

Privacy Policy

ENTITY

Company: Goodlegal SRL a company, operating and registered under the laws of Romania, with its registered headquarters in Equilibrium Building 2 Gara Herastrau, 11th floor, 2nd District 020334, Bucharest, Romania, e-mail: privacy@goodlegal.io

VALIDITY

Published <April 1, 2022>. These terms replace and supersede all prior versions. Please take a moment to read through the policy, as amended by us from time to time, which is the document between the Company and you, to ensure that you have a complete and clear understanding of the principles and legal obligations under which we provide you the Offering and process the data you provided.

DEFINITIONS

- **Offering** - means Company's or its' affiliates identified herein websites, services, products, applications, software, courses, trainings, forums, workflows, improvements of any kind and associated documentation, including any beta or other test programs, results, provided by us, or obtained by us while ensuring continuous improvement of the Offering or as provided for you specific use, and any provided or shared.
- **Content** – which means text, images, videos, audio, algorithms, software, or other information.
- **Company** – further referenced either as “Company”, “we”, “us” or “our”.
- **Customer** – further referenced either as “you”, “your”, “user” or “client” defined as any individual or organization that has, accesses, or directs the use of, an account or service with us, or is testing or using directly or indirectly, the Offering.
- **Confidential Information** – means any information marked confidential or which would normally under the circumstances be considered as such.
- **Company Aggregate Data** – means aggregated and anonymized statistical and other information from the use of the Offering, which does not identify a specific person, and which may be used for reporting, research, improvement, fraud prevention, compliance, and other reasonable business purposes.

SCOPE

This privacy policy describes how the Company will make use of your information in the context of your use of our Offering (defined as our apps, websites, software, support, including documentation, assets or services offered by us) and for marketing, sales, and advertising initiatives. The Company is developing the Offering tools focused on improving the industry and overall services provision in the industry of which we or our Offering is designed to be used as described in detail on our websites or Offering documentation.

PARTIES

The Company and its affiliates (collectively “COMPANY” or “we,” “us” or “our”) are the controllers with respect to your data. This means that we determine the purpose and manner in which your personal data is processed. The contact entity for any questions regarding how your personal data is being processed is indicated herein.

Company's Processing Role

COMPANY as Controller	COMPANY as Processor
We are the data controller when we collect and use information as described herein for the purpose of our Offering.	We are the data processor when our customers collect and use information as described herein.
In this case we are responsible for determining use of the Offering, and for ensuring that all legal requirements applicable to processing of personal information through our Offering are ensured.	In this case the data controller is the customer who is solely responsible for determining how to use the Offering, and for ensuring that all legal requirements applicable to processing of personal information through our Offering are ensured.

OBJECTIVE (Data Processing Activities)

General use, registration, and customer support

When you register to use our website, create an account, or contact us for support or other offerings, we collect information that identifies you, such as:

Category	Type
Natural or Legal Person	Name; Date of birth; Company name; Email address; Telephone number; Address; Country;
	<i>Recruitment</i> Information in resume/cv, (schools or previous employment) along with other relevant information
Hardware	IP address; Mobile Device ID;
Financial	Payment/billing information (for paid services); Eligibility information (e.g., for free apps);
Activity	People with whom you communicate or share content or requests through our Offering; Types of apps and websites of interest; Activity on third-party sites and apps that use our services; Types of industries and services of interest; Content uploaded with or to our Offering; and Content of customer support communications.

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We may combine information provided by you to ensure accuracy of the data with information from third party sources, and we may also collect information to detect, prevent, or otherwise address fraud, security, or technical issues, as well as to protect against harm to the rights, property or safety of our company, employees, users, vulnerable categories, or the public.

Website

We collect information about how you use our website. This information may be associated with your device or browser, or it may be associated with your Offering account and includes:

Category	Type
Hardware	IP address; Mobile Device ID; Type of browser and device;
Route	Webpage that led you to our website;
Activity	Search terms entered into a search engine which lead you to our website; Use and navigation of websites and apps (collected through cookies and similar technologies, or by our servers when you are logged in to the app or website); Analysis of your content (e.g., documents, workflows, photos, videos, activity logs, other data points and direct feedback from you) which is sent or received using an online feature of our website, or which is stored on our servers (e.g., usage logs regarding the use of the Offering, including logins and other actions taken, time stamps, and other usage data).

Emails and texts

Emails we send you may include web beacons through which we see if you have received or opened the email, or clicked a link in the email (you can opt out from collection and receiving our marketing).

