES OR DISCLOSURE OF YOUR FINANCIAL INFORMATION WITHOUT YOUR AUTHORIZATION

The following information describes different ways that MBB may use or disclose your business/financial information without your authorization. Although we cannot list every use or disclosure within a category, we are only permitted to use or disclose your business/financial information without your authorization if it falls within one of these categories. If your business/financial information contains certain information regarding handling your personal information, we are required by state and federal law to obtain your consent prior to certain disclosures of the information. Once we have obtained your consent through your signing of the Release of Information Agreement, we will treat the disclosures of such information in accordance with our privacy practices outlined in this Notice.

USES AND DISCLOSURES CATEGORIES

Preparation

We may use business/financial information about you to provide you with business/finance services. We may disclose business/financial information about you to personnel who are involved in taking care of your business with MBB or another affiliated business/financial firm and/or professional. MBB may also share business/financial information about you in order to coordinate business or financial services that you need.

Payment

We may use or disclose business/financial information about you in order to bill and collect payment for the services and items you may receive from us. For example, we may need to give financial information about your business to the bank to collect ACH check/Credit card payments for services that we rendered.

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Financial Operations

We may use and disclose business/financial information about you for MBB operations. For example, we may use business/financial information to review our services and to evaluate the performance of our staff in working for you. We may also combine business/financial information about our clients to decide what additional services should be offered, what services are not needed, and whether certain new services are effective. We may disclose your business/financial information for review and learning purposes. We may combine the business/financial information we have with personal information from other finance/business advisors to compare how we are doing and see where we can make improvements in the work and services that we offer.

Staff Members

MBB and the independent other business/finance advisors who are members/partners of our company are considered to be an organized business/finance arrangement under federal law for the specific purpose of sharing and preparing client information. As such, MBB and its staff will share business/finance information about clients necessary to carry out work, payment, and business operations. Although all independent staff members/partners who provide service at MBB follow the privacy practices described in this Notice; they exercise their own independent judgment in working for clients; and, they are solely responsible for their own compliance with the MBB privacy practice laws. MBB and its members/partners remain completely separate and independent entities that are legally responsible for their own actions.

Financial Information Exchanges (FIE)

Financial information exchanges allow financial/business advisors, including MBB Business Services LLC to share and receive information about clients which assists in the coordination of client service. MBB participates in a FIE that may make your financial information available to other financial/business advisors for work or payment purposes. Your financial information may be included in the FIE. We may also make your financial information available to other financial

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exchange services rendered to you. Participation in the FIE is voluntary and you have the right to opt out. Please see the **“Right to Request Restrictions”** section to learn about opting out of the FIE. Additional information on MBB’s FIE can be found at our website, www.mbbbusinessservices.com/important_links.

Appointment Reminders, Follow-up Calls and Preparation Alternatives

We may use or disclose business/financial information to remind you that you have an appointment or to check on you after your service is complete. If you have an answering-machine we may leave a message. If you elect, we may also send appointment reminders via email. We may also send you a post service appointment reminder. We may contact you about possible business/ financial options, alternatives or other related benefits or services that may be of interest to you.

Fundraising Activities

As a for-profit business, support from generous clients and affiliates helps MBB remain essential to continue its business operations. We may use business/financial information to contact you for fundraising opportunities. We are allowed to and may use demographic information to contact you, such as your name, address, phone number, or date of birth. We may also use the dates you received services, department of services and outcomes information. You have the right to opt out of fundraising communications. If you do not want MBB to contact you for fundraising efforts, you may opt out by calling (678) 921-2935, emailing info@mbbusinessservices.com or by submitting the request in writing to MBB Business Services LLC 3330 Cumberland Blvd – Suite 500 Atlanta, Georgia 30339. Your decision whether or not to receive fundraising communications will not affect your ability to receive financial/business services at MBB.

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MBB Directory

We may use or disclose business information about you in the client directory while you are a client at an MBB. This information may include your name, your general business need(s) and your business affiliations. The directory information will be released to people who ask for you by name and present our signed legal authorization to so do this.

