

Legal Nodes Privacy Policy

Last updated: 19/12/2018

Please read carefully this Privacy Policy (hereinafter – the “Policy”) prior to using a <https://legalnodes.org/> website (hereinafter – the “Website”).

If you do not agree with this Policy, you may not access or use the Website or any other services provided by the Legal Nodes Company. All information and services provided on the Legal Nodes Website are provided on a strictly “as is” basis without any warranty whatsoever.

1. Privacy Policy Status and Acceptance

1.1. This Policy sets forth the general rules of User's Personal Data collection, processing, distribution, use and keeping by the Company during the Website use and/or directly on our request.

1.2. Each User must carefully read and comply with this Policy.

It is understood and presumed per se that by the fact of the Website use or by providing us the Personal Data directly on our request, the respective User fully read, understood and accepted this Policy. If any User does not agree with this Policy in general or any part of it, such User must not access and use the Website.

1.3. The Company reserves the right to modify or amend this Policy at its sole discretion. Any revisions to this Privacy Policy will be posted on the homepage of our Website. If we make changes, we will notify you by revising the date at the top of this Policy. In addition, if the revised version includes any substantial changes to the manner in which your personal information will be processed, we will provide you with prior notice by posting notification of the change on the Privacy Policy area of our Website. We strongly recommend you to periodically visit the Website to review any changes that may be made to this Privacy Policy to stay informed about our information practices and your privacy rights and choices. Your continued usage of the Website shall mean your acceptance of those amendments.

1.4. It is the personal obligation and responsibility of each Employee to act in a manner consistent with this Policy.

1.5. All Employees must report any breaches, violations, risks, incidents, and complaints, as appropriate.

2. Terms and Definitions

2.1. **Applicable Law** - laws of the England and Wales applicable under this Policy to any and all relations between a User and Company.

2.2. **Authorized User** - any person, who uses the Website with prior registration and authorization.

2.3. **Blockchain** (also referred to as “**Blockchain Technology**”) – a decentralized technology that uses cryptographic means of ciphering of data blocks.

2.4. **Consulting Services** – services provided to the Authorized Users on the Platform by Legal Experts in the blockchain sphere.

2.5. **Cryptocurrency** - digital currency represented by Ethereum (ETH) virtual assets used by Authorized Users to pay for the blockchain consulting services on the Platform.

2.6. **Employee** – a Legal Nodes employee.

2.7. **Legal Expert** – a natural person with full legal capacity who provides Consulting Services on the Platform in the blockchain sphere on a professional basis.

2.8. **Legal Nodes Ltd** (also referred to as “**the Company**”, “**the Platform**”, “**We**”, “**Our**”, “**Us**”) – a company, incorporated under the laws of England and Wales that connects you with Legal Experts in the blockchain sphere.

2.9. **Legal Nodes Private Chat** (also referred to as “**Private Chat**”) – means of communication between the Authorized User and the Legal Expert on the Legal Nodes Website that utilizes cryptographic means of protection and encryption.

2.10. **Privacy Policy** (also referred to as “**Policy**”) – this Privacy Policy posted on the homepage of our Website which may be revised or updated from time to time as stated in subsection 1.3 of this Privacy Policy.

2.11. **Personal Data** (also referred to as “**Personal Information**”) - any information relating to an identified or identifiable natural person (“data subject”).

2.12. **Smart contract** (also referred to as “**Smart contract technology**”) - a contract that is performed electronically in an automated mode using blockchain technology that performs a function defined in our Terms and Conditions that can be accessed using the [Terms and Conditions](#) link.

2.13. **User** (also referred to as “**You**”, “**Your**”) – any person, who uses the Website without prior registration and authorization.

2.14. **Verification Procedure** (also referred to as “**Authorization**”, “**Registration**”) - procedure, conducted in accordance with this Policy by the Company, aimed at determining whether a User is an Authorized User and is eligible to order services from Legal Experts.

2.15. **Website** – the website maintained and owned by the Company at <https://legalnodes.org/>.

3. Purpose of Personal Data Use

3.1. We collect from the Users only the Personal Data that we need for their proper use of the Website. In particular, we use your Personal Data to:

- administer our Website and provide services;
- facilitate the provision of Consulting Services;
- comply with relevant AML/KYC rules in accordance with the applicable law, our Privacy Policy, and Cookie Policy;
- personalize our Website for you;
- send you technical notices and support and administrative messages;

- communicate with you about products, services, promotions, events and other news and information we think will be of interest to you;
- monitor and analyse trends, usage, and activities in connection with our Website and services;
- provide third parties with statistical information about our Users (but those third parties will not be able to identify any individual User from that information);
- detect, investigate and prevent fraudulent transactions and other illegal activities and protect the rights and property of the Company and others;
- link or combine Personal Data We collect from or about you.

