

ExpressCFO Privacy Policy

ExpressCFO A wholly owned subsidiary of XBS Express Business Solutions LLC 3535 Peachtree Road NE | Suite 320 | Atlanta, GA 30326

Effective Date: June 1, 2026 **Last Updated:** June 1, 2026 **Jurisdiction:** United States
Compliance: CCPA, COPPA, GLBA, and applicable state financial data laws

This Privacy Policy governs the collection, use, disclosure, and protection of personal information by ExpressCFO and its parent company, XBS Express Business Solutions LLC. Please read this document carefully before using our services.

1. Introduction and Scope

ExpressCFO ("ExpressCFO," "we," "our," or "us") is a wholly owned subsidiary of XBS Express Business Solutions LLC, a management accounting and capital advisory firm headquartered in Atlanta, Georgia. ExpressCFO operates the financial coaching, fractional CFO, accounting advisory, and capital access platform available at expresscfo.com and related subdomains (collectively, the "Platform").

This Privacy Policy describes how ExpressCFO collects, uses, stores, protects, and in limited circumstances shares information about individuals who visit our website, create an account, book a coaching session, download content, or otherwise interact with the Platform (collectively, "Users").

By accessing or using the Platform, you acknowledge that you have read and understood this Privacy Policy and agree to its terms. If you do not agree, you must discontinue use of the Platform immediately.

This policy applies to all Users of the Platform regardless of geographic location, subject to applicable local law. Where local law provides greater rights or protections than those described here, we will comply with those additional requirements.

2. Who We Are

ExpressCFO is the operating brand for financial coaching, fractional CFO services, accounting advisory, and capital access programs developed and delivered by XBS Express Business Solutions LLC. For the purposes of applicable data protection law, XBS Express Business Solutions LLC is the data controller responsible for personal information collected through the Platform.

Data Controller Contact Information

XBS Express Business Solutions LLC 3535 Peachtree Road NE, Suite 320 Atlanta, GA 30326

Email: team@xbsatlanta.com

3. Information We Collect

We collect information in three ways: directly from you when you provide it, automatically when you use the Platform, and from third-party services you authorize. The categories below describe each type in detail.

3.1 Information You Provide Directly

Account Registration

- First Name and Last Name
- Business Email Address
- Company Name
- Password (stored in encrypted form; never stored in plain text)
- Agreement confirmation to Terms of Service and Privacy Policy

Google OAuth Sign-In

We offer account creation and sign-in through Google Authorization (Google OAuth 2.0). When you choose to sign in with Google, we receive a limited set of profile information from your Google account including your name, email address, and Google profile identifier. We do not receive your Google password. We do not access your Google contacts, Google Drive, Gmail, or any other Google service beyond what is necessary for authentication. You may revoke our access to your Google account at any time through your Google Account security settings.

Coaching Session Intake Form

- Business Name
- Industry
- Annual Revenue Range (selected from a dropdown range; exact revenue figures are not required)
- Years in Business
- Biggest Financial Challenge (selected from a dropdown category)
- How you heard about ExpressCFO

Pre-Work Financial Self-Assessment

Prior to your coaching session, we ask you to complete a short self-assessment covering general financial awareness. Responses are collected and used solely to prepare your advisor for the session and to improve our coaching methodology. Individual responses are anonymized before being incorporated into any aggregate analysis. You are not required to provide specific financial figures at any stage of this process.

Contact and Communications

- Information submitted through our Contact Us form including name, email, phone number, service interest, and message content
- Email correspondence and replies to our marketing communications
- Responses to surveys or feedback requests

Content Downloads and Lead Magnet Forms

- Name and email address collected when you download white papers, eBooks, or case studies
- Company name collected for certain gated content downloads
- Form submission metadata including timestamp and content item accessed

Partner Program Applications

- Name, email, company, professional license or credential if applicable
- Business model description and estimated referral or deal volume
- Preferred contact method

3.2 Information Collected Automatically

When you use the Platform, we and our third-party service providers automatically collect certain technical and usage information. This collection occurs whether or not you create an account.

