

Privacy Policy

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1. Information and Overview

Albee Law Firm, PLLC d/b/a Kindred Law (“Kindred”) has contracted with Themis-Tech Inc. d/b/a Flare (“Flare”) (collectively “we”, “our” or “us”) in order to provide efficient services to Kindred's clients.

Flare provides technological, marketing, and other services with the goal of enabling law firms to provide efficient and personalized support throughout clients’ legal journey. You are viewing this Privacy Policy (“Policy”) because Flare manages the entire user journey in relation to your case and your relationship with Kindred. It describes how we collect, use, and share information about you as well as your rights and choices regarding such information. It applies to information collected through the Kindred’s website located at www.kindred-law.com and any online location operated by us that links to this Privacy Policy or offline location that makes this Privacy Policy available to you. The activities described above are the “Service(s)” to which this Privacy Policy applies. We put great efforts in communicating our privacy practices and in making sure that the information we process is safe and properly used.

By using the Service or interacting with us offline, you agree to our Terms of Use and consent to our collection, use and disclosure practices, and other activities as described in this Privacy Policy. If you do not agree and consent, discontinue use of the Service. If you are a resident of Nevada or California, please see the additional

disclosures at the end of this Privacy Policy. If you have any questions or wish to exercise your rights and choices, please contact us as set out in the “Contact Us” section.

Notwithstanding anything to the contrary in this Privacy Policy, this Privacy is not to be construed in a way (and we will not take any such action) that violates applicable law(s) regulating the legal profession, including the attorney-client privilege and/or the attorney work product doctrine, and any sharing of information between Kindred and Flare shall be done in compliance with the law. Clients who have entered into a formal written and signed agreement with Kindred, for Kindred to act as legal counsel for the Client, may be subject to additional terms and privacy provisions. If you are a client of Kindred Law and have questions regarding how we process your information, please reach out to us at hello@kindred-law.com.

This Policy describes how we collect, store, use and disclose personal information which relates to a current or prospective client of Kindred (“Client(s)”), who receives legal services through email or any other means of communication, including by creating a profile in or otherwise interacting with our Services (collectively “Online Platforms”).

Specifically, this Privacy Policy describes our practices regarding:

1. [Data Collection & Processing](#)
2. [Data Uses & Business Purposes](#)
3. [Data Location and Retention](#)
4. [Data Disclosure](#)
5. [Cookies and Tracking Technologies](#)
6. [Communications](#)
7. [Data Security](#)
8. [Data Subject Rights](#)
9. [Business/Service Provider](#)
10. [Additional Notices](#)

Please read this Privacy Policy carefully and make sure that you fully understand and agree to it. You are not legally required to provide us with any personal information and may do so (or avoid doing so) at your own free will. If you do not wish to provide us with your personal information, or to have it processed by us or any of our service providers, please avoid any interaction with us or any use of our Services.

2. Data Collection & Processing

When we use the term “personal information” in this Policy, we mean information that identifies, relates to, describes, is reasonably capable of being associated with, or could reasonably be linked, directly or indirectly, to an individual or household. It does not include aggregated, de-identified or anonymized information that is maintained in a form that is not reasonably capable of being associated with or linked to an individual.

Specifically, in the last twelve months (12) we have collected, in relation to the Services, the following categories of Personal information:

Category	Examples	Collected
Category A - Identifier	Name, postal address, phone number, email address, username, password, IP address, or other similar identifiers	YES
Category B – Additional personal information categories	Name, signature, address, telephone number, bank account number, credit card number, debit card number, or any other financial information	YES
Category C – Protected classification characteristics	Age, ethnicity, citizenship, religion or creed, marital status, medical condition (including physical or mental disability, pregnancy), gender, sexual orientation	YES
Category D – Commercial information	Records of personal property, products or services purchased	YES
Category E – Biometric information	Genetic, physiological, biological characteristics or other identifier or identifying information	NO

	such as fingerprints, faceprint, voiceprint	
Category F – Internet or other similar network activity	Access history and information on your interaction with our application recorded by log files, cookies, pixels, device fingerprinting, information for authentication and account access	YES
Category G – Geolocation data	Location data including imprecise location data (such as location derived from an IP address or data that indicates a city or postal code level)	YES
Category H – Sensory data	Audio, electronic, visual or similar information	YES
Category I – Professional or employment-related information	Current or past job history, employer information	YES
Category J – Non-public education information	Education level, grades, transcripts, student financial information or student disciplinary records	NO
Communications between Attorneys and Clients	Correspondence relating to the case, answers to your case assessment questionnaire, feedback and testimonials received	YES
Financial information	Credit reports, credit scores, bank and credit card details and other financial information	YES
Attorneys' notes relating to the Client's case uploaded to the Online	Any personal information included in Attorneys case summaries, notes and conclusions that is	YES

