

## **PRIVACY POLICY**

LOCAL LEGAL LEADS (“LL”) is committed to respecting the privacy rights of users of IM’s website (the “Website”). LL believes in 100% permission-based marketing. LL created this Privacy Policy to give you or your company (in either case, “You” or “Your”) confidence as You visit and use the Website, and to demonstrate its commitment to fair information practices and to the protection of privacy.

This Privacy Policy is only applicable to the Website and not to any websites of third parties (“Third-Party Websites”), which may have data collection, storage and use practices and policies that differ materially from this Privacy Policy. For additional information, see the section concerning Third-Party Websites, below.

BY USING THE WEBSITE, YOU REPRESENT AND WARRANT THAT YOU HAVE READ AND UNDERSTOOD, AND AGREE TO THE TERMS OF, THIS PRIVACY POLICY. IF YOU DO NOT UNDERSTAND OR DO NOT AGREE TO BE BOUND BY THIS PRIVACY POLICY, YOU MUST IMMEDIATELY LEAVE THE WEBSITE.

Each time You use the Website, the then-current version of this Privacy Policy will apply. Accordingly, each time You use the Website You should check the date of this Privacy Policy (which appears at the end) and review any changes since the last time You used the Website. For additional information, see the section concerning Updates and Changes to Privacy Policy, below.

### **1. CHILDREN’S PRIVACY**

LL does not solicit or knowingly collect personally identifiable information from children under the age of 13. If LL obtains actual knowledge that it has collected personally identifiable information from a child under the age of 13, LL will immediately delete such information from its database. Because %% does not collect personally identifiable information from children under the age of 13, %%has no such information to use or disclose to third parties. %%has designed this Privacy Policy in order to comply with the Children’s Online Privacy Protection Act (“**COPPA**”).

### **2. INFORMATION COLLECTION PRACTICES**

#### **(a) Traffic Data.**

Like most website operators, LL automatically gathers information of the sort that browsers automatically make available, including: (i) IP addresses; (ii) domain servers; (iii) types of computers accessing the Website; and (iv) types of Web browsers accessing the Website (collectively “**Traffic Data**”). Traffic Data is anonymous information that does not personally identify You.

#### **(b) Cookie Policy**

“**Cookies**” are text files that are placed on your computer by websites that you visit or certain emails that you open. A Cookie acts as a string of information that a website stores on a user’s computer, and that the user’s browser provides to the website each time the user submits a query to the website. The purpose of a Cookie is to identify the user as a unique user of the Website. LL uses Cookies.

LL uses cookies on the Website for the following purposes:

- to customize your experience on the Website to your interests
- to ensure that you do not see the same advertisements or informational messages repeatedly, and
- to store your password so you do not have to re-enter it each time you visit the Website.

IF YOU DO NOT WISH TO HAVE COOKIES PLACED ON YOUR COMPUTER, YOU SHOULD SET YOUR BROWSERS TO REFUSE COOKIES BEFORE ACCESSING THE WEBSITE, WITH THE UNDERSTANDING THAT CERTAIN OF THE SERVICES AND CERTAIN FEATURES OF THE WEBSITE MAY NOT FUNCTION PROPERLY WITHOUT THE AID OF COOKIES. IF YOU REFUSE COOKIES, YOU ASSUME ALL RESPONSIBILITY FOR ANY RESULTING LOSS OF FUNCTIONALITY.

You can learn more about how to delete or control cookies at [www.aboutcookies.org](http://www.aboutcookies.org).

**(c) Ad Serving.**

LL uses third-parties for advertising and analytics for pages that we host. These third-parties may place cookies on Your machine, use web beacons, gather IP addresses and log data to collect traffic and activity data to send to the United States in order to deliver relevant metrics, content, and advertising.

