# **PRIVACY POLICY**

## Version 2.0 Effective date - 14/05/2021

When you write a review on ReviewSolicitors or otherwise use our Website, we collect and process personal data about you. This document helps you understand what personal information we collect about you, how we collect it, what we use it for, and what rights you have regarding your personal data.

When we talk about "ReviewSolicitors," "we," "us" or "our," we mean Professional Reviews LTD trading as ReviewSolicitors. We also use "Policy" to refer to this Privacy Policy and "Website" to refer to our applications and all of ReviewSolicitors's websites, like <u>www.reviewsolicitors.co.uk</u>, <u>www.reviewsolicitors.com</u>, <u>www.reviewsolicitors.ie</u> and www.reviewsolicitors.com.au.

Professional Reviews LTD is the entity responsible for processing your personal data.

# 1 Personal data - what we collect and what we use it for

1.1 Master data and profiles

When you create a profile as a reviewer or write your first review on the Website, we may automatically generate a personal account for you on ReviewSolicitors ("Account") and collect the following personal data about you (the "Master Data"):

- Your name (Your first name will always be public)
- Your securely encrypted password, and
- Your email address.

This information is mandatory, which means that it will not be possible to write a review on the Website without it. In instances where you have clicked a link that has been sent in an email to you, some of this information may have already been provided to us by the law firm that has requested we send you an email asking you to leave a review.

You can choose to add further personal data to your profile. This additional information will be part of your public profile and will also be part of the Master Data.

If you register with us as a law firm or legal provider, we will collect your name and contact information as well us your association with the firm/provider and any other information that you supply to us when registering.

#### 1.2 Information in reviews and ratings

When you write a review and post it on our Website, we collect the information you put in

your review. This may include, but is not limited to:

- Which firm you review
- The type of service experience your review concerns
- The headline and content of your review
- Your rating of criteria such as your initial impression, knowledge, approachability, value for money, services, and professionalism (1-5 stars)
- The date of your review and matter. If you update your review, the date on which it is edited
- The area of law to which your review relates
- Information related to the price of the service
- Private feedback that is posted directly to the law firm you are reviewing
- Specific questions that you answer related to the type of service you received
- If we ask you to provide information or documentation verifying your service experience, and you send us such documentation, we will collect and process the documentation for the purpose(s) stated in the request.

You agree not to share any sensitive personal documents or information with us, either concerning yourself or others.

1.3 Information about views, likes and how useful your review is for others

When you write a review of a law firm on our Website, people can show that they find your review useful, for example by "liking it", and we collect this information. We also collect information about how many people read your review. We don't track the identities of people who aren't logged in and read the reviews, but we do collect data on the number of users who read your review. If you "like" another person's review, we will also collect that information.

## 1.4 Notifications

If you notify us about a review that you believe violates our User Guidelines, then we collect the information you provide in your notification to us. This can include which review you notified us about, the reason for your notification, the date of your notification, etc.

1.5 Information from other services, including social networks like Facebook

You can connect your ReviewSolicitors profile with your profile on social networks, e.g. Facebook, Google and Linkedin ("Social Network(s)"). When you use this option we automatically collect selected information about you from your Social Networks. The information we collect depends on what information you have made available on those Social Networks and your privacy settings for sharing such information on the Social Networks. Depending on your settings and selection, we may collect the following information:

- Name and/or username
- Email address
- Profile photo

When you make a request to connect your ReviewSolicitors profile with a Social Network profile, we will tell you which information we will collect from the Social Network in

question. You will receive this information before your request is implemented.

You can choose to disconnect your Social Network profile from your ReviewSolicitors profile via your Account. At this point, ReviewSolicitors will remove your Social Network unique ID, and disconnect/revoke ReviewSolicitors from your Social Network. Your profile picture from your Social Network profile will remain on your ReviewSolicitors profile.

1.6 Marketing law firms and other businesses

If you agree on the Website, we will use your contact information to send you information about the services offered by the law firm or other business that you review. You can withdraw your permission at any time as explained on our Website.

1.7 Your IP address, browser settings and location

When you visit the Website, we register your computer's IP address and browser settings. The IP address is the numerical address of the computer used to visit the Website. Browser settings can include the type of browser you use, browser language, and time zone. We collect this information in connection with visits to or use of the Website.

1.8 Newsletters and digest emails

We collect the information you provide us with when you subscribe to receive our newsletters, digest emails or similar (we collect your name, email address and newsletter preferences). If you no longer wish to receive our newsletters, digest emails or similar, you can unsubscribe by logging into your Account and changing your settings.

1.9 For what purposes do we use your personal information?

We may use the information to:

- Provide our services to you, including displaying your reviews, and providing you with access to your profile and our Website
- Identify you as a registered user when you log in to the Website and re-visit the Website
- Verify the legitimacy of your reviews
- Improve the Website and our services
- Respond to your questions and provide related customer service
- Pass on a message from the company you reviewed via the Website
- Contact you if your review is flagged by other users or companies and, if necessary, ask you to provide documentation to verify your review or experience
- Send you our newsletters
- Inform you when other users find your review helpful or otherwise provide feedback concerning your review
- Engage in various internal business purposes, i.e data analysis, audits, fraud monitoring and prevention, developing new products and services, improving or modifying the Website, or our services including our widgets, identifying usage trends, determining the effectiveness of our promotional campaigns and operating and expanding our

business activities

- Comply with legal requirements and legal process, requests from public and governmental authorities, relevant industry standards and our internal policies
- Enforce our Terms and Conditions
- Protect our operations or those of any of our affiliates
- Protect our rights, privacy, safety or property and/or that of our affiliates, you or others
- Allow us to pursue available remedies or limit any damages that we sustain

We will also use the information in other ways for which we provide specific notice at the time of collection.

1.10 On what legal basis do we process your personal data?

We need to process your personal information in order to:

- Perform our contract with you or take steps to enter such a contract
- Comply with our legal obligations and operate an online review platform in compliance with applicable laws and regulations
- Pursue legitimate business interests of our own related to operating the Website and providing our services to you, or to pursue the legitimate interests of third parties, as long as your interests and fundamental rights do not override those interests
- For the establishment, exercise or defence of legal claims, where necessary

Some of these grounds for processing your personal data overlap, so there may be several reasons which justify us processing your personal information.

In those limited circumstances where you have expressly given your consent to us to process your personal data, for example, when subscribing to our newsletters, you are free to revoke your consent at any time. However, please be aware that we

may have the right to continue to process your information if it can be justified on one of the other legal bases mentioned above.

You have the right to object to how we process your personal information, or to ask us to restrict the processing. Please see below, at 13, for more details.

If you would like more information about our legal basis for processing your personal information, please contact our Data Protection Officer (DPO) - see 14, below.

# 2 Disclosure of personal information

#### 2.1 Disclosure of personal information on the Website

We are an open review platform and we share your review on our Website so that others can read about your experience with a specific company. When you write a review, we will disclose your review, your first name (as entered into the "first name" field) and any other information you have chosen to connect with your public profile. We recommend that you exercise care in deciding which information to make publicly available on the Website, and be aware that, depending on the level of information provided, you may or may not be anonymous.

#### Master Data and other information

When you write a review on our Website and create an Account, your username, review and photo, will be visible on the Website. The law firms you review can also receive information about your review.

#### **Geo-location**

When you write a review on the Website, we use your computer's IP address (see 1.7 of this Policy, above) to approximate your location.

2.3 Disclosure to other services, websites and companies

One of ReviewSolicitors' main goals is to increase the exposure and availability of reviews on the Website. We therefore permit other services to show reviews created on the Website. This increases the potential audience for your reviews.

The categories of third party services and companies who can show your review(s) together with your public user profile include:

- Search engines, including Google and Bing
- Law firms reviewed on ReviewSolicitors
- Consumer portals and business portals, including price comparison websites, shopping guides, etc.
- Other similar websites where, in ReviewSolicitors' assessment, it will be relevant for users to search for reviews.
- Social media such as Facebook, Twitter, LinkedIn your review may be shared by us or the firm you reviewed

Once you submit your review, it is published on the Website. This means that the following information is disclosed:

- Your review(s), (see 1.2, above)
- Your first name (as entered into the "first name" field) and the additional data you choose to add to your profile.

If you write a review on ReviewSolicitors in response to an invitation sent by a company via our review invitation services, the company who sent you the invite will be able to associate your review with the invitation. This may include data such as your name, the service you received and your email address.

2.4 Other disclosures

In addition to the above, we may disclose your personal information to the following parties and in the following circumstances:

- To allow third party vendors, consultants and other service providers to provide services to us
- To ReviewSolicitors subsidiaries and other companies within the ReviewSolicitors group of companies
- To comply with laws or to respond to claims, legal process (including but not limited to subpoenas and court orders) and requests from public and government authorities
- To cooperate with regulatory bodies and government authorities, including but not limited to Trading Standards, The Competition and Markets Authority in connection with investigations or case referrals
- To third parties in connection with enforcement of our Terms and Conditions and Guidelines
- To third parties in order for us to protect our operations or those of our affiliates
- To third parties in order for us to pursue available remedies, or limit damages that we may sustain
- To insurers and professional advisers in connection with our insurance cover or to deal with legal claims
- To third parties in order for us to investigate, prevent or take action regarding suspected or actual prohibited activities, including but not limited to fraud and misuse of our Website
- To a third party in the event of any reorganization, merger, acquisition, sale, joint venture, assignment, transfer or other disposition of all or any portion of our business or assets (including in connection with any bankruptcy or similar proceedings).

# **3 Data controller**

We are the "data controller" in respect of your personal information referred to in this Policy.

## 4 Links to websites

Our Website contains links to other websites. Our inclusion of such links does not imply that we endorse those websites. We do not control the content of those third party websites, and assume no responsibility for the third party or their policies or practices.

We encourage you to review the privacy policies for these third party websites because their procedures for collecting, handling and processing personal data will be different from ours.

# 5 Data processors and transfer of personal information outside the UK

We use external companies to maintain the technical operation of the Website and our services.

Some of these third party services are located outside the UK such as in the US. You agree to us sending your information abroad provided that there is a legal framework governing the transfer of your personal data and ensuring adequate protection of it, for example by use of "standard contractual clauses" sanctioned by the Information Commissioner.

## 6 Data retention

We will keep your personal information until our contract with you has ended (see our terms and conditions) or you ask us to delete the information (by emailing us at the above email address). However, we are entitled to retain your reviews and associated data (including your first name as entered into the "first name field") indefinitely on our Website.

We may hold on to some (or all) of your information for as long as reasonably needed for legal, regulatory or tax reasons, deal with disputes, prevent fraud or abuse and/or enforce our terms and conditions (typically up to up to six years).

We will keep your information which we use only for newsletters or other marketing until you tell us to stop sending you such messages.

We will generally keep automated browsing information for up to 26 months.

#### 7 Security measures

We use reasonable organisational, technical and administrative measures to protect your personal information within our organisation and we regularly audit our system for vulnerabilities. However, since the internet is not a 100% secure environment, we cannot ensure or warrant the security of the information you transmit to us. Emails sent via the Website may not be encrypted, and we therefore strongly advise you not to include any confidential information in your emails to us.

We are always working to improve our security practices.

## 8 Cookies

The Website uses cookies and similar technologies ("Cookies"). By using our Website, you accept that we use Cookies as described below.

8.1 What types of Cookies do we use?

We and/or other companies use cookies and other tracking technologies on our website. A cookie is an identifier (a small file of letters and numbers) that is sent to your web browser. Cookies are widely used to make websites work, or work more efficiently, as well as to provide information to the website owner or others. Some are session temporary "session" cookies that remain in the cookie file of your browser only until your browser is closed. Whereas persistent cookies stay for longer (depending on the lifetime of the specific cookie). For further information on cookies, including how to use your browser to block them and how to delete existing cookies, visit: www.allaboutcookies.org. Our site's functionality will be limited if you configure your browser to reject cookies.

8.2 What do we use Cookies for?

We use Cookies for:

#### **Generating statistics**

Measuring Website traffic such as the number of visits to the Website, which domains the visitors come from, which pages they visit on the Website and in which overall geographicalareas the visitors are located.

#### Monitoring Website performance and your use of our Website

Monitoring the performance of the Website, our applications and Widgets and how you use our Website, applications and Widgets.

#### Authentication and improving the functionality of our Website

Optimizing your experience with the Website, which includes remembering your username and password when you return to the Website, and remembering information about your browser and preferences (e.g. which language you prefer).

#### **Connecting you to Social Networks**

We give you the option of connecting with Social Networks, such as Facebook and Linkedin.

#### Quality assurance

Ensuring the quality of reviews and to prevent misuse or irregularities in connection with writing reviews and using the Website.