Platform (“Attorneys Notes”)	uploaded to the Online Platform	
Client's legal documentation uploaded to the Online Platform (“Case-Related Documents”)	Any personal information included in contracts, agreements, or other legal documents relating to a Client’s case or claim that is uploaded to the Online Platform	YES
Client Relationship Manager (CRM) and prospective clients’ information	Contact details, Communications, source, as well as any needs, preferences, attributes and insights relevant to the potential engagement	YES in relation to prospective clients

We obtain the categories of personal information listed above from the following categories of sources:

- From the User: We collect personal information about you when you use the Services, such as information you provide when you fill out a case assessment, when you submit Case-Related Documents, when an Attorney is managing your case, when you access our content, make a purchase, or contact customer support;
- Information collected automatically: We generate personal information when you use the Services, such as data about your use of the Services, data about your device (device’s operating software, your internet service provider, settings, and device identifier) and data about your location (such as location derived from an IP address or data that indicates a city or postal code level);
- From third parties: We collect personal information about you from other sources such as our affiliates, social networks with which you interact, credit agencies, vendors and other parties involved in driving users to our Services, as well as from publicly available sources.

3. Data Uses & Business Purposes

We collect and use information for business and commercial purposes in accordance with the practices described in this Privacy Policy. In the last 12

months, the business purposes for which we collected and used your personal information included to the following:

- Operating and managing our Services.
- Performing processing activities requested by you, such as evaluating your information based on the answers to your case assessment questionnaire.
- Providing customer service.
- Providing financing options for case management.
- Sending you technical notices, updates, security alerts, information regarding changes to our policies, and support and administrative messages.
- Preventing and addressing fraud, breach of policies or terms, and threats or harm.
- Monitoring and analyzing trends, usage, and activities.
- Conducting research, including focus groups and surveys.
- Improving the Services or other websites, apps, marketing efforts, products and services.
- Developing and sending you advertising, direct marketing, and communications, including about our and other entities' products, offers, promotions, rewards, events, and services.
- Fulfilling any other business or commercial purposes at your direction or with your notice and/or consent.

Notwithstanding the above, we may use information that does not identify you (including information that has been aggregated or de-identified) for any purpose except as prohibited by applicable law.

4. Data Location & Retention

Data Location: We and our authorized service providers (defined below) maintain, store and process personal information in the United States and other locations as reasonably necessary for the proper performance and delivery of our Services, or as may be required by applicable law.

While privacy laws vary between jurisdictions, we, our affiliates and service providers are each committed to protect personal information in accordance with this Policy, customary and reasonable industry standards, and contractual terms requiring adequate protection of the personal information.

Notwithstanding the foregoing, where we process personal information as a Service Provider on behalf of a Business, such personal information (i.e. Case-Related Documents) is processed in the locations as permitted in our commercial agreements with such Business (as further described in [Section 10](#) below).

Data Retention: We may retain your personal information for as long as it is reasonably needed in order to maintain and expand our relationship and provide you with our Services and offerings; in order to comply with our legal and contractual obligations; or to protect ourselves from any potential disputes (i.e. as required by laws applicable to log-keeping, records and bookkeeping, and in order to have proof and evidence concerning our relationship, should any legal issues arise following your discontinuance of use), all in accordance with our data retention policy and at our reasonable discretion. To determine the appropriate retention period for personal information, we consider the amount, nature, and sensitivity of such data, the potential risk of harm from unauthorized use or disclosure of such data, the purposes for which we process it, and the applicable legal requirements. If you have any questions about our data retention policy, please contact us by email at privacy@kindred-law.com.

5. Data Disclosure

We may disclose your personal information to a third party for a business purpose. When we disclose personal information for a business purpose, we enter a contract that describes the purpose and requires the recipient to both keep that personal information confidential and not use it for any purpose except performing the contract.

In the preceding twelve (12) months, we have disclosed the following categories of personal information for a business purpose:

- Category A: Identifiers.
- Category B: Additional personal information categories
- Category C: Protected classification characteristics
- Category D: Commercial information
- Category F: Internet or other similar network activity
- Category H: Sensory data
- Category I: Professional or employment-related information.
- Communications between Attorneys and Clients
- Financial information
- Case-Related Documents
- CRM and prospective client's information

We disclose your personal information for a business purpose to the following categories of third parties:

Service Providers: We engage selected third-party companies and individuals as service Providers, to perform services on our behalf or complementary to our own. These include providers of Third Party Services (as defined in the Terms), such as: hosting and server co-location services, communications and content delivery networks (CDNs), data and cyber security services, billing and payment processing services, fraud detection, web and mobile analytics, email and communication distribution and monitoring services, session or activity recording services, call recording, analytics and transcription services, remote access services, performance measurement, data optimization and marketing services, social and advertising networks, content, lead generating and data enrichment providers, email, voicemails, video conferencing solutions, support and customer relation management systems, third-party customer support providers, and our legal, compliance and financial advisors and auditors.

