

# Privacy Policy of Blue Ocean Law Group

Blue Ocean Law Group collects some Personal Data from its Users.

## Owner and Data Controller

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## Types of Data collected

Among the types of Personal Data that Blue Ocean Law Group collects, by itself or through third parties, there are: first name; last name; phone number; company name; profession; physical address; fax number; country; state; email address; ZIP/Postal code; various types of Data; city; field of activity; website; Trackers; Usage Data; answers to questions; clicks; keypress events; motion sensor events; mouse movements; scroll position; touch events; Data communicated while using the service; payment info; billing address; user content; contents of the email or message; profile picture; date of the message; time the message was sent; sender of the message.

Complete details on each type of Personal Data collected are provided in the dedicated sections of this privacy policy or by specific explanation texts displayed prior to the Data collection.

Personal Data may be freely provided by the User, or, in case of Usage Data, collected automatically when using Blue Ocean Law Group.

Unless specified otherwise, all Data requested by Blue Ocean Law Group is mandatory and failure to provide this Data may make it impossible for Blue Ocean Law Group to provide its services. In cases where Blue Ocean Law Group specifically states that some Data is not mandatory, Users are free not to communicate this Data without consequences to the availability or the functioning of the Service.

Users who are uncertain about which Personal Data is mandatory are welcome to contact the Owner.

Any use of Cookies – or of other tracking tools — by Blue Ocean Law Group or by the owners of third-party services used by Blue Ocean Law Group serves the purpose of providing the Service required by the User, in addition to any other purposes described in the present document and in the Cookie Policy.

Users are responsible for any third-party Personal Data obtained, published or shared through Blue Ocean Law Group.

## Mode and place of processing the Data

### Methods of processing

The Owner takes appropriate security measures to prevent unauthorized access, disclosure, modification, or unauthorized destruction of the Data.

The Data processing is carried out using computers and/or IT enabled tools, following organizational procedures and modes strictly related to the purposes indicated. In addition to the Owner, in some cases, the Data may be accessible to certain types of persons in charge, involved with the operation of Blue Ocean Law Group (administration, sales, marketing, legal, system administration) or external parties (such as third-party technical service providers, mail carriers, hosting providers, IT companies, communications agencies) appointed, if necessary, as Data Processors by the Owner. The updated list of these parties may be requested from the Owner at any time.

### Place

The Data is processed at the Owner's operating offices and in any other places where the parties involved in the processing are located.

Depending on the User's location, data transfers may involve transferring the User's Data to a country other than their own. To find out more about the place of processing of such transferred Data, Users can check the section containing details about the processing of Personal Data.

### Retention time

Unless specified otherwise in this document, Personal Data shall be processed and stored for as long as required by the purpose they have been collected for and may be retained for longer due to applicable legal obligation or based on the Users' consent.

## The purposes of processing

The Data concerning the User is collected to allow the Owner to provide its Service, comply with its legal obligations, respond to enforcement requests, protect its rights and interests (or those of its Users or third parties), detect any malicious or fraudulent activity, as well as the following: Contacting the User, User database management, Spam and bots protection, Content performance and features testing (A/B testing), Displaying content from external platforms, Handling payments, Managing contacts and sending messages, Interaction with external social networks and platforms, Operations, Selling goods and services online, Platform services and hosting, Tag Management, Traffic optimization and distribution, Hosting and backend infrastructure, Registration and authentication, Content commenting, Handling activities related to productivity, Infrastructure monitoring, Collection of privacy-related preferences, Analytics and Interaction with live chat platforms.

For specific information about the Personal Data used for each purpose, the User may refer to the section "Detailed information on the processing of Personal Data".

## Detailed information on the processing of Personal Data

Personal Data is collected for the following purposes and using the following services:

### Analytics

The services contained in this section enable the Owner to monitor and analyze web traffic and can be used to keep track of User behavior.

#### Google Analytics (Universal Analytics) with anonymized IP (Google LLC)

Google Analytics (Universal Analytics) is a web analysis service provided by Google LLC ("Google"). Google utilizes the Data collected to track and examine the use of Blue Ocean Law Group, to prepare reports on its activities and share them with other Google services.

Google may use the Data collected to contextualize and personalize the ads of its own advertising network.

This integration of Google Analytics anonymizes your IP address. It works by shortening Users' IP addresses within member states of the European Union or in other contracting states to the Agreement on the European Economic Area. Only in exceptional cases will the complete IP address be sent to a Google server and shortened within the US.

In order to understand Google's use of Data, consult [Google's partner policy](#).

Personal Data processed: Trackers; Usage Data.

Legal basis for processing: Consent.

Place of processing: United States – [Privacy Policy](#) – [Opt Out](#).

Category of Personal Information collected according to the CCPA: internet or other electronic network activity information.

### Collection of privacy-related preferences

This type of service allows Blue Ocean Law Group to collect and store Users' preferences related to the collection, use, and processing of their personal information, as requested by the applicable privacy legislation.

#### Finsweet Cookie Consent

Our Privacy Preference Center is provided via the Finsweet Cookie Consent Solution and delivered to our website via the Content Delivery Network (CDN) JSDELIVR.

JSDELIVR is a free Content Delivery Network (CDN) for Open Source located in Poland (within the EU therefore its operations are subject to the GDPR) designed, developed and maintained by Prospect One and Dmiytu Akutov.

CDN's are used to enable faster website load times globally.

Fast, reliable, and automated.

Around since 2012.

Serving ~ 177 billion requests/month.

You can read their Privacy Policy here:

### **iubenda Consent Database (iubenda srl)**

The iubenda Consent Database allows to store and retrieve records of Users' consent to the processing of Personal Data, and information and preferences expressed in relation to the provided consent.

In order to do so, it makes use of a Tracker that temporarily stores pending information on the User's device until it is processed by the API. The Tracker (a browser feature called localStorage) is at that point deleted.

Personal Data processed: Data communicated while using the service; Trackers.

Place of processing: Italy – [Privacy Policy](#).

Category of Personal Information collected according to the CCPA: internet or other electronic network activity information.

