

## **Gangi Legal Care's Privacy Notice**

Effective: June 7, 2023

Gangi Legal Care ("GLC", "we" or "us") respect your right to privacy. This Privacy Notice applies to GLC's physical offices and information received through our website [www.gangilegalcare.com](http://www.gangilegalcare.com) ("Website") and explains how GLC may collect, share, use and process information about you, and how you can exercise your privacy rights. It applies to all individuals who access our Website, mobile apps, and in connection with our blogs, alerts, newsletters, webinars, social media sites or programs and other communication services ("Services").

If you have any concerns or questions about your privacy or use of our Services, please contact us via email at [lulu@gangilegalcare.com](mailto:lulu@gangilegalcare.com) or via postal mail at office located at 4300 Biscayne Blvd., Suite 203, Miami, FL 33137.

We may provide supplemental privacy notices on specific occasions when we are collecting or processing personal information about you. Those supplemental notices should be read together with this Privacy Notice.

1. **Changes to this Privacy Notice:** We may update this Privacy Notice from time to time. The effective date of the current Privacy Notice is noted at the top of this page. If we make material changes to the way we collect, use, share or process the personal information that you have provided that adversely impact you, we will notify you by posting a notice of the changes in a clear and conspicuous manner on the GLC website or via the most recent email address we have on file for you.
2. **Information We May Collect:** When you use our Services, we collect personal information about your use of our Services and information that you send us. Throughout this Privacy Notice, we use the term "personal information," which generally means information that identifies you or makes you identifiable and will have the meaning throughout as defined under the applicable law. Information that has been anonymized so that it does not identify a specific individual is not "personal information." We may collect and store the following information when running the Service:
  - a. *Information You Provide Voluntarily.* We collect information that you voluntarily provide to us, including: when you communicate via email or other channels; when you sign up for news, publications and marketing communications and events; when you seek career information; when you register for client communications newsletters, alerts, or other materials; when you submit an application for a position with us; when you sign up for a webinar or event; when you respond to our communications or requests for information. The information you provide may include your name, contact information, e-mail, description of a legal concern or matter, title, and information about the organization with which you are affiliated. In relation to career information, the information you provide may also include employment history and qualifications. We only collect and process the personal information we need to allow us to respond to your request and/or provide the particular service you have sought.

- b. *Information We Collect Automatically.* We may automatically collect information about you when you use our Services such as, but not limited to:
- i. *Device Information.* We may collect information about devices you use to access the Services and how you use the Services, such as your Internet Protocol (“IP”) address and which websites you visited before accessing our Services.
  - ii. *Performance and Log Data.* Our servers may automatically record information created by your use of our Services, which may include information such as, but not limited to, your IP address, browser type, operating system, command line information, diagnostic information related to the Services (e.g., crash activity reports), the referring web page, pages visited, location, your mobile carrier, device and application IDs, and search terms. For instance, when we send you an email, we may collect certain information including the nature of the email, whether you opened or deleted our email, action you took upon receipt of our email, or your name and contact information.
  - iii. *Cookies.* We use cookies to display information more effectively, store, on a user’s computer or device information about the user’s preferences and settings, gather statistical information about the use of our Services to improve our design and functionality, and for security purposes. Please review our Cookie Notice link in our website footer to update your browser’s cookie preferences for our website at any time.
  - iv. *DNT.* Please note that we do not currently respond to web browser “do not track” signals or other mechanisms that may allow you to opt out of the collection of information across networks of websites and online services as there is no standard for how online services should respond to such signals. As standards develop, we may develop policies for responding to do-not-track signals that we will describe in this Privacy Notice.
  - v. *Information We Receive From Third Parties.* When we receive personal information about you from third parties and use such information, this can include: your name, email address, contact information, the company you work for, your position, business and home address, identification and background information, professional experience and qualifications, previous positions, financial information, such as payment related information and shareholdings, and other personal information.
  - vi. *Social Medical Information.* If you connect to us from a social network, such as Instagram, LinkedIn or Facebook, we will collect personal information from the social network in accordance with your privacy settings on that social network. The connected social network may provide us with information such as your name, profile picture, network, gender, username, user ID, age or age range, language, country, friends list, follower list, and any other information you have agreed it can share or that the social network provides to us. We will assume that such social network or other third parties are entitled to collect and share such personal information with us.

