

## ONLINE PRIVACY NOTICE

### 1. Introduction.

- (a) **Web Site Owner.** Fortuna-Insights, Inc. ("CaseCraft" or "We" or "Our") is the owner of this web site ("CaseCraft"). CaseCraft can be contacted by mail at 251 Little Falls Drive, Wilmington, DE 19808, by phone at (949) 531-8579, or by e-mail at support@fortuna-insights.com. This online privacy notice discloses CaseCraft information practices for this CaseCraft Website, including what type of personal identifiable information is requested in order to make a purchase, how the information is used, and with whom the information is shared. Note that other Fortuna-Insights websites may be governed by privacy notices containing different information practices applicable to those sites.
- (b) **Website Visits.** In general, you can visit on the CaseCraft Website without disclosing any personal information. CaseCraft does keep track of the domains from which people visit us.
- (c) **Web Site Transactions.** At times, CaseCraft will need personal information regarding a customer or a prospect. For example, to process an order or provide a subscription, CaseCraft may need to know a customer's name, mailing address, e-mail address and credit card details. It is CaseCraft's intent to inform you before CaseCraft collects personal information, such as user's name and/or address on the Internet. If you tell us that you do not wish to have this information used as a basis for further contact with you, CaseCraft will respect your wishes.

### 2. Personal Information That May Be Collected.

- (a) **Identifying Information.** In order to make a purchase and/or access designated subscriber services and/or restricted areas within the CaseCraft Website, CaseCraft will request a user to provide certain personal identifying information, which may include: name, postal address, e-mail address, screen name, password, telephone number, facsimile number, method of payment, and, if applicable, credit card number. CaseCraft may request additional information necessary to establish and maintain customer's account.
- (b) **Service Quality Monitoring.** Some website transactions may require a customer to telephone CaseCraft, or CaseCraft to call the customer. CaseCraft will not contact you by telephone without your prior consent, except to confirm an order placed online and/or to inform a customer of the status of such order. Customer should be aware that it is CaseCraft's practice to monitor, and in some cases record such calls for staff training or quality assurance purposes.
- (c) **Information from Children.** CaseCraft does not collect or maintain information from users actually known to be under the age of 13, and no part of CaseCraft's Web sites are structured to attract anyone under the age of 13.
- (d) **Lost or Stolen Information.** If a customer's credit card and/or password is lost or stolen, the customer should promptly notify CaseCraft in order to enable CaseCraft to

cancel the lost or stolen information and to update its records with a changed credit card and/or password.

- (e) **Chat Rooms, Forums and Bulletin Boards.** If customer participates in an CaseCraft chat room, discussion forum, or posts messages to an CaseCraft bulletin board, customer should be aware that the information disclosed and shared will be broadly available to other persons, both inside of and/or outside CaseCraft, who have access to that chat room, forum or bulletin board. Some individual CaseCraft chat rooms, forums or bulletin boards have additional rules and conditions regarding participation. Also, participant's expressed opinion is his or her own and should not be considered as reflecting the opinion of CaseCraft.
- (f) **Links to Other Web Sites.** A CaseCraft Website or other product may contain links to other web sites. CaseCraft is not responsible for the privacy practices or the content of those other Web sites.
- (g) **Law School Inputs and Outputs.** While We record the inputs and outputs for law school products, We will follow best practices in recording inputs to individual users.

### 3. Uses Made of the Information.

- (a) **Limited Uses Identified.** Without customer's prior consent, CaseCraft will not use your personal identifiable information for any purpose other than that for which it is submitted or as identified hereunder. CaseCraft uses personal identifiable information to reply to inquiries, handle complaints, provide operational notices and in program record-keeping. CaseCraft also processes billing and business requests related to CaseCraft Web Site participation and use. We collect, sell and/or share your personal information for the following business purposes:
  - (i) Auditing related to counting ad impressions to unique visitors, verifying positioning and quality of ad impressions, and auditing compliance with this specification and other standards;
  - (ii) Helping to ensure security and integrity to the extent the use of your personal information is reasonably necessary and proportionate for these purposes;
  - (iii) Debugging to identify and repair errors that impair existing intended functionality;
  - (iv) Short-term, transient use, including, but not limited to, non-personalized advertising shown as part of your current interaction with CaseCraft, provided your personal information is not disclosed to another third party and is not used to build a profile about you or otherwise alter your experience outside the current interaction with CaseCraft;
  - (v) Performing services on behalf of CaseCraft, including maintaining or servicing accounts, providing customer service, processing or fulfilling orders and transactions, verifying customer information, processing payments, or providing similar services on behalf of CaseCraft or service provider;
  - (vi) Providing advertising and marketing services, except for cross-context behavioral advertising, to you;