## **Contacting the User**

### **Contact form (Blue Ocean Law Group)**

By filling in the contact form with their Data, the User authorizes Blue Ocean Law Group to use these details to reply to requests for information, quotes or any other kind of request as indicated by the form's header.

Personal Data processed: city; company name; country; email address; fax number; field of activity; first name; last name; phone number; physical address; profession; state; various types of Data; website; ZIP/Postal code.

Category of Personal Information collected according to the CCPA: identifiers; commercial information; internet or other electronic network activity information; employment related information.

### **Mailing list or newsletter (Blue Ocean Law Group)**

By registering on the mailing list or for the newsletter, the User's email address will be added to the contact list of those who may receive email messages containing information of commercial or promotional nature concerning Blue Ocean Law Group. Your email address might also be added to this list as a result of signing up to Blue Ocean Law Group or after making a purchase.

Personal Data processed: email address; first name.

Category of Personal Information collected according to the CCPA: identifiers.

This processing constitutes:

- a Sale in Virginia, Colorado, Connecticut, Utah, Texas, Oregon and Montana

### **Phone contact (Blue Ocean Law Group)**

Users that provided their phone number might be contacted for commercial or promotional purposes related to Blue Ocean Law Group, as well as for fulfilling support requests.

Personal Data processed: phone number.

Category of Personal Information collected according to the CCPA: identifiers.

## **Content commenting**

Content commenting services allow Users to make and publish their comments on the contents of Blue Ocean Law Group. Depending on the settings chosen by the Owner, Users may also leave anonymous comments. If there is an email address among the Personal Data provided by the User, it may be used to send notifications of comments on the same content. Users are responsible for the content of their own comments.

If a content commenting service provided by third parties is installed, it may still collect web traffic data for the pages where the comment service is installed, even when Users do not use the content commenting service.

### **Blog Comments**

Users may add comments to blog posts (subject to moderator approval).

Legal basis for processing: Consent.

## **Content performance and features testing (A/B testing)**

The services contained in this section allow the Owner to track and analyze the User response concerning web traffic or behavior regarding changes to the structure, text or any other component of Blue Ocean Law Group.

### **Optimizely (Optimizely, Inc.)**

Optimizely is an A/B testing service provided by Optimizely, Inc.

Personal Data processed: Trackers; Usage Data.

Place of processing: United States – [Privacy Policy](#).

Category of Personal Information collected according to the CCPA: internet or other electronic network activity information.

## **Displaying content from external platforms**

This type of service allows you to view content hosted on external platforms directly from the pages of Blue Ocean Law Group and interact with them.

This type of service might still collect web traffic data for the pages where the service is installed, even when Users do not use it.

### **YouTube video widget (Google LLC)**

YouTube is a video content visualization service provided by Google LLC that allows Blue Ocean Law Group to incorporate content of this kind on its pages.

Personal Data processed: Trackers; Usage Data.

Place of processing: United States – [Privacy Policy](#).

Category of Personal Information collected according to the CCPA: internet or other electronic network activity information.

## **Handling activities related to productivity**

This type of service helps the Owner to manage tasks, collaboration and, in general, activities related to productivity. In using this type of service, Data of Users will be processed and may be retained, depending on the purpose of the activity in question. These services may be integrated with a wide range of third-party services disclosed within this privacy policy to enable the Owner to import or export Data needed for the relative activity.

### **Jetboost (San Diego CA, USA)**

Your No-Code Webflow Sidekick

On-page real-time search, dynamic filtering, and more for Webflow — without writing code

Used to enhance the user experience by enabling enhanced website search and filtering capabilities.

Your customers expect to be able to search your content. You've tried the native Webflow search, but you want to search a single CMS list, not your entire site.

So, what if you could search items directly on your page, in real-time as you type?

Jetboost makes this possible, with instant, on-page search. It even works with paginated lists.

Jetboost Privacy Policy can be found here:

<https://app.jetboost.io/privacy>

## **Handling payments**

Unless otherwise specified, Blue Ocean Law Group processes any payments by credit card, bank transfer or other means via external payment service providers. In general and unless where otherwise stated, Users are requested to provide their payment details and personal information directly to such payment service providers. Blue Ocean Law Group isn't involved in the collection and processing of such information: instead, it will only receive a notification by the relevant payment service provider as to whether payment has been successfully completed.

### **PayPal (PayPal Inc.)**

PayPal is a payment service provided by PayPal Inc., which allows Users to make online payments.

Personal Data processed: various types of Data as specified in the privacy policy of the service.

Place of processing: See the PayPal privacy policy – [Privacy Policy](#).

Category of Personal Information collected according to the CCPA: identifiers.

This processing constitutes:

- a Sale in Virginia, Colorado, Connecticut, Utah, Texas, Oregon and Montana

### **Stripe (Stripe, Inc.)**

Stripe is a payment service provided by Stripe, Inc.

Personal Data processed: billing address; first name; last name; payment info; various types of Data as specified in the privacy policy of the service.

Place of processing: United States – [Privacy Policy](#).

Category of Personal Information collected according to the CCPA: identifiers; commercial information.

## **Hosting and backend infrastructure**

This type of service has the purpose of hosting Data and files that enable Blue Ocean Law Group to run and be distributed as well as to provide a ready-made infrastructure to run specific features or parts of Blue Ocean Law Group.

Some services among those listed below, if any, may work through geographically distributed servers, making it difficult to determine the actual location where the Personal Data are stored.

### **Digital Safe Custody Vault (SOC 2 Type II Compliance)**

Sign-Up to provide ongoing access to the Client's Digital Safe Custody Vault (provided as a white-labeled service). SOC 2 Type II Compliance Attestation by Chartered Accountant.

### **Amazon Web Services (AWS) (Amazon Web Services, Inc.)**

Amazon Web Services (AWS) is a hosting and backend service provided by Amazon Web Services, Inc.

Personal Data processed: various types of Data as specified in the privacy policy of the service.

Place of processing: Australia – [Privacy Policy](#).

Category of Personal Information collected according to the CCPA: identifiers.