Advertising

We may advertise online, including displaying our ads to you on other companies' websites and on social media, such as Facebook or LinkedIn. Our website uses cookies and similar technologies that allow us to gather additional information to measure and improve the effectiveness of our advertising, such as:

Which ads are displayed	Which ads are clicked on	Where the ad was displayed
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PURPOSE

We use the information we collect about you for the following purposes:

Purpose	Information
To take steps linked to a contract: this is relevant where you register to use our Offering (whether paid, or as a free trial). This includes:	<ul style="list-style-type: none"> • Providing you with the requested websites; • Verifying your identity; • Processing payments; • Sending you communications (for example, related to payments); • Sending communication related to the Offering; and • Providing customer service or support.
As required by us to conduct our business and pursue our legitimate interests , in particular:	<ul style="list-style-type: none"> • Providing you with the products for which you have registered; • Analyzing your use and measuring effectiveness of our Offering; • Sending you information about our Offering and similar; • For various events; • For recruitment; • Sharing your information with 3rd parties for their own marketing purposes (where your consent is not required); • Analyzing your provided use and content to customize marketing communications (where your consent is not required); • Analyzing your content through techniques such as machine learning to improve our Offering (where your consent is not required); • Create aggregated statistical data, derived non-personal data, or anonymized or pseudonymized data (rendered non-personal and non-identifiable), which we or our partners or customers may use to provide and improve our Offering. • Detecting, preventing, or otherwise addressing problems, fraud, security or technical issues, as well as protecting against harm to the rights, property or safety of the company, our users, or the public; • Conducting surveys and market research (we will only do this with your permission where consent is required); • Investigating and responding to any comments or complaints; • Checking the validity of the account number and card number for which we may use third parties; • If we merge with or are acquired by another company, sell a website or business unit, or if all or a substantial portion of our assets are acquired by another company, your

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	<p>information will likely be disclosed to our advisers and any other prospective purchaser's advisers and will be one of the assets that is transferred to the new owner; and</p> <ul style="list-style-type: none"> • In connection with legal claims and regulatory purposes as necessary (including government agency requests or litigation).
<p>Where we process your information based on <i>legitimate interests</i>, you can object to this processing in certain circumstances. In such cases, we will cease processing information unless we have compelling legitimate grounds to continue processing or where it is needed for legal reasons.</p>	
<p>Where required, when you give us your consent (which you can withdraw at any time) or otherwise consistent with your choices:</p>	<ul style="list-style-type: none"> • Sending you information about our Offering, special offers and sharing your information with third parties for their own marketing purposes; • Placing cookies and using similar technologies on our website and in email communications, in accordance with this policy and the information provided to you when those technologies are used; • Accessing information stored on your device relating to your use of the website and crash reports; and • Analyzing your content using techniques such as machine learning in order to improve our services and the user experience;
<p>For legal reasons:</p>	<ul style="list-style-type: none"> • Responding to requests by government or law enforcement authorities conducting an investigation or to detect, prevent, or otherwise address misuse, fraud, security, potential illegal activities, or technical issues and software piracy.
<p>Where this processing and these disclosures are not strictly required by law, we may rely on our legitimate interests and those of third parties described above.</p>	

Sharing with other Data Controllers

We may share your personal information within our group of companies (as identified on our website, if any) for the above purposes. We may also share your personal information with other third-party data controllers. The types of third parties your information may be shared with include:

contractors	vendors	resellers	partners	advertisers	research	ISPs	fraud monitoring providers	Infrastructure providers
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Third-party data controllers may also use our Offering to collect and process your personal information. If you are using an email address that is associated with a business domain to use our Offering, or if you were invited by a business, we may share your information to that business.

Sharing for Fraud Prevention, Safety and Security Purposes

We will share personal information with companies, organizations or individuals outside of the Company if we have a good-faith belief that access, use, preservation or disclosure of the information is reasonably necessary to detect, prevent, or otherwise address fraud, security or technical issues, as well as to protect against harm to the rights, property or safety of the company and our employees, our users, vulnerable categories or the public as required or permitted by law.

Sharing with Data Processors

We will also share your personal information with companies (*which we ask to protect your personal information similar to this policy*) that help us run our business by processing personal information on behalf of the Company for the purposes identified above. Such companies include providers of customer support services, business development, payment processing services, fraud monitoring and prevention, email, social media, and other marketing, service providers, and hosting services.

Other Information Sharing

We may also share your personal information based on:

Consent	When you agree to the sharing.
Legal Process	When we have a good faith belief that we are required to provide information in response to a subpoena, court order, or other applicable law or legal process, or to respond to an emergency.
Corporate Restructuring	Merger or acquisition by another company, sell of all, or a substantial portion of our assets or business to another company, your information will likely be disclosed to our advisers and any prospective purchaser's advisers and will be one of the assets that is transferred to the new owner.
Statistics	We may share or publish aggregate information that doesn't specifically identify you, such as statistical information about visitors to our websites or statistical information about how customers use the website.

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RESPONSIBILITIES

To protect personal data we employ administrative, technical, and physical security controls where appropriate, such as encryption, 2-step verification, and strict contractual confidentiality obligations for employees and contractors. Your personal information and files are stored on our servers and the servers of companies we hire to provide services to us, such as infrastructure providers. The main locations where we process your personal information are in the locations where our infrastructure partners are based or from where they provide the infrastructure services we require. We may also transfer personal information to other countries in the world where our Offering may be available. We carry out these transfers in compliance with applicable laws – for example, by putting data transfer agreements in place to help protect your personal information. We rely on one or more of the following legal mechanisms to ensure adequate protection such as for our EU based users: European Commission approved Standard Contractual Clauses, Privacy Shield, your consent, or similar mechanisms. A copy of the relevant mechanism can be provided for your review upon request, using the contact details.