Device and Browser Information

- IP address (collected; anonymized before any external use)
- Browser type and version
- Operating system
- Device type (desktop, tablet, or mobile)
- Screen resolution

Usage and Behavioral Data

- Pages visited and time spent on each page
- Click paths and navigation sequences
- Form interactions (field entry, abandonment, completion)
- Content downloads and gated content access events
- Session start and end times
- Referral source (the URL or platform that directed you to us)

Cookies and Tracking Technologies

We use cookies, pixel tags, and similar tracking technologies to operate the Platform, remember your preferences, analyze usage patterns, and support marketing activities. You may configure your browser to refuse cookies, but doing so may affect the functionality of certain Platform features including account sign-in and gated content access.

We use the following categories of cookies:

- **Strictly Necessary Cookies:** Required for the Platform to function, including session management and authentication
 - **Analytics Cookies:** Used through Google Analytics 4 to understand how Users interact with the Platform
 - **Marketing and Preference Cookies:** Used to remember your choices and, where applicable, to deliver relevant content and retargeting
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3.3 Information from Third-Party Services

Google OAuth

When you choose to sign in with Google, we receive your name, email address, and Google account identifier. This information is used solely for authentication and to populate your account profile.

Zoom

We use Zoom for coaching sessions. When you book a session, Zoom collects and processes information in accordance with its own privacy policy. We receive confirmation of your scheduled appointment and any information you include in the booking form. Coaching session content is not recorded without your express written consent.

Mailchimp

When you submit a lead magnet form or subscribe to communications, your name and email are added to our Mailchimp account. Mailchimp processes this data in accordance with its own privacy policy and applicable data transfer agreements.

Agiled CRM

We use Agiled as our client relationship management and project management platform. Information you provide during onboarding or through our forms may be stored in Agiled for the purpose of managing our service relationship with you.

4. How We Use Your Information

We use the information we collect for the specific purposes described below. We do not use your personal information for purposes that are incompatible with these stated purposes without your prior notice and, where required, your consent.

4.1 Service Delivery

- Creating and managing your account
- Authenticating your identity when you sign in, including through Google OAuth
- Processing and confirming coaching session bookings
- Delivering white papers, eBooks, case studies, and other gated content
- Fulfilling advisory, accounting, capital advisory, and fractional CFO service engagements
- Operating the member dashboard and managing access to gated pricing and content

4.2 Communication

- Responding to inquiries submitted through the Contact Us form
- Sending confirmation and follow-up emails related to coaching session bookings
- Delivering Mailchimp email sequences associated with content downloads
- Sending newsletters and educational content through Substack where you have subscribed
- Notifying you of material changes to this Privacy Policy or our Terms of Service

4.3 Internal Analytics and Data Lake

ExpressCFO maintains an internal data lake for the purpose of improving our services, understanding founder financial literacy trends, and building data monetization strategies with strategic partners. This is described in detail in Section 6.

4.4 Platform Improvement

- Analyzing usage patterns to improve Platform performance, navigation, and content
- Measuring the effectiveness of lead magnets and conversion pathways
- Identifying technical issues and resolving them
- Developing new features and service offerings based on aggregate user behavior

4.5 Legal Compliance and Safety

- Complying with applicable law including CCPA, COPPA, GLBA, and state financial data regulations
- Responding to lawful requests from regulatory authorities or law enforcement
- Enforcing our Terms of Service and protecting the rights, property, and safety of ExpressCFO, XBS Express Business Solutions LLC, and our Users
- Detecting and preventing fraud, unauthorized access, and other security threats

5. Legal Basis for Processing

For Users located in jurisdictions that require a legal basis for processing personal information, including California under the CCPA and states with similar frameworks, we process personal information on the following grounds.

5.1 Performance of a Contract

Processing is necessary to provide the services you have requested, including account creation, coaching session booking, content delivery, and advisory service engagements.