## **Infrastructure monitoring**

This type of service allows Blue Ocean Law Group to monitor the use and behavior of its components so its performance, operation, maintenance and troubleshooting can be improved.

Which Personal Data are processed depends on the characteristics and mode of implementation of these services, whose function is to filter the activities of Blue Ocean Law Group.

### **Bugsnag (Bugsnag Inc.)**

Bugsnag is a monitoring service provided by Bugsnag Inc.

Personal Data processed: Trackers.

Place of processing: United States – [Privacy Policy](#).

Category of Personal Information collected according to the CCPA: internet or other electronic network activity information.

## **Interaction with external social networks and platforms**

This type of service allows interaction with social networks or other external platforms directly from the pages of Blue Ocean Law Group.

The interaction and information obtained through Blue Ocean Law Group are always subject to the User's privacy settings for each social network.

This type of service might still collect traffic data for the pages where the service is installed, even when Users do not use it. It is recommended to log out from the respective services in order to make sure that the processed data on Blue Ocean Law Group isn't being connected back to the User's profile.

### **Twitter Tweet button and social widgets (X Corp.)**

The Twitter Tweet button and social widgets are services allowing interaction with the Twitter social network provided by X Corp.

Personal Data processed: Trackers; Usage Data.

Place of processing: United States – [Privacy Policy](#).

Category of Personal Information collected according to the CCPA: internet or other electronic network activity information.

### **Interaction with live chat platforms**

This type of service allows Users to interact with third-party live chat platforms directly from the pages of Blue Ocean Law Group, in order to contact and be contacted by Blue Ocean Law Group's support service.

If one of these services is installed, it may collect browsing and Usage Data in the pages where it is installed, even if the Users do not actively use the service. Moreover, live chat conversations may be logged.

### **WhatsApp Business Chat widget (Meta Platforms, Inc.)**

WhatsApp Business Chat widget is a service for interacting with the WhatsApp instant messaging app and platform provided by Meta Platforms, Inc.

Personal Data processed: answers to questions; contents of the email or message; Data communicated while using the service; date of the message; first name; last name; phone number; profile picture; sender of the message; time the message was sent; user content.

Place of processing: United States – [Privacy Policy](#).

Category of Personal Information collected according to the CCPA: identifiers; internet or other electronic network activity information; audio, electronic, visual, thermal, olfactory, or similar information; inferences drawn from other personal information.

### **Managing contacts and sending messages**

This type of service makes it possible to manage a database of email contacts, phone contacts or any other contact information to communicate with the User.

These services may also collect data concerning the date and time when the message was viewed by the User, as well as when the User interacted with it, such as by clicking on links included in the message.

### **BulkSMS (Blue Ocean Law Group)**

BulkSMS is a phone numbers management and communication service provided by

- Celerity Europe AG;
- Celerity Systems Ltd;
- Celerity Messaging Ltd.

Personal Data processed: phone number.

Legal basis for processing: Consent.

Place of processing: various places depending on the company that provides the service – [Privacy Policy](#).

Category of Personal Information collected according to the CCPA: identifiers.

### **Mailchimp (Intuit Inc.)**

Mailchimp is an email address management and message sending service provided by Intuit Inc.

Personal Data processed: email address; first name.

Place of processing: United States – [Privacy Policy](#).

Category of Personal Information collected according to the CCPA: identifiers.

This processing constitutes:

- a Sale in Virginia, Colorado, Connecticut, Utah, Texas, Oregon and Montana

## **Operations**

### **Cloud-based Legal Practice Management System (AU & USA)**

All data transmitted to our Cloud-based Legal Practice Management System is encrypted using SSL. Data is encrypted at rest in both database and document-level storage.

Legal basis for processing: Consent.

Legal basis for data transfer: No data transfer.

Data retention period: 7 years.

### **Document Storage Systems (Australia & US) with ISO/IEC 27001 Certification**

Due to our CyberSecurity protocols, we can only divulge that we use secure Document Storage Systems. When these systems are used the documents are stored on servers in Australia and the US. ISO/IEC 27001 Certification is the world's best-known standard for information security management systems (ISMS) and their requirements.

Legal basis for processing: Consent.

Data retention period: 7 years.

## **Platform services and hosting**

These services have the purpose of hosting and running key components of Blue Ocean Law Group, therefore allowing the provision of Blue Ocean Law Group from within a unified platform. Such platforms provide a wide range of tools to the Owner – e.g. analytics, user registration, commenting, database management, e-commerce, payment processing – that imply the collection and handling of Personal Data.

Some of these services work through geographically distributed servers, making it difficult to determine the actual location where the Personal Data are stored.

### **Webflow (Webflow, Inc.)**

Webflow is a platform provided by Webflow, Inc. that allows the Owner to build, run and host Blue Ocean Law Group. Webflow is highly customizable and can host websites from simple blogs to complex e-commerce platforms.

Personal Data processed: Trackers; Usage Data; various types of Data as specified in the privacy policy of the service.

Legal basis for processing: Consent.

Place of processing: United States – [Privacy Policy](#) – [Opt out](#).

Category of Personal Information collected according to the CCPA: identifiers; internet or other electronic network activity information.

## **Registration and authentication**

By registering or authenticating, Users allow Blue Ocean Law Group to identify them and give them access to dedicated services. Depending on what is described below, third parties may provide registration and authentication services. In this case, Blue Ocean Law Group will be able to access some Data, stored by these third-party services, for registration or identification purposes.

Some of the services listed below may also collect Personal Data for targeting and profiling purposes; to find out more, please refer to the description of each service.

### **Trax Print**

Protection For Documents And Identification Both Digital And Printed, using a unique closed-loop technology. We also have the option to GPS-lock PDF documents so they can only be accessed by an authorized person at the GPS location specified.

Legal basis for processing: Consent.

## **Selling goods and services online**

This type of service helps the Owner to sell goods, provide services or monetize online content. To this end, the services listed below may for instance allow the Owner to process payments, set up subscription models, track orders, and manage deliveries.

### **Chargebee (Chargebee Inc.)**

Chargebee is a subscription management tool provided by Chargebee Inc, which allows the Owner to manage subscriptions, invoicing, pricing models, and subscription and revenue analytics.

