Welcome to LegalMe's Privacy and Data Protection Policy ("Privacy Policy").

At LegalMe LTD ("we", "us", or "our"), we are committed to protecting and respecting your privacy and personal data in compliance with the law and guidelines of the EU General Data Protection Regulation ("GDPR").

This Privacy Policy explains how we collect, process and keep your data safe when you visit and use our website ("https://legalme.co.uk" or the "Site"). The Privacy Policy will tell you about your privacy rights, how the law protects you, and inform our employees and staff members of all their obligations and protocols when processing data.

The Data Controller for your personal information is LegalMe LTD. We have appointed a data protection officer ("DPO") who is responsible for overseeing questions in relation to this Privacy Policy. If you have any questions about this Privacy Policy, including any requests to exercise your legal rights surrounding your Personal Data please contact the DPO at **legalmebusiness@gmail.com**.

You have the right to contact the Information Commissioner's Office (ICO), the UK supervisory authority for data protection issues (<u>www.ico.org.uk</u>). We would, however, appreciate the chance to deal with your concerns before you approach the ICO so please contact us in the first instance.

1. How LegalMe uses your personal information

1.1 LegalMe Services

If you are receiving advice or support from us, or if someone else has referred you to us for such a service, we will need to process your data because of your specific relationship with us.

We will keep all your relevant personal information – including notes, letters, emails and information given to us about you – in a confidential record that is specific to you. We take information security very seriously. No one is allowed access to our system or files unless they need this to provide the service to you, or for one of the other purposes discussed in this notice.

We may need to disclose and discuss your personal information to third party individuals or organisations if this is necessary to help resolve your issue. Examples include:

- your landlord
- council housing, social services and Housing Benefits teams
- the DWP/Job Centre or HMRC
- your GP or medical professionals
- lenders and creditors
- legal representatives or advisers
- the court

We will discuss this with you as we go along, and will only act with your express consent unless one of the other legal bases in data protection legislation applies.

When you speak or communicate with us in any manner or form, this communication is recorded. This is used for training purposes, quality assurance, complaint investigations, and to make further improvements to the service we provide to you. You are informed of the recording before any data collection occurs.

To ensure that our services meet a high standard of quality, client files are sometimes checked by our quality assurance staff. Files may also be checked by external auditors if the work we do is funded by another organisation, such as a local authority or the Legal Aid agency. All auditors are bound by confidentiality policies.

Where our funders require it as a condition of our contract with them, we may use your data in reports to them. Typically this is so that they can monitor the outcomes of the help we have provided to you, to ensure we are meeting the terms of our contract with them.

We may use your data for general statistical reports. These statistics will not include any information that could be used to identify any individual.

1.2 Fundraising/campaigning/direct marketing

We would love to keep you up to date with our fundraising, marketing and campaign activity. We use a range of marketing activities and channels to contact our supporters – including our website, face-to-face fundraising, direct mail, SMS/text campaigns, email, and telephone. We will obtain your consent to contact you by email and text message for marketing purposes.

Through the above channels, we may send you the following marketing materials:

- 1. **updates about LegalMe's work** including newsletters, magazines, and other publications informing you about our work
- 2. **appeals and fundraising activities** including requests for donations, information about how you can leave us a gift in your will, how you can raise money on our behalf, attend or take part in a fundraising event.
- 3. Products or services including information about products or services offered by our platform
- 4. **professional services** including details of the professional services that LegalMe offers, such as training and publications

We will **never** share or sell your personal data to a third-party organisation for its marketing, fundraising or campaigning purposes.

You can withdraw your consent, unsubscribe from or update your marketing preferences at any point using the details in the 'Contact us' section below."

Any electronic communications, such as emails, will have a link to unsubscribe from future electronic communications, so you can manage your own communication preferences.

If you make any changes to your consent, we will update your record without undue delay and at the latest within one month of receipt. It may take 60 days for our systems to update and stop any postal communications from being sent to you. Email communications will, however, be stopped immediately.

1.3 Administrative communications to LegalMe

In addition to the fundraising and marketing communications that you receive from LegalMe, we will also communicate with you by post, telephone, and email in relation to administrative and transactional matters. For example, we will call you after you have set up a Direct Debit to confirm your details, and upon cancellation. There may also be other occasions where we need to contact you about your payment for services and products which we offer on our Site.

We may still need to communicate with you for administrative purposes even where you have opted out of marketing communications from us.

