

LOCALCOUNSEL PRIVACY AND COOKIE POLICY

Limited Liability Company "LocalCounsel Ukraine" (Kyiv, Ukraine) (USREOU code: 45054130) ("**LocalCounsel**" or "we" or "us" or "our") acting as the operator of <http://localcounsel.com.ua> (the "**Site**") respects your privacy. This policy ("**Policy**") explains the types of personal information we collect and how we use and disclose such information. It provides information about your privacy rights along with our general rights and obligations and our policy in relation to how we collect, maintain, use and disclose your personal information. It also describes your options in the event you don't want us using or disclosing your personal information for certain purposes in the future.

For the purpose of this Policy, personal information shall mean information about an identifiable individual, such as name, address, email address, phone number, comments or inquiries you have made about the Site when such comments or inquiries are linked to you.

We process personal information in compliance with provisions of multiple legislations, including the Regulation of the European Parliament and of the Council (EU) 2016/679 ("**GDPR**").

We perform processing of personal information by using automation means, including collection, recording, classification, accumulation, reading, hardware access/extracting, storage, usage, transfer (including cross-border), blocking, and destruction. We neither use automated decision-making nor automated profiling.

Kindly note that we need certain types of information so that we can provide the services via the Site to you. If you do not provide us with such information, or ask us to delete it, you may no longer be able to access or use the Site.

Please read this Policy carefully to be clear how LocalCounsel will treat your personal information.

WHO IS THE DATA CONTROLLER

LocalCounsel is the controller of your personal information.

If you have any questions or concerns regarding our treatment of your personal information, please contact us at: privacy@localcounsel.com.ua. Our office location is the following: Ukraine, Kyiv, Sichovkyh Striltsiv Street, 21/27, office 405.

HOW WE COLLECT YOUR INFORMATION

We collect personal information in a number of circumstances, including when you provide it to us voluntarily (e.g. by registering at the Site) or in other circumstances with your consent (when you consent to marketing communication) or as permitted or required by law. The personal data may also be collected automatically or received from the third parties that process it.

WHAT INFORMATION WE COLLECT

The types of personal information we collect and process depend on your use of the Site (as a client, law firm representative, visitor). In terms of your use of the Site, we collect and process the following personal data:

<i>Data</i>	<i>Purpose of processing</i>	<i>Legal basis for processing</i>
- First name	Providing the services via the Site	Performance of the contract with you
- Last name		
- Name of organization (company or law firm respectively)	Improving the services provided through the Site	Legitimate interest
- Job title		
- Email	Identification of the users of the Site	Performance of the contract with you



- Phone number	Communications to the users of the Site	Performance of the contract with you, Legitimate interest
	Marketing communication to the users of the Site	Legitimate interest, Consent
	Legal, Compliance and Regulatory Obligations imposed on us	Legal obligation
	Analysis of the request filed on the Site	Performance of the contract with you
- User-generated content, information on work previously performed outside the Site, skills, tests taken, publicly available data	Improving the services provided through the Site	Legitimate interest, Consent
	Marketing and Communication	Legitimate interest, Consent
- Unique device and app identifiers, browsing history or other usage data, the browser and operating system you are using, the search terms you entered into a search engine that led you to the Site, areas within the Site that you visited, which links you clicked on, which pages or content you viewed and for how long, other similar information and statistics about your interactions, such as content response times, download errors and length of visits to certain pages and other information commonly shared when browsers communicate with websites	Providing the services via the Site	Performance of the contract with you
	Improving the services provided through the Site	Consent
	Marketing and Communication	Consent

HOW LONG WE STORE YOUR INFORMATION

We apply a general rule of keeping personal information only for as long as is required to fulfil the purpose for which it was collected. However, in some circumstances, we will retain your personal information for longer periods of time. We will retain personal information for the following purposes:

- as long as it is necessary and relevant for our operations, e.g. so that we have an accurate record of your dealings with us in the event of any complaints or challenge; and
- in relation to personal information from closed accounts to comply with applicable laws, prevent fraud, collect any fees owed, resolve disputes, troubleshoot problems, assist with any investigation, enforce our Site terms and take other actions as permitted by law.

WHO DO WE SHARE YOUR INFORMATION WITH

As a general rule we store your personal information in Ukraine. Some of the personal information you provide to us will be stored or processed on our behalf by third party suppliers and data processors and may be located in other jurisdictions, whose laws may differ from the jurisdiction in which you live. With regard to data transfers to the recipients outside Ukraine, we provide appropriate safeguards, in particular, by way of entering into EU standard contractual clauses as amended from time to time, and/or equivalent data transfer safeguards. We will take all steps reasonably necessary to ensure that your personal information is treated securely and in accordance with this Policy.



WHAT RIGHTS DO YOU HAVE

You have the following rights in respect of your personal information:

- to obtain information about how and on what basis your personal information is processed and to obtain a copy;
- to rectify inaccurate personal information;
- to erase your personal information in certain circumstances;
- to restrict processing of your personal information;
- to object to decisions which are based solely on automated processing or profiling;
- where you have provided your personal information to us with your consent, to ask us for a copy of this data in a structured, machine-readable format and to ask us to share (port) this data to another data controller;
- the right to lodge a complaint with a supervisory authority for data protection.