Personal Data processed: Data communicated while using the service; Trackers; Usage Data.

Place of processing: United States – [Privacy Policy](#).

Category of Personal Information collected according to the CCPA: internet or other electronic network activity information.

## **Selling goods and services online**

White labelled LegalTech provider (Fluent Docs) of High-Quality Australian Legal Documents and Legal Document Automation Software.

Legal basis for processing: Consent.

## **Spam and bots protection**

This type of service analyzes the traffic of Blue Ocean Law Group, potentially containing Users' Personal Data, with the purpose of filtering it from unwanted parts of traffic, messages and content that are recognized as spam or protecting it from malicious bots activities.

### **Google reCAPTCHA (Google LLC)**

Google reCAPTCHA is a SPAM protection service provided by Google LLC.  
The use of reCAPTCHA is subject to the Google [privacy policy](#) and [terms of use](#).

In order to understand Google's use of Data, consult [Google's partner policy](#).

Personal Data processed: answers to questions; clicks; keypress events; motion sensor events; mouse movements; scroll position; touch events; Trackers; Usage Data.

Place of processing: United States – [Privacy Policy](#).

Category of Personal Information collected according to the CCPA: internet or other electronic network activity information; inferences drawn from other personal information.

## **Tag Management**

This type of service helps the Owner to manage the tags or scripts needed on Blue Ocean Law Group in a centralized fashion. This results in the Users' Data flowing through these services, potentially resulting in the retention of this Data.

### **Google Tag Manager (Google LLC)**

Google Tag Manager is a tag management service provided by Google LLC.

Personal Data processed: Trackers; Usage Data.

Place of processing: United States – [Privacy Policy](#).

Category of Personal Information collected according to the CCPA: internet or other electronic network activity information.

## **Traffic optimization and distribution**

This type of service allows Blue Ocean Law Group to distribute their content using servers located across different countries and to optimize their performance.

Which Personal Data are processed depends on the characteristics and the way these services are implemented. Their function is to filter communications between Blue Ocean Law Group and the User's browser.



Considering the widespread distribution of this system, it is difficult to determine the locations to which the contents that may contain Personal Information of the User are transferred.

### **Cloudflare (Cloudflare, Inc.)**

Cloudflare is a traffic optimization and distribution service provided by Cloudflare Inc.

The way Cloudflare is integrated means that it filters all the traffic through Blue Ocean Law Group, i.e., communication between Blue Ocean Law Group and the User's browser, while also allowing analytical data from Blue Ocean Law Group to be collected.

Personal Data processed: Trackers.

Legal basis for processing: Consent.

Place of processing: United States – [Privacy Policy](#).

Category of Personal Information collected according to the CCPA: internet or other electronic network activity information.

### **Amazon Cloudfront**

Amazon Cloudfront is a Global Content Delivery Network (CDN) used to securely deliver content with low latency and high transfer speeds.

Reach viewers across the globe in milliseconds with built-in data compression, edge compute capabilities, and field-level encryption.

You can learn more here:

<https://aws.amazon.com/cloudfront/>

You can find the Cloudfront Privacy Policy here:

[https://aws.amazon.com/privacy/?nc1=f\\_pr](https://aws.amazon.com/privacy/?nc1=f_pr)

### **User database management**

This type of service allows the Owner to build user profiles by starting from an email address, a personal name, or other information that the User provides to Blue Ocean Law Group, as well as to track User activities through analytics features. This Personal Data may also be matched with publicly available information about the User (such as social networks' profiles) and used to build private profiles that the Owner can display and use for improving Blue Ocean Law Group. Some of these services may also enable the sending of timed messages to the User, such as emails based on specific actions performed on Blue Ocean Law Group.

### **HubSpot CRM (HubSpot, Inc.)**

HubSpot CRM is a User database management service provided by HubSpot, Inc.

Personal Data processed: email address; phone number; Trackers; various types of Data as specified in the privacy policy of the service.

Place of processing: United States – [Privacy Policy](#).

Category of Personal Information collected according to the CCPA: identifiers; internet or other electronic network activity information.

## **Information on opting out of interest-based advertising**

In addition to any opt-out feature provided by any of the services listed in this document, Users may learn more on how to generally opt out of interest-based advertising within the dedicated section of the Cookie Policy.

## **Further information about the processing of Personal Data**

### **End-to-End Encrypted Email**

Email Security and Compliance Standards are 100% compliant with HIPAA/HITECH, PII, GDPR, FSA, FINRA, FERPA, CCPA.

Award-winning email security platform.

## The Service is not directed to children under the age of 13

Users declare themselves to be adult according to their applicable legislation. Minors may use Blue Ocean Law Group only with the assistance of a parent or guardian. Under no circumstance persons under the age of 13 may use Blue Ocean Law Group.

## Cookie Policy

Blue Ocean Law Group uses Trackers. To learn more, Users may consult the [Cookie Policy](#).

## Further Information for Users

### Legal basis of processing

The Owner may process Personal Data relating to Users if one of the following applies:

- Users have given their consent for one or more specific purposes.
- provision of Data is necessary for the performance of an agreement with the User and/or for any pre-contractual obligations thereof;
- processing is necessary for compliance with a legal obligation to which the Owner is subject;
- processing is related to a task that is carried out in the public interest or in the exercise of official authority vested in the Owner;
- processing is necessary for the purposes of the legitimate interests pursued by the Owner or by a third party.

In any case, the Owner will gladly help to clarify the specific legal basis that applies to the processing, and in particular whether the provision of Personal Data is a statutory or contractual requirement, or a requirement necessary to enter into a contract.

### Further information about retention time

Unless specified otherwise in this document, Personal Data shall be processed and stored for as long as required by the purpose they have been collected for and may be retained for longer due to applicable legal obligation or based on the Users' consent.

Therefore:

- Personal Data collected for purposes related to the performance of a contract between the Owner and the User shall be retained until such contract has been fully performed.
- Personal Data collected for the purposes of the Owner's legitimate interests shall be retained as long as needed to fulfill such purposes. Users may find specific information regarding the legitimate interests pursued by the Owner within the relevant sections of this document or by contacting the Owner.