4. User`s Rights

4.1. You have a right to access to your Personal Data, withdraw your consent for data processing, obtain the information whether or not your personal data is being processed and to require the correction, updating or deletion of incorrect or/and inaccurate data by contacting us at hello@legalnodes.org. We shall delete your respective Personal Data from any sources within 24 hours from the moment we receive such request from you. At that, the Company reserves its right to suspend the provision of any services to you and/or delete your Account on the Website without prior notice.

4.2. To disable your account and remove Your Personal Data completely, please email us at hello@legalnodes.org with a request that complies with the Legal Nodes Terms and Conditions that can be accessed using the [Terms and Conditions](#) link.

4.3. You have the right to receive notices of processing activities from the Company.

4.4. You have the right to transfer data in a machine-readable format.

4.5. You have the right to lodge a complaint with the local supervisory authority, authorized to review such complaints.

4.6. You are entitled with and may exercise any of the rights and freedoms guaranteed by the General Data Protection Regulation (the GRPR) with regard to the processing of personal data if you fall under its` material and territorial scope as defined in the GDPR.

5. Personal Data Protection and Sharing

5.1. We collect Personal Data from running the Website and use Personal Data, provided to Us by You. We may collect such Personal Data:

- e-mail address;
- full name and surname.

5.2. We reserve the right to conduct a Verification Procedure, that shall take place in a form of User`s registration on the Website and includes the submission of documents that contain Personal Data (including User`s ID and proof of residence) and collecting the relevant data in order to determine whether the User a citizen or a permanent resident of a FATF sanction

country. Services provided on this Website are not available to citizens and permanent residents of countries, marked as high-risk jurisdictions by the Financial Action Task Force on Money Laundering. For more information, please visit <https://www.fatf-gafi.org/>.

5.3. When registering on the Website and providing consent to the collection, storing and processing of your personal data, you warrant that you have read and understood this Policy, Cookie Policy, and Terms and Conditions.

5.4. We reserve the right to collect any Other Data, including data which is not Personal per se such as:

- your LinkedIn profile address;
- any other information if we deem necessary in accordance with the Privacy Policy set forth herein.

5.5. When you visit the Website or use our products, we automatically collect the Personal Data sent to us by your computer, mobile phone, or another access device. This Personal Data may include:

- your IP address;
- device information including, but not limited to, identifier, name, and type of operating system;
- mobile network information;
- standard web log information, such as Your browser type, and the pages You accessed on Our Website, access times, website navigation paths.

5.6. The Company collects some data automatically, namely information about devices (including mobile devices), which you may use to access the Website, IP-address of your devices, used browser and operating system, date, time, geographical location data of your access to the Website. However, we will not release your personally-identifying information of such kind to any third party without your consent, except as set forth herein.

5.7. We do not process any sensitive Personal Data, such as religion, race, ethnicity and/or political views.

5.8. We may also use third-party service providers, which we entrust storing data, its collection and analysis. This is made in order to enable you to get the best services possible and to make our cooperation the most effective and with the best benefit for you. These third parties have their own privacy policies and their own conditions, whether to collect your data or opt-out from it. Thus, we do recommend you to get yourself acquainted with the terms of third-party service provider if you use other services on our Website. We will not seek any of your Personal Information through any other software platforms, data web resources etc., even if this information is necessary for You or your usage of the Website.

5.9. When you access the Website or use Our Product or services we (or Google Analytics or similar service provider on our behalf) may place small data files called cookies on your computer or another device. We use these technologies to recognize you as our User, customize Our Website, understand usage and determine the effectiveness of email marketing campaigns, measure promotional effectiveness and collect information about your computer (as described in clause 5.5 hereof) or other access device to mitigate risk, help prevent fraud,

and promote trust and safety. You may control the use of cookies within your internet browsers' settings. If you reject or delete certain cookies, be aware that the performance of the related features and functions of our Websites and services may be impaired. Web beacons (or pixel tags) are electronic images that may be used in our web Services or emails to help deliver cookies, count website visits, understand usage and determine the effectiveness of email marketing campaigns.

5.10. You agree to provide the Personal Data specified herein and agree that your provided Personal Data may be processed and stored by us or our counterparties (as specified in clause 5.8 hereof) during the period of time that is practically necessary for the purposes for which the information may be used.

5.11. The components of Personal Data that mentioned below may be modified from time to time according to the Applicable law and our needs that will be reflected in this Policy. We will not collect any other Personal Data except for the mentioned herein until we amend and post these amendments to the Policy on the homepage of our Website.

5.12. You have the right to request personal information safeguards in case your data is being transferred outside of the territorial scope of the GDPR as defined in the GDPR.

6. Personal Data Protection and Sharing

6.1. We will do any and all efforts and actions prescribed by Applicable Law to store any of your Personal Data in secrecy, to protect Your Personal Data from accidental loss, disclosure or erasure, from illegal processing or illegal access.

