

## CONFIDENTIALITY AND PERSONAL DATA PROCESSING POLICY

This **LawCoster** confidentiality and personal data processing policy (“**Policy**”) applies to any and all information, messages, data (including personal data), documents (“**Information**”) that may be posted and/or received by the Counterparties in the course of using **LawCoster** service.

This Policy determines the procedure of ensuring the confidential nature of processing Information by the operator of the platform - **Trustware Consulting LTD** limited liability company, registered in accordance with the laws of England and Wales (registration number: 11305296, address: 7 Mill Bank, Tonbridge, Great Britain, TN9 1PY), and also establishes the rights and obligations of the Counterparties in respect of the Information.

The Policy also establishes the rights of processing Personal Data that are provided by the Counterparties in the course of using the Platform.



### TERMS

<b>Cookie</b>	Piece of data that is sent by a web-server and stored on the device by using which a person visits the pages of the Site;
<b>Order</b>	Request for providing the Service posted by the Customer on the Platform;
<b>Customer</b>	The person who has placed the Order on the Platform;
<b>Information</b>	As defined in the preamble of the Policy;
<b>Provider</b>	The Candidate chosen by the Customer for rendering the Service;
<b>Confidential Information</b>	Any Information, disclosure (leak, transfer) that may cause harm to economic or other interests of <b>Trustware Consulting LTD</b> and Counterparties, as well as obligatory for fulfillment by the person who has got access to certain Information, the requirement is to not transfer such Information to third persons without consent of its owner;
<b>Trade Secret</b>	Regime of confidentiality of Information that allows its owner in existing or possible circumstances to increase the income, avoid unjustified expenses, preserve the position on the market of goods, works and services or to obtain other commercial benefits. Business secret may include, without limitation, corporate or any other information of any nature that are of actual (potential) commercial value, as well as information about the ways of performing professional activity of Counterparties;
<b>Selection</b>	Procedure of choosing a Provider by the Customer among Candidates on the basis of the offers for rendering the Service received from them;
<b>Personal Data</b>	Any information that directly or indirectly relates to a certain or identifiable individual;
<b>Platform</b>	Online service for making Orders of Services placed on the Site;
<b>Policy</b>	This <b>LawCoster</b> confidentiality and personal data processing policy;
<b>Representative</b>	The individual authorized to perform actions on the Platform in the name and on behalf of a Counterparty, who has created the profile on the Site by means of registration;
<b>Candidate</b>	Legal firm taking part in Selection;
<b>Site</b>	Web-site of <b>Trustware Consulting LTD</b> with the following address <a href="http://www.lawcoster.net">www.lawcoster.net</a> ;
<b>Service</b>	Legal or related Service specified in the Order;
<b>Counterparties</b>	The umbrella term for the Customer, Candidate and Provider.



## INTERPRETATION

### LawCoster

Depending on the context may mean the Platform or **Trustware Consulting LTD** as the operator thereof;

### LawCoster Service/Platform

Depending on the context we call our product “**Service**” (describing the services provided by it), “**Platform**” (speaking of hardware and soft hardware/firmware) or «**LawCoster**» (placing emphasis on the brand and speaking of the product as a whole). For the purposes of this document these terms are regarded as synonyms.



## GENERAL PROVISIONS

Any Confidential Information, Trade Secret, Personal Data, posted and received by means of the Platform, are provided on the terms of strict confidentiality and are not subject to disclosure to third persons.

Any Confidential Information, Trade Secret and Personal Data are accepted by **Trustware Consulting LTD** on the Platform and processed solely for the purposes of implementing effective interaction between the Counterparties, comprehensive evaluation by them of the terms and conditions of the Order/Selection, as well as the capability of exercising further cooperation in the future in respect of the Order.

The Customer acknowledges and confirms that the Information provided by it in the Order will be disclosed to the Candidates.

The Candidate acknowledges and confirms that his offer for rendering of the Service will be disclosed to the Customer.

**Trustware Consulting LTD** uses the Confidential Information, Trade Secret, Personal data exclusively for implementing the purposes of this Policy and User Agreement, and notifies Counterparties and their Representatives of all situations that may involve or impact their Confidential Information, Trade Secret and/or Personal data.



## PERSONAL DATA

**Trustware Consulting LTD** gathers and processes Personal Data of Customers and Representatives who provide their Personal Data in the course of voluntary registration on the Site.

Within the framework of the service, Counterparties may provide Personal Data of other natural persons for the purposes of operating the features of the Platform. Thus, the Customer may provide data on the representatives of legal firms within the framework of describing the required Service, and the Candidate may provide information about its specialists within the framework of the offer for rendering the Service.

Responsibility for obtaining consent to processing Personal data of other natural persons is vested in the disclosing party. Providing Personal data without the consent of the subject thereof is not allowed.

The Counterparties hereby confirm that they have received the consents to processing the above-mentioned Personal data by **Trustware Consulting LTD**. The Counterparties shall confirm the fact of receipt of such consents upon the first request from **LawCoster**, in particular, provide the written consent certified by the signature of the subject of personal data. In case of failure to comply with the terms and conditions of this paragraph **Trustware Consulting LTD** is entitled to block the account of the Counterparty and disqualify it from further using the service.

