



LAWCOSTER CONFIDENTIALITY AND PERSONAL DATA PROCESSING POLICY

This Policy describes (i) how LawCoster collects and processes Personal Data and other submitted information; (ii) what measures it takes to ensure confidentiality of data; and (iii) rights and obligations of the Users. The Policy applies to any and all information and documents that can be posted and/or received by the Users via LawCoster.

The operator of the LawCoster platform is Trustware Consulting LTD, a UK company with the registration number 11305296, with the office at: 7, Mill Bank, Tonbridge, Great Britain, TN9 1PY.

We can update this Policy from time-to-time by publishing changes to it on our website. We encourage you to check our website periodically to ensure that you are aware of our current Policy. If we make any major changes to our Policy that would require your explicit consent, we will request your consent or your renewed consent (in case it was obtained previously).



TERMS

Cookies	Piece of data that is sent by a web-server and stored on the User's device visiting the Platform for record-keeping purposes and allows the Platform to analyze the Platform traffic patterns
Order	Request for providing the Service posted by the Customer on the Platform
Customer	The party which has placed the Order on the Platform
Information	Data coming from the Users of the Platform as defined in the preamble of the Policy. It can cover: Cookies, email, first name and last name of the Representative, company name of the User, country of the User registration, number of employees, data communicated while using the Platform, information about the Representative etc.
Provider	The Candidate chosen by the Customer
Personal Data	Any information that directly, indirectly, or in connection with other information — including a personal identification number — allows for the identification or identifiability of an individual.
Policy	This LawCoster personal data processing policy
Representative	The individual authorized to perform actions on the Platform in the name and on behalf of a the User who has created the profile on the Site by means of registration
Candidate	Legal firm taking part in Selection
Users	users of LawCoster, e.g. Customers, Candidates and Providers, their representatives and employees.



INTERPRETATION

LawCoster	Depending on the context can mean the Platform or Trustware Consulting LTD as the operator thereof
LawCoster Service/Platform	Depending on the context can be named a " Service ", or a " Platform ", or « LawCoster ». For the purposes of this document these terms are regarded as synonyms.



GENERAL CONFIDENTIALITY UNDERTAKING

LawCoster is committed to keeping the Users' Information confidential.

LawCoster keeps appropriate security measures to prevent unauthorized access, disclosure, modification or unauthorized destruction of the Information.

LawCoster can only disclose information to the Users that have assumed the confidentiality obligation under LawCoster documents. It includes providing information to the Candidate about the Customer and the legal service it submits through LawCoster.

Also, if the Customer requires so, the Information about the legal service can be made available to the Candidate in a limited scope, e.g. without the Customer name or other details.

Users that provide Information must ensure that it is accurate and does not violate any third parties' rights. The Users assume full liability for any claims and damages that LawCoster can receive and incur as the result of receipt, processing or disclosure of the Information.



PERSONAL DATA

LawCoster is committed to safeguarding the Personal Data of Users. LawCoster processes Personal Data in compliance with provisions of multiple legislations, including the Regulation of the European Parliament and of the Council (EU) 2016/679 (the "GDPR").

LawCoster 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, and destruction. We neither use automated decision-making nor automated profiling.

LawCoster can collect Personal Data either directly from the User or from third parties. We can collect this information when a User:

registers to use the LawCoster platform and related services

communicates with LawCoster through correspondence, chats, email, or when the User shares information from other social applications, services or websites

- interacts with LawCoster website, services, content and advertising
- shares information relating to the User or his/her place of work.

Unless specified otherwise the Information required by LawCoster from the User is mandatory and failure to provide information makes it impossible to use LawCoster. If LawCoster does not define Information as mandatory the User is free not to provide it to LawCoster.

If it is not clear for the User which Information is mandatory the User is free to submit any queries to LawCoster contract details specified below.

What Personal Data we collect and why

Data	Purpose of processing	Legal basis	How the consent is obtained
Name of the User (name, surname), employer, job position - if applicable, contact information	Communications, including communication between Users through the LawCoster platform	Express consent	During registration on the LawCoster platform. can be fine tuned in the account settings.
	Personalised marketing and promotional messages	Express consent	During registration on the LawCoster platform. can be opted out in the account settings.
	Legal communication; to verify the identity of the User or his/her representative	Our legitimate interest in carrying out legal communication and establishing the powers of the representative	n/a

User's name, professional experience (current and previous positions, place of work), number of employees, expertise description	To submit requests for proposal and replies to the requests on the LawCoster platform	Express consent	Terms of Use; by the fact of submitting the relevant information by the User
Email address, telephone number and other contact details (including messengers and social media accounts) of the User	Communication, including communications between the Users	Express consent	During registration on the LawCoster platform. can be fine tuned in the account settings.
	Legal communication between LawCoster and the User	Our legitimate interest in receiving communication from you and reacting to it and your interest in getting our response	n/a
	Marketing and promotional messages	Express consent	During registration on the LawCoster platform. can be opted out in the account settings.
User's device type	To identify you in the LawCoster	Explicit consent	Settings of the User's device
Information you provide to us through customer surveys	To manage user experience and improve the LawCoster platform	Explicit consent	Before completion or promptly before submitting the survey form
Information about the Users' experience provided by Google Analytics	To manage and optimise Users' experience by improving our knowledge of our users	Our legitimate interest in evaluating and creating statistics on the use of LawCoster platform and Users' interest in the LawCoster updates which will be tailored to your needs	n/a

