

Digital Lawyers Privacy Policy

Last updated: 04 March 2019

Please read carefully this Privacy Policy (the "Policy") prior to using <https://digitallawyers.io> website (the "Website").

If you do not agree with this Policy, you may not access or use the Website or any other services provided by the Digital Lawyers LTD, UK company with registration number 11646625 (the "Company"). All information and services provided on the Digital Lawyers Website are provided on a strictly "as is" basis without any warranty whatsoever.

1. Terms and Definitions

1.1. *Applicable Law* - laws of the England and Wales applicable under this Policy to any and all relations between a User and the Company.

1.2. *Authorized User* - any person that uses the Website with prior registration and authorization.

1.3. *Consulting Services* - services provided to the Authorized Users by Legal Experts.

1.4. *Employee* - a Company's employee.

1.5. *Legal Expert* - natural person with full legal capacity who provides Consulting Services on behalf of the Company.

1.6. *Privacy Policy (also referred to as "Policy")* - this Privacy Policy posted on the homepage of the Website which may be revised or updated from time to time as stated in subsection 1.3 of this Privacy Policy.

1.7. *Personal Data (also referred to as "Personal Information")* - any information relating to an identified or identifiable natural person ("data subject").

1.8. *User (also referred to as "You")* - any person, who uses the Website without prior registration and authorization.

1.9. *Verification Procedure (also referred to as "Authorization", "Registration")* - procedure, carried out by the Company in accordance with this Policy, aimed at determining whether a User is an Authorized User and is eligible to order services from Legal Experts.

1.10. *Website* - the website maintained and owned by the Company accessible at <https://digitallawyers.io>.

2. Privacy Policy Status and Acceptance

2.1. This Policy sets forth the general rules of the User's Personal Data collection, processing, distribution, use and keeping by the Company during the Website use and/or directly upon the Company's request.

2.2. Each User must carefully read and comply with this Policy. It is understood and presumed per se that by the fact of the Website use or by providing the Personal Data directly on the Company's request, the respective User has fully read, understood and accepted this Policy. If any User does not agree with this Policy in general or any part of it, such User must not access and use the Website.

2.3. The Company reserves the right to modify or amend this Policy at its sole discretion. Any revisions to this Privacy Policy will be posted on the homepage of the Website. If the Company will make changes, the Company will notify you by revising the date at the top of this Policy. In addition, if the revised version includes any substantial changes to the manner in which your personal information is processed, the Company will provide you with prior notice by posting notification of the change on the Privacy Policy area of the Website. The Company strongly recommends you to periodically visit the Website to review any changes that may be made for this Privacy Policy to stay informed about the information practices and your privacy rights and choices. Your continued usage of the Website shall mean your acceptance of those amendments.

2.4. It is the personal obligation and responsibility of each employee of the Company to act in a manner consistent with this Policy.

2.5. All Employees of the Company must report any breaches, violations, risks, incidents, and complaints of the Privacy Policy.

3. Purpose of Personal Data Use

3.1. The Company collects the Users' Personal Data only in the amount necessary to ensure proper usage of the Website. In particular, the Company will use the Personal Data to:

- administer the Website;
- facilitate the provision of Consulting Services by the Company;
- comply with relevant AML/KYC rules in accordance with the applicable law, the Privacy Policy and Cookies Policy;
- personalize the Website;
- support and administrate messages;
- communicate with Users concerning products, services, promotions, events and other news and information that may be interesting for the Users;
- monitor and analyse information related to the Website and the Consulting Services;
- provide third parties with statistical information about the Users (but those third parties will not be able to identify any particular User using such information);
- detect, cease and prevent any fraudulent transactions and / or illegal activities, as well as to protect the Company's property rights;

- collect, systemize and process Users' Personal Data.

4. User`s Rights

4.1. Any User has the right to access and withdraw its Personal Data, as well as to request amending, updating or deleting incorrect and / or inaccurate data by contacting the Company via the following e-mail: info@digitallawyers.io. Within 24 hours from the moment of receiving such a request the Company will be obliged either to delete the requested informed, or to provide a well-reasoned refusal.

4.2. To disable Users' accounts and remove Users' Personal Data completely, please email us at info@digitallawyers.io with a request that complies with this Policy.

4.3. Any User has the right to receive notifications about the Company's processing activities.

4.4. Any User has the right to transfer data in a machine-readable format.

4.5. Any User has the right to lodge a complaint with the local supervisory authority, authorized to review such complaints.