### Personal Data are gathered with the following purposes:

- giving Counterparties access to **LawCoster** for using the service;
- analysis of information and documents provided for creation of the Order;
- creation of the Order and its coordination with the Customer;
- communicating the Order to the Candidates;
- receiving offers from the Candidates for rendering the Service under the Order;
- communication with the Counterparties on the Platform, and also by phone and e-mail, necessary within the framework of operation of the Platform;
- getting feedback from the Counterparties;
- regulation of possible disputes between the Counterparties or Representatives and **LawCoster** or between the Counterparties and/or Representatives;
- development, improvement and expansion of features of **LawCoster**.

### Volume of processed Personal Data

For the purposes of performing its activities relating to providing access to **LawCoster Trustware Consulting LTD** may gather and process the following Personal Data:

- surname, name, patronymic;
- e-mail address;
- telephone number;
- level of education;
- position;
- place of work;
- length of service;
- photo;
- other Personal Data that may be provided by the Counterparties within the framework of creation of the Order and as the part of the Candidate's offer for rendering the Service.

### Anonymized data

When individuals visit the site **Trustware Consulting LTD** collects their anonymized data. Such information is out of relation with a specific personality, it gives **Trustware Consulting LTD** the idea of the number of individuals visiting the pages of the Site and helps to make it more convenient.

**Trustware Consulting LTD** automatically preserves the general information about the device used for the site session (location, operating system version, model and unique device identification, IP-address, attachment point address, etc.).

### Cookie

**Trustware Consulting LTD** may get anonymized Personal Data by means of cookies and similar technologies, in order to differentiate the Customers and Representatives who have passed voluntary registration on the Site, from other visitors of the Site; to ensure maximum convenience, providing personalized information, and also to improve the service.

### Types of used Cookies:

- **Strictly necessary cookies.** Such Cookies are necessary for correct operation of the Site; they allow an individual to navigate the Site and use its features. Such files don't identify the personality. If the individual doesn't agree to use this type of files, this may impact the productivity and/or operability of the site or its elements for this individual;
- **Cookies related to productivity, effectiveness and analytics.** Such Cookies help to understand the way the individual interacts with the Site, providing information about the sections he/she has visited, and about the amount of the time the individual spent on the Site. Such files also demonstrate the problems with operation of the Site. Cookies related to analytics, also help to optimize the content of the Site. This type of Cookies can't be used for personal identification. All information that is gathered and analyzed is completely anonymous;
- **Functional Cookies.** Such Cookies are needed for identification of the individual who visits the Site again. They allow to select the content of the Site on an individual basis. If an individual blocks this type of files, this may impact the productivity and features of the Site, and also restrict access to its content;
- **Advertising Cookies.** Such Cookies record information about the actions of individuals in Internet, in particular, visits to sites and pages, as well as information about links and advertisement, that the individual chose to view. The main purpose is to reflect on the Sites the content that is geared to the user to the maximum extent, as well as to enable providing advertising and other information so that it would meet the interests of a particular individual to the maximum extent.

### Managing Cookies

Individuals may deactivate creation of Cookies, restrict their creation by the Site or activate notification of sending Cookies in their browsers, and also delete Cookies from their devices at any moment. However, if all Cookies are blocked (including the strictly necessary ones), individuals can't get access to the Site/its parts or the pages will be shown with restrictions/incorrectly.

Staying on the Site, the individual agrees with placement of Cookies on his/her device for analysis of using the Site. If the individual doesn't want to receive Cookies, he/she should stop using the Site.

### Third-party Cookies

The Site uses Google Analytics and Yandex.Metrics Cookie files.

**Trustware Consulting LTD** uses Google Analytics and Yandex.Metricx to provide web analytics data about how the Site is used. You may get additional information about Cookie Google Analytics **on help pages and confidentiality policy of Google**, and about Yandex.Metrics – **in the policy of using data and confidentiality policy of Yandex**.

To refuse to use Google Analytics and Yandex.Metrics, the individual may, in particular, upload and install **opt-out Browser add-on**.

### Means of processing and actions performed with Personal Data

**Trustware Consulting LTD** performs processing of Personal Data by using automation means, including collection, recording, classification, accumulation, reading, hardware access/extracting, storage, usage, transfer (including cross-border), blocking, destroying.

### Transfer of Personal Data to third persons

In order to ensure efficient service and operation of the features of the Platform, **Trustware Consulting LTD** may transfer Personal Data to other Counterparties within the framework of Selection, as well as carry out cross-border transfer of Personal Data for implementation of the purposes specified in this Policy.

Personal Data of the Customer and/or its Representative, as well as Personal Data of other individuals provided by the Customer and/or its Representative, may be disclosed by **Trustware Consulting LTD** to the Candidates within the framework of Selection and, consequently, to the Provider chosen as the result of Selection.

In their turn, Personal Data of the Representative of the Candidate, as well as Personal Data of other individuals provided by the Candidate, may be disclosed to the Customer within the framework of Selection.