Personal Data of employees and representatives

Users can provide Personal Data of other individuals in order to register with and use LawCoster as well as part of their requests for proposals and pitch proposals (e.g. about a specialist that will perform the instruction). Users guarantee that providing such Personal Data to LawCoster under this Policy is permitted. For this, LawCoster can request documents confirming such persons' consent. LawCoster can restrict processing of relevant Personal Data and, if lack of such Data makes it impossible to use LawCoster, suspend/terminate any services and operations related to such processing if the consent is not presented upon the LawCoster's request.

Direct marketing and feedback

LawCoster can send to the User direct marketing communications and information about services and products if you have consented to receiving these communications. This can take the form of emails, SMS, mail or phone calls. You can opt-out of receiving marketing materials by switching off this option in the account settings, via the unsubscribe link or by contacting us (please refer to the contact us section below).

LawCoster can contact you to seek feedback on its services and on its clients. Feedback and surveys are on a no-names basis unless you consent to disclosure of your name, position and/or contact information.

Anonymized data

When individuals visit the LawCoster website (www.lawcoster.net), LawCoster collects their anonymized data. Such information is out of relation with a specific personality. It gives LawCoster 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.).

Cookies

Trustware Consulting LTD can obtain anonymized Personal Data by means of Cookies to differentiate the Users registered on LawCoster from its other visitors, to enhance user experience and, in general, to improve the Platform.

Types of used Cookies:

- Strictly necessary cookies. Such Cookies are necessary for correct operation of LawCoster. They allow The User to navigate LawCoster and use its features. Such files do not identify the personality. If the individual does not agree to use this type of files, this can impact the productivity and/or operability of the Platform 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 LawCoster again. They allow users to select the content of the Site on an individual basis. If an individual blocks this type of files, this can 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 on the 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 can 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 to the 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 Cookie files.

Trustware Consulting LTD uses Google Analytics to provide web analytics data about how the Site is used. You can get additional information about Cookie Google Analytics on help pages and the confidentiality policy of Google.

To refuse to use Google Analytics, the individual can, in particular, upload and install an opt-out Browser add-on.

Storage of Personal Data and its disclosure to third parties

We store your Personal Data only on servers located within the European Union.

LawCoster does not disclose Users' Information, except when the disclosure is:

- made between the Users and LawCoster while using the Platform
- expressly authorised by the User
- made to third party suppliers and service providers (internal and external), including:
 - in connection with providing services through LawCoster to comply with our obligations to the User (administration, sales, marketing, legal, system administration)

- for the operation of the Platform and/or LawCoster business (such as third-party technical service providers, mail carriers, hosting providers, IT companies). Such providers include:
 - Hosting: GoDaddy Web Hosting and Google LLC
 - Analytics: Google. Inc
- made to our agents and partners for the purposes of complying with our obligations to the User
- related to a task that is carried out in the public interest or in the exercise of official authority vested in LawCoster
- necessary for the purposes of the legitimate interests pursued by LawCoster
- required by law.

Due to the nature of LawCoster the disclosure of Personal Data can be to any place depending on location of the Users and jurisdictions involved. By submitting the request for proposal or a reply to it through LawCoster Users shall expect that the Personal Data can at least be transferred to the location of the Customer and Provider and the location of their head office. LawCoster has no technical or business capacity to monitor locations where the Information exchanged by the Users is stored.

The Users, therefore, acknowledge and consent to such cross-border transfer of the Personal Data. Users must ensure they have provided a requisite consent.

Transfer of Personal data

LawCoster holds Personal data in the territories of the UK and the European Economic Area ('EEA'), but it might also be transferred to or stored outside the UK or EEA. In this case LawCoster ensures the Personal data is safe. We do this only if:

- transfer of the Personal data is to a country which the European Commission has decided has a suitable level of protection
- If a third party entered into a contract (known as Standard Contractual Clauses) that makes sure the third party outside of the EEA promises to protect your personal data.

LawCoster also makes sure that any other supplementary security measures are put in place where necessary.

Links

LawCoster can contain links to websites operated by third parties. Those links are provided for convenience and can not 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.

What rights do you have?

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 related to protection Personal Data by means of 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 can 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 Personal Data processing

Trustware Consulting LTD processes Personal Data throughout the period of time during which it is necessary to do it for implementation of the purpose for the processing 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.

Thus, for purposes of:

- performing the agreements between the User and LawCoster the Personal Data is processed until such contract is performed in full.
- meeting the LawCoster's legitimate interest the Personal Data is processed as long as needed to fulfill such purposes.

After achieving the purposes of 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 Platform and remains in force indefinitely (or till the date of posting of the new version).

This Policy can 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 can 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** can 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.