**(d) Personal Information.**

In order for You to use certain of the Services, You will be asked to provide LL certain information that personally identifies You (“Personal Information”). Personal Information includes, without limitation: (1) “**Contact Data**” (such as Your name, phone number, fax number, mailing address, and e-mail address); (2) “**Financial Data**” (such as Your credit/debit card number and expiration date); and (3) “**Demographic Data**” (such as Your gender and zip code). **Additionally, we purchase and manage opt-in email lists generated by affiliate sites and organizations.** To provide better and more relevant services, LL may supplement the Personal Information You provide with additional Personal Information gathered from public sources or from third-parties, including affiliate sites and organizations and consumer reporting agencies, as long as those third-parties may lawfully provide such information to LL. You are under no obligation to provide Personal Information, with the caveat that Your refusal to do so may prevent you from using certain of the Services.

**(e) Information You Make Public.**

The Website may contain features that permit You to upload, post, transmit, display, perform or distribute content, information or other, including Your Personal Information. Any information that You choose to disclose by means of such features becomes public information over which LL is unable to exercise control. You should exercise caution when deciding to disclose Your Personal Information by means of such features, and You agree to assume all responsibility for doing so.

### **3. INFORMATION USE AND DISCLOSURE PRACTICES**

**(a) Traffic Data and Information Gathered Using Cookies.**

LL analyzes Traffic Data and information gathered using Cookies to help LL better understand who is using the Website and how they are using it. By identifying patterns and trends in usage, LL is able to better design the Website to improve Your experience, and to serve You more relevant and interesting content and advertisements. From time to time, LL may release Traffic Data and information gathered using Cookies in the aggregate, such as by publishing a report on trends in the usage of the Website. LL does not attempt to link information gathered using Cookies to Personal Information.

## **(b) Personal Information**

### **(i) Generally.**

LL uses Your Contact Data to send You information about LL and IM's products and services, and to contact You when necessary in connection with the Services. LL uses Your Financial Data to verify Your qualifications for certain Services and, when necessary, to bill You. LL uses Your Business Information to file corporate documents. LL uses Your Demographic Data to customize and tailor Your experience on the Website. As with Traffic Data and information gathered using Cookies, from time to time LL may release Demographic Data in the aggregate, such as by publishing a report on trends in the usage of the Website.

### **(ii) Disclosure Practices.**

Except under the following circumstances, LL will keep Your Personal Information private, and will not share it with third parties.

- **Disclosure to Affiliate Marketers AND Partner Advocacies and Attornies.** LL may utilize any and all Personal Information to help our clients better understand the demographics of our target audiences as well as to support our marketing data products and services. We may also provide personally identifiable data to partner firms which may include third party marketing companies, affiliates, advertising agencies, and data aggregation companies. Such data may be used by the aforementioned partner firms to provide consumers with information on products and services that may be of interest.
- **Disclosure in Connection with Services.** LL discloses Personal Information to those who help it provide services, including without limitation those who perform technical, administrative, and data processing tasks such as hosting, billing, fulfillment, and data storage and security.
- **By Law or to Protect Rights.** LL discloses Personal Information when required to do so by law, or in response to a subpoena or court order, or when LL believes in its sole discretion that disclosure is reasonably necessary to protect the property or rights of LL, third parties or the public at large.
- **Business Transfers; Bankruptcy.** LL reserves the right to transfer all Personal Information in its possession to a successor organization in the event of a merger, acquisition, or bankruptcy or other sale of all or a portion of IM's assets. Other than to the extent ordered by a bankruptcy or other court, the use and disclosure of all transferred Personal Information will be subject to this Privacy Policy, or to a new privacy policy if You are given notice of that new privacy policy and an opportunity to affirmatively opt-out of it. Personal Information submitted or collected after a transfer, however, may be subject to a new privacy policy adopted by IM's successor organization.
- **Unpaid Accounts.** If You fail to pay any balance owed in consideration of services, LL may, as permitted by law, report Your Personal Information, including without limitation Your unpaid balance, to consumer credit reporting services, collection agencies and others.