Our service providers may have access to personal information, depending on each of their specific roles and purposes in facilitating and enhancing our Services or other activities, and may only use the data as determined in our agreements with them.

Feedback or Recommendations: If you submit a public review or feedback, note that we may (at our discretion) store and present your review publicly, on our Services. If you wish to remove your public review, please contact us at privacy@kindred-law.com. If you choose to send others an email or message inviting them to use the Services through our Services, we may use the contact information you provide us to automatically send such invitation email or message on your behalf. Your name and email address may be included in the invitation email or message.

Business Colleagues: We share information with our non-attorney business colleagues in connection with offering co-branded services or engaging in joint marketing activities.

Legal Compliance: In exceptional circumstances, we may disclose or allow government and law enforcement officials access to your personal information, in response to a subpoena, search warrant or court order (or similar requirement), or in compliance with applicable laws and regulations. Such disclosure or access may occur if we believe in good faith that: (a) we are legally compelled to do so; (b) disclosure is appropriate in connection with efforts to investigate, prevent, or take

action regarding actual or suspected illegal activity, fraud, or other wrongdoing; or (c) such disclosure is required to protect the security or integrity of our products and Services.

Protecting Rights and Safety. We may share your personal information with others if we believe in good faith that this will help protect the rights, property or safety of us, our Clients, Attorneys, Visitors or any members of the general public.

Our Affiliates/Subsidiaries and organizational changes. We share personal information internally within our group of companies (i.e., affiliates and subsidiaries), for the purposes described in this Policy. In addition, should we or any of our group of companies undergo any change in control, including by means of merger, acquisition or purchase of substantially all or a portion of its assets, or transfer of all or a portion of its business to another business, your personal information may be shared with the parties involved in such an event. If we believe that such change in control might materially affect your personal information stored with us at the time, we will notify you of this event and the choices you may have via email or a prominent notice on our Services.

For the avoidance of doubt, Flare may share your personal information in additional manners, pursuant to your explicit approval, or if we are legally obligated to do so, or if we have successfully rendered such data non-personal and anonymous.

In the preceding twelve (12) months, we have not sold any personal information.

6. Cookies and Tracking Technologies

Our Services (including some of our service providers) may utilize “cookies”, anonymous identifiers, pixels, container tags and other technologies in order for us to provide and monitor our Services, to ensure that they perform properly, to analyze our performance and marketing activities, and to personalize your experience. Such cookies and similar files or tags may also be temporarily placed on your device. Certain cookies and other technologies serve to recall personal information, such as an IP address. To learn more about our practices concerning cookies and tracking, please see our Cookie Policy. You may also use the “Cookie settings” feature available in our Services depending on your location and activity on our Services, as applicable.

Please note that we do not change our practices in response to a “Do Not Track” signal in the HTTP header from a browser or mobile application, however, most browsers allow you to control cookies, including whether or not to accept them and how to remove them. You may set most browsers to notify you if you receive a cookie, or to block or remove cookies altogether.

7. Communications

We engage in Services and promotional communications, through email, phone, chat, SMS and notifications.

Service Communications: We may contact you with important information regarding our Services. For example, we may send you notifications (through any of the means available to us) of changes or updates to our Services, billing issues, log-in attempts or password reset notices, etc.

Promotional Communications: We may also notify you about new features, additional offerings, events and special opportunities or any other information we think you will find valuable. We may provide such notices through any of the contact means available to us (e.g., phone, mobile or email), through the Services, or through our marketing campaigns on any other sites or platforms. If you do not wish to receive such promotional communications, you may notify Flare at any time by sending an email to privacy@kindred-law.com, changing your communications preferences in your User Profile settings, or by following the “unsubscribe”, “stop”, “opt-out” or “change email preferences” instructions contained in the promotional communications you receive.

8. Data Security

In order to protect your personal information held with us, we use industry-standard physical, procedural and technical security measures, including encryption as appropriate. However, please be aware that regardless of any security measures used, we cannot and do not guarantee the absolute protection and security of any personal information stored with us or with any third parties as described in [Section 5](#) above.

