

PRIVACY POLICY

Introduction

We are committed to keep our users information safe. When you use FacelegalApp, you trust us with your information. You can review this privacy policy for more details.

This policy describes the information we collect, how it is used and shared, and your choices regarding this information.

Data Collections And Uses

Scope

SUMMARY

This policy applies to users of FacelegalApp's services anywhere in the world, including users of FacelegalApp's apps, websites, features or other services.

This policy describes how FacelegalApp and its affiliates collect and use personal information to provide our services. This policy applies to all users of our apps, websites, features or other services anywhere in the world. This policy specifically applies to:

- **Users:** users who request or receive consultation
- **Lawyers:** users who provide legal consulting services individually or through partner law firms
- **Paralegals:** users who provide paralegal services
- **Third party Providers:** users who provide professional services

This policy also applies to those who provide information to FacelegalApp in connection with an application to use our services, or whose information FacelegalApp otherwise receives in connection with its services. All those subject to this policy are referred to as "users" for purposes of this policy.

Data Controller

SUMMARY

FacelegalApp provides services to users throughout the world. If you use our services in the United States or elsewhere, FacelegalApp is the data controller for your information.

We process personal information inside and outside of the United States.

Questions, comments and complaints about FacelegalApp's data practices can be submitted to FacelegalApp's help center via email to helpdesk@facelegalsupport.com.

We process personal information inside and outside of the United States. FacelegalApp transfers information of users' outside the United States on the basis of mechanisms approved under applicable laws.

The Information We Collect

SUMMARY

FacelegalApp collects:

- Information that you provide to FacelegalApp, such as when you create your FacelegalApp account.
- Information created when you use our services, such as location, usage and device information.
- Information from other sources, such as FacelegalApp partners and third parties that use FacelegalApp APIs.

The following information is collected by or on behalf of FacelegalApp:

1. Information you provide

This may include:

- **User profile:** We collect information when you create or update your FacelegalApp account. This may include your name, email, phone number, login name and password, address, payment or banking information (including related payment verification information), government identification numbers such as Social Security number, driver's license or passport if required by law, birth date, photo and signature. This also includes attorney license and registration information. This also includes the preferences and settings that you enable for your FacelegalApp account.
- **Background check information:** We may collect background check information if you sign up to use FacelegalApp's services as a lawyer or third party provider. This may include information such as your professional history, good standing certificate or criminal record (where permitted by law). This information may be collected by a vendor on FacelegalApp's behalf.
- **Demographic data:** We may collect demographic information about you, including through user feedbacks. In some countries, we may also receive demographic information about you from third parties.
- **User content:** We may collect information that you submit when you contact FacelegalApp customer support, provide ratings or compliments for other users, or otherwise contact FacelegalApp.

2. Information created when you use our services

This may include:

- **Location Information**
Depending on the FacelegalApp services that you use, and your app settings or device permissions, we may collect your precise or approximate location information as determined through data such as GPS, and IP address.
 - If you are a lawyer or third party provider, FacelegalApp collects location information when the FacelegalApp app is running in the foreground (app open and on-screen) or background (app open but not on screen) of your device.
 - If you are a user and have provided permission for the processing of location data, FacelegalApp collects location information when the FacelegalApp app is running in

the foreground. In certain regions, FacelegalApp also collects this information when the FacelegalApp app is running in the background of your device.

- Users may use the FacelegalApp app without enabling FacelegalApp to collect their location information. However, this may affect the functionality available on your FacelegalApp app. For example, if you do not enable FacelegalApp to collect your location information, you will have to manually enter your location.

- **Transaction Information**

We collect transaction details related to your use of our services, including the type of services you requested or provided, your brief details, legal matter information, date and time the service was provided, amount charged, length of video call, and payment method. Additionally, if someone uses your promotion code, we may associate your name with that person.

- **Usage information**

We collect information about how you interact with our services. This includes information such as access dates and times, app features or pages viewed, app crashes and other system activity, type of browser, and third-party sites or service you were using before interacting with our services. In some cases, we collect this information through cookies, and similar technologies that create and maintain unique identifiers. To learn more about these technologies, please see our Cookie Statement.

