

Privacy Policy  
Effective Date: 15/05/2023

1. Introduction and Overview.

This Privacy Policy provides a comprehensive description of how Vera Legal (collectively referred to as “Vera,” “we,” “our,” or “us”) collects, uses, and shares information about you as well as your rights and choices regarding such information. It applies to information collected through the Vera website located at [www.Veralegal.uk](http://www.Veralegal.uk), our Vera apps available through iOS and Android, and any online location operated by us that links to this Privacy Policy (the “Service”) or offline location that makes this Privacy Policy available to you.

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 have any questions or wish to exercise your rights and choices, please contact us as set out in the “Contact Us” section.

Contact details

If you have any questions about this privacy policy or our privacy practices, please contact our data privacy manager in the following ways:

Full name of legal entity: Vera Legal Limited

Email address: [vera@veralegal.uk](mailto:vera@veralegal.uk)

Postal address: Launch Lab, Franklin Building, 124 Goswell Rd., London EC1V 7DP

You have the right to make a complaint at any time to the Information Commissioner's Office (ICO), the UK regulator for data protection issues ([www.ico.org.uk](http://www.ico.org.uk)). We would, however, appreciate the chance to deal with your concerns before you approach the ICO so please contact us in the first instance.

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 shall be done in compliance with the law. Clients who have entered into a formal written and signed agreement with Vera to act as legal counsel may be subject to additional terms and privacy provisions. If you are a client of Vera and have questions regarding how we process your information, please reach out to us at [Vera@veralegal.uk](mailto:Vera@veralegal.uk).

2. Information Collection.

A. Information You Provide.

We collect information about you when you use the Service or interact with us offline, including information you provide when you fill out a case assessment, access our content, make a purchase, or contact customer support. The following are categories of information we collect and may have collected in the last 12 months:

- Contact Data, including your first and last name, email address, city, postal address, and phone number.
- Account Credentials, including your username, password, password hints, and information for authentication and account access.
- Demographic Data, including your age, gender, and country.
- Billing Data, including your payment instrument number (such as a credit or debit card number), expiration date, and security code as necessary to process your payments.
- Content, including content within any messages you send to us (such as feedback) or publicly post on the Service (such as in service reviews).

You may choose to voluntarily provide other information to us that we do not request, and, in such instances, you are solely responsible for such information.

#### B. Information Collected Automatically.

In addition, we automatically collect information when you use the Service. The categories of information we automatically collect and have collected in the last 12 months includes:

- Service Use Data, including data about features you use, pages you visit, emails and advertisements you view, services you view, the time of day you browse, and your referring and exiting pages.
- Device Data, including data about the type of device or browser you use, your device's operating software, your internet service provider, your device's regional and language settings, and device identifiers such as IP address and Ad Id.
- Location Data, including imprecise location data (such as location derived from an IP address or data that indicates a city or postal code level).

We use various current – and later – developed tracking technologies to automatically collect information when you use the Service, including the following:

- Log Files, which are files that record events that occur in connection with your use of the Service.
- Cookies, which are small data files stored on your device that act as a unique tag to identify your browser. We use two types of cookies: session cookies and persistent cookies. Session cookies make it easier for you to navigate our website and expire when you close your browser. Persistent cookies help with personalizing your experience, remembering your preferences, and supporting security features. Additionally, persistent cookies allow us to bring you advertising. Persistent cookies may remain on your device for extended periods of time, and generally may be controlled through your browser settings.

- Pixels (also known as web beacons), which is code embedded in a website, video, email, or advertisement that sends information about your use to a server. There are various types of pixels, including image pixels (which are small graphic images) and JavaScript pixels (which contains JavaScript code). When you access a website, video, email, or advertisement that contains a pixel, the pixel may permit us or a separate entity to drop or read cookies on your browser. Pixels are used in combination with cookies to track activity by a particular browser on a particular device. We may incorporate pixels from separate entities that allow us to track our conversions, bring you advertising, and provide you with additional functionality.

- Device Fingerprinting, which is the process of analyzing and combining sets of data elements from your device's browser, such as JavaScript objects and installed fonts, to create a "fingerprint" of your device and uniquely identify your browser and device.