#### 8.3 Third party Cookies

Third party Cookies are set by third party websites – not our Website. When you visit our Website, the following third party Cookies may be set:

- *Analytics cookies:* These kinds of cookies recognise and count the number of website visitors as well as providing other information about the visit such as duration, route through the website and where the visitor came from. This information helps us to improve the way our website works, for example by making sure users find what they need easily. These cookies are provided by:
  - *Google Analytics ("GA")*. More information:
    - Google's overview of GA data practices and safeguarding
    - how to specifically opt out from GA cookies
    - Google's <u>use of its partners' data</u>
- *Advertising cookies:* These kinds of cookies are typically used to personalise ads on this or other sites based on your use of our site, to measure ad effectiveness (for example, how

often you click on or view ads and whether you go on to buy something from the advertiser) and to stop you being shown the same ad repeatedly. These cookies are provided by:

- Google (including Analytics Ad Features / AdSense / Doubleclick)
  - how Google <u>uses cookies and other technologies in advertising</u> including how to opt out of advertising cookies (this explains how ad personalisation works)
  - Google's <u>use of its partners' data</u>
- Facebook (including "Facebook Pixel")
  - Facebook's <u>cookies policy</u> (see especially under "Advertising, recommendations, insights and measurement") including how to control Facebook's use of cookies
  - Facebook's privacy policy
- Microsoft's Bing
  - Microsoft's privacy policy including how to control Microsoft's use of cookies

Note that there are various places where you can go to opt out of many companies' advertising cookies in one go including some or all of the above:

- <u>www.networkadvertising.org/choices</u>
- <u>http://www.youronlinechoices.com/</u>
- <u>http://optout.aboutads.info</u>
- Third party log-in cookies: If you log in through a third party website, that website will place its own cookies on your computer:
  - Facebook's privacy policy
  - <u>Google's privacy policy</u>

# 9 Access and insights into the personal data we have about you

If you have an Account on ReviewSolicitors, you can log in to your Account and see some of the information we hold about you, including your reviews, and why we have that information.

If you don't have an Account, you can email info@ReviewSolicitors.com and request information about your personal data. Upon receiving your request, we will let you know what personal information we have about you, how we collect the information, the purpose for which we process your personal data, and who we share your personal information with.

# 10 Download your personal data (data portability)

We do not currently provide the ability to automatically download your data but we will be happy to provide this upon request. Please email info@reviewsolicitors.com

## 11 Correction and deletion of your personal data

If any of the Master Data or other personal information that we have about you is incorrect or misleading or you want to delete it, you can generally do this yourself via your Account. Otherwise, you are welcome to ask us to assist with correcting or deleting your information (provided any applicable legal conditions are met).

## **12 Other rights**

In addition to the rights set out above concerning your personal data, you also have the following rights:

- To object to the processing of your personal data and have the processing of your personal data restricted.
- In particular, you have an unconditional right to object to the processing of your personal data for direct marketing purposes.
- If our processing of your personal information is based on your consent, you have the right to withdraw your consent at any time. Your withdrawal will not affect the lawfulness of the processing of data carried out before you withdrew your consent. You may withdraw your consent by emailing us at privacy@reviewsolicitors.com

In some circumstances, these rights may be limited or conditional. For example, whether or not you have the right to data portability in a particular case depends on the specific circumstances of the processing activity.

If you have a complaint about how we are dealing with your personal information, please contact us via the email address above. If you are not happy with our response or think we are not handling your personal information in accordance with the law, you have the right to complain to the Information Commissioner's Office (ICO). For more information about your rights, visit the ICO's website: www.ico.org.uk.

# 13 Children's information

Our Website is not intended for children. If you become aware that a child under the age of 13 has provided us with their personal information, please contact us.

# 14 Our Data Protection Officer

We have a Data Protection Officer (DPO). If you have any questions about the data processing activities performed by us, you are welcome to contact our DPO by email at: privacy@reviewsolicitors.com.

# **15 Changes to this Policy**

We reserve the right to make changes to this Policy. The date shown at the start of this Policy indicates when it was last revised. If we make important changes to it, we will provide notice through our Website, or by other means, to give you the opportunity to review the changes

before they come into effect. Your continued use of our Website after we publish or send a notice about the changes to the Policy will mean that you accept and agree to the updated Policy.

## 16 Contact information and where to send questions or complaints

If you have questions or concerns about our Policy, how we process your personal information, or would like us to correct your personal information, feel free to contact us at: privacy@reviewsolicitors.co.uk

You can also reach us by post.

ReviewSolicitors | Aspect House| Bennerley Road | Nottingham | Nottinghamshire | NG6 8WR |