

Privacy Notice
Effective date: 12 September 2022

Lawflex Ltd. and its affiliates ("**us**", "**we**", or "**our**") respect your privacy and take your personal data seriously. Please read the following to learn more about our Privacy Policy (this "**Policy**"). This Policy applies to the lawflex.com website including any subdomains such as join.lawflex.com. (the "**Website**") as well as to our Lawflex Platform available at <https://lftalents.my.stacker.app/register> (the "**Platform**"), collectively referred to as our "**Online Services**".

Capitalized terms not otherwise defined herein shall have the meaning assigned to them in the Platform Terms of Use, available [here](#)

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1. What Personal Data We Collect, How, and How is it Being Processed

- 1.1. The following table describes what personal data we collect through the Online Services, and for what purposes it may be processed:

Instance in which data is collected	Categories of personal data that are processed	Purposes of processing	Legal basis for processing (under GDPR)
When you fill out our "Join us" flow	Your first and last name, telephone number, email address, years of professional experience, area of practice and	To contact you occasionally in relation to provision of legal services to our clients	Consent (Article 6(1)(a))

	expertise, level of English, place of practice, details on last employer, and CV	<p>To assess your suitability for specific projects of our clients</p> <p>To process your engagement with us and inclusion of your details in our freelancer data base and Platform</p> <p>To process payments and any logistics related to our engagement</p> <p>To record your consent to our terms and conditions of engagement</p>	Our Legitimate Business Interest (Article 6(1)(f) or if contracting you directly, fulfillment of a contract (Article 6(1)(b))
When you submit "contact us" form	First and last name, email address, free text at your consideration	<p>To process your query or request and get back to you regarding your message</p> <p>To contact you occasionally with marketing communications regarding Company's services and products, newsletters and events subject to applicable laws (for example, where required, subject to your consent).</p>	Your Consent Article (6)(1)(a))
Data that you provide passively (by using the Website or the Platform, by navigating the screens, clicking on buttons etc.)	Your Device's IP address, browser type and version, operating system type and version, language preferences or the webpage You were visiting before our Website, pages of our Website that You visit, the time spent on those pages, information you search for on	<p>To improve, modify and update services and content offered on the Online Services.</p> <p>To monitor and ensure the orderly and proper operation and development of the Online Services and associated services.</p> <p>To improve and customize the user experience and the content that is presented on the Online Services.</p>	Our legitimate business interest (Article (6)(1)(f))

	our Website, access times and dates, and other statistics		
When you submit an RFP through "Hire a lawyer" process on the Website	First and last name, email address, phone number, type of workplace	<p>To process your request</p> <p>To create an account for you on the Platform</p> <p>To create access credentials for you to the Platform</p> <p>To prepare RFP for your projects</p> <p>To connect you with our Talents through the Platform</p> <p>To allow Talents communicate with you at your request</p>	Our Legitimate Business Interest (Article 6(1)(f) or if contracting you directly- Fulfillment of a contract (Article 6(1)(b))
		To include you in our Customers mailing list for transactional communications.	Legitimate Business Interest (Article 6(1)(f))
When you create a Talent profile in the Platform	First and last name, email address	<p>To set up your profile in the Platform</p> <p>For Lawflex team to manage the Talents data base</p> <p>Sharing with Customers, when Talent agrees separately per Customer; following which customers may contact the Talents using any contact method included in the Talent profile</p> <p>To include you in our Talents mailing list for transactional communications.</p>	Consent (Article 6(1)(a))
When you provide data and content related to your Talent pages in the Platform	Mobile/phone number, profile picture, profile data	<p>To increase your visibility to your potential customers</p> <p>To allow you to update your profile and CV information</p>	Fulfillment of a contract (Article

	such as experience, education, credentials and areas of practice, your billable hours and details you provide regarding those hours, your bank account details, your rates and accumulated earnings. Any other free text that you may choose to provide in applicable free text fields.	independently and gain more control on how you are presented to potential Customers. To help us and you manage your billing and projects To monitor your work and projects To remit payments to you To manage our talents base	6(1)(b) and Legitimate Business Interest (Article 6(1)(f))
When you otherwise browse the Platform pages (whether as a talent or customer)	Your Device's IP address, browser type and version, operating system type and version, language preferences or the webpage You were visiting before our Website, pages of our Website that You visit, the time spent on those pages, information you search for on our Website, access times	To gain insight on how the Platform is used To analyze how we can improve the Platform	Our legitimate business interest (Article 6(1)(f))

	and dates, and other statistics		
When we interview you online through the Video Ask service (applicable to talents)	A recording of your online interview with us, and if applicable, any text and document that you provided through the Video Ask service	To manage our talent screening process and decisions	Our legitimate business interest (Article 6(1)(f))