- **Device Information**

We may collect information about the devices you use to access our services, including the hardware models, device IP address, operating systems and versions, software, file names and versions, preferred languages, unique device identifiers, advertising identifiers, serial numbers, device motion information, and mobile network information.

- **Communications data**

We enable users to communicate with each other and FacelegalApp through the FacelegalApp apps, websites, and other services. For example, we enable lawyers and users, and third party providers, to call or text each other. To provide this service, FacelegalApp receives some information regarding the calls or texts, including the date and time of the call/text, and the content of the communications. FacelegalApp may also use this information for customer support services (including to resolve disputes between users), for safety and security purposes, to improve our products and services and for analytics.

3. Information from other sources

These may include:

- User feedback, such as as ratings or compliments.
- Users providing your information in connection with referral programs.
- Users requesting services for or on your behalf.
- Users or others providing information in connection with claims or disputes.
- FacelegalApp business partners through which you create or access your FacelegalApp account, such as payment providers, social media services, or apps or websites who use FacelegalApp's APIs or whose API FacelegalApp uses.
- Professional Insurance providers (if you are a lawyer or third party provider).
- Financial services providers (if you are an user).
- Third Party Providers companies (if you are a lawyer who uses our services through an account associated with such a law firms).
- The owner of an FacelegalApp for Business or FacelegalApp Family profile that you use.
- Publicly available sources.

- Marketing service providers.
FacelegalApp may combine the information collected from these sources with other information in its possession.

How We Use Your Information

SUMMARY

FacelegalApp collects and uses information to enable reliable and trustable video call and other products and services. We also use the information we collect:

- To enhance the safety and security of our users and services
- For customer support
- For research and development
- To enable communications to or between users
- To provide promotions or contests
- In connection with legal proceedings

FacelegalApp does not sell or share your personal information to third parties for third party direct marketing purposes.

FacelegalApp uses the information it collects for purposes including:

1. Providing services and features

FacelegalApp uses the information we collect to provide, personalize, maintain and improve our products and services. This includes using the information to:

- Create and update your account.
- Verify your identity.
- Enable video calls, and other services.
- Process or facilitate payments for those services.
- To track the progress of your video call.
- Enable features that allow you to share information with other people, such as when you submit a compliment about a lawyer, refer a friend to FacelegalApp.
- Perform internal operations necessary to provide our services, including to troubleshoot software bugs and operational problems, to conduct data analysis, testing, and research, and to monitor and analyze usage and activity trends.

2. Safety and security

We use your data to help maintain the safety, security and integrity of our services and users. This includes, for example:

- Using device, location, profile, usage and other information to prevent, detect, and combat fraud or unsafe activities. This includes processing of such information, in certain countries, to identify practices or patterns that indicate fraud or risk of safety incidents. This may also include information from third parties. In certain cases such incidents may lead to deactivation by means of an automated decision making process. Users in the EU have have the right to object to this type of processing; see Section II.I.1.d for more information

- Using user ratings to encourage improvement by affected users, and as grounds for deactivating users with ratings below a certain minimum as may be required in their region.

3. Customer support

FacelegalApp uses the information we collect (including recordings of customer support calls after notice to you and with your consent) to assist you when you contact our customer support services, including to:

- Direct your questions to the appropriate customer support person
- Investigate and address your concerns
- Monitor and improve our customer support responses

4. Research and development

We may use the information we collect for testing, research, analysis and product development. This allows us to improve and enhance the safety and security of our services, develop new features and products.

5. Communications among users

FacelegalApp uses the information we collect to enable communications between our users. For example, a user may text during the calls a lawyer to provide additional information or questions.

6. Communications from FacelegalApp

FacelegalApp may use the information we collect to communicate with you about products, services, promotions, studies, surveys, news, updates and events.

FacelegalApp may also use the information to promote and process contests and sweepstakes, fulfill any related awards, and serve you relevant ads and content about our services and those of our business partners. You may receive some of these communications based on your profile as an FacelegalApp user. Users in the EU have have the right to object to this type of processing.

FacelegalApp may also use the information to inform you about legal news, proposed bills, new regulations, administrative changes, and other political and policy processes that relate to our services.