- App Technologies, which are technologies included in our apps that are not browser-based like cookies and cannot be controlled by browser settings. For example, our apps may include SDKs, which is code that sends information about your use to a server. These SDKs allow us to track our conversions, bring you advertising, and provide you with additional functionality.

For further information on how we use tracking technologies for analytics and advertising, and your rights and choices regarding them, see the "Analytics and Advertising" and "Your Rights and Choices" sections below.

### C. Information from Other Sources.

We also collect information from other sources. The categories of sources we collect and have collected information from in the last 12 months include:

- Social networks with which you interact.
- Vendors and other parties involved in driving users to our Service.
- Publicly-available sources, including data in the public domain.
- Affiliates.

### 3. Use of Information.

We collect and use information for business and commercial purposes in accordance with the practices described in this Privacy Policy. Our business purposes for collecting and using information, including in the last 12 months, include to:

- Operate and manage our Service.
- Perform services requested by you, such as responding to your case assessment questionnaire and requests, and providing customer service.

- Send you technical notices, updates, security alerts, information regarding changes to our policies, and support and administrative messages.
- Prevent and address fraud, breach of policies or terms, and threats or harm.
- Monitor and analyse trends, usage, and activities.
- Conduct research, including focus groups and surveys.
- Improve the Service or other Vera websites, apps, marketing efforts, products and services.
- Develop and send you advertising, direct marketing, and communications, including about our and other entities' products, offers, promotions, rewards, events, and services.
- Fulfill 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. For information on your rights and choices regarding how we use information about you, please see the "Your Rights and Choices" section below.

#### 4. Sharing of Information.

We share information we collect in accordance with the practices described in this Privacy Policy. The types of entities to whom we share and have shared information with in the last 12 months, include the following:

- **Service Providers.** We share information with service providers that process information on our behalf for our business purposes. Service providers assist us with services such as payment processing, legal services, data analytics, marketing and advertising, website hosting, and technical support. We contractually prohibit our service providers from retaining, using, or disclosing information about you for any purpose other than performing the services for us, although we may permit them to 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.
- **Lawyers.** We share information with prospective lawyers we work with in order to determine whether we can provide you with legal assistance if so requested, and we also share information with lawyers we work with after we are formally retained in order to provide you with the legal assistance that has been mutually agreed upon in writing.
- **Vendors and Other Parties.** We share information with vendors and other parties for analytics and advertising purposes. These parties may act as our service providers, or in certain contexts, independently decide how to process your information. For more information on advertising and analytics, see the "Analytics and Advertising" section below.

- **Affiliates.** We share information with our related entities, including where they act as our service providers or for their own internal purposes.
- **Business Colleagues.** We share information with our non-attorney business colleagues in connection with offering co-branded services or engaging in joint marketing activities.
- **Merger or Acquisition.** We share information in connection with, or during negotiations of, any proposed or actual merger, purchase, sale or any other type of acquisition or business combination of all or any portion of our assets, or transfer of all or a portion of our business to another business.
- **Security and Compelled Disclosure.** We share information to comply with the law or other legal process, and where required, in response to lawful requests by public authorities, including to meet national security or law enforcement requirements. We also share information to protect the rights, property, life, health, security and safety of us, the Service or anyone else.
- **Facilitating Requests.** We share information at your request or direction.
- **Consent.** We share information with notice to you and your consent.

Notwithstanding the above, we may share information that does not identify you (including information that has been aggregated or de-identified) except as prohibited by applicable law. For information on your rights and choices regarding how we share information about you, please see the “Your Rights and Choices” section below.

## 5. Other Parties.

We offer parts of our Service through websites, platforms, and services operated or controlled by separate entities. In addition, we integrate technologies operated or controlled by separate entities into parts of our Service. Please note that when you interact with other entities, including when you leave our Service, those entities may independently collect information about you and solicit information from you. The information collected and stored by those entities remains subject to their own policies and practices, including what information they share with us, your rights and choices on their services and devices, and whether they store information in the U.S. or elsewhere. We encourage you to familiarize yourself with and consult their privacy policies and terms of use.

## 6. Analytics and Advertising.

We use analytics services, such as Google Analytics and others, to help us understand how users access and use the Service. In addition, we work with agencies, advertisers, ad networks, and other technology services to place ads about our products and services on other websites and services. For example, we place ads through Google and Facebook that you may view on their platforms as well as on other websites and services.