5.2 Legitimate Interests

We process certain information based on our legitimate business interests, including improving the Platform, conducting internal analytics, and communicating with Users about services relevant to their expressed needs, provided those interests are not overridden by your rights and interests.

5.3 Compliance with Legal Obligations

We process information as necessary to comply with applicable law, including GLBA financial recordkeeping requirements, CCPA disclosure obligations, COPPA age restrictions, and responses to lawful legal process.

5.4 Consent

Where we rely on your consent as a legal basis, including for certain marketing communications and for participation in our anonymized data program described in Section 6, we will make the consent request clear and specific. You may withdraw consent at any time using the methods described in Section 9.

6. Data Anonymization and Strategic Partner Sharing

Important: Please Read This Section Carefully. This section describes how ExpressCFO uses anonymized data and your right to opt out.

6.1 Our Anonymized Data Program

ExpressCFO collects structured financial and behavioral data from Users through coaching session intake forms, pre-work assessments, platform interactions, and service engagements. This data is valuable for understanding patterns in small business financial health, capital readiness, and founder decision-making.

We anonymize this data before any use in aggregate analysis or sharing with strategic partners. Anonymization is performed by removing or irreversibly transforming all fields that could identify an individual User, including name, email address, company name, IP address, and any other direct or indirect identifiers. The resulting anonymized data cannot reasonably be used to re-identify any individual.

6.2 Default Participation

All Users of the Platform are included in the anonymized data program by default. This means that your anonymized data may be used in aggregate analysis and may be shared with strategic partners as described in Section 6.3 unless you opt out in writing using the process described in Section 6.4.

We rely on this approach because our data program is foundational to the research and advisory quality we provide and because the data shared is genuinely anonymized and cannot be traced back to any individual. However, we respect your right to choose otherwise, and the opt-out process is straightforward.

6.3 Strategic Partner Sharing

Anonymized data may be shared with vetted strategic partners for the following limited purposes:

- Financial literacy research and trend analysis
- Capital access and lending market intelligence
- Small business health and performance benchmarking
- Development of advisory tools, assessments, and educational content
- Aggregate reporting to investors, lenders, or research institutions

We do not share anonymized data for advertising targeting, credit scoring of individuals, or any purpose that could disadvantage a User based on their financial profile. All strategic partners who receive anonymized data are contractually prohibited from attempting to re-identify Users and from using the data for purposes other than those described above.

6.4 How to Opt Out

You may opt out of the anonymized data program at any time by submitting a written opt-out request to:

Email: team@xbsatlanta.com **Subject Line:** Data Opt-Out Request **Include:** Your full name, the email address associated with your account, and a clear statement that you wish to opt out of the anonymized data program.

We will process your opt-out request within 30 days of receipt and will send written confirmation to your email address. Opting out does not affect your ability to use the Platform or access any services. Opting out applies prospectively; it does not affect anonymized data already incorporated into aggregate datasets prior to receipt of your request.

6.5 What We Never Do

- We never sell your personally identifiable information to any third party for any purpose
 - We never share your name, email address, company name, financial details, or any direct identifier with strategic partners
 - We never use your data to make automated decisions about your creditworthiness or eligibility for financial products
 - We never share data with partners for advertising targeting or profiling purposes
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7. Information We Do Not Sell

ExpressCFO does not sell, rent, lease, or otherwise transfer personally identifiable information to third parties for monetary consideration or other valuable consideration. This applies to all Users regardless of geographic location.

California residents are advised that this policy constitutes our compliance with the California Consumer Privacy Act of 2018 as amended by the California Privacy Rights Act of 2020 (collectively, "CCPA") with respect to the sale of personal information. We do not sell personal information as defined under the CCPA.

If our practices change with respect to the sale of personal information, we will provide at least 30 days advance written notice to all Users before any such change takes effect and will obtain any required consent.