7. Legal proceedings and requirements

We may use the information we collect to investigate or address claims or disputes relating to your use of FacelegalApp's services, or as otherwise allowed by applicable law, or as requested by regulators, government entities, and official inquiries.

Cookies And Third Party Technologies

SUMMARY

FacelegalApp and its partners use cookies and other identification technologies on our apps, websites, emails, and online ads for purposes described in this policy.

Cookies are small text files that are stored on your browser or device by websites, apps, online media, and advertisements. **FacelegalApp uses cookies and similar technologies for purposes such as:**

- Authenticating users
- Remembering user preferences and settings
- Determining the popularity of content
- Delivering and measuring the effectiveness of advertising campaigns
- Analyzing site traffic and trends, and generally understanding the online behaviors and interests of people who interact with our services We may also allow others to provide audience measurement and analytics services for us, to serve advertisements on our behalf across the Internet, and to track and report on the performance of those advertisements. These entities may use cookies, web beacons, SDKs, and other technologies to identify your device when you visit our site and use our services, as well as when you visit other online sites and services. Please see our Cookie Statement for more information regarding the use of cookies and other technologies described in this section, including regarding your choices relating to such technologies.

Information Retention And Deletion

SUMMARY

FacelegalApp retains user profile and other information for as long as you maintain your FacelegalApp account.

FacelegalApp retains transaction, location, usage and other information for 7 years in connection with regulatory, tax, insurance or other requirements in the places in which it operates. FacelegalApp thereafter deletes or anonymizes such information in accordance with applicable laws.

Users may request deletion of their accounts at any time. Following such request, FacelegalApp deletes the information that it is not required to retain, and restricts access to or use of any information it is required to retain.

FacelegalApp requires user profile information in order to provide its services, and retains such information for as long you maintain your FacelegalApp account.

You may request deletion of your account at any time through the Privacy Settings in the FacelegalApp app, or via FacelegalApp's website.

Following such request, FacelegalApp deletes the information that it is not required to retain. In certain circumstances, FacelegalApp may be unable to delete your account, such as if there is an outstanding credit on your account or an unresolved claim or dispute. Upon resolution of the issue preventing deletion, FacelegalApp will delete your account as described above.

FacelegalApp may also retain certain information if necessary for its legitimate business interests, such as fraud prevention and enhancing users' safety and security. For example, if FacelegalApp shuts down a user's account because of unsafe behavior or security incidents, FacelegalApp may retain certain information about that account to prevent that user from opening a new FacelegalApp account in the future.

Special Information For EU Users

SUMMARY

Beginning May 25, 2018, the processing of personal data of users in the European Union is subject to the EU General Data Protection Regulation (“GDPR”).

This section summarizes FacelegalApp’s grounds for processing personal information under the GDPR, and the rights of EU users as relates to FacelegalApp’s handling of personal information.

Beginning May 25, 2018, the processing of personal data of users in the European Union is subject to the EU General Data Protection Regulation ('GDPR'). This section provides information as relates to EU users' rights, and FacelegalApp's responsibilities, under this regulation.

1. EU User Rights

If you are an FacelegalApp user in the EU, you have the following rights with respect to FacelegalApp's handling of your personal information. To exercise these rights, please see below or submit your request [here](#).

Users outside the EU may also request explanation, correction, deletion or copies of their personal data [here](#).

- **a. Explanation and copies of your data**
 - You have the right to request an explanation of the information that FacelegalApp has about you and how FacelegalApp uses that information.
 - You also have the right to receive a copy of the information that FacelegalApp collects about you if collected on the basis of consent or because FacelegalApp requires the information to provide the services that you request.
- **b. Correction**
 - If FacelegalApp has information about you that you believe is inaccurate, you have the right to request correction of your information. Please see the section titled 'Explanation, Copies and Correction' below for more information on correcting, or requesting correction of, your information.
- **c. Deletion**
 - Users may request deletion of their accounts at any time. Users may requests deletion through the Privacy Settings menu in the FacelegalApp app, or via FacelegalApp's website. We may retain certain information about you as required by law and for legitimate business purposes permitted by law.
 - Please see the 'Information Retention & Deletion' section above for more information regarding FacelegalApp's retention and deletion practices.
- **d. Objections and complaints**
 - Users in the EU have the right to object to FacelegalApp's processing of personal data, including for marketing purposes based on profiling and/or automated decision making. FacelegalApp may continue to process your information notwithstanding the objection to the extent permitted under GDPR.
 - Users in the EU also have the right to file a complaint relating to FacelegalApp's handling of your personal information with the Autoriteit Persoonsgegevens, the Dutch Data Protection Authority. Their contact information is as follows:
Autoriteit Persoonsgegevens
Postbus 93374
2509 AJ DEN HAAG
(+31) - (0)70 - 888 85 00