As part of this process, we incorporate tracking technologies into our own Service (including our website and emails) as well as into our ads displayed on other websites and services. Some of these tracking technologies track your activities across time and services for

purposes of associating the different devices you use, and delivering relevant ads and/or other content to you (“Interest-based Advertising”).

We also use audience matching services to reach people (or people similar to people) who have visited our Service or are identified in one or more of our databases (“Matched Ads”). This is done by us uploading a customer list to a technology service or incorporating a pixel from a technology service into our own Service, and the technology service matching common factors between our data and their data. For instance, we incorporate the Facebook pixel on our Service and may share your email address with Facebook as part of our use of Facebook Custom Audiences.

As indicated above, vendors and other parties may act as our service providers, or in certain contexts, independently decide how to process your information. We encourage you to familiarize yourself with and consult their privacy policies and terms of use.

For further information on the types of tracking technologies we use on the Service and your rights and choices regarding analytics, Interest-based Advertising, and Matched Ads, please see the “Information Collected Automatically” and “Your Rights and Choices” sections.

## 7. Your Rights and Choices.

### A. Account Information.

You may access, update, or remove certain information that you have provided to us through your account by sending an email to the email address set out in the “Contact Us” section below. We may require additional information from you to allow us to confirm your identity. Please note that we will retain and use information about you as necessary to comply with our legal obligations, resolve disputes, and enforce our agreements.

### B. Tracking Technology Choices.

**Cookies and Pixels.** Most browsers accept cookies by default. You can instruct your browser, by changing its settings, to decline or delete cookies. If you use multiple browsers on your device, you will need to instruct each browser separately. Your ability to limit cookies is subject to your browser settings and limitations.

**Do Not Track.** Your browser settings may allow you to automatically transmit a “Do Not Track” signal to online services you visit. Note, however, there is no industry consensus as to what site and app operators should do with regard to these signals. Accordingly, unless and until the law is interpreted to require us to do so, we do not monitor or take action with respect to “Do Not Track” signals. For more information on “Do Not Track,” visit <https://www.allaboutdnt.com>.

**Apps.** You can stop all collection of information via an app by uninstalling the app. You can also reset your device Ad Id at any time through your device settings, which is designed to allow you to limit the use of information collected about you.

Please be aware that if you disable or remove tracking technologies some parts of the Service may not function correctly.

### C. Analytics and Interest-Based Advertising.

Google provides tools to allow you to opt out of the use of certain information collected by Google Analytics at <https://tools.google.com/dlpage/gaoptout> and by Google Analytics for Display Advertising or the Google Display Network at <https://www.google.com/settings/ads/onweb>.

The companies we work with to provide you with targeted ads are required by us to give you the choice to opt out of receiving targeted ads. Most of these companies are participants of the Digital Advertising Alliance (“DAA”) and/or the Network Advertising Initiative (“NAI”). To learn more about the targeted ads provided by these companies, and how to opt out of receiving certain targeted ads from them, please visit: (i) for website targeted ads from DAA participants, <https://www.aboutads.info/choices>; (ii) for app targeted ads from DAA participants, <https://www.aboutads.info/appchoices>; and (iii) for targeted ads from NAI participants, <https://www.networkadvertising.org/choices>. Opting out only means that the selected participants should no longer deliver certain targeted ads to you, but does not mean you will no longer receive any targeted content and/or ads (e.g., in connection with the participants’ other customers or from other technology services).

To opt out of us using your data for Matched Ads, please contact us as set forth in the “Contact Us” section below and specify that you wish to opt out of Matched Ads. We will remove your data from any subsequent lists shared with third parties for Matched Ads. Alternatively, you may directly contact the applicable technology service to opt out.

Please note that if you opt out using any of these methods, the opt out will only apply to the specific browser or device from which you opt out. We are not responsible for the effectiveness of, or compliance with, any opt out options or programs, or the accuracy of any other entities’ statements regarding their opt out options or programs.

### D. Communications.

**Emails.** You can opt-out of receiving promotional emails from us at any time by following the instructions as provided in emails to click on the unsubscribe link, or emailing us at the email address set out in the “Contact Us” section below with the word UNSUBSCRIBE in the subject field of the email. Please note that you cannot opt-out of non-promotional emails, such as those about your account, transactions, servicing, or Vera’s ongoing business relations.