- 1.2. You are not obliged under any applicable law to provide to us any of the above information and you may be able to opt not to disclose your personal data to Company. However, not providing Company with certain data may mean that we cannot provide you with certain functionalities or process any requests.
- 1.3. In addition to the above uses of your personal data, we will also process your personal data for the following purposes:
 - 1.3.1. We use all of the above personal data to operate, maintain, and provide to you the Online Services features and functionality and to provide you with the services as requested by you.
 - 1.3.2. To prevent, detect and fight fraud or other illegal or unauthorized activities
 - 1.3.3. To ensure legal compliance – from our side (to legal requirements that apply to us and to our obligations under the Terms of Use) and from your side (Compliance with laws applicable to you and with the Terms of Use)
 - 1.3.4. We will not use your Personal Data for any personal profiling and automated decision making, as referred to under GDPR, regarding you based on such profiling.
 - 1.3.5. To operate and manage our data bases and gain meaningful insights or improve the management of our business
 - 1.3.6. to implement measures to secure our confidential data, personal data and third parties confidential data and test such measures.
- 1.4. We limit access by our employees to your information only to those who were specifically authorized by the Company to access your information, as part of their job.
- 1.5. We use anonymized, aggregate data, in order to gain insight on how you and other users use the Online Services and try and improve it, as well as to plan our marketing and advertisements.
- 1.6. All of the above processing is based on our legitimate business interest (GDPR Article 6(1)(f), except for point 1.6 which is partially based on our legitimate business interest (concerning compliance with terms of use) and partially is processing that is necessary to comply with legal obligations that apply to us (GDPR

Article 6(1)(c)) and except for section 1.3.5 which is based on our legal obligations (GDPR Article 6.1.(c)).

2. How we Share Your Personal Data

- 2.1. No Sale to Third Parties. We do not, and will not, sell any of your personal data to any third party for advertising, marketing or any other purpose.
- 2.2. Service Providers: we employ other companies and people to perform tasks on our behalf and need to share your information with them in order to provide the services to us. The categories of third party recipients of the personal data from us are as follows: Cloud hosting services, email campaign automation, marketing automation, , CRM platform and tools, analytics tools providers, web page building tools, accounting and bookkeeping services and accounting documentation platforms, data base tools, forms tools and digital signing tools.. Our service providers do not have any right to use your personal information collected from our Online Services beyond what is necessary for the purpose of facilitating our provision of the Online Services.
- 2.3. Clients: if you are submitting your CV through the site, we will consider adding you to our freelancer data base, and we may occasionally transfer your CV and contact information to our clients, however we will first ask your permission in every instance.
- 2.4. Compliance with the Law: We may disclose your information if we believe it's necessary in order to comply with the law, such as to comply with a subpoena, regulation or legal request, respond to a government request, to address fraud or security issues, to protect the safety of any person, to enforce our agreements with you; to investigate, prevent, or take other action regarding illegal activity, suspected fraud or other wrongdoing or to protect our own rights or property. If you are located in the EU, we may only do so based on legal requirements specified above of EU authorities. This includes sharing such information with our legal counsels.
- 2.5. Business Transfers: If we are in a bankruptcy, merger, acquisition, reorganization or sale of assets, your information may be transferred as part of that transaction to a successor in interest and to the applicable legal authorities as well as legal counsels and other professional counsels involved such as accountants, and other officers of the government or of the applicable judiciary instance.
- 2.6. Anonymized Information: We may provide third parties with aggregated but anonymized information and analytics about our customers however, before we do so, we will make sure that it does not identify you.

3. Data Transfers and Global Processing

- 3.1. The website may be operated in countries other than your own location, and your personal data may be accessed and/or processed from and/or transferred to countries other than your own location. We may do this where data is accessed/processed:
 - 3.1.1. by Company and its affiliates for operational, administrative, compliance purposes or customer support teams in our various locations;
 - 3.1.2. By our service providers, for the purposes we specified under the section "Service Providers".

3.2. The safeguards we deploy for performing such transfers across boundaries:

3.2.1. Adequacy. If you are located outside of Israel, and choose to provide information to us, please note that we transfer the data, including personal data, to Company headquarters located Israel and process it there. Any transfers to Israel may be made on the basis of an adequacy decision made by the European Commission.

3.2.2. Model Clauses. With some of our processors, we use standard contractual clauses approved by the European Commission that are binding standards of processing of personal data committed to contractually by third parties processing information for us and on our behalf.

3.2.3. Consent. In the absence of an adequacy decision or Model Clauses, and in the absence of any other right to transfer your data, your consent shall serve as the basis for such transfer. By accessing and using the website, you agree and understand that your information may be transferred from the EEA or other countries in which you may be using or accessing the website, to other jurisdictions outside your own location (including outside the EEA). The transfer will be to such third parties as described under Section 2 (How we share your personal data).