6.2. We store and process your Personal Data on Our servers in various jurisdictions, where our facilities and/or our service providers are located. By submitting Your Personal Data, you agree to this transfer, storing, or processing. We will take all steps reasonably necessary to ensure that Your Personal Data is treated securely and in accordance with this Policy. We protect your Personal Data under internationally acknowledged standards, using physical, technical, and administrative security measures to reduce the risks of loss, misuse, unauthorized access, disclosure, and alteration. Some of the safeguards we use are firewalls and data encryption, physical access controls to our data centres, and information access authorization controls. We also authorize access to Personal Data only for those employees or contractors who require it to fulfil their job or service responsibilities. All of our physical, electronic, and procedural safeguards are designed to comply with applicable laws and regulations. Third parties may be located in other countries where the laws on the processing of Personal Data may be less stringent than in your country. From time to time, the Personal Data may be also stored in other locations, and in such cases, we will ensure that the Personal Data will be stored and processed with the reasonable level of care and security.

6.3. We reserve our right to share your Personal Data with the following parties and with regard to the following cases:

- companies that We plan to merge with or be acquired by (all or a portion of our business);
- companies in connection with, or during negotiations of, any sale of company assets or any financing by another company;

- service providers that execute any work for us (such as hosting providers, identity verification, support, payment, and email service providers);
- in response to a request for information if we believe disclosure is in accordance with or required by, any applicable law, regulation or legal process;
- if we believe your actions are inconsistent with our user agreements or policies, or to protect the rights, property, and safety of Legal Nodes or others;
- between and among Company and its current and future corporate parents, affiliates, subsidiaries, and other companies under common control and ownership;
- when we believe, in our sole discretion, that the disclosure of personal information is necessary to report suspected illegal activity or to investigate violations of our Terms and Conditions.

6.4. We will not provide your Personal Data to any other Website users or third parties other than described in clause 6.3 herein without your consent or direction.

6.5. We will not sell or rent your Personal Data and/or customer lists to third parties without your explicit consent.

6.6. We may combine your Personal Data with information we collect from other companies and use it to improve and personalize the Website and our products, as well as our content and advertising.

6.7. We may use your name and email address to provide you with information about products or services that may be of interest to you, but we will not use your Personal Data without complying with applicable laws and, where appropriate, obtaining your consent.

6.8. Our services may, from time to time, contain links to and from the websites of our partner networks, advertisers, and affiliates (including, but not limited to, websites on which the Website is advertised). If you follow a link to any of these websites, please note that these websites and any services that may be accessible through them have their own terms of use privacy policies and that we do not accept any responsibility or liability for these policies or for any Personal Data that may be collected through these websites or services, such as contact and location data. Please check these policies before you submit any personal data to these websites or use these services.

6.9. We may allow others to provide analytics services on our behalf in connection with our services. These entities may use cookies and other technologies to collect information about your use of the services and other websites and apps (if any), including your IP address, web browser, pages views, app performance, time spent on pages and links clicked. This information may be used by the Company and others to, among other things, analyse and track data, determine the popularity of certain content and better understand your online activity.

7. Data Storage and Retention

7.1. In accordance with Applicable Law and as needed to provide services to our Users, we may store and retain your Personal Data provided its integrity and the appropriate approach to it. This requirement is conditioned by the need of complying with legal obligations and resolving possible disputes. We may retain your Personal Data for as long as your account is

active. Moreover, your Personal Data may be held beyond the abovementioned period until it is indispensable for us to have relevant information to respond to any issues that may arise later.

8. Attorney-Client Relationships

8.1. No attorney-client relationships are created between the Users and Legal Nodes. Your communications with Legal Nodes are not attorney-client product, are not protected by the attorney-client privilege, and are not attorney work-product and you should not consider them as such.

8.2. Any attorney-client relationships formed between an Authorized User and a Legal Expert in the Legal Nodes Private Chat are exclusively formed between the Authorized User and the Legal Expert. Legal Nodes shall not be a party of any attorney-client relationships.

8.3. Legal Nodes shall not be a party to any agreements between Authorized Users and Legal Experts.

8.4. All information and/or documents shared in the Private Chat shall be protected by cryptographic means of encryption and in compliance with this Policy and the applicable law.

9. Blockchain Information

9.1. Legal Nodes does not collect your blockchain information (Ethereum wallet public key). This information is requested for refund purposes only, as described in our Terms and Conditions that can be accessed using the [Terms and Conditions](#) link.

9.2. The Company does not request and/or save your private key. Legal Nodes does interact (directly or indirectly) with User`s Ethereum accounts.

9.3. Legal Nodes does not serve as a party and/or financial intermediary to transactions made using smart contract technology.

10. Cookies and Cookie Policy

10.1. Legal Nodes uses cookies. Detailed information about cookies can be found in our [Cookie Policy](#).

11. Security

11.1. We use relevant electronic and procedural safeguards to protect the privacy of the information you provide to us from loss, misuse, disclosure, alteration, and destruction. Please note that transmission of data or information (including communications by e-mail) over the Internet or other publicly accessible networks is not one hundred percent secure. Please note that we are not liable for the security of any data you are transmitting over the Internet, or third-party content.

12. Contact details

12.1. If you have any questions regarding this Privacy Policy, please contact us at hello@legalnodes.org.