- vii. *Sensitive Information.* We may collect sensitive information about you when you use our Services. Any use of such information is limited to such purposes described to you at the time of collection.

### 3. **How and Why We Use Your Information**

- a. *To Provide Our Services to You.* We may process your personal information to inform you about our Services, new legal and policy developments, relevant information in the industries we serve, and our marketing events. Without your personal information, we cannot provide such Services.
- b. *To Respond to Your Inquiries.* We process your personal information when you contact us, such as with questions, concerns, feedback, disputes or issues. Without your personal information, we cannot respond to you or ensure your continued use and enjoyment of the Services.
- c. *To Enforce Our Terms or Agreements.* We process your personal information to actively monitor, investigate, prevent and mitigate any alleged or actual prohibited, illicit or illegal activities in connection with our Services; investigate, prevent, or mitigate violations of our terms, agreements or policies; and enforce our agreements with third parties and partners. We cannot perform our Services in accordance with our terms, agreements or policies without processing your personal information for such purposes.
- d. *To Ensure the Security of the Service.* We are committed to ensuring your safety and continued enjoyment of our Services. To do so, we process your personal information to: combat spam, malware, malicious activities or security risks; improve and enforce our security measures; and to monitor and verify your identity so that unauthorized users do not access your account with us or your information we otherwise hold. We cannot ensure the security of our Services if we do not process your personal information for security purposes.
- e. *For Research and Development Purposes.* To continue to provide you with our innovative Services, we collect information about the way you use and interact with our Services for research and development purposes. Research and development help us improve our Services and build new Services and customized features or Services. We take additional security measures when processing your personal information for such purposes, by de-identifying or pseudonymizing your information, limiting access to personnel that may conduct research and development, and applying other technical, physical, and administrative security measures.
- f. *For Potential Employment.* We process your personal information when you seek employment with us to evaluate you as a candidate for the position. Without your personal information, we cannot evaluate your qualifications for employment.
- g. *To Engage in Marketing Activities.* We process your personal information to inform you about our Services, new legal and policy developments, relevant information on the industries we serve and our marketing events (including by electronic means, such as email). To do so we may process your contact information or information about your interactions on our Services to send you marketing communications; provide you with information about events, webinars, or other materials; deliver targeted marketing to you and keep you updated about our Services. You can opt-out of

receiving our marketing information at any time by clicking an unsubscribe link in our emails.

4. **Information Sharing and Disclosure:** We do not sell, exchange, transfer, or give your personal information to any other company or individual for any reason except as set forth in this Privacy Notice and as described below:
  - a. *GLC Affiliated Entities.* As a state organization that provides statewide services, we may share your information with our offices and data centers throughout the state to provide our Services (e.g., Miami Dade, Broward, Palm Beach, and Sarasota).
  - b. *Our Service Providers.* We share information with our service providers, suppliers, subcontractors, and similar third parties who provide services to us, or act on our behalf so that they can assist us with the maintenance of our Service. Our contracts with these service providers prohibit them from sharing your personal information with others for other purposes than as directed by us.
  - c. *Corporate Reorganization.* We may transfer information to a third party in case of the reorganization, sale, merger, joint venture, assignment, transfer or other disposition of all or any portion of our business, asset or stocks, including in the event of corporate restructuring. We reserve the right, as part of this transaction, to transfer or assign personal information we have collected from you to these third parties. Except as otherwise provided by a bankruptcy or other court, the use and disclosure of all personal information will be subject to policies that are consistent with the policies described in this Privacy Notice. However, any personal information that is submitted or collected after that transfer may be subject to a new privacy policy adopted by the successor entity.
  - d. *Legal Concerns or Liabilities.* We may use, share, or disclose information about you in order to address legal concerns or liabilities, especially when we believe, in our sole discretion, that (a) you might have misused the Services, such as to gain unauthorized access to any system, engaged in spamming, denial of service attacks, or similar attack; (b) disclosure is reasonably necessary to enforce our Terms and Conditions; (c) to respond to suspected illegal or fraudulent activity; (d) to protect legal rights or defend against legal claims; (e) to allow us to pursue available remedies or limit the damages that we or a third party may sustain.
  - e. *Your Consent.* We will disclose your information to a person you have given us your consent to disclose to or as required to complete the Services.
5. **Links to Third Party Services:** Our Service may include links to third party services where you might be able to post comments, reviews, or view third party information. The use of these third-party services may result in the collection and sharing of information about you by these third-party services. This Privacy Notice does not address the data processing practices of any third party, unless as specified otherwise. Please note, the inclusion of a link on our Service to a third party's service does not imply endorsement of the third party's data handling practices and does not imply that the third party's practices are covered by this Privacy Notice. We are not responsible for the privacy practices of these entities.