To exercise your rights, write to us at privacy@localcounsel.com.ua.

You may submit a complaint regarding the processing of your personal data to the data protection authority at your location.

HOW DO WE PROCESS THE PERSONAL INFORMATION OF THE MINORS

The Site is offered and available to users who are at least 18 years of age or older and of legal age to form a binding contract. Minors under 18 and at least 14 years of age are only permitted to use the Site through an account owned by a parent or legal guardian with their appropriate permission. Minors under 14 are not permitted to use the Site. We do not knowingly collect personal information from children under 14. Parents and guardians should at all times supervise their children's activities. If we learn we have collected or received personal information from a child under 14, we will delete that personal information.

LINKS TO OTHER SITES

The Site can contain links to websites and other publicly available data operated by third parties. Those links are provided for convenience and cannot remain current or be maintained. Unless expressly stated otherwise, we are not responsible for the privacy practices of, or any content on, those linked websites, and have no control over or rights in those linked websites. The privacy policies that apply to those other websites can differ substantially from our Policy, so we encourage individuals to read them before using those websites.

HOW DO WE USE COOKIES

Cookies are small data files that contain a string of characters. Cookies help us to improve our site and to deliver a better and more personalized service, for instance by storing information about your preferences and allowing us to recognize you when you return to the Site.

Our Site use the following types of cookies:

STRICTLY NECESSARY COOKIES. These cookies are essential, as they enable you to move around the Site and use its features, such as accessing secure areas. Without these cookies, some services you have asked for such as payment submission can't be provided. These cookies cannot be switched off in our systems, because they are necessary for Site functionality. While you can set your browser to block or alert you about these cookies, some or all parts of the Site may not function.

PERFORMANCE COOKIES. These cookies collect information about how you use the Site, for example which pages you go to most often and if you get error messages from certain pages. These cookies gather only aggregated or anonymous information that does not identify you.



FUNCTIONALITY COOKIES. These cookies allow the Site to remember choices you make (such as your username or the region you're in). For instance, the Site uses functional cookies to remember your language preference. These cookies can also be used to remember changes you've made to text size, font and other parts of pages that you can customize. They may also be used to provide services you've asked for such as watching a video or commenting on a blog. They may be set by us or by third party providers whose services we have added to our pages. If you do not allow these cookies then some or all of these services may not function properly.

TARGETING COOKIES. These cookies are used to deliver advertisements that are more relevant to you and your interests. They are also used to limit the number of times you see an advertisement as well as help measure the effectiveness of an advertising campaign. They remember that you have visited a website and this information may be shared with other organizations such as advertisers. This means after you have been to the Site you may see some advertisements about our services elsewhere on the Internet.

The length of time a cookie will stay on your browsing device depends on whether it is a "persistent" or "session" cookie. Session cookies will only stay on your device until you stop browsing. Persistent cookies stay on your browsing device until they expire or are deleted.

The browser you are using to view the Site can enable, disable or delete cookies. To do this, follow the instructions provided by your browser. Please note that if you set your browser to disable cookies, you may not be able to access certain parts of the Site. Other parts of the Site may also not work properly. You can find out more information about how to change your browser cookie settings at www.allaboutcookies.org.

SPECIAL NOTICES TO THE RESIDENTS OF CERTAIN US LOCATIONS

Notice for California residents

During the last twelve (12) months we have collected the categories of personal information indicated in WHAT INFORMATION WE COLLECT section.

We use the personal information that we collect or receive for the business purposes as described above and do not sell the collected information to any of the third parties.

You are entitled to the following specific rights in accordance with the legislation in force in California, subject to certain exceptions, in relation to personal information related to you:

You have a right to request access to the personal information we have collected about you over the past 12 months, including: (i) the categories of personal information we collect about you; (ii) the categories of sources from which the personal information is collected; (iii) the business or commercial purpose for collecting your personal information; (iv) the categories of third parties with whom we have shared your personal information; (v) the specific pieces of personal information that we have collected about you.

You have a right to request that we delete personal information related to you that we collected from you under certain circumstances and exceptions.

You also have a right not to be discriminated against for exercising your rights.

You also have a right to submit your request via an authorized agent. If you use an authorized agent to submit a request to access or delete your personal information on your behalf, the authorized agent must: (1) be a person or business entity registered with the California Secretary of State to conduct business in California; (2) provide proof of such registration; and (3) provide documentation or other proof indicating that they are authorized to act on your behalf. We may also require you to verify your identity directly with us, and directly confirm with us that you provided the authorized agent permission to submit the request.

Notice for Nevada residents

If you are a resident of Nevada, you have the right to opt-out of the sale of certain personal information to third parties who intend to license or sell that personal information. You can exercise this right by contacting us at privacy@localcounsel.com.ua.



CHANGES TO OUR PRIVACY AND COOKIE POLICY

We may revise this Policy from time to time in our sole discretion. If there are any material changes to this Policy, we will notify you as required by applicable law. You understand and agree that you will be deemed to have accepted the updated Policy if you continue to use the Site after the new Policy takes effect.