- You may also submit questions, comments or complaints to FacelegalApp's Data Protection Officer.

2. Grounds for Processing

The GDPR requires that companies processing the personal data of EU users do so on the basis of specific legal grounds. As described below, FacelegalApp processes the information of EU users based on one or more of the grounds specified under the GDPR:

- **a. The processing is necessary to provide the services and features you request**
 - FacelegalApp must collect and use certain information in order to provide its services. This includes:
 - User profile information that is necessary to establish and maintain your account, including to verify your identity; enable communications with you about your video calls, orders and accounts; and to enable you to make payments or receive earnings.
 - Background check Information necessary to enable lawyers to provide consulting services through the FacelegalApp app.
 - User location Information, which is necessary to match lawyers with users.
 - Transaction information, which is necessary to generate and maintain in connection with your use of FacelegalApp's services.
 - Usage information, which is necessary to maintain, optimize and enhance FacelegalApp's services, including to determine, sometimes in combination with other information, incentives, connect users and lawyers.
 - Collection and use of this information is a requirement for using FacelegalApp's apps.
- **b. The processing is necessary to protect the vital interests of our users or of others**
 - FacelegalApp may process personal information, including disclosing data with law enforcement authorities in case of threats to the safety of users or of others.
- **c. The processing is necessary for FacelegalApp's legitimate interests**
 - FacelegalApp collects and uses personal information to the extent necessary for its legitimate interests. This includes collecting and using information:
 - To maintain and enhance our users' safety and security. For example, we collect background check information (where permitted by law) to prevent unsafe users from providing services through our apps. We also use personal information to prevent use of our services by users who have engaged in inappropriate or dangerous behavior, such as by retaining information of banned users to prevent their use of FacelegalApp's apps. We also use usage information to prevent matching of users and lawyers for whom there is higher risk of conflict (e.g., because they have been the subject of prior complaints from other users).
 - To prevent, detect and combat fraud in connection with the use of our services. For example, FacelegalApp uses user profile, location, device and usage information, to identify and prevent circumstances when users attempt to defraud FacelegalApp or other users.
 - To inform law enforcement officials regarding criminal acts or threats to public safety.
 - To provide customer support.
 - To optimize our service and develop new services. This includes, for example, identifying the best user and lawyer match, recommending (new) features, improving navigation, and matching users and lawyers or third party providers.

- For research and analytical purposes. This includes, for example, analyzing usage trends to improve the user experience and enhance the safety and security of our services.
 - For direct marketing purposes. This includes, for example, analysing data to identify trends and tailor marketing messages to user needs.
 - To enforce FacelegalApp's Terms of Service.
- **d. The processing is necessary for the legitimate interests of other persons or parties**
 - FacelegalApp collects and uses personal information to the extent necessary for the interests of other persons or the general public. This includes sharing information in connection with legal or insurance claims, to protect the rights and safety of others.
 - FacelegalApp may also process personal information when necessary in regards to a substantial public interest, on the basis of applicable laws.
- **e. The processing is necessary to fulfill FacelegalApp's legal obligations**
 - FacelegalApp is subject to legal requirements in the jurisdictions in which it operates that require us to collect, process, disclose and retain your personal data. For example, FacelegalApp is subject to laws and regulations in many cities and countries that require it to collect and retain information about your trips, to retain such information for extended periods of time, and to provide copies of such information to governmental or other authorities. FacelegalApp uses your information to comply with such laws to the extent they apply to your use of the FacelegalApp apps.
 - FacelegalApp may also share information with law enforcement, or requests by third parties pursuant to legal processes. For more information about such sharing, please see FacelegalApp's Guidelines for Law Enforcement Authorities in the United States, Guidelines for Law Enforcement Authorities Outside the United States, and Guidelines for Third Party Data Requests.
- **f. Consent**
 - FacelegalApp may collect and use your information on the basis of your consent. You may revoke your consent at any time. If you revoke your consent, you will not be able to use any service or feature that requires collection or use of the information we collected or used on the basis of consent.
 - FacelegalApp relies on consent in connection with data collections or uses that are necessary to enhance the user experience, to enable optional services or features, or to communicate with you. If you are an EU user, the following types of data collections or uses are done on the basis of your consent.
 - Location Information (Users)
 - Share Live Location (Users)
 - Notifications: Account Updates
 - Notifications: News
 - Accessibility features
 - Please see the Choice & Transparency section below for further information about these data collections and uses, how to opt in or out of them, and the effect of opting out of these on your use of FacelegalApp's apps.
 - FacelegalApp may also collect personal information about you through voluntary surveys. Your responses to such surveys are collected on the basis of consent, and will be deleted once no longer necessary for the purposes collected.