Individuals Involved in Your Preparation or Payment for Your Service

Unless you object by written legal authorization, we may disclose business/financial information to a friend or family member who is involved in your finances or who assists in taking care of you and your finances. We may also provide the information to someone who helps pay for your services. We may advise your family or friends of your general business/financial status. In addition, we may disclose business/financial information about you to an entity assisting in a disaster relief effort so that your family can be notified about its financial outlook.

Research

Researchers may be conduct Business/Financial Research that uses or discloses your business/financial information. Business/Financial Research is research that looks at business/financial information in your records. For example, a research project may compare the finance records of our clients who received one service to those of other firms who received services for the same need. Some types of research are covered by GLBA and other types are not. However, for all types of research that we use or disclose identified business/financial information from your records, we will obtain your written authorization **except when** (a) an institutional Review Board determines in advance that use or disclosure of your business/financial information meets specific criteria specified by law; (b) the researcher signs a legally binding document certifying that he/she will only use the business/financial information to prepare a research protocol for purposes to prepare a research project and that he/she will maintain the confidentiality of your information and will not remove any of the business/financial information from MBB. MBB may also disclose business/financial information to a researcher if,

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(c) it involves financial information of deceased clients and the researcher certifies the information is necessary for research purposes; or (d) a researcher obtains data with certain very non-specific geographic identifiers (for example, a zip code) called a limited data set and agrees to use the data only for research or public business/financial purposes. If you would like more information on the privacy policies regarding use and disclosure of your business/financial information for research that is covered by the GLBA you may contact MBB Business Services LLC 3330 Cumberland Blvd – Suite 500 Atlanta, Georgia 30339.

As Required by Law

We will use or disclose business/financial information when required to do so by federal, state or local law.

To Avert a Serious Threat to Finance or Safety

We may use or disclose business/financial information when necessary to prevent a serious threat to your business/finance and safety, or the business/finance and safety of another client or the public. Any disclosure, however, would only be to someone able to help prevent the threat.

SPECIAL SITUATIONS

We may also use or disclose your business/financial information without your authorization in the following situations:

Military and Veterans

To military command authorities as required if you are a member of the armed forces. We may also disclose financial information about foreign military personnel to the appropriate foreign military authority.

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Workers' Compensation

To workers' compensation or similar programs that provide benefits for work-related injuries or illnesses.

Public Finance Activities

To public business/finance agencies or other governmental authorities to report public business/finance activities or risks. These activities generally include the following: to prevent or control business/finance information exposure; report problems with services; to notify you of law changes affecting clients' business/finances; to notify a person whose information may have been exposed or may be at risk for third party views unauthorized as authorized by law; to notify the appropriate government authority if we believe a client has been the victim of identity theft. We will only make this disclosure if you agree or when required or authorized by law.

Financial Oversight Activities

To a business/finance oversight agency for activities authorized by law and the Internal Revenue Service. Examples of oversight activities include audits, investigations, inspections, and licensure. Oversight activities are necessary for the government to monitor the financial system and government programs to ensure compliance with civil rights laws and to enforce privacy regulations.

Lawsuits and Disputes

In response to a court or administrative order if you are involved in a lawsuit or a dispute. We may also disclose business/financial information about you in response to a subpoena, discovery request, or other lawful process by someone else involved in the dispute, but only if efforts have been made to tell you about the request or to obtain an order protecting the information requested.

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Law Enforcement

Under certain circumstances in response to a court order, subpoena, warrant, summons or similar process; or upon request by a law enforcement official(s) for certain law enforcement purposes. We may report a death that we believe may be the result of criminal conduct or report suspected criminal conduct occurring on our premises. We may also report information related to a suspected crime discovered in the course of providing last-minute financial/business services.

National Security and Intelligence Activities

To authorized federal officials for intelligence, counterintelligence, and other national security activities authorized by law.

Protective Services for the President and Others

To authorized federal officials so they may provide protection to the President of the United States, other authorized persons or foreign heads of state or to conduct special investigations.