- (vii) Undertaking internal research for technological development and demonstration;
- (viii) Undertaking activities to verify or maintain the quality or safety of a service or device that is owned, manufactured, manufactured for, or controlled by CaseCraft, and to improve, upgrade, or enhance the service that is owned, manufactured, manufactured for, or controlled by CaseCraft;
- (ix) To comply with Our legal and regulatory obligations;
- (x) For the performance of Our services for you or to take steps at your request before entering into a contract;
- (xi) For Our legitimate interests or those of a third party; or
- (xii) A legitimate interest is when We have a business or commercial reason to use your information, so long as this is not overridden by your own rights and interests.
- (xiii). The table below explains what We use (process) your personal information for and Our reasons for doing so:

<b>What We use your personal information for</b>	<b>Our reasons</b>
To prevent and detect fraud against you or CaseCraft.	For Our legitimate interests or those of a third party, i.e., to minimize fraud that could be damaging for us and for you.
<p>Conducting checks to identify Our customers and verify their identity.</p> <p>Screening for financial and other sanctions or embargoes.</p> <p>Other processing necessary to comply with professional, legal and regulatory obligations that apply to Our business.</p>	To comply with Our legal and regulatory obligations
Gathering and providing information required by or relating to audits, enquiries or investigations by regulatory bodies.	To comply with Our legal and regulatory obligations.
Ensuring business policies are adhered to, e.g., policies covering security and internet use.	For Our legitimate interests or those of a third party, i.e., to make sure We are following Our own internal procedures so We can deliver the best service to you.
Operational reasons, such as improving efficiency, training and quality control.	For Our legitimate interests or those of a third party, i.e., to be as efficient as We can so We can deliver the best service for you at the best price.

<p>Ensuring the confidentiality of commercially sensitive information.</p>	<p>For Our legitimate interests or those of a third party, i.e., to protect trade secrets and other commercially valuable information.</p> <p>To comply with Our legal and regulatory obligations.</p>
<p>Statistical analysis to help us manage Our business, e.g., in relation to our financial performance, customer base, or other efficiency measures.</p>	<p>For Our legitimate interests or those of a third party, i.e., to be as efficient as We can so We can deliver the best service for you at the best price.</p>
<p>Preventing unauthorized access and modifications to systems.</p>	<p>For Our legitimate interests or those of a third party, i.e., to prevent and detect criminal activity that could be damaging for us and for you.</p> <p>To comply with Our legal and regulatory obligations.</p>
<p>Updating and enhancing customer records.</p>	<p>For the performance of Our contract with third-parties.</p> <p>To comply with Our legal and regulatory obligations.</p> <p>For Our legitimate interests or those of a third party, e.g., making sure that We can keep in touch with Our users about existing orders and new products.</p>
<p>Statutory returns.</p>	<p>To comply with Our legal and regulatory obligations.</p>
<p>Ensuring safe working practices, staff administration and assessments.</p>	<p>To comply with Our legal and regulatory obligations.</p> <p>For Our legitimate interests or those of a third party, e.g., to make sure We are following Our own internal procedures and working efficiently so We can deliver the best service to you.</p>
<p>Marketing Our services and those of selected third parties to:</p> <ul style="list-style-type: none"> <li>—existing and former users and customers;</li> <li>—third parties who have previously expressed an interest in Our services and product;</li> <li>—third parties with whom We have had no previous dealings.</li> </ul>	<p>For Our legitimate interests or those of a third party, i.e., to promote Our business to existing and former customers.</p>

Credit reference checks via external credit reference agencies.	For Our legitimate interests or those of a third party, i.e., to ensure Our users are likely to be able to pay for Our products and services.
External audits and quality checks, e.g., for accreditations and the audit of Our accounts.	For Our legitimate interests or a those of a third party, i.e., to maintain Our accreditations so We can demonstrate We operate at the highest standards.  To comply with Our legal and regulatory obligations.

- (b) **Stored Information Uses.** CaseCraft stores and retains the information provided by customer. Stored information that is personally identifiable is used by CaseCraft and CaseCraft agents: to support customer interaction with the CaseCraft Website and other software; to deliver customer purchases; and/or to contact customer again about other CaseCraft services and products; and to improve models.
- (c) **Privacy Exceptions.** Certain users are exempted from the collection of any personal data that can be used for creating or improving models. Those users who purchase any subscription or package under the “lawyer” category, or herein notifies CaseCraft of his or her subscription to the lawyer category, will be considered a user whose data may not be used for the creation or improving of any model.
- (d) **Deleted Information Uses.** Any account that is deleted will only delete information associated directly with the user. All other information—including anonymized inputs and outputs—are not deleted and may be retained by CaseCraft.
- (e) **Online Advertising.** Some companies that help CaseCraft deliver interactive on-line advertising, such as banner ads, may collect and use information about CaseCraft's customers to help CaseCraft better understand the types of advertising or promotions that are most appealing to CaseCraft's customers. After it is collected the information is aggregated so it is not identifiable to a specific individual.

#### 4. Disclosure of the Information.

- (a) **Within Corporate Organization.** CaseCraft is a multinational organization, with legal entities, business processes, management structures, and technical systems that cross borders. CaseCraft may share your personal information within the Fortuna-Insights, Inc. corporate organization, and may transfer the information to countries in the world where CaseCraft conducts business. Some countries may provide less legal protection for customer personal information.
- (b) **Mