# **Privacy Policy**

This Privacy Policy describes how https://www.catrinafarrugiaplc.com (the "Site" or "we") collects, uses, and discloses your Personal Information when you visit or make a purchase from the Site.

### **Contact**

After reviewing this policy, if you have additional questions, want more information about our privacy practices, or would like to make a complaint, please contact us by e-mail at firm@lawinmichigan.com or by mail using the details provided below:

## **Collecting Personal Information**

When you visit the Site, we collect certain information about your device, your interaction with the Site, and the information necessary to process your purchases. We may also collect additional information if you contact us for customer support. In this Privacy Policy, we refer to any information about an identifiable individual (including the information below) as "Personal Information". See the list below for more information about what Personal Information we collect and why.

#### Device information

- Purpose of collection: to load the Site accurately for you, and to perform analytics on Site usage to optimize our Site.
- **Source of collection:** Collected automatically when you access our Site using cookies, log files, web beacons, tags, or pixels.
- **Personal Information collected:** version of web browser, IP address, time zone, cookie information, what pages you view, search terms, and how you interact with the Site.

#### Account information

- **Purpose of collection:** to associate your account with a subscription and trial usage of the application.
- **Source of collection:** Upon installation, a customer record is automatically created via Stripe.
- Personal Information collected: name and email address.

#### • Subscription information

- Purpose of collection: to provide products or services to you to
  fulfill our contract, to process your payment information, and provide
  you with invoices and/or order confirmations, communicate with you,
  screen our orders for potential risk or fraud, and when in line with the
  preferences you have shared with us, provide you with information
  or advertising relating to our products or services.
- **Source of collection:** Payment information is processed by Stripe.
- **Personal Information collected:** name, billing address, shipping address, payment information (including credit card numbers), email address, and phone number.

#### Gmail information

- **Purpose of collection:** to provide products or services to you to fulfill our contract, to interact with your Gmail account in order to generate draft emails both automatically and on-demand.
- Source of collection: By authorising your Google account via
   OAuth authentication and the user granting permission to perform
   operations to their Gmail account including viewing email threads
   and messages and inserting draft email responses.
- Personal Information collected: your name and email address. No
  information related to the contents of your Gmail account, including
  email contents and contacts, are not stored at any point and are only
  used transactionally to generate new draft emails. Only emails that
  require a response are processed. All transactional data logs are
  deleted within 30 days. Settings within the Ready to Send Gmail
  add-on are stored locally within your Google account and cannot be
  accessed by third-parties.

### **Sharing Personal Information**

We share your Personal Information with service providers to help us provide our services and fulfill our contracts with you, as described above. For example:

 We use Square to power our online payments. You can read more about how Square uses your Personal Information here: https://squareup.com/us/en/legal/general/privacy

- We may share your Personal Information to comply with applicable laws and regulations, to respond to a subpoena, search warrant or other lawful request for information we receive, or to otherwise protect our rights.
- We use Stripe to power our service subscriptions. You can read more about how Stripe manages your privacy here: <a href="https://stripe.com/au/privacy">https://stripe.com/au/privacy</a>

Pursuant to the General Data Protection Regulation ("GDPR"), if you are a resident of the European Economic Area ("EEA"), we process your personal information under the following lawful bases:

- Your consent;
- The performance of the contract between you and the Site;
- Compliance with our legal obligations;
- To protect your vital interests;
- To perform a task carried out in the public interest;
- For our legitimate interests, which do not override your fundamental rights and freedoms.

## Retention

When you subscribe to a service through the Site, we will retain your Personal Information for our records unless and until you ask us to erase this information. For more information on your right of erasure, please see the 'Your rights' section below.

## **Automatic decision-making**

If you are a resident of the EEA, you have the right to object to processing based solely on automated decision-making (which includes profiling), when that decision-making has a legal effect on you or otherwise significantly affects you.

We do not engage in fully automated decision-making that has a legal or otherwise significant effect using customer data.

Our processor Stripe uses limited automated decision-making to prevent fraud that does not have a legal or otherwise significant effect on you.

Services that include elements of automated decision-making include:

- Temporary blacklist of IP addresses associated with repeated failed transactions. This blacklist persists for a small number of hours.
- Temporary blacklist of credit cards associated with blacklisted IP addresses. This blacklist persists for a small number of days.

## Your rights

### **GDPR**

If you are a resident of the EEA, you have the right to access the Personal Information we hold about you, to port it to a new service, and to ask that your Personal Information be corrected, updated, or erased. If you would like to exercise these rights, please contact us through the contact information above.

### **CCPA**

If you are a resident of California, you have the right to access the Personal Information we hold about you (also known as the 'Right to Know'), to port it to a new service, and to ask that your Personal Information be corrected, updated, or erased. If you would like to exercise these rights, please contact us through the contact information above.

If you would like to designate an authorized agent to submit these requests on your behalf, please contact us at the address above.

## **Cookies**

A cookie is a small amount of information that's downloaded to your computer or device when you visit our Site. We use a number of different cookies, including functional, performance, advertising, and social media or content cookies. Cookies make your browsing experience better by allowing the website to remember your actions and preferences (such as login and region selection). This means you don't have to re-enter this information each time you return to the site or browse from one page to another. Cookies also provide information on

how people use the website, for instance whether it's their first time visiting or if they are a frequent visitor.

The length of time that a cookie remains on your computer or mobile device depends on whether it is a "persistent" or "session" cookie. Session cookies last until you stop browsing and persistent cookies last until they expire or are deleted. Most of the cookies we use are persistent and will expire between 30 minutes and two years from the date they are downloaded to your device.

You can control and manage cookies in various ways. Please keep in mind that removing or blocking cookies can negatively impact your user experience and parts of our website may no longer be fully accessible.

Most browsers automatically accept cookies, but you can choose whether or not to accept cookies through your browser controls, often found in your browser's "Tools" or "Preferences" menu. For more information on how to modify your browser settings or how to block, manage or filter cookies can be found in your browser's help file or through such sites as: <a href="https://www.allaboutcookies.org">www.allaboutcookies.org</a>.

Additionally, please note that blocking cookies may not completely prevent how we share information with third parties such as our advertising partners. To exercise your rights or opt-out of certain uses of your information by these parties, please follow the instructions in the "Behavioural Advertising" section above.

## **Do Not Track**

Please note that because there is no consistent industry understanding of how to respond to "Do Not Track" signals, we do not alter our data collection and usage practices when we detect such a signal from your browser.

# **Changes**

We may update this Privacy Policy from time to time in order to reflect, for example, changes to our practices or for other operational, legal, or regulatory reasons.

# **Complaints**

As noted above, if you would like to make a complaint, please contact us by e-mail or by mail using the details provided under "Contact" above.

If you are not satisfied with our response to your complaint, you have the right to lodge your complaint with the relevant data protection authority. You can contact your local data protection authority, or our supervisory authority here: consumercomplaints.fcc.gov