Inmates

To the correctional institution or law enforcement official if you are an inmate of a correctional institution or under the custody of a law enforcement official. This release would be necessary (1) for the institution to provide you with financial preparation; (2) to protect your finances and safety of the business/finance of others.

USES AND DISCLOSURES WHICH REQUIRE YOUR AUTHORIZATION

Most uses and disclosures of business/financial files and notes use and disclosure for marketing purposes, disclosures that constitute a sale of business/financial information, and other types of uses and disclosures of your business/financial information not described in this Notice require an authorization and will be made only with your written authorization. You may revoke your authorization by giving written notice to our financial records department where you received

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service. If you revoke your authorization, we will no longer use or disclose your business/financial information as permitted by your initial authorization. Please understand that we will not be able to take back any disclosures we have already made and that we are still required to retain our records containing your business/financial information that document the service that we provided to you for only a period of five years.

YOUR RIGHTS REGARDING YOUR FINANCIAL INFORMATION

Right to Inspect and Copy

You have the right to inspect and obtain a copy of your business/financial or billing records, you must submit your request in writing to MBB Business Services LLC c/o Billing Records. You need to include in your request your name, or if acting as a personal representative, include your contact information, the name of the client, the client's date of birth and the dates of service if known. To the extent that your business/financial information is maintained electronically, and the information requested in an electronic format, to the extent possible we will provide you a machine-readable copy. If you request a copy, you will be charged a fee for the costs of copying, mailing or other supplies associated with your request. We may deny your request to inspect and copy records in certain limited circumstances; however, you may request that the denial be reviewed. A licensed business/finance professional chosen by MBB will review your request and the denial. The person conducting the review will not be person who denied your request. We will comply with the outcome of the review. MBB might not retain financial records from other facilities for inclusion in your financial record or designated record set. These could include paper files or USB drives that were or might be provided to MBB. Please check with your preparer or office administrator if you have any questions regarding this policy.

Right to Request an Amendment

If you feel that the business/financial or personal information, we have about you is incorrect, you may ask us to amend it. You have the right to request an amendment for as long as the

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information is kept by or for MBB. To request an amendment, your request must be made in writing and submitted to our records department. In addition, you must provide a reason that supports your request. You need to include in your request your name, contact information, date of birth and dates of service if known. If you are acting as a personal representative, include your contact information and client's contact information, date of birth and the dates of service if known. We may deny your request for an amendment if it is not in writing, does not include a reason to support the request or is unlawful by federal, state or local laws. In addition, we may deny your request if you ask us to amend business/financial information that:

- Was not created by us, unless the person or entity that created the business/financial information is no longer available to make the amendment;
- Is not part of the business/financial information kept by or for MBB Business Services LLC;
- Is not part of the business/financial information which you would be permitted to inspect and copy; or,
- Is accurate and complete.

Right to an Accounting of Disclosures

You have the right to request a list of the disclosures we made of your business/financial information except for disclosures:

- for preparation, payment or financial operations,
- pursuant to an authorization,
- incident to a permitted use or disclosure, or
- for certain other limited disclosures defined by law.

To request this list of disclosures, you must submit your request in writing to the MBB Business Services LLC 3330 Cumberland Blvd – Suite 500 Atlanta, Georgia 30339. Your request must specify a time period for which you are seeking an account of disclosures and include your name, contact information, date of birth and the dates of service if known. If you are acting as a personal representative, include your contact information, the client's contact information, date of birth and the dates of service if known. You may not request disclosures that are more than **seven (7)**

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years from the date of your request or that were before **January 1, 2013**. Your request should indicate in what form you want the list, for example, on paper or electronically. The first list you request within a 12-month period will be free. For additional lists, we may charge you for the costs of providing the list. We will notify you of the cost involved and you may choose to withdraw or modify your request at that time before any costs are incurred.