Besides, **Trustware Consulting LTD** may involve third parties (including those located in other countries) for carrying out certain actions on its behalf, which may require the transfer of Personal Data to them. Such actions may include, among other things, administration of the Site.

### Withdrawal of consent to Personal Data processing

Individuals whose Personal Data are processed by **Trustware Consulting LTD**, are entitled to withdraw their consent to processing their Personal Data by means of sending the respective statement to **LawCoster** support service ([contact@lawcoster.net](mailto:contact@lawcoster.net)). Withdrawal of consent may result in the impossibility to use the service.

**Trustware Consulting LTD** shall act as the **Processor of the Personal data** obtained by means of the service.



### PROTECTION FROM UNAUTHORIZED ACCESS AND STORAGE

**Trustware Consulting LTD** takes all necessary measures provided for by the applicable laws and relating to protection of Confidential Information, Trade Secret and Personal Data by means of performing legal, organizational, technical and other actions aimed at protection thereof from unauthorized access, destroying, modifying, blocking, coping, disclosure, distribution, transfer, as well as from other illegal actions.

The above-mentioned measures include, among other things, the following: internal audit of safety measures aimed at prevention of unauthorized access to the systems (theft, stealing, tampering, loss, distortion, falsification, counterfeiting, blocking and special actions) used for storage of Confidential Information, Trade Secret and Personal Data, and for preventing leakage thereof via communication channels.

In order to prevent and avert leakage of Confidential Information, Trade Secret and Personal Data via communication channels **Trustware Consulting LTD** uses certified information protection means, including the secure protocol of Personal Data transfer (SSL-certificate).

The following additional measures are used for prevention of leakage of information due to unauthorized access:

- strict differentiation of access to the Information on the principle of the need to implement certain purposes of using the Platform;
- using licensed and certified Information protection means.

Server hardware of **Trustware Consulting LTD** is located in the internationally recognized data center with the highest level of compliance with ISO/IEC 27001 security standard, which ensures safety of using the Platform and posting Information thereon.

**Trustware Consulting LTD** demands all employees and representatives of **Trustware Consulting LTD**, as well as the companies, including those, not related to **Trustware consulting LTD**, but acting on behalf of **Trustware Consulting**

**LTD**, to protect the Confidential Information, Trade Secret, and Personal Data that they may get access to in accordance with this Policy.

**Trustware consulting LTD** performs storage of Confidential Information, trade Secret and Personal Data, ensures protection thereof from unauthorized access and disclosure in accordance with the internal rules, by-laws, regulatory documents and applicable laws, in particular, in accordance with the regulatory provisions of international public and international private law, including, without limitation, the English law.

#### **Period of storage of Confidential Information, Trade Secret and Personal Data processing**

**Trustware Consulting LTD** stores Confidential Information, Trade Secret and processes Personal Data throughout the period of time during which it is necessary to do it for implementation of the purpose of placement/processing thereof in accordance with this Policy, as well as throughout the time, required or allowed in accordance with the requirements of the laws applicable to certain legal relationships/area of regulation, as well as in accordance with the regulatory provisions of international private and international public law.

After achievement of the purposes of storage of the Confidential Information, Trade Secret or processing Personal Data **Trustware Consulting LTD** ensures their destruction in accordance with the applicable law. In some cases **Trustware Consulting LTD** is entitled to continue processing Personal Data when it is needed for fulfillment of the duties arising in accordance with the applicable law, or if processing is required for protection of rights and lawful interests of **Trustware Consulting LTD**, Counterparties, Representatives and/or third persons.



#### **APPLICABLE LAW, COMING OF THE POLICY INTO FORCE, ENTERING AMENDMENTS**

This Policy is regulated by and interpreted in accordance with the English law.

This Policy comes into force on the day it is posted on the Site and remains in force indefinitely (or till the date of posting of the new version).

This Policy may be amended by **Trustware Consulting LTD** in full or in part (hereinafter in this section - amendments) unilaterally without any responsibility towards the Counterparties and Representatives and without the need to notify them about this. Counterparties and Representatives shall on their own check the provisions of the Policy for any amendments. If Counterparties and Representatives continue using the service, they agree with and consent to any amendments entered.

#### **Accepting this Policy:**

- The Customer/Representative expresses consent to processing of its Personal Data by **Trustware Consulting LTD**, and also acknowledges and confirms that for implementation of the purposes specified in this Policy, its Personal Data may be transferred by **Trustware Consulting LTD** to other Counterparties within the framework of Selection or to third persons;
- Counterparties acknowledge and confirm that for implementing the purposes specified in this Policy, **Trustware Consulting LTD** may transfer the Confidential Information, Trade Secrets and Personal Data provided by them to other Counterparties within the framework of Selection or to third persons;
- Counterparties and Representatives acknowledge and confirm, that the Policy establishes clear, valid, compulsory and binding terms and conditions, and shall comply with them;
- Counterparties and Representatives understand and agree that none of the ways of transmission by using Internet is completely safe and error-free, and that Confidential Information, Trade Secret, Personal Data cannot be absolutely invulnerable. **Trustware Consulting LTD** takes all possible measures to prevent any violations in respect of the Information provided in the course of using the service.