

# PRIVACY POLICY

Effective November 15, 2020

At LawLytics, Inc (“LawLytics”, “we”, “us” or “our”) we respect your privacy, and believe in transparency as to the information that we collect and how we use it. So we’ve set out in this document what personal information we collect, how we use it, and your rights surrounding it.

LawLytics, Inc is Delaware Corporation with its primary business located at: 6390 E Broadway Blvd, Suite 200, Tucson, AZ, 85710. If you have questions or comments about this Privacy Policy or our privacy practices, or if you would like to exercise any of your rights or choices in the Policy, please email us at [privacy@lawlytics.com](mailto:privacy@lawlytics.com), or write to us at the above address. If mailing us, please write “Attention: Privacy” on the envelope.

By using any of the LawLytics Services, you confirm that you have agreed to the Terms of Service, and that you have also read and understand this Privacy Policy.

We encourage and invite you to review the Privacy Policy whenever you visit the website to make sure that you understand how any information collected will be used. Please be aware that our Privacy Policy changes periodically. You must consent to the current agreement in order to visit this and any LawLytics member sites.

In this Privacy Policy we refer to “Users”, which means our customers who use any of the LawLytics Services (also referred to as “Members”), and also includes non-customers who visit our websites and/or interact with our educational materials including podcasts, webinars and eBooks. The visitors of our Members’ websites (law firm websites powered by the LawLytics platform) are referred to as “End Users.” Any other capitalized term that is not explicitly defined in this Privacy Policy shall have the meaning defined in our Terms of Service.

This Privacy Policy sets forth what we do with personal and non-personal information that we collect and use for our own purposes, such as Users’ account information, information about how you use and interact with our Services, marketing and educational materials, including information that you submit through our website, to support through forms and emails, and through the LawLytics Control Panel.

## Personal information we collect

We collect a variety of personal and non-personal information regarding Users and non-customers and your devices including:

- Information that you provide when you create a LawLytics account. Specifically, we collect your name, your firm name, your address, your email address, your phone number. When you sign up for paid services our payment processor provides us with the type of card you

use, the last four digits of your card, the zip code of the card's billing address and the expiration date of the card.

- Information that you provide us when you sign up for educational materials including newsletters, eBooks and webinars includes your name, your email address, your phone number, your location, your role in your law firm, your practice jurisdictions and practice types, years in practice, number of lawyers in your firm.
- Your marketing preferences.
- The emails and the contents of support tickets that you send us including but not limited to your practice descriptions, content for your website, images and videos.
- Information you share with us in response to surveys, promotions and contests.
- Information that you add directly to your LawLytics Control Panel and/or publish on your LawLytics powered website(s), including the content you add or send us to add.
- Information from your use of LawLytics Services or Users' websites. This includes your IP addresses, preferences, referring websites, information about your browser, device, screen size, operating system, ISP, preference settings, and location, information about how you interact with the LawLytics Control Panel and our Users' websites (which may include time and date stamps, clicks, scrolling motions, time on pages, searches, referring pages, load speeds and error logging).

## How we collect the information

We obtain your information from various sources and modalities. The three primary ways that we get the information are:

1. You provide the information to us directly (ie, by submitting a form or registering for an account);
2. We capture and record some of it automatically when you visit LawLytics.com and subdomains, use the LawLytics Control Panel or other Services, or when End Users visit our Members' websites. We use technologies including cookies described in detail below for this.
3. We receive some of it through third parties. For example, when you make a payment, we receive payment information from our payment processor.

These practices, and the reasons for them, are described in greater detail below.

## How we use your information.

We use the personal information we collect or obtain about you to:

- **Account creation.** Create and update your account, including providing and personalizing our Services, process payments, and respond to your support tickets and strategy requests.
- **Communication with you.** To communicate with you, including sending you emails about your purchases, announcements and product updates.
- **Promotion.** To promote our services and send you customized marketing communications about our products and services, as well as educational and informational opportunities offered by LawLytics and our partners, and to measure the effectiveness of those efforts.