5. Personal Data Protection and Sharing

5.1. The Company collects and use the Users' Personal Data by running the Website. The Company may collect the following Personal Data:

- e-mail address
- full name and surname.

5.2. The Company reserves the right to carry out Verification Procedure, that shall take place in a form of the User`s registration on the Website. During such registration the User may submit documents containing Personal Data (in particular, the User`s ID and proof of residence), whereas the Company may collect and process such information in order to make sure that the User is not a citizen or a permanent resident of a FATF sanction country. Services provided on this Website are not available to citizens and permanent residents of countries, marked as high-risk jurisdictions by the Financial Action Task Force on Money Laundering. For more information, please visit <https://www.fatf-gafi.org>.

5.3. When registering on the Website and providing consent to the collection, storing and processing of the Users' personal data, you guarantee that you have read and understood this Policy and Cookies Policy.

5.4. The Company reserves the right to collect any other data, including data which is not personal per se such as:

- Users' LinkedIn profile addresses;
- any other information that may be deemed by the Company as necessary in accordance with this Policy.

5.5. When User visits the Website his Personal Data may be automatically collected and send to the Company via the Users' computers, mobile phones or any other devices. Such Personal Data may include:

- Users' IP address;
- device information including, but not limited to, identifiers, names and types of operating systems;
- mobile network information;
- standard web log information, such as Users' browsers types, the pages accessed by the User on the Website, number of times of accessing these pages and website navigation paths.

5.6. The Company collects some data automatically, namely the information about devices (including mobile devices), which you may use to access the Website, IP-addresses of the Users' devices, used browsers and operating systems, date, time, the Users' geographical location data when accessing the Website. However, the Company will not provide the above Users' personally-identifying information to any third party without User's prior consent, except as set forth herein.

5.7. The Company does not process any sensitive Personal Data, such as religion, race, ethnicity and/or political views.

5.8. The Company may also use third-party service providers, which the Company entrusts storing data, its collection and analysis. This is made in order to enable you to get the best services possible and to make the cooperation the most effective and with the best benefit for you. These third parties have their own privacy policies and their own conditions, whether to collect Users' data or opt-out from it. The Company will not seek any of Users' Personal Information through any other software platforms, data web resources etc., even if this information is necessary for the Users to use the Website.

5.9. When you access the Website, the Company (or Google Analytics or similar service provider) may place small data files called cookies on the Users' computers or another devices. The Company uses these technologies to recognize you as the User, customize the Website, understand usage and determine the effectiveness of email marketing campaigns, measure promotional effectiveness and collect information about the Users' computers (as described in paragraph 5.5 herein), mitigate possible risks, prevent fraud activities and promote trust and safety. You may control the use of cookies within the Users' internet browsers' settings. If you reject or delete certain cookies, be aware that the performance of the related features and functions of the Website and its services may be impaired. Web beacons (or pixel tags) are electronic images that may be used on the Website or in emails to help delivering cookies, count website visits, understand usage and determine the effectiveness of email marketing campaigns.

5.10. You agree to provide the Personal Data specified herein and agree that the provided Personal Data may be processed and stored by the Company or its counterparties (as specified in paragraph 5.8 herein) during the period of time that is practically necessary for the purposes for which the information may be used.

5.11. The components of Personal Data that mentioned below may be modified from time to time according to the Applicable law and the needs that will be reflected in this Policy. The Company will not collect any other Personal Data except from the mentioned herein until the Company amends and posts such amendments to the Policy on the homepage of the Website.

6. Personal Data Protection and Sharing

6.1. The Company will do any and all efforts and actions prescribed by Applicable Law to store any of the Users' Personal Data in secrecy, protect Users' Personal Data from accidental loss, disclosure or erasure, from illegal processing or illegal access.

6.2. The Company stores and processes the Users' Personal Data on servers in various jurisdictions, where the facilities and/or the service providers are located. By submitting Users' Personal Data, you agree to this transfer, storing or processing. The Company will take all steps reasonably necessary to ensure that the Users' Personal Data is treated securely and in accordance with this Policy. The Company protects Users' Personal Data under internationally acknowledged standards, using physical, technical and administrative security measures to reduce the risks of loss, misuse, unauthorized access, disclosure and alteration. Some of the safeguards the Company uses are firewalls and data encryption, physical control of accessing the data centres and information that requires authorization. The Company also authorizes access to Personal Data only for those employees or contractors who require it to do their jobs or provide services. All of the physical, electronic and procedural safeguards are designed to comply with applicable laws and regulations. Third parties may be located in other countries where the laws on the processing Personal Data may be less stringent than in the Users' countries. From time to time, the Personal Data may also be stored in other locations, and in such cases the Company will ensure that the Personal Data is stored and processed with the reasonable level of care and security.