9. Data Subject Rights

If you wish to exercise your privacy rights under any applicable law, such as the California Consumer Privacy Act (CCPA) or other state or federal laws, such as the right to know/request access to (specific pieces of personal information collected; categories of personal information collected; categories of sources from whom the personal information was collected; purpose of collecting personal information; categories of third parties with whom we have shared personal information), to request rectification or erasure of your personal information held with Flare, or to restrict or object to such personal information’s processing (including the right to

direct us not to sell your personal information to third parties now or in the future), or to obtain a copy or port such personal information, or the right to equal Services and prices (i.e. non-discrimination) – please contact us by email at privacy@kindred-law.com.

Please note that when you ask us to exercise any of your rights under this Privacy Policy or applicable law, we may require additional information and documents, including certain personal information and credentials in order to process your request in a proper manner (e.g., in order to authenticate and validate your identity so that we know which data in our systems relates to you, and where necessary, to better understand the nature and scope of your request). Such additional information will be then retained by us for legal purposes (e.g., as proof of the identity of the person submitting the request, and of how each request was handled), in accordance with [Section 4](#) above.

We may redact from the data which we make available to you, any personal or confidential data related to others.

10. Business/Service Provider

Certain data protection laws and regulations typically distinguish between two main roles for parties processing personal data: the “data controller” (or under the CCPA, “business”), who determines the purposes and means of processing; and the “data processor” (or under the CCPA, “Services provider”), who processes such data on behalf of the data controller (or business). Below we explain how these roles apply to our Services, to the extent that such laws and regulations apply.

Flare is the “data controller” (or “Business”) of personal information relating to Attorneys, Clients, prospective clients and Visitors, as detailed in [Section 2](#) (excluding Case-Related Documents and Attorneys Notes over which Flare is a data processor as explained below). Accordingly, we assume the responsibilities of a data controller (solely to the extent applicable under law), as set forth in this Privacy Policy.

Flare is the “data processor” (or “Service Provider”) of personal information contained in the Case-Related Documents. In addition, Flare is the processor of personal information contained in the Attorneys Notes. In such instances, the Law Firm shall be deemed the “data controller” of such data, and Flare will process such data on its behalf, as its “data processor”, in accordance with its reasonable instructions, subject to our Terms, our Data Processing Addendum (to the extent applicable) and other commercial agreements with such Law Firm. The Law Firm

will be responsible for meeting any legal requirements applicable to data controllers (such as providing adequate notices to the Clients or obtaining their consent for processing). The Law Firm is also responsible for handling data subject rights requests under applicable law from the Client and other individuals whose data is processed through the Services.

Therefore, if you would like to make any requests or queries regarding your personal information included in Case-Related Documents or Attorney Notes, please contact your Attorney or the Law Firm directly.

11. Additional Notices

Nevada Residents: Nevada law (NRS 603A.340) requires each business to establish a designated request address where Nevada consumers may submit requests directing the business not to sell certain kinds of personal information that the business has collected or will collect about the consumer. A sale under Nevada law is the exchange of personal information for monetary consideration by the business to a third party for the third party to license or sell the personal information to other third parties. If you are a Nevada consumer and wish to submit a request relating to our compliance with Nevada law, please contact us at hello@kindred-law.com.

California Residents: These additional disclosures for California residents apply only to individuals who reside in California. The California Consumer Privacy Act of 2018 (“CCPA”) provides additional rights to know, delete and opt out, and requires businesses collecting or disclosing personal information to provide notices and means to exercise rights.

Updates and Amendments: We may update and amend this Privacy Policy from time to time by posting an amended version on our Services. The amended version will be effective as of the date it is published. When we make material changes to this Policy, we will give notice as appropriate under the circumstances, e.g., by displaying a prominent notice within the Services or by sending an email. Your continued use of the Services after the changes have been implemented will constitute your acceptance of the changes.

Third Party Websites and Services: Our Services includes links to third party websites and services, and integrations with Third Party Services (as defined in the [Terms](#)). Such websites, services and Third Party Services, and any information you process, submit, transmit or otherwise use with or to such websites, services and Third Party Services, are governed by such third party’s terms and privacy practices and policies, and not by this Privacy Policy. We encourage you to carefully read the terms and privacy policies of such websites, services and Third Party Services.

Our Services is not directed to children under the age of 16: We do not knowingly collect personal information from children and do not wish to do so. If we learn that

a person under the age of 16 is using the Services, we will attempt to prohibit and block such use and will make our best efforts to promptly delete any personal information stored with us with regard to such child. If you believe that we might have any such data, please contact us by email at privacy@kindred-law.com.

Questions, concerns or complaints: If you have any comments or questions regarding our privacy policy or practices, or if you have any concerns regarding your personal information held with us, or if you wish to make a complaint about how we process your personal information, please contact our support at privacy@kindred-law.com.