#### **4. CONSENT TO RECEIVE ELECTRONIC COMMUNICATIONS FROM LL**

Without limitation, by providing your name, email, postal or residential address, and/or phone number to the Website, you hereby expressly consent to receive electronic communications, over the short term and periodically, including email and short-message service (“SMS” or “text message”) communications from LL regarding the Services, new product offers, promotions, and other matters. You may opt-out of receiving electronic communications at any time by (a) following the unsubscribe instructions contained in each communication; or (b) sending an email to [ssdiassistancenetwork@gmail.com](mailto:ssdiassistancenetwork@gmail.com).

#### **5. CONSENT TO RECEIVE ELECTRONIC COMMUNICATIONS FROM LL PARTNER ADVOCATES AND ATTORNEYS**

Without limitation, by providing your name, email, postal or residential address, and/or phone number through the Website, you hereby consent to receive and openly and knowingly solicit electronic communications, including email and SMS communications, from IM's partner advocacies and attorneys regarding their services, including offers, promotions, and other related matters. You may opt-out of receiving electronic communications at any time by (a) following the unsubscribe instructions contained in each communication; or (b) sending an email to [ssdiassistancenetwork@gmail.com](mailto:ssdiassistancenetwork@gmail.com).

LL remains dedicated to providing notice and choice to all subscribers. Once a subscriber chooses to be removed from our database via our unsubscribe process, the subscriber will no longer receive any offers from us. Please note, however, the subscriber may still receive offers from other affiliated websites and third parties in which he or she has subscribed.

#### **6. SECURITY OF PERSONAL INFORMATION**

LL has implemented and maintains reasonable security procedures and practices to protect against the unauthorized access, use, modification, destruction or disclosure of Your Personal Information.

#### **6. LOST OR STOLEN INFORMATION**

You must promptly notify us if Your credit, bank, other financial institution information, user name or password is lost, stolen or used without permission. In such and event, we will remove that credit card number, bank account information, other financial institution information, user name or password from Your account and updated our records accordingly.

#### **7. USER ABILITY TO ACCESS, UPDATE, AND CORRECT PERSONAL INFORMATION**

LL wants Your Personal Information to be complete and accurate. As stated in the Terms of Use, by using the Website, You represent and warrant that all information You provide on any registration form or otherwise in connection with Your use of the Website and Services will be complete and accurate, and that You will update that information as necessary to maintain its completeness and accuracy. To confirm the completeness and accuracy of, or make changes to, Your Personal Information, you may contact LL at [ssdiassistancenetwork@gmail.com](mailto:ssdiassistancenetwork@gmail.com).

#### **8. THIRD-PARTY WEBSITES**

LL neither owns nor controls Third-Party Websites. Accordingly, Third-Party Websites are under no obligation to comply with this Privacy Policy except with respect to Personal Information provided directly to them by LL. Before visiting or providing Personal Information to a Third-Party Website, You should inform Yourself of the privacy policies and practices (if any) of that Third-Party Website, and should take those steps necessary to, in Your discretion, protect Your privacy.

## **9. PROMOTIONAL ACTIVITIES**

From time to time, LL may conduct contests, giveaways and other promotions (collectively, "Promotional Activities"). Any information submitted in connection with Promotional Activities will be treated in accordance with this Privacy Policy. From time to time, LL may also ask You to participate in surveys designed to help LL improve the Websites or Services. Any Personal Information provided to LL in connection with any survey will be used only in relation to that survey, and will be disclosed to third parties not bound by this Privacy Policy only in aggregated form.

## **10. UPDATES AND CHANGES TO PRIVACY POLICY**

Although most changes are likely to be minor, LL reserves the right, at any time and without notice, to add to, update, change or modify this Privacy Policy, simply by posting such update, change or modification on this page. Any such addition, update, change or modification will be effective immediately upon posting on the Website. Each time You use the Website, the then-current version of this Privacy Policy will apply. Accordingly, each time You use the Website You should check the date of this Privacy Policy (which appears at the end) and review any changes since the last time You used the Website. Unless LL obtains Your express consent, any revised Privacy Policy will apply only to information collected after the effective date of such revised Privacy Policy, and not to information collected under any earlier Privacy Policy.

Effective Date: September 19, 2013