The Owner may be allowed to retain Personal Data for a longer period whenever the User has given consent to such processing, as long as such consent is not withdrawn. Furthermore, the Owner may be obliged to retain Personal Data for a longer period whenever required to fulfil a legal obligation or upon order of an authority.

Once the retention period expires, Personal Data shall be deleted. Therefore, the right of access, the right to erasure, the right to rectification and the right to data portability cannot be enforced after expiration of the retention period.

## The rights of Users based on the General Data Protection Regulation (GDPR)

Users may exercise certain rights regarding their Data processed by the Owner.

In particular, Users have the right to do the following, to the extent permitted by law:

- **Withdraw their consent at any time.** Users have the right to withdraw consent where they have previously given their consent to the processing of their Personal Data.
- **Object to processing of their Data.** Users have the right to object to the processing of their Data if the processing is carried out on a legal basis other than consent.
- **Access their Data.** Users have the right to learn if Data is being processed by the Owner, obtain disclosure regarding certain aspects of the processing and obtain a copy of the Data undergoing processing.
- **Verify and seek rectification.** Users have the right to verify the accuracy of their Data and ask for it to be updated or corrected.
- **Restrict the processing of their Data.** Users have the right to restrict the processing of their Data. In this case, the Owner will not process their Data for any purpose other than storing it.
- **Have their Personal Data deleted or otherwise removed.** Users have the right to obtain the erasure of their Data from the Owner.
- **Receive their Data and have it transferred to another controller.** Users have the right to receive their Data in a structured, commonly used and machine readable format and, if technically feasible, to have it transmitted to another

controller without any hindrance.

- **Lodge a complaint.** Users have the right to bring a claim before their competent data protection authority.

Users are also entitled to learn about the legal basis for Data transfers abroad including to any international organization governed by public international law or set up by two or more countries, such as the UN, and about the security measures taken by the Owner to safeguard their Data.

### **Details about the right to object to processing**

**Where Personal Data is processed for a public interest, in the exercise of an official authority vested in the Owner or for the purposes of the legitimate interests pursued by the Owner, Users may object to such processing by providing a ground related to their particular situation to justify the objection.**

**Users must know that, however, should their Personal Data be processed for direct marketing purposes, they can object to that processing at any time, free of charge and without providing any justification. Where the User objects to processing for direct marketing purposes, the Personal Data will no longer be processed for such purposes. To learn whether the Owner is processing Personal Data for direct marketing purposes, Users may refer to the relevant sections of this document.**

### **How to exercise these rights**

Any requests to exercise User rights can be directed to the Owner through the contact details provided in this document. Such requests are free of charge and will be answered by the Owner as early as possible and always within one month, providing Users with the information required by law. Any rectification or erasure of Personal Data or restriction of processing will be communicated by the Owner to each recipient, if any, to whom the Personal Data has been disclosed unless this proves impossible or involves disproportionate effort. At the Users' request, the Owner will inform them about those recipients.

## **Further information for Users in Brazil**

This section of the document integrates with and supplements the information contained in the rest of the privacy policy and is provided by the entity running Blue Ocean Law Group and, if the case may be, its parent, subsidiaries and affiliates (for the purposes of this section referred to collectively as “we”, “us”, “our”).

This section applies to all Users in Brazil (Users are referred to below, simply as “you”, “your”, “yours”), according to the “Lei Geral de Proteção de Dados” (the “LGPD”), and for such Users, it supersedes any other possibly divergent or conflicting information contained in the privacy policy.

This part of the document uses the term “personal information” as it is defined in the **LGPD**.

### **The grounds on which we process your personal information**

We can process your personal information solely if we have a legal basis for such processing. Legal bases are as follows:

- your consent to the relevant processing activities;
- compliance with a legal or regulatory obligation that lies with us;
- the carrying out of public policies provided in laws or regulations or based on contracts, agreements and similar legal instruments;
- studies conducted by research entities, preferably carried out on anonymized personal information;
- the carrying out of a contract and its preliminary procedures, in cases where you are a party to said contract;
- the exercising of our rights in judicial, administrative or arbitration procedures;
- protection or physical safety of yourself or a third party;
- the protection of health – in procedures carried out by health entities or professionals;
- our legitimate interests, provided that your fundamental rights and liberties do not prevail over such interests; and
- credit protection.

To find out more about the legal bases, you can contact us at any time using the contact details provided in this document.

### **Categories of personal information processed**

To find out what categories of your personal information are processed, you can read the section titled “Detailed information on the processing of Personal Data” within this document.

### **Why we process your personal information**

To find out why we process your personal information, you can read the sections titled “Detailed information on the processing of Personal Data” and “The purposes of processing” within this document.

### **Your Brazilian privacy rights, how to file a request and our response to your requests**

## Your Brazilian privacy rights

You have the right to:

- obtain confirmation of the existence of processing activities on your personal information;
- access to your personal information;
- have incomplete, inaccurate or outdated personal information rectified;
- obtain the anonymization, blocking or elimination of your unnecessary or excessive personal information, or of information that is not being processed in compliance with the LGPD;
- obtain information on the possibility to provide or deny your consent and the consequences thereof;
- obtain information about the third parties with whom we share your personal information;
- obtain, upon your express request, the portability of your personal information (except for anonymized information) to another service or product provider, provided that our commercial and industrial secrets are safeguarded;
- obtain the deletion of your personal information being processed if the processing was based upon your consent, unless one or more exceptions provided for in art. 16 of the LGPD apply;
- revoke your consent at any time;
- lodge a complaint related to your personal information with the ANPD (the National Data Protection Authority) or with consumer protection bodies;
- oppose a processing activity in cases where the processing is not carried out in compliance with the provisions of the law;
- request clear and adequate information regarding the criteria and procedures used for an automated decision; and
- request the review of decisions made solely on the basis of the automated processing of your personal information, which affect your interests. These include decisions to define your personal, professional, consumer and credit profile, or aspects of your personality.