- **Advertising.** We analyze the way you interact with our services and third-party services so that we can create a personalized advertising experience that is best suited for you and your level of engagement with us. For example, if you are already a LawLytics Member, we may decide to serve you advertisements about our Add-on Listings and Reviews services, or about our Content services instead of showing you general ads. Another example would be if you indicate that you practice Estate Planning law in Arizona, we may choose to send you highly relevant webinar invitations based on our awareness of your practice.
- **Improving our services.** We analyze and study how our Users access and interact with our services, and also how End Users find and interact with our Members' websites. We use the data and the results of our analysis to refine our products and services to make them more effective. We also analyze and study the effectiveness of our advertising. We do this by looking at large aggregations of anonymous data and we do not focus on you individually unless you opt-in to usability testing. For example, if we determine that nobody uses a particular feature or integration, we might determine that it is either not needed and therefore deprecate it, or we might determine that it needs to be improved to be more user-friendly or useful, or we might determine that users are simply not aware of it, and we need to do a better job of advertising it.
- **Security.** We use the information we collect to monitor, measure and ensure the security and integrity of our systems and Services.
- **Third party relationships.** We use the information we collect to manage and monitor our vendor and partner relationships.
- **Enforcement.** To enforce our Terms of Service and other legal obligations, contracts, terms and policies.
- **Protection.** To protect our interests and the interests of others as to rights and properties, including but not limited to protecting our Users from abuse, and protecting our infrastructure.
- **Compliance.** To comply with applicable legal obligations and requirements, including taxation, regulations, agreements, industry standards and law enforcement requirements.

We process the information in furtherance of the above when:

- **Consent.** You have consented to use your information.
- **Performance of an obligation:**
  - **Contractual Obligation.** We require your personal information to provide you with services, information, products and educational materials that you request, or to respond to your inquiries. For example, we need your information to create a LawLytics account for you, or to send you a link to review a recorded webinar, or to answer a support or consultation request.
  - **Legal Obligation.** Our legal obligation requires us to use your personal information to comply with laws and regulations, including but not limited to taxation, regulatory compliance, and binding court and law enforcement information requests.
- **Legitimate interests.** We have a legitimate interest in using your personal information in the following cases:

- To conduct the business of LawLytics and provide you with tailored educational opportunities, advertising and communications to cultivate and promote our business.
  - To audit, investigate, analyze and improve the security and safety of our Services. We have a legitimate interest in ensuring that the LawLytics service is secure and providing protections against abuse, spam and fraud.
  - To provide and improve our Services, and to personalize those services, we use information as necessary to pursue our legitimate interests in providing an experience that is useful for our Users and End Users on an ongoing basis.
  - To anonymize and use anonymized data and information.
- **Protecting you.** To protect your vital interests.
  - **Protecting third-parties' interests.** When needed, for the purposes of protecting a third parties' legitimate interests. An example would be working with our integration partners who are integrated with your account to troubleshoot or test the functionality, security, usability, customization or personalization of your integration.

## How we share your personal information.

We share your personal information with and according to the following:

- **Users.** We share information regarding usage of our Members' websites by End Users of their LawLytics powered sites. For example, we provide our Users with information about which pages the End User visited, which website referred the End User, which browser they used, their operating system and device type. We do this so that our Users can discover how End Users are relating to their marketing and services, and make improvements and provide more useful information.
- **Business partners.** We may share personal information with business partners. For example, when our Services integrate with third-party services, only information that you have been informed about, or that you would otherwise expect to be shared, will be shared.
- **Service providers.** We share personal information with our service and infrastructure providers that perform services on our behalf. For example, we use third-party services for email spam filtering, support desk software, delivery of webinars and many other things. We may use third parties to help us perform all essential and expected activities associated with conducting an online business, including but not limited to hosting, data processing, data storage, DNS management, email processing, server monitoring and analytics.
- **Processing payments.** We transmit your personal information via secure and encrypted processes to our payment processor when you create a LawLytics account, or update your billing preferences.
- **Law enforcement.** We will share information when necessary to following the law, complying with the law, or protecting rights and interests. We disclose your personal information if we determine that disclosure is reasonably required and necessary to comply with the law, protect our rights, protect others' rights, or prevent fraud or abuse of LawLytics, our Users or their End Users. Specifically, we may disclose your information when

responding to lawfully made requests by public or governmental authorities in the interest of public safety, national security or law enforcement.

- **Advertising and marketing.** We share personal information with third parties so that we can customize the marketing and educational opportunities we send you and monitor the effectiveness of our campaigns.
- **Business transfer.** If we are ever involved in a reorganization, acquisition, merger or sale of some or all of our assets, your personal information may be transferred as part of that transaction.