3.3. Company will take steps reasonably necessary to ensure that your data is treated securely and in accordance with this Privacy Policy and no transfer of your Personal Data will take place to an organization or a country unless there are adequate controls in place including the security of your data and other personal information and subject to proper transfer assessments.

3.4. Currently we process data in Israel, USA and the EEA.

4. Data Subject Rights

4.1. It is your responsibility to ensure that all personal data submitted to Company is correct. Company would like to make sure you are fully aware of all of your data protection rights. Depending on your location and on the laws that are applicable to you, you may be entitled to some or all of the following rights:

4.2. **The right to access** – You have the right to request Company for copies of your personal data, which includes the right to obtain confirmation as to whether or not personal data concerning you are being processed and, where that is the case, access to the personal data and the purposes of the processing; categories of personal data concerned; recipients or categories of recipient to whom the personal data have been or will be disclosed; where possible, the envisaged period for which the personal data will be stored; the existence of the right to request rectification or erasure of personal data or restriction of processing of personal data or to object to such processing; the right to lodge a complaint with a supervisory authority; where the personal data are not collected from the data subject, any available information as to their source; the existence of automated decision-making, including profiling; the appropriate safeguards relating to the transfer of your personal data outside the EEA,. We may charge you a small fee for this service under certain conditions.

4.3. **The right to rectification** – You have the right to request that Company correct any information you believe is inaccurate. You also have the right to request Company to complete the information you believe is incomplete.

4.4. **The right to erasure** – You have the right to request that Company erase your personal data, under certain conditions.

- 4.5. **The right to restrict processing** – You have the right to request that Company restrict the processing of your personal data, when: (a) you contest the accuracy of your personal data, for a period allowing Company to verify the accuracy of said data; (b) if you believe personal data has been unlawfully processed and you wish to restrict processing rather than delete it; (c) Company no longer needs the personal data but you require to keep it in order to establish, exercise or defend a legal claim; or (d) you have exercised your right to object the processing (below) for a period allowing Company to consider whether your legitimate grounds override those of Company.
- 4.6. **The right to object to processing** – You have the right to object to the processing of your personal data at any time – this means you have the right to stop or prevent Company from processing your personal data (it could be in relation to part or all of your personal data, and for part or all of the processing purposes). When relating to processing for marketing purposes, you have an absolute right to object; while for other purposes, the existence of the right depends on what lawful basis the processing relies on.
- 4.7. **The right to data portability** – You have the right to request that Company transfer the data that we have collected to another organization, or directly to you, under certain conditions.
- 4.8. If allowed by applicable laws, you have the right to withdraw your consent at any time when Company processes your personal data based on your consent on any of these rights. However, withdrawal does not affect the legitimacy and effectiveness of how we process your personal data based on your consent before the withdrawal is made; nor does it affect any data processing based on another lawful bases other than your consent.
- 4.9. You may exercise these rights to the extent these rights apply to you by emailing Company to: privacy@lawflex.com or use any of the contact information listed below. We will undertake to respond to your request within the applicable time frame prescribed by applicable law. Although we will make reasonable efforts to accommodate your requests, in some circumstances we may deem your request unfounded or not eligible under applicable law. In such instances we reserve the right to refuse your request. We shall require, as pre-requisite to fulfilling any request, to verify your identity which we may do by asking you to provide certain information or identification to ensure that all data subjects' privacy is protected.
- 4.10. If you think that the way we process your personal information does not comply with applicable data protection laws, you are of course invited to contact us and we will consider your request, but in any event you may contact the relevant competent data protection authority. You can obtain the contact information for all of the EEA data protection authorities at https://edpb.europa.eu/about-edpb/board/members_en.

5. Cookies & Similar Technologies

- 5.1. A cookie is a small text file that is stored in your web browser that allows Company or a third party (such as third-party service providers) to recognize you. Cookies can either be session cookies or persistent cookies. A session cookie expires automatically when you close your browser. A persistent cookie will remain until it expires, or you delete your cookies.

5.2. Cookies that we may use can generally be categorized as follows:

- 5.2.1. Necessary Cookies: These cookies are necessary to load the website or to allow users to use website's certain features.
- 5.2.2. Analytics Cookies: These cookies track information about how the website is being used so that we can make improvements and report on our performance.
- 5.2.3. Preference Cookies: These first party cookies store your website preferences.
- 5.2.4. Marketing Cookies: These are usually third-party cookies by advertising platforms or networks in order to: (i) deliver ads and tracks ad performance, and (ii) enable advertising networks to deliver ads that may be relevant based upon your activities.