Right to Request Restrictions

You have the right to request a restriction or limitation on the business/financial information we use or disclose about you for business/financial preparations, payments, or operations. You also have the right to request a limit on the information that we disclose about you to someone who is involved in your business/finances or the payment for your business/finances, like a family member or friend. For example, you could ask that we not use or disclose information about a business deal you had. Except as otherwise required by law, we will comply with a request to restrict disclosure of business/financial information to a business/financial plan for purposes of carrying out payment or business/financial operations, **BUT ONLY** if the business/financial information you ask to be restricted from disclosure pertains solely to a business/financial preparation item or service for which you have paid out of pocket and in full. **We are not required to agree to any other requests.** If we do agree, we will comply with your request unless the information is needed to provide you with last-minute services or violates federal, state, or local law. We have the right to revoke our agreement at any time, and once we notify you of this revocation, we may use or disclose your business/financial information without regard to any restriction or limitation you may have requested. To request restrictions, you must make your request in writing to MBB Business Services LLC 3330 Cumberland Blvd – Suite 500 Atlanta, Georgia 30339. In your request, you must tell us (1) what information you want to limit; (2) whether you want to limit or use, disclosure or both; and (3) to whom you want the limits to apply, for example, disclosures to your spouse.

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Right to Request Confidential Communications

You have the right to request that we communicate with you about business/financial matters in a certain way or at a certain location. For example, you can ask that we only contact you at work or by mail. To request confidential communications, you must make your request in writing to MBB Business Services LLC 3330 Cumberland Blvd – Suite 500 Atlanta, Georgia 30339. You will need to include your name, or if acting as a personal representative, include your name and contact information, the client's name and contact information, the client's date of birth, and the dates of service if known. We will not ask you the reason for your request. We will work to accommodate all reasonable requests according to federal, state or local law. Your request must specify how or where you wish to be contacted.

Right to Receive a Paper Copy of This Notice

Even if you have agreed to receive this Notice electronically, you have the right to receive a paper copy of this Notice, which you may ask for at any time. You may obtain a copy of this Notice at our website, www.mbbbusinessservices.com. To obtain a paper copy of this Notice, write to MBB Business Services LLC 3330 Cumberland Blvd – Suite 500 Atlanta, Georgia 30339.

Right to Receive Notification of a Breach of Your Financial Information

We have put in place reasonable processes and procedures to protect the privacy and security of your business/finance information. If there is an authorized acquisition, access, use or disclosure of your protected finance information we will notify you as required by law. The law may not require notice to you in all cases. In some situations, even if the law does not require notification, we may choose to notify you.

CHANGES TO THIS NOTICE

We reserve the right to change this notice at any time. We reserve the right to make the revised or changed notice effective for business/financial information we already have about you as well

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as any information we receive in the future. We will post a copy of the current Notice of MBB Business Services LLC and you may request a copy of the current notice. In addition, the current notice will be posted at www.mbbbusinessservices.com/importantlinks.

COMPLAINTS

If you believe your privacy rights have been violated, you may file a complaint by writing to MBB Business Services LLC 3330 Cumberland Blvd – Suite 500 Atlanta, Georgia 30339. You may also file a complaint with the **Federal Trade Commission (FTC) to file a complaint or to get free information on consumer issues, visit ftc.gov or call toll-free, 1-877-FTC-HELP (1-877-382-4357), TTY: 1-866-653-4261**. You will not be penalized for filing a complaint. For further information, you may send written inquiries to MBB Business Services LLC 3330 Cumberland Blvd – Suite 500 Atlanta, Georgia 30339 or call 678-921-2935.

This Notice of Privacy Practices applies to the following organization:

MBB Business Services LLC will abide by this notice that may change from time to time; you may obtain an updated list by calling 678-921-2935 or visiting our website at www.mbbbusinessservices.com.

MBB Business Services LLC is called a “Hybrid Covered Entity” under the GLBA regulations. This is because it has some components that are covered by GLBA (thereafter referred to as, “Covered Component”) and others that are not. This facility may change from time to time; you may obtain an updated list by calling 678-921-2935 or visiting our website at www.mbbbusinessservices.com.

MBB Business Services LLC complies with applicable Federal civil rights laws and does not discriminate on the basis of race, color, national origin, age, disability, or sex.