1.4 Registration and User Information

You will need to include Personal Data when creating your profile on our Site so the content you input is linked to your profile. In order to use our Platform you need to contract with us under our Terms of Service and so this data is necessary to form the contract between us.

We lastly need to understand where you are logging in from so we know whether you can take advantage of our services, and what browser you are using so we can understand our customer demographic to help diagnose service provision issues, to keep our records up-to-date and analyse how customers use our services

1.5 Payments and Transactions

You will need to include Personal Data when filling in your details on the Site so as to process the necessary transactions or payments. We will retain the name that is stated on the credit/debit card you enter into our API.

In order to use our Platform you need to contract with us under our Terms of Service and so this is necessary to form the contract between us We need to retain your Transactional Data so that we can comply with our legal obligation to send you an invoice following a purchase

We lastly need to know who you are so that we know who to deliver the service to once it has been purchased. It also enables us to provide support to the right individual in case there is an issue with the purchased product

1.6 Site Administration and Data Analytics

We may utilise your data for running our business, provision of administration and IT services, network security, and to prevent fraud. We may also use your information to be able to comply with all legal obligations surrounding data collection, processing and retention.

We may also utilise your information for data analytics in order to define types of customers for our products and services, to keep our Site and Platform updated and relevant, to develop our business and to inform users about marketing strategy.

2. Why we collect your data:

We collect and process personal data about the people who interact with us. The kind of data we collect depends on someone's needs, and how they're using our services. For instance, we might collect data to communicate with someone and send requested information to them, to provide a product a service, or to improve our services.

Some of the reasons we might collect your data include:

- to provide you with advice, support or legal services that you have requested or been referred to
- to record personal details shared during conversations with our staff
- to process a purchase of a LegalMe product or service
- to record and contact you regarding payments you make to LegalMe
- to administer services LegalMe is providing to you
- to communicate with you regarding LegalMe's work and activities
- to provide you with information about and and to administer or work or activities
- to manage your communication preferences
- to process job applications or volunteer placements (TBC)
- to conduct surveys, research and gather feedback
- to obtain information to improve LegalMe's services and user experiences
- to address and resolve complaints about LegalMe and our services
- to carry out research to find out more information about our users' and prospective users' backgrounds and interests
- to comply with applicable laws and regulations, and requests from statutory agencies
- to comply with our contractual obligations to our funders

3. Types of Data / Privacy Policy Scope

Personal Data means any information about an individual from which that person can be identified. It does not include data where the identity has been removed (anonymous data).

We may collect, use, store and transfer different kinds of Personal Data about you which we have grouped together below. Not all of the following types of data will necessarily be collected from you but this is the full scope of data that we collect:

If you sign up to use LegalMe and create a profile this will include:

- **Profile/Identity Data** including first name, last name and gender.
- Contact Data including address and email address.
- **Communications Data** including your preferences in receiving marketing from us and your communication preferences.

If you purchase a product on our this will include:

• **Billing Data** including debit/credit card holder information (name/billing address) of whoever purchased something from LegalMe.

• **Transaction Data** including details about payments from you for products and purchases you have made from LegalMe.

If you utilise our document creation, filing or other services, we may also collect the following types of information:

- Information you enter onto the LegalMe website.
- photographs, video or audio recordings.
- occupation, biological information, and legal information regarding your personal or housing status.
- any other information you share with us.
- Customer Support Data includes feedback and survey responses. If you have spoken to us or contacted us by email or via chat we will retain a record of that conversation.
- Usage Data, including information about how you use our website, products and services.

This information may be collected via:

- any paper forms you complete.
- telephone, webchat or email conversations, or face-to-face interactions.
- digital forms completed via our website, or online surveys.
- third-party companies and websites.
- publicly available sources.
- communication via social media.

We also collect, use and share **Aggregated Data** such as deal data to help you to make data-driven funding decisions. For example, we could indicate that e.g. "Participating Preferences are selected 23% of the time." Aggregated Data could be derived from your Personal Data but is not considered Personal Data in law as this data will **not** directly or indirectly reveal your identity. However, if we combine or connect Aggregated Data with your Personal Data so that it can directly or indirectly identify you, we treat the combined data as Personal Data which will be used in accordance with this Privacy Policy.

Further, we may use anonymous data collected from the LegalMe Site for site administration, analytics, advertising and promotional purposes, and we may share such information with other entities (such as service providers) for such purposes. We may also aggregate data to enable research or analysis so that we can better understand and serve you and others. For example, we may conduct research on your demographics and usage. Although this aggregated data may be based in part on Personal Data, it does not identify you personally. LegalMe may share this type of anonymous data with others, including service providers, our affiliates, agents and current and prospective business partners.