8. Compliance with Applicable Law

8.1 California Consumer Privacy Act (CCPA / CPRA)

California residents have the following rights under the CCPA as amended by the CPRA:

- **Right to Know:** The right to request disclosure of the categories and specific pieces of personal information we have collected about you
- **Right to Delete:** The right to request deletion of personal information we hold about you, subject to applicable legal exceptions
- **Right to Correct:** The right to request correction of inaccurate personal information
- **Right to Opt Out of Sale or Sharing:** We do not sell personal information. You may opt out of the anonymized data program as described in Section 6.4.

- **Right to Limit Use of Sensitive Personal Information:** We do not use sensitive personal information for purposes other than those permitted under the CPRA
- **Right to Non-Discrimination:** We will not discriminate against you for exercising any of your CCPA rights

To exercise your CCPA rights, submit a verifiable consumer request to team@xbsatlanta.com. We will respond within 45 days of receipt. We may extend this period by an additional 45 days where necessary and will notify you of any extension.

8.2 Children's Online Privacy Protection Act (COPPA)

The Platform is not directed to children under the age of 13. We do not knowingly collect personal information from children under 13. If we become aware that we have inadvertently collected personal information from a child under 13, we will delete that information promptly. If you believe we have collected information from a child under 13, please contact us immediately at team@xbsatlanta.com.

Users between the ages of 13 and 17 may use the Platform only with documented parental or guardian consent. We do not knowingly collect financial business data from individuals under 18 without verified parental consent.

8.3 Gramm-Leach-Bliley Act (GLBA)

ExpressCFO provides financial advisory and accounting services and is subject to applicable provisions of the Gramm-Leach-Bliley Act, which governs the collection, use, and disclosure of nonpublic personal financial information ("NPI"). We maintain administrative, technical, and physical safeguards designed to protect NPI against unauthorized access, use, or disclosure. We limit disclosure of NPI to affiliates and service providers as permitted by law and do not disclose NPI to unaffiliated third parties except as described in this Privacy Policy or as otherwise permitted by applicable law.

8.4 State Financial Data Laws

In addition to the federal frameworks described above, we comply with applicable state financial data protection laws, including but not limited to the New York SHIELD Act, the Illinois Personal Information Protection Act, the Virginia Consumer Data Protection Act, and comparable statutes in states where our Users are located. Where state law provides greater protections than those described in this Privacy Policy, we apply the more protective standard.

9. Your Rights and Choices

Regardless of your location, you have the following rights with respect to your personal information on the Platform.

9.1 Access and Correction

You may access and update the personal information in your account at any time by signing in and navigating to Account Settings. For information not accessible through your account, you may submit a written request to team@xbsatlanta.com and we will respond within 30 days.

9.2 Deletion

You may request deletion of your account and associated personal information by submitting a written deletion request to team@xbsatlanta.com. We will process deletion requests within 30 days. Please note that we may be required to retain certain information for legal, tax, regulatory, or audit purposes even after account deletion. We will inform you of any such retention at the time we process your request.

9.3 Data Portability

You may request a copy of the personal information you have provided to us in a commonly used, machine-readable format by contacting team@xbsatlanta.com.

9.4 Opt Out of Marketing Communications

You may unsubscribe from our marketing emails at any time by clicking the unsubscribe link in any email we send or by contacting team@xbsatlanta.com. Transactional communications related to your account or services you have requested are not subject to marketing opt-out.

9.5 Opt Out of Anonymized Data Program

As described in Section 6.4, you may opt out of our anonymized data program at any time by submitting a written request to team@xbsatlanta.com with the subject line "Data Opt-Out Request."

9.6 Cookie Preferences

You may manage your cookie preferences through the cookie consent banner displayed on your first visit to the Platform or through your browser settings. Note that disabling certain cookies may affect Platform functionality.

9.7 Google OAuth Revocation

If you signed in using Google OAuth, you may revoke our access to your Google account at

any time through your Google Account security settings. Revoking access will require you to use an alternative sign-in method or create a new account using email and password.