6.3. The Company reserves the right to share the Users' Personal Data with the following parties and with regard to the following cases:

- companies that the Company plans to merge with or be acquired by (all or a portion of the business);
- companies in connection with, or during negotiations of, any sale of company assets or any financing by another company;
- service providers that execute any work for us (such as hosting providers, identity verification, support, payment, and email service providers);
- in response to a request for information if the Company believes disclosure is in accordance with or required by, any applicable law, regulation or legal process;
- if the Company believes Users' actions are inconsistent with the user agreements or policies, or to protect the rights, property, and safety of the Company or others;

- between and among Company and its current and future corporate parents, affiliates, subsidiaries, and other companies under common control and ownership;

- when the Company believes, in the sole discretion, that the disclosure of personal information is necessary to report suspected illegal activity or to investigate violations of this Policy or applicable laws.

6.4. The Company will not provide the Users' Personal Data to any other Website users or third parties other than described in paragraph 6.3 herein without the Users prior consent.

6.5. The Company will not sell or rent Users' Personal Data and / or customer lists to third parties without the Users' explicit consent.

6.6. The Company may combine the Users' Personal Data with information the Company collects from other companies and use it to improve and personalize the Website and the products, as well as the content and advertising.

6.7. The Company may use the Users names and email addresses to provide thereof with information about products or services that may be of interest thereto, but the Company will not use the Users' Personal Data without complying with applicable laws and, where appropriate, obtaining the Users' consents.

6.8. Information provided by the Company may, from time to time, contain links to and from the websites of the partner networks, advertisers, and affiliates (including, but not limited to, websites on which the Website is advertised). If you follow a link to any of these websites, please note that these websites and any services that may be accessible through them have their own terms of use privacy policies and that the Company does not accept any responsibility or liability for these policies or for any Personal Data that may be collected through these websites or services, such as contact and location data. Please check these policies before you submit any personal data to these websites or use these services.

6.9. The Company may allow others to provide analytics services that relate to the Company's Consulting services. These entities may use cookies and other technologies to collect information about Users' use of the Services and other websites and apps (if any), including the Users' IP addresses, web browsers, page views, app performance, time spent on pages and links clicked. This information may be used by the Company and other information, in particular information related to the analysis and track of data, determine the popularity of certain content and better understand Users online activity.

7. Data Storage and Retention

7.1. In accordance with Applicable Law and as needed to provide services to the Users, the Company may store and retain Users' Personal Data provided its integrity and the appropriate approach to it. This requirement is conditioned by the need of complying with legal obligations and resolving possible disputes. The Company may retain Users' Personal Data for as long as Users' account is active. Moreover, Users' Personal Data may be held beyond the

abovementioned period until it is indispensable for us to have relevant information to respond to any issues that may arise later.

8. Attorney-Client Relationships

8.1. No attorney-client relationships are created between the Users and the Company by visiting the Company's Website. Users communications with the Company are not attorney-client product, are not protected by the attorney-client privilege, and are not attorney work-product and you should not consider them as such.

8.2. Any attorney-client relationships formed between an Authorized User and a Legal Expert are exclusively formed between the Authorized User and the Legal Expert. The Company shall not be a party of any attorney-client relationships.

8.3. The Company shall not be a party to any agreements between Authorized Users and Legal Experts.

9. Cookies and Cookies Policy.

9.1. The Company uses cookies. Detailed information about cookies can be found in the Cookies Policy published on the Website.

10. Security.

10.1. The Company uses relevant electronic and procedural safeguards to protect the privacy of the information you provide to the Company from loss, misuse, disclosure, alteration, and destruction. Please note that transmission of data or information (including communications by e-mail) over the Internet or other publicly accessible networks is not one hundred per cent secure. Please note that the Company is not liable for the security of any data you are transmitting over the Internet, or third-party content.

11. If you have any questions regarding this Privacy Policy, please contact us at info@digitallawyers.io.