6. **Access to Your Information:** We take reasonable steps to ensure that your personal information is accurate, complete, and up to date. You may access and update your personal information that we hold by contacting us directly at [lulu@gangilegallcare.com](mailto:lulu@gangilegallcare.com). For your protection, we may need to verify your identity before implementing your request. We will try to implement your request as soon as reasonably practicable. In your request, please make clear what information you would like to have changed, whether you would like to have your personal information suppressed from our database, or other limitations you would like to put on our use of your personal information, including discontinuing any onward transfers or sharing with business partners. We may only implement requests with respect to personal information that is associated with the particular email address that you use to send your request. However, please note that we reserve the right to refuse to act on a request that is manifestly unfounded or excessive (for example because it is repetitive) and/or to charge a fee that takes into account the administrative costs for providing the information or taking the action requested.
7. **How We Keep Your Information Secure:** We seek to use reasonable technical, organizational, and administrative measures to protect user information within our organization against unauthorized or unlawful access or processing, and against accidental loss, destruction, or damage. We believe that these measures are reasonably adapted to the nature of the information in our custody. In addition to the security measures detailed above, we protect personal information by taking measures: (i) to protect the ongoing confidentiality, integrity, availability, and resilience of our processing systems and services; (ii) to restore the availability of and access to personal information in a timely manner in the event of a physical or technical incident; and (iii) to regularly test, assess, and evaluate the effectiveness of our technical and organizational measures. However, even though GLC makes reasonable efforts to protect information in its custody, no security system or data storage or transmission over the Internet or otherwise is fully secure. Thus, we cannot guarantee the security of any information we may have collected or received from you or transmitted to you. If you believe your information is not secure, please immediately notify us of the problem at the address provided in the “How to Contact Us” section below.
8. **Retention:** We retain information about you for as long as necessary to perform the activities described in this Privacy Notice, or where we have an ongoing legitimate business need to do so, such as for legal, regulatory, accounting or reporting requirements. When our legitimate interest for retaining your personal information ceases to exist, we will either delete or anonymize your information so that it can no longer be attributed to a particular individual. To the extent residual information remains within our databases, back-ups or other records and we are unable to anonymize it we will isolate such information from further processing until deletion is possible. If you have any questions, please feel free to contact us.
9. **Children’s Information:** We do not knowingly collect any personal information from children under 16. If we become aware that an individual under the age of 16 is submitting information without consent from their parent or legal guardian or as permitted under applicable law, we will delete the information as soon as possible from our database. If you believe we are collecting information about an individual under 16, please notify us immediately so that we can take appropriate action.

10. **Individual Rights:** We take reasonable steps to ensure that your personal information is accurate, complete, and up to date. You have the right to access, correct, or delete the personal information that we collect. You are also entitled to restrict or object, at any time, to the further processing of your personal information. You have the right to receive your personal information in a structured and standard format and, where technically and legally feasible, the right to have your personal information transmitted directly to a third party. If you would like to exercise your rights under applicable law, or if you believe we have infringed or violated your privacy rights, please contact us at [lulu@gangilegalcare.com](mailto:lulu@gangilegalcare.com) so that we may resolve your dispute directly. You also have a right to lodge a complaint with a competent supervisory authority situated in a Member State of your habitual residence or place of alleged infringement.
11. **How to Contact Us:** You can contact us via email at [lulu@gangilegalcare.com](mailto:lulu@gangilegalcare.com). If you prefer to contact us by postal mail, please contact us at: Gangi Legal Care, 4300 Biscayne Blvd, Suite 203, Miami, FL 33137.