You will never be discriminated against, or otherwise suffer any sort of detriment, if you exercise your rights.

### How to file your request

You can file your express request to exercise your rights free from any charge, at any time, by using the contact details provided in this document, or via your legal representative.

### How and when we will respond to your request

We will strive to promptly respond to your requests.

In any case, should it be impossible for us to do so, we'll make sure to communicate to you the factual or legal reasons that prevent us from immediately, or otherwise ever, complying with your requests. In cases where we are not processing your personal information, we will indicate to you the physical or legal person to whom you should address your requests, if we are in the position to do so.

In the event that you file an **access** or personal information **processing confirmation** request, please make sure that you specify whether you'd like your personal information to be delivered in electronic or printed form.

You will also need to let us know whether you want us to answer your request immediately, in which case we will answer in a simplified fashion, or if you need a complete disclosure instead.

In the latter case, we'll respond within 15 days from the time of your request, providing you with all the information on the origin of your personal information, confirmation on whether or not records exist, any criteria used for the processing and the purposes of the processing, while safeguarding our commercial and industrial secrets.

In the event that you file a **rectification, deletion, anonymization or personal information blocking** request, we will make sure to immediately communicate your request to other parties with whom we have shared your personal information in order to enable such third parties to also comply with your request — except in cases where such communication is proven impossible or involves disproportionate effort on our side.

### Transfer of personal information outside of Brazil permitted by the law

We are allowed to transfer your personal information outside of the Brazilian territory in the following cases:

- when the transfer is necessary for international legal cooperation between public intelligence, investigation and prosecution bodies, according to the legal means provided by the international law;
- when the transfer is necessary to protect your life or physical security or those of a third party;
- when the transfer is authorized by the ANPD;
- when the transfer results from a commitment undertaken in an international cooperation agreement;
- when the transfer is necessary for the execution of a public policy or legal attribution of public service;
- when the transfer is necessary for compliance with a legal or regulatory obligation, the carrying out of a contract or preliminary procedures related to a contract, or the regular exercise of rights in judicial, administrative or arbitration procedures.

## Further information for Users in the United States

This part of the document integrates with and supplements the information contained in the rest of the privacy policy and is provided by the business running Blue Ocean Law Group and, if the case may be, its parent, subsidiaries and affiliates (for the purposes of this section referred to collectively as “we”, “us”, “our”).

The information contained in this section applies to all Users (Users are referred to below, simply as “you”, “your”, “yours”), who are residents in the following states: California, Virginia, Colorado, Connecticut, Utah, Texas, Oregon and Montana.

For such Users, this information supersedes any other possibly divergent or conflicting provisions contained in the privacy policy.

This part of the document uses the term Personal Information (and Sensitive Personal Information).

## Notice at collection

The following Notice at collection provides you with timely notice about the **categories of Personal Information collected or disclosed in the past 12 months** so that you can exercise meaningful control over our use of that Information.

*While such categorization of Personal Information is mainly based on California privacy laws, it can also be helpful for anyone who is not a California resident to get a general idea of what types of Personal Information are collected.*

### • Identifiers

**Personal Information collected or disclosed:** First name, Last name, Phone number, Company name, Profession, Physical address, Fax number, Country, State, Email address, Zip/postal code, Various types of data, City, Field of activity, Website, Various types of data as specified in the privacy policy of the service, Trackers, Usage data, Billing address, Data communicated while using the service, Answers to questions, User content, Profile picture, Date of the message, Time the message was sent, Sender of the message

**Sensitive Personal Information collected or disclosed** ⓘ: payment info, contents of the email or message

#### Purposes:

- Contacting the User
- User database management
- Handling payments
- Managing contacts and sending messages
- Further information about Personal Data
- Platform services and hosting
- Interaction with live chat platforms
- Hosting and backend infrastructure

**Retention period:** for the time necessary to fulfill the purpose

**Sold or Shared** ⓘ: Yes

**Targeted Advertising:** ⓘ: No

**Third-parties:** HubSpot, Inc., PayPal Inc., Blue Ocean Law Group, The Rocket Science Group, LLC., Webflow, Inc., Stripe, Inc., Meta Platforms, Inc., Amazon Web Services, Inc.

**Service providers or contractors:** Blue Ocean Law Group, Blue Ocean Law Group

### • Commercial information

**Personal Information collected or disclosed:** First name, Last name, Phone number, Company name, Profession, Physical address, Fax number, Country, State, Email address, Zip/postal code, Various types of data, City, Field of activity, Website, Various types of data as specified in the privacy policy of the service, Billing address

**Sensitive Personal Information collected or disclosed** ⓘ: payment info

#### Purposes:

- Contacting the User
- Handling payments

**Retention period:** for the time necessary to fulfill the purpose

**Sold or Shared** ⓘ: Yes

**Targeted Advertising:** ⓘ: No

**Third-parties:** Stripe, Inc.

**Service providers or contractors:** Blue Ocean Law Group

- **Internet or other electronic network activity information**

**Personal Information collected or disclosed:** First name, Last name, Phone number, Company name, Profession, Physical address, Fax number, Country, State, Email address, Zip/postal code, Various types of data, City, Field of activity, Website, Various types of data as specified in the privacy policy of the service, Trackers, Usage data, Answers to questions, Clicks, Keypress events, Motion sensor events, Mouse movements, Scroll position, Touch events, Data communicated while using the service, User content, Profile picture, Date of the message, Time the message was sent, Sender of the message

**Sensitive Personal Information collected or disclosed** ⓘ: contents of the email or message

**Purposes:**

- Contacting the User
- User database management
- Spam and bots protection
- Content performance and features testing (A/B testing)
- Displaying content from external platforms
- Interaction with external social networks and platforms
- Selling goods and services online
- Platform services and hosting
- Tag Management
- Traffic optimization and distribution
- Infrastructure monitoring
- Analytics
- Interaction with live chat platforms
- Collection of privacy-related preferences