## Your privacy rights and choices

Depending on the requirements of applicable law, and subject to any applicable exceptions, you may have a right to access, update, delete or change personal information. You can request access to, change, delete or update personal information, or the personal information of your End Users by contacting us at [privacy@lawlytics.com](mailto:privacy@lawlytics.com).

You can also elect to not receive marketing emails from us by unsubscribing, or by changing your preferences in the link provided at the bottom of marketing emails. Because of the technical requirements for deleting personal information from our systems, there is likely to be a delay between the time when you ask us to delete it, and when the personal information is deleted.

We reserve the right to retain personal information in order to comply with the law, to protect our rights and the rights of third parties, to enforce our terms of service or other policies and to resolve disputes to the extent allowed under applicable law. You may have the right to object to, or restrict, the processing of your personal information, or to exercise a right of data portability under applicable law.

Additionally, if we rely on your consent to process information, you may withdraw your consent to the processing of your personal information at any time, free of charge. This will not affect the lawfulness of the processing before your consent is withdrawn.

If you are an End User of one of our User's sites, you should contact the site owner directly to exercise your rights with respect to any information that they hold about you.

Our cookie policy below explains how you can manage cookies and related technologies, and the section on Google Analytics explains how to manage integration with Google Analytics.

## How we protect your information

Although no online service is ever completely secure, we take security very seriously and are dedicated to keeping personal information secure and safe. We use infrastructure providers that provide industry standard physical, technical and administrative protocols and safeguards to protect against accidental and unlawful loss, destruction, modification, disclosure, misuse, misappropriation

and all other forms of unlawful possession, processing or use of personal information. We conduct regular security audits, and have built-in redundancies in our network for testing of vulnerability and recovery from attack, accident or any other type of loss.

## How we retain your information

We retain personal information regarding you, your account and your use of our Services for the duration of your account, or for as long as is necessary to provide you and your End Users with our Services. We also retain your personal and account information for as long as is necessary to comply with our legal obligations, and to protect us in the event of a dispute or the need to enforce our agreements and to protect our interests and the interests of third-parties.

The exact amount of time that we keep personal information depends on what the information is and why we need it. We consider factors such as the minimum required retention periods dictated by law or that are recommended as best practices, the period of time during which a claim or dispute can be initiated with respect to an agreement, whether the personal information has been aggregated or pseudonymized, and other criteria that may be relevant.

Because Members who cancel their accounts frequently come back to us and want to reactivate their account, we don't immediately delete your account and personal information upon cancellation of your Membership. The information will, therefore, be there for you for at least two years should you decide to resume your Membership. However, because our Add-on Listings and Reviews services utilize third-party software, all account data is immediately deleted upon cancellation of the individual Add-on Unit, or of LawLytics Membership.

If you want to delete all of the information from your Account immediately following, or any time after cancellation of your LawLytics Membership, email us at [privacy@lawlytics.com](mailto:privacy@lawlytics.com) and we will delete the personal information we hold about you unless we need to retain it for purposes enumerated in this Privacy Policy.

Notwithstanding the above, we do collect and maintain aggregated, anonymized data about that we may retain indefinitely.

## End Users' information

Our Members who have sites powered by LawLytics are responsible for what they do with the personal information they collect through LawLytics about their End Users. If you are a LawLytics Member, you may collect personal information about your End Users. For example, if you have a contact or client intake form on your website, you may ask your End Users to provide their names, phone numbers, email addresses and whatever other personal information you ask for in your forms. Your End Users may submit more information, or different information, from the information you ask for in your forms, especially in text areas. It is up to you to determine what information to collect, and how to use it.

You may also use third-party scripts such as newsletter subscription forms from companies like MailChimp or Constant Contact that collect information voluntarily given by your End Users, or scripts like Google Analytics that track and analyze your End Users' use of your site(s). Any third-party script that you add to your website, or request that we add to your site, may collect information. You are solely responsible for complying with any laws and regulations that apply to your collection and use of your End Users' information.

You must publish your own privacy and cookie policy, or, if you use the stock started policies provided by the LawLytics system, read them, understand them, and adopt them as your own without relying on their adequacy or legal sufficiency.

We are not liable for your relationship with your End Users, or for how you collect and use personal information about them, even if you collect that information using LawLytics functionality, and we will not provide you with legal advice regarding your privacy policies, personal information collection, use or retention.