Choice And Transparency

SUMMARY

FacelegalApp provides means for you to see and control the information that FacelegalApp collects, including through:

- in-app privacy settings
- device permissions
- in-app ratings pages
- marketing opt-outs

You may also request that FacelegalApp provide you with explanation, copies or correction of your data.

A. PRIVACY SETTINGS

The Privacy Settings menu in the FacelegalApp app gives users the the ability to set or update their location and contacts sharing preferences, and their preferences for receiving mobile notifications from FacelegalApp. Information on these settings, how to set or change these settings, and the effect of turning off these settings are described below.

- **Location Information**
 - FacelegalApp uses user's device location services to make it easier to find the closest, reliable lawyer whenever you need one. Location data helps improve our services, including video calls, navigation, and customer support.
- **Share Live Location (Users)**
 - If you have enabled the device location services on your mobile device, you may also enable FacelegalApp to share your location with your lawyer from the time you request a video call to the start the conversation.
- **Notifications: Account and Updates**
 - FacelegalApp provides users with status notifications and updates related to your account. These notifications are a necessary part of using the FacelegalApp app, and cannot be disabled. However, you may choose the method by which you receive these notifications through the Privacy Settings menu in the FacelegalApp app.

B. DEVICE PERMISSIONS

Most mobile platforms (iOS, Android, etc.) have defined certain types of device data that apps cannot access without your consent. And these platforms have different permission systems for obtaining your consent. The iOS platform will alert you the first time the FacelegalApp app wants permission to access certain types of data and will let you consent (or not consent) to that request. Android devices will notify you of the permissions that the FacelegalApp app seeks before you first use the app, and your use of the app constitutes your consent.

C. RATINGS LOOK-UP

After every video calls, users are able to rate the lawyers, as well as give feedback on how the video call went. This helps FacelegalApp to provide services.

Your lawyer rating is available in the Ratings tab of the FacelegalApp app.

D. EXPLANATIONS, COPIES AND CORRECTION

You may request that FacelegalApp:

- Provide a detailed explanation regarding the information FacelegalApp has collected about you and how it uses that information.
- Receive a copy of the information FacelegalApp has collected about you.
- Request correction of any inaccurate information that FacelegalApp has about you.
You can make these requests by contacting FacelegalApp [here](#).
You can also edit the name, phone number and email address associated with your account through the Settings menu in FacelegalApp's apps.

E. MARKETING OPT-OUTS

You may opt out of receiving promotional emails from FacelegalApp [here](#). You may also opt out of receiving emails and other messages from FacelegalApp by following the instructions in those messages. Please note that if you opt out, we may still send you non-promotional messages, such as receipts when you purchase credits for your video calls or information about your account.

Updates To This Policy

SUMMARY

We may occasionally update this policy.

We may occasionally update this policy. If we make significant changes, we will notify you of the changes through the FacelegalApp apps or through other means, such as email. To the extent permitted under applicable law, by using our services after such notice, you consent to our updates to this policy.

We encourage you to periodically review this policy for the latest information on our privacy practices. We will also make prior versions of our privacy policies available for review.