We may use your anonymous data outside of LegalMe to improve third party marketing or use your data in combination with third party data to improve your experiences both in and outside LegalMe. We may retain your IP address and/or other device-identifying data in order to help us diagnose problems with our servers, to administer LegalMe including personalizing content or links relevant to your geographic area or device-type, to verify that your account is not being used by others, to gather broad anonymous demographic data (such as the number of visitors from a geographic area), to enforce compliance with our Terms of Use for our Site, Terms of Service or otherwise in order to protect our services, Site, Platform, Users, or other third parties.

We sometimes also collect sensitive, personal data about individuals. This includes information about health, religion, sexuality, ethnicity, political and philosophical beliefs, and criminal records. We will normally only record this data where we have your explicit consent, unless we are permitted to do so in other circumstances under data protection law.

Where we are providing you with advice or support services, we may record your sensitive personal data if this is necessary for the establishment, exercise or defence of legal claims, or if it is in the substantial public interest because we would not be able to provide our services without doing so.

4. The Legal Basis for Collecting That Data

There are a number of justifiable reasons under the GDPR that allow collection and processing of Personal Data. The main avenues we rely on are:

- **Consent**: Certain situations allow us to collect your Personal Data, such as when you tick a box that confirms you are happy to receive email newsletters from us, or 'opt in' to a service.
- **Contractual Obligations**: We may require certain information from you in order to fulfil our contractual obligations and provide you with the promised service.
- Legal Compliance: We're required by law to collect and process certain types of data, such as fraudulent activity or other illegal actions.
- Legitimate Interest: We might need to collect certain information from you to be able to meet our legitimate interests this covers aspects that can be reasonably expected as part of running our business, that will not have a material impact on your rights, freedom or interests. Examples could be your address, so that the platform can include that address at the bottom of forms it generates so the recipient of the form knows who to contact; or a founder's salary found within a shareholders' agreement, necessary for your investors to know, and a document that we store on the platform for you for future reference.

5. Your rights

You have many rights under data protection legislation. These include:

Right of Access

You have the right to know what information we hold about you and to ask, in writing, to see your records.

We will supply any information you ask for that we hold about you as soon as possible, but this may take up to one calendar month. We will not charge you for this other than in exceptional circumstances. You will be asked for proof of identity as the person dealing with your request may not be the staff member you have met before. We need to be sure we are only releasing your personal data to you.

This is called a data subject access, and can be done by:

• emailing legalmebusiness@gmail.com

Right to be informed

You have the right to be informed how your personal data will be used. This policy, as well as any additional information or notice that is provided to you either at the time you provided your details, or otherwise, is intended to provide you with this information.

Right to withdraw consent

Where we process your data based on your consent (for example, to send you marketing texts or emails), you can withdraw that consent at any time. To do this, or to discuss this right further with us, please contact us at legalmebusiness@gmail.com

Right to object

You also have a right to object to us processing data where we are relying on it being within our legitimate interests to do so (for example, to send you direct marketing by post). To do this, or to discuss this right further with us, please contact us using the details in the 'Contact us' section below.

Right to restrict processing

In certain situations, you have the right to ask for processing of your personal data to be restricted because there is some disagreement about its accuracy or legitimate usage.

Right of erasure

In some cases, you have the right to be forgotten (i.e. to have your personal data deleted from our database). Where you have requested that we do not send you marketing materials, we will need to keep some limited information to ensure that you are not contacted in the future.

Right of rectification

If you believe our records are inaccurate, you have the right to ask for those records concerning you to be updated. To update your records, please get in touch with us at legalmebusiness@gmail.com.

Right to data portability

Where we are processing your personal data because you have given us your consent to do so, you have the right to request that the data is transferred from one service provider to another.

6. Complaints

If you have any complaints about the way in which we have used your data, please get in touch with us at legalmebusiness@gmail.com. You are also entitled to make a complaint to the <u>Information Commissioner's</u> <u>Office</u> and the <u>Fundraising Regulator</u>, and, where you have been helped by a solicitor, the <u>Legal</u> <u>Ombudsman</u>.

7. Contact us

If you have any questions about this policy, would like more information, or want to exercise any of the rights set out in the 'Your rights' section above, you can get in touch with us in the following ways:

email: legalmebusiness@gmail.com