## Cookie policy

We use cookies and similar technologies to provide, customize, study, promote, improve and protect our Services, and to enhance the experience of our Users. Cookies are small snippets of text that are sent to your web browser when you visit a website. Cookies serve many functions, including letting us remember certain information you provide to us as you navigate between pages of our websites and within the LawLytics Control Panel. We use cookies on lawlytics.com, including all subdomains. Cookies are used for the following purposes:

- **Authentication, Customization, Security and other Functional Cookies.** When Members log into the LawLytics service, cookies help us verify your account and determine when you're logged in, so we can make it easier for you to access features and stay logged in.
- **Analytics and Performance.** We use cookies to analyze how our Services are being accessed, how they are used, and how they are performing.
- **Marketing.** We use cookies to target advertising, including remarketing or retargeting ads. These are the ads that you see after visiting a website.

To opt out of cookies, you may set your browser to not accept cookies, but this may limit the functionality of some of our services, and/or make you have to re-enter data repeatedly. For example, we use cookies to remember who you are so you don't have to enter your contact information each time you want to watch a webinar or download an ebook. Opting out of cookies at the browser level may mean that you have to do extra work to access the materials you prefer. You can also opt out of receiving web-based ads from certain ad networks by visiting the NAI Consumer Opt Out at <http://optout.networkadvertising.org>

We use device identifiers on the LawLytics website, and on our Members' websites to track, analyze and optimize the performance of our services and to provide our Members with marketing performance intelligence about their websites.

We also use third-party scripts on the website lawlytics.com and associated subdomains, and in the LawLytics Control Panel. These scripts may take the form of tracking codes, snippets and/or pixels. We use pixels to learn how you interact with our website pages and emails. This information enables us to provide you with a more personalized and better experience. We use tracking snippets such as Google Analytics and AdRoll to capture data from your browser, make requests and set cookies on your devices. As an example, if you see a LawLytics ad on social media or on a news website for a webinar about a personal injury webinar after visiting a page on our website about personal injury, that is possible because of this type of tracking. We use HubSpot tracking codes to log Users activities on our lawlytics.com and all subdomains, and we send our newsletters, webinar invitations and other announcements through HubSpot. This enables us to understand what educational materials you have interacted with, what web pages you've visited, and determine whether you've opened and interacted with our emails. We use this information to provide you with a more customized experience that will be more useful to you, and also to understand the demand for and engagement with our educational materials, which empowers us to improve them and make them more useful for you in the future.

We do not directly place cookies in our Members' websites or their End Users' browsers. However, all LawLytics powered websites use two services, CloudFlare and New Relic, that do use cookies that get placed in the End Users' browsers.

- New Relic is a service that we use to monitor the speed and availability of websites. It uses cookies in LawLytics powered sites and End Users' browsers to make this possible. For a description of New Relic's use of cookies in browsers, see <https://docs.newrelic.com/docs/browser/new-relic-browser/page-load-timing-resources/new-relic-cookies-used-browser>, and for their cookies policy, see <https://newrelic.com/termsandconditions/cookie-policy>.
- CloudFlare is a service that we use to provide security certificates (commonly known as SSL certificates) to our Members' websites. These cookies are used for security and enable our Members' websites to be shown to End Users over HTTPS in their web browsers. For details about the CloudFlare cookie we use, see <https://support.cloudflare.com/hc/en-us/articles/200170156-What-does-the-Cloudflare-cfuid-cookie-do->.

## Google Analytics integration

You have the option to connect your Google Analytics account to your LawLytics account. If you enable this option, you will be giving us permission to retrieve data on your behalf from your Google account, such as your:

- Email address
- Google Analytics properties associated with your Google account

At any time, you may remove our access to your Google account by disabling the integration in your account settings.

We use the data we retrieve from Google on your behalf to display summary reports and graphs related to your website's traffic. For example, when you visit your website's reports section in your LawLytics account, we might present a graph of daily unique visitor counts across a



specified date range. These reports are only accessible to logged-in users belonging to your specific account.

We do not sell or share your Google Analytics data. Beyond the specific use case of reliably providing you with summary reports and graphs, we do not access or store your Google Analytics data.

## GDPR, UK DPA and other data protection laws

LawLytics is located in the United States. We do not advertise, solicit, market, or otherwise sell into the EU or UK. Accordingly, we are not directly subject to the General Data Protection Regulation (“GDPR”), the United Kingdom Data Protection Act (“UK DPA”), or the data protection laws of any country other than the United States.

- Data collected on the platform will be transferred and processed in the United States.
- If you are subject to the GDPR or the UK DPA and have additional data protection requirements, please contact us to discuss.