RESOURCES

We process your personal data in accordance with the applicable law and you have the right:

Right	Action
Access	<ul style="list-style-type: none"> • you have the right to obtain a confirmation whether or not we process your personal data; • to have access to the type of personal data and to the conditions of processing; • you have the right to obtain the personal information you provide to us for a contract or with your consent in a structured, machine-readable format.
Rectification	<ul style="list-style-type: none"> • you have the right to request, the rectification of inaccurate or incomplete personal data which we have about you
Erasure	<ul style="list-style-type: none"> • you have the right to request erasure of your personal data in case <ol style="list-style-type: none"> (i) the data are no longer necessary for their original purpose (and no new lawful purpose exists), (ii) we initially process your data based on your consent and you withdraw your consent and therefore no lawful ground exists anymore, (iii) you object and we have no overriding grounds for continuing the processing, (iv) the data have been processed unlawfully, (v) erasure is necessary for compliance with applicable law
Restriction	<ul style="list-style-type: none"> • you have the right to ask for the restriction of processing in cases where you consider that the personal data processed is inaccurate or unlawful
Withdraw	<ul style="list-style-type: none"> • you have the right to withdraw your consent for processing
Object	<ul style="list-style-type: none"> • you have the right to object to the data processing and to object at any moment to the data processing for direct marketing purposes and the right not to be subject to a decision based solely on automated processing
Portability	<ul style="list-style-type: none"> • you have the right to ask us to port your information to another controller in a structured, machine-readable format
Complain	<ul style="list-style-type: none"> • you have the right to file a complaint with the national Data Protection Authority and the right to address to the competent courts of law.
Withdrawing consent or objecting to direct marketing	<p>We and the companies we hire may use your information to provide you with information and offers related to our Offering. Where we rely on your consent, you will always be able to withdraw that consent, although we may have other legal grounds for processing your information for other purposes, such as those set out above. In some cases, we are able to send you direct marketing without your consent, where we rely on our legitimate interests. You have the right to opt-out of direct marketing, at any time by: Updating your preferences in your account; Clicking the unsubscribe link at the bottom of our marketing emails; or E-mail us using the details provided here.</p>

In addition to the rights above, see [California Consumer Privacy Rights](#) for additional information if you are based in California. Please note that we do not sell the personal information we collect to other parties.

TERM

We will store your personal data for the period of time necessary to achieve the purposes described in this policy and in accordance with our legal obligations, our contractual obligations or the industry practices. When you register for an account, we process and keep most personal information we have about you for as long as you are an active user. When you close your account, we begin deleting (in accordance with our procedures, which may involve archiving, anonymizing or destroying it) certain personal information that we no longer have a business reason to retain. However, we will retain personal information related to our contract and business transactions with you from the termination of our agreement with you, in accordance with the applicable law.

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Where we process personal information for marketing purposes or with your consent, we process the information until you request us to stop the processing. We also keep a permanent record of the fact that you have asked us not to send you direct marketing or to process your information so that we can respect your request in future.

GENERAL

We may update this privacy policy (or other related documents) to allow the Company to accommodate new technologies, industry practices, regulatory requirements or for other purposes. We will change the "last updated" date at the top of this policy and the revised policy will be posted to this page so that you are aware of the information we collect, how we use it, and under what circumstances we may disclose it. Under certain circumstances (for example with certain material changes) we will provide notice to you of these changes and, where required by applicable law, we will obtain your consent. Notice may be by email to you, by posting a notice of such changes on our apps and websites, or by other means consistent with applicable law.

We also use "web beacons" (or "tags" bits of programming code included in web pages, emails, and ads that notify us or our partners when those web pages, emails, or ads have been viewed or clicked on) to help deliver cookies and gather usage and performance data. Our Offering may include web beacons, cookies, or similar technologies from third-party service providers. Cookies are small text files placed on your device to store data that can be recalled by a web server in the domain that placed the cookie. We use cookies and similar technologies for storing and honoring your preferences and settings, enabling you to sign in, combating fraud, analyzing how our Offering perform, remembering your preferences, measuring your use of our Offering, understanding your interests so we can provide you more relevant content, running the solutions that help our customers improve the security and performance of their websites and digital infrastructure. Depending on the purpose for which they are used cookies can be

essential (for the functionality of the website)

Place	Name	Owner
Cookies	accepted_terms	Goodlegal
Session	session_cookies	Goodlegal

functional (for enhancement of your experience and remembering your preferences)

Place	Name	Owner

analytical (for understanding how the website is used)

Place	Name	Owner

advertising (for providing offers and services)

Place	Name	Owner

Cookies can also be "first", or "third" party based on the website or domain placing it. Third party cookies are set by third parties' websites or domains that you are visiting and are other entities than the Company. You have the tools to control the data collected by cookies, web beacons, and similar technologies. For example, you can use the settings in your internet browser to limit how the websites you visit are able to use cookies and to withdraw your consent by clearing or blocking cookies.

If you have a privacy question or request, please contact us.