5.3. We may use additional tracking technologies to help understand user activities and preferences. For example, we use web beacons (also known as clear gifs, pixel tags or web bugs) to track user activities and communicate with cookies. You cannot opt out of web beacons used in webpages, but you can limit their use by opting out of the cookies they interact with. You can opt-out of web beacons used in emails by setting your email client to render emails in text mode only.

Name ↑	Provider	Type	Category ⓘ	Expires In
CONSENT	youtube.com	Third Party	Targeting/Advertising	2 Year(s)
awxxxx	lawflex.com	First Party	Targeting/Advertising	1 Year(s)
YSC	youtube.com	Third Party	Targeting/Advertising	Session
VISITOR_INFO1_LIVE	youtube.com	Third Party	Targeting/Advertising	6 Month(s)
cookiesession1	lawflex.com	First Party	Unknown	1 Year(s)

5.4. We use the following cookies and other tracking technologies. We will update this list from time to time depending on the cookies we will be using.

5.5. We may set cookies that monitor links to our website that we send to you (if you have consented to receiving emails from us). These cookies are used to track visitors to our website sourced from these emails. To avoid these types of cookies, please follow the explanation below on how to change your browser cookies settings.

5.6. In addition we may use tracking technology in certain types of emails (e.g., documents sent to you for signature by email) to understand how often our emails are opened and clicked on by our customers. If you do not wish this tracking to be effected, please change your email software or service (such as outlook, Gmail etc.) settings to not automatically download images (to the extent it is not already your default) In some instances, depending on your email or browser settings, cookies in an email may be automatically accepted (for example, when you have added an email address to your address book or safe senders list). Please refer to your email browser or device instructions for more information on this.

- 5.7. You can change your browser's settings to delete cookies that have already been set and to not accept new cookies. To learn more about how to do this, visit the help pages of your browser. Some useful information can also be found here: <https://www.allaboutcookies.org/> Please note, however, that if you delete cookies or do not accept them, you might not be able to use all of the features we offer, you may not be able to store your preferences, and some of our pages might not display properly.

6. Security of Processing

- 6.1. We use appropriate physical, management, and technical measures to protect your data from unauthorized access, disclosure, use, modification, damage, or loss. We also provide training on security and privacy protection for employees to raise their awareness of personal data protection. However, please note that no security measure is perfect, therefore, you should take special care in deciding what information you disclose.
- 6.2. For more details regarding the security features deployed by our processors you can visit the following websites; Lawflex is not responsible for the accuracy or reliability of the content contained therein as it is provided by third parties Lawflex does not control; this information is provided here for your convenience only.
- 6.2.1. **Firebase:** <https://firebase.google.com/support/privacy>
- 6.2.2. **Typeform:**
<https://www.typeform.com/help/a/what-happens-to-my-data-360029581691/>
- 6.2.3. **Hotjar:**
<https://help.hotjar.com/hc/en-us/articles/360045354594-Security-at-Hotjar>
- 6.2.4. **Jotforms:** <https://www.jotform.com/security/>
- 6.2.5. **Integromat:**
<https://www.integromat.com/en/help/technical-and-organizational-measures>
- 6.2.6. **Airtable** - <https://www.airtable.com/security>
- 6.2.7. **Stacker:** <https://www.getstacker.com/security/>

7. Data retention

- 7.1. We will retain your personal data for no longer than is necessary for the purposes stated in this Policy unless otherwise extending the retention period is required or permitted by law or subject to our retention policies as may be in place from time to time. The data storage period may vary with scenario, product, and service.
- 7.2. The standards Company uses to determine the retention period are as follows: the time required to retain personal data to fulfill business purposes, including providing products and services; maintaining corresponding transaction and business records; controlling and improving the performance and quality of the website; handling possible user queries or complaints and locating problems; whether the user agrees to a longer retention period; and whether the laws, contracts, and other equivalencies have special requirements for data retention.

8. Changes to This Privacy Policy

- 8.1. We may update our Privacy Policy from time to time. We will notify you of any changes by posting the new Privacy Policy on this page. We may notify you through different channels, for example, posting a notice on our website or sending you direct notification.

- 8.2. You are advised to review this Privacy Policy periodically for any changes. Changes to this Privacy Policy are effective when they are posted on this page.

9. General

- 9.1. If you have any questions or suggestions, to exercise any of your rights, or if you have any other questions or complaints about our use of your personal data and your privacy please contact our data protection officer at privacy@lawflex.com
- 9.2. Where your personal data is processed by Company in accordance with this Privacy Policy, Lawflex Ltd. Of 26 Hamasger 26, Israel, is the controller of the related personal data.