**Retention period:** for the time necessary to fulfill the purpose

**Sold or Shared** ⓘ: Yes

**Targeted Advertising:** ⓘ: No

**Third-parties:** HubSpot, Inc., Google Inc., Optimizely, Inc., Twitter, Inc., Chargebee Inc., Webflow, Inc., Google LLC, Cloudflare, Inc., Bugsnag Inc., Meta Platforms, Inc., iubenda srl

**Service providers or contractors:** Blue Ocean Law Group

- **Employment related information**

**Personal Information collected or disclosed:** First name, Last name, Phone number, Company name, Profession, Physical address, Fax number, Country, State, Email address, Zip/postal code, Various types of data, City, Field of activity, Website

**Purposes:**

- Contacting the User

**Retention period:** for the time necessary to fulfill the purpose

**Sold or Shared** ⓘ: Yes

**Targeted Advertising:** ⓘ: No

**Service providers or contractors:** Blue Ocean Law Group

- **Inferences drawn from other personal information**

**Personal Information collected or disclosed:** Usage data, Trackers, Answers to questions, Clicks, Keypress events, Motion sensor events, Mouse movements, Scroll position, Touch events, First name, Last name, Phone number, Data communicated while using the service, User content, Profile picture, Date of the message, Time the message was sent, Sender of the message

**Sensitive Personal Information collected or disclosed** ⓘ: contents of the email or message

**Purposes:**

- Spam and bots protection
- Interaction with live chat platforms

**Retention period:** for the time necessary to fulfill the purpose

**Sold or Shared** ⓘ: Yes

**Targeted Advertising:** ⓘ: No

**Third-parties:** Google Inc., Meta Platforms, Inc.

- **Audio, electronic, visual, thermal, olfactory, or similar information**

**Personal Information collected or disclosed:** First name, Last name, Phone number, Data communicated while using the service, Answers to questions, User content, Profile picture, Date of the message, Time the message was sent, Sender of the message

**Sensitive Personal Information collected or disclosed** ⓘ: contents of the email or message

**Purposes:**

- Interaction with live chat platforms

**Retention period:** for the time necessary to fulfill the purpose

**Sold or Shared** ⓘ: Yes

**Targeted Advertising:** ⓘ: No

**Third-parties:** Meta Platforms, Inc.

ⓘ You can read the definitions of these concepts inside the “[Definitions and legal references section](#)” of the privacy policy.

**To know more about your rights in particular to opt out of certain processing activities and to limit the use of your sensitive personal information (“Limit the Use of My Sensitive Personal Information”) you can refer to the “[Your privacy rights under US state laws](#)” section of our privacy policy.**

For more details on the collection of Personal Information, please read the section “[Detailed information on the processing of Personal Data](#)” of our privacy policy.

We won’t process your Information for unexpected purposes, or for purposes that are not reasonably necessary to and compatible with the purposes originally disclosed, without your consent.

## **What are the sources of the Personal Information we collect?**

We collect the above-mentioned categories of Personal Information, either directly or indirectly, from you when you use Blue Ocean Law Group.

For example, you directly provide your Personal Information when you submit requests via any forms on Blue Ocean Law Group. You also provide Personal Information indirectly when you navigate Blue Ocean Law Group, as Personal Information about you is automatically observed and collected.

Finally, we may collect your Personal Information from third parties that work with us in connection with the Service or with the functioning of Blue Ocean Law Group and features thereof.

## **Your privacy rights under US state laws**

You may exercise certain rights regarding your Personal Information. In particular, to the extent permitted by applicable law, you have:

- **the right to access Personal Information: the right to know.** You have the right to request that we confirm whether or not we are processing your Personal Information. You also have the right to access such Personal Information;
- **the right to correct inaccurate Personal Information.** You have the right to request that we correct any inaccurate Personal Information we maintain about you;
- **the right to request the deletion of your Personal Information.** You have the right to request that we delete any of your Personal Information;

- **the right to obtain a copy of your Personal Information.** We will provide your Personal Information in a portable and usable format that allows you to transfer data easily to another entity – provided that this is technically feasible;
- **the right to opt out from the Sale of your Personal Information;** We will not discriminate against you for exercising your privacy rights.
- **the right to non-discrimination.**

#### **Additional rights for Users residing in California**

In addition to the rights listed above common to all Users in the United States, as a User residing in California, you have

- **The right to opt out of the Sharing of your Personal Information** for cross-context behavioral advertising;
- **The right to request to limit our use or disclosure of your Sensitive Personal Information** to only that which is necessary to perform the services or provide the goods, as is reasonably expected by an average consumer. Please note that certain exceptions outlined in the law may apply, such as, when the collection and processing of Sensitive Personal Information is necessary to verify or maintain the quality or safety of our service.

#### **Additional rights for Users residing in Virginia, Colorado, Connecticut, Texas, Oregon and Montana**

In addition to the rights listed above common to all Users in the United States, as a User residing in Virginia, Colorado, Connecticut, Texas and Oregon, you have

- **The right to opt out of** the processing of your personal information for **Targeted Advertising or profiling** in furtherance of decisions that produce legal or similarly significant effects concerning you;
- **The right to freely give, deny or withdraw your consent for the processing of your Sensitive Personal Information.** Please note that certain exceptions outlined in the law may apply, such as, but not limited to, when the collection and processing of Sensitive Personal Information is necessary for the provision of a product or service specifically requested by the consumer.

#### **Additional rights for users residing in Utah**

In addition to the rights listed above common to all Users in the United States, as a User residing in Utah, you have

- **The right to opt out of** the processing of your Personal Information for **Targeted Advertising**;
- **The right to opt out of the processing of your Sensitive Personal Information.** Please note that certain exceptions outlined in the law may apply, such as, but not limited to, when the collection and processing of Sensitive Personal Information is necessary for the provision of a product or service specifically requested by the consumer.

#### **How to exercise your privacy rights under US state laws**

To exercise the rights described above, you need to submit your request to us by contacting us via the contact details provided in this document.

For us to respond to your request, we must know who you are. We will not respond to any request if we are unable to verify your identity and therefore confirm the Personal Information in our possession relates to you. You are not required to create an account with us to submit your request. We will use any Personal Information collected from you in connection with the verification of your request solely for verification and shall not further disclose the Personal Information, retain it longer than necessary for purposes of verification, or use it for unrelated purposes.