10. Data Security

We implement and maintain commercially reasonable administrative, technical, and physical security measures designed to protect your personal information against unauthorized access, disclosure, alteration, or destruction. These measures include:

- Encryption of passwords and sensitive data fields at rest using industry-standard encryption
- Secure HTTPS transmission for all data in transit
- Access controls that limit personal information access to authorized personnel who need it to perform their job functions
- Regular review of data collection, storage, and processing practices
- Contractual data security requirements imposed on all third-party service providers

No method of transmission over the internet or method of electronic storage is completely secure. While we strive to use commercially acceptable means to protect your personal information, we cannot guarantee absolute security. In the event of a data breach that is reasonably likely to result in harm to Users, we will notify affected Users in accordance with applicable state breach notification laws.

11. Data Retention

We retain personal information for as long as necessary to fulfill the purposes described in this Privacy Policy, unless a longer retention period is required or permitted by law.

Account Information Retained for the duration of your active account and for up to 3 years following account deletion, except where longer retention is required for legal or regulatory compliance.

Coaching Session Records Retained for up to 7 years in accordance with standard business record retention practices and applicable tax and financial recordkeeping requirements.

Marketing and Lead Magnet Data Retained until you unsubscribe or request deletion, subject to legal hold requirements.

Anonymized Data Anonymized data, by definition, is no longer personal information and is not subject to data retention limits applicable to personal information. Once data is genuinely anonymized, it may be retained and used indefinitely for the purposes described in Section 6.

Legal Hold Certain information may be retained beyond the standard retention period if subject to pending litigation, regulatory inquiry, or legal hold notice.

12. Third-Party Services and Links

The Platform may contain links to third-party websites, tools, or services that we do not own or control. This Privacy Policy does not apply to those third-party services. We encourage you to review the privacy policies of any third-party service you access through our Platform.

Google (OAuth, Analytics, Fonts) Google processes authentication data and analytics data in accordance with Google's Privacy Policy at policies.google.com/privacy.

Zoom Zoom processes scheduling and video conferencing data in accordance with Zoom's Privacy Policy at zoom.us/privacy.

Mailchimp (Intuit) Mailchimp processes email marketing data in accordance with Mailchimp's Privacy Policy at mailchimp.com/legal/privacy.

Agiled Agiled processes CRM and project management data in accordance with its own privacy policy.

Substack Substack processes newsletter subscription data in accordance with Substack's Privacy Policy at substack.com/privacy.

Stripe Stripe processes payment information in accordance with Stripe's Privacy Policy at stripe.com/privacy. ExpressCFO does not store credit card numbers or payment card data on its own systems.

13. Changes to This Privacy Policy

We may update this Privacy Policy from time to time to reflect changes in our practices, the Platform, applicable law, or other operational, legal, or regulatory reasons. When we make material changes, we will:

- Update the "Last Updated" date at the top of this document

- Post a notice on the Platform homepage for at least 30 days
- Send written notification to all registered Users at the email address on file
- Where required by applicable law, obtain your consent before the change takes effect

Your continued use of the Platform after the effective date of any update constitutes acceptance of the revised Privacy Policy. If you do not agree with the revised policy, you must discontinue use of the Platform and may request account deletion as described in Section 9.2.

14. Contact Us

If you have questions, concerns, or requests related to this Privacy Policy or our data practices, please contact us at:

ExpressCFO | XBS Express Business Solutions LLC Attn: Privacy Officer 3535 Peachtree Road NE, Suite 320 Atlanta, GA 30326 **Email:** team@xbsatlanta.com

We will respond to all privacy inquiries within 30 days of receipt.

This Privacy Policy was prepared for informational and operational purposes by XBS Express Business Solutions LLC acting in a paralegal capacity. This document does not constitute legal advice and should be reviewed by a licensed attorney admitted to practice in your jurisdiction before publication, particularly with respect to GLBA financial data obligations, CCPA and CPRA compliance, and state-specific breach notification and data protection statutes.

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