**Push Notifications.** If you have opted-in to receive push notification on your device, you can opt-out at any time by adjusting the permissions in your device or uninstalling our app.

Please note that your opt out is limited to the email address or device used and will not affect subsequent subscriptions.

### 8. Children.

The Service is intended for a general audience, and is not directed at children under 18 years of age. We do not knowingly collect personal information (as defined by the U.S. Children’s Privacy Protection Act, or “COPPA”). If you are a parent or guardian and you

believe we have collected information from your child in a manner not permitted by law, contact us at vera@veralegal.uk. We will remove the data to the extent required by applicable laws. We do not knowingly “sell,” as that term is defined under the CCPA, the personal information of minors who are California residents.

#### 9. Data Security.

We implement and maintain reasonable administrative, physical, and technical security safeguards to help protect information about you from loss, theft, misuse and unauthorized access, disclosure, alteration and destruction. Nevertheless, transmission via the internet is not completely secure and we cannot guarantee the security of information about you.

#### 10. International Transfer.

We are based in the U.K. and the information we collect is governed by U.K. law. If you are accessing the Service from outside of the U.K., please be aware that information collected through the Service may be transferred to, processed, stored, and used in the U.K. and other jurisdictions. Data protection laws in the U.K. and other jurisdictions may be different from those of your country of residence. Your use of the Service or provision of any information therefore constitutes your consent to the transfer to and from, processing, usage, sharing, and storage of information about you in the U.K. and other jurisdictions as set out in this Privacy Policy.

#### 11. Changes to this Privacy Policy.

We reserve the right to revise and reissue this Privacy Policy at any time. Any changes will be effective immediately upon posting of the revised Privacy Policy. Your continued use of our Service indicates your consent to the Privacy Policy then posted. If the changes are material, we may provide you additional notice to your email address.

#### 12. Contact Us.

If you have any questions or comments about this Privacy Policy, our data practices, or our compliance with applicable law, please contact us:

By email:

vera@veralegal.uk

By mail:

Launch Lab, Franklin Building, 124 Goswell Rd., London EC1V 7DP

This Privacy Policy has been designed to be accessible to people with disabilities. If you experience any difficulties accessing the information here, please contact us at the contact form at the bottom of the Vera page.

#### 13. Not used

#### 14. Not used



#### A. Notice of Collection.

In the past 12 months, we have collected the following categories of personal information listed in the CCPA:

- Identifiers, including name, email address, phone number, account name, IP address, and an ID or number assigned to your case or case assessment conducted on our Service.
- Customer records, billing and shipping address, and credit or debit card information.
- Demographics, such as your age or gender.
- Commercial information, including purchases and engagement with the Service.
- Internet activity, including your interactions with our Service.
- Audio or visual data, including pictures or videos you post on our Service.
- Geolocation.
- Inferences, including information about your interests, preferences and favorites.

For more information about what information we collect, including the sources we receive information from, review the “Information Collection” section. We collect and use these categories of personal information for the business purposes described in the “Use of Information” section, including to provide and manage our Service.

Vera does not generally sell information as the term “sell” is traditionally understood. However, to the extent “sale” under the CCPA is interpreted to include advertising technology activities such as those disclosed in the “Analytics and Advertising” section as a “sale,” we will comply with applicable law as to such activity. Vera discloses the following categories of personal information for commercial purposes: identifiers, demographic information, commercial information, internet activity, and inferences. We use and partner with different types of entities to assist with our daily operations and manage our Service. Please review the “Sharing of Information” section for more detail about the parties we have shared information with.

#### B. Not used.

#### C. Right to Opt Out.

To the extent Vera sells your personal information as the term “sell” is defined under the CCPA, you have the right to opt-out of the sale of your personal information by us to third parties at any time. You may submit a request to opt-out through our online form available at <https://www.themarbleway.com/do-not-sell-my-info> or by emailing us at [vera@veralegal.uk](mailto:vera@veralegal.uk) and specifying you wish to opt-out of the sale your personal information.

#### D. Authorized Agent.

You can designate an authorized agent to submit requests on your behalf. However, we will require written proof of the agent's permission to do so and verify your identity directly.

E. Right to Non-Discrimination.

You have the right not to receive discriminatory treatment by us for the exercise of any of your rights.

F. Not used