If you are an adult, you can make a request on behalf of a child under your parental authority.

#### **How to exercise your rights to opt out**

In addition to what is stated above, to exercise your right to opt-out of Sale or Sharing and Targeted Advertising you can also use the privacy choices link provided on Blue Ocean Law Group.

If you want to submit requests to opt out of Sale or Sharing and Targeted Advertising activities via a user-enabled **global privacy control**, such as for example the Global Privacy Control ("[GPC](#)"), you are free to do so and we will abide by such request in a frictionless manner.

#### **How and when we are expected to handle your request**

We will respond to your request without undue delay, but in all cases within the timeframe required by applicable law. Should we need more time, we will explain to you the reasons why, and how much more time we need.

Should we deny your request, we will explain to you the reasons behind our denial (where envisaged by applicable law you may then contact the relevant authority to submit a complaint).



We do not charge a fee to process or respond to your request unless such request is manifestly unfounded or excessive and in all other cases where it is permitted by the applicable law. In such cases, we may charge a reasonable fee or refuse to act on the request. In either case, we will communicate our choices and explain the reasons behind them.

## **Additional information about Data collection and processing**

### **Legal action**

The User's Personal Data may be used for legal purposes by the Owner in Court or in the stages leading to possible legal action arising from improper use of Blue Ocean Law Group or the related Services.

The User declares to be aware that the Owner may be required to reveal personal data upon request of public authorities.

### **Additional information about User's Personal Data**

In addition to the information contained in this privacy policy, Blue Ocean Law Group may provide the User with additional and contextual information concerning particular Services or the collection and processing of Personal Data upon request.

### **System logs and maintenance**

For operation and maintenance purposes, Blue Ocean Law Group and any third-party services may collect files that record interaction with Blue Ocean Law Group (System logs) or use other Personal Data (such as the IP Address) for this purpose.

### **Information not contained in this policy**

More details concerning the collection or processing of Personal Data may be requested from the Owner at any time. Please see the contact information at the beginning of this document.

### **Changes to this privacy policy**

The Owner reserves the right to make changes to this privacy policy at any time by notifying its Users on this page and possibly within Blue Ocean Law Group and/or - as far as technically and legally feasible - sending a notice to Users via any contact information available to the Owner. It is strongly recommended to check this page often, referring to the date of the last modification listed at the bottom.

Should the changes affect processing activities performed on the basis of the User's consent, the Owner shall collect new consent from the User, where required.

### **Definitions and legal references**

#### **Personal Data (or Data) / Personal Information (or Information)**

Any information that directly, indirectly, or in connection with other information — including a personal identification number — allows for the identification or identifiability of a natural person.

#### **Sensitive Personal Information**

Sensitive Personal Information means any Personal Information that is not publicly available and reveals information considered sensitive according to the applicable privacy law.

#### **Usage Data**

Information collected automatically through Blue Ocean Law Group (or third-party services employed in Blue Ocean Law Group), which can include: the IP addresses or domain names of the computers utilized by the Users who use Blue Ocean Law Group, the URI addresses (Uniform Resource Identifier), the time of the request, the method utilized to submit the request to the server, the size of the file received in response, the numerical code indicating the status of the server's answer (successful outcome, error, etc.), the country of origin, the features of the browser and the operating system utilized by the User, the various time details per visit (e.g., the time spent on each page within the Application) and the details about the path followed within the Application with special reference to the sequence of pages visited, and other parameters about the device operating system and/or the User's IT environment.

#### **User**

The individual using Blue Ocean Law Group who, unless otherwise specified, coincides with the Data Subject.

## Data Subject

The natural person to whom the Personal Data refers.

## Data Processor (or Processor)

The natural or legal person, public authority, agency or other body which processes Personal Data on behalf of the Controller, as described in this privacy policy.

## Data Controller (or Owner)

The natural or legal person, public authority, agency or other body which, alone or jointly with others, determines the purposes and means of the processing of Personal Data, including the security measures concerning the operation and use of Blue Ocean Law Group. The Data Controller, unless otherwise specified, is the Owner of Blue Ocean Law Group.

## Blue Ocean Law Group (or this Application)

The means by which the Personal Data of the User is collected and processed.

## Service

The service provided by Blue Ocean Law Group as described in the relative terms (if available) and on this site/application.

## Sale

Sale means any exchange of Personal Information by the Owner to **a third party, for monetary or other valuable consideration**, as defined by the applicable privacy US state law. Please note that the exchange of Personal Information with a service provider pursuant to a written contract that meets the requirements set by the applicable law, does not constitute a Sale of your Personal Information.

## Sharing

Sharing means any sharing, renting, releasing, disclosing, disseminating, making available, transferring, or otherwise communicating orally, in writing, or by electronic or other means, a consumer's Personal Information by the business to a **third party for cross-context behavioral advertising**, whether for monetary or other valuable consideration, including transactions between a business and a third party for cross-context behavioral advertising for the benefit of a business in which no money is exchanged, as defined by the California privacy laws. Please note that the exchange of Personal Information with a service provider pursuant to a written contract that meets the requirements set by the California privacy laws, does not constitute sharing of your Personal Information.

## Targeted advertising

Targeted advertising means displaying advertisements to a consumer where the advertisement is selected based on Personal Information obtained from that consumer's activities over time and across nonaffiliated websites or online applications to predict such consumer's preferences or interests, as defined by the applicable privacy US state law.

## European Union (or EU)

Unless otherwise specified, all references made within this document to the European Union include all current member states to the European Union and the European Economic Area.

## Cookie

Cookies are Trackers consisting of small sets of data stored in the User's browser.

## Tracker

Tracker indicates any technology - e.g Cookies, unique identifiers, web beacons, embedded scripts, e-tags and fingerprinting - that enables the tracking of Users, for example by accessing or storing information on the User's device.

## Legal information

This privacy statement has been prepared based on provisions of multiple legislations.

This privacy policy relates solely to Blue Ocean Law Group, if not stated otherwise within this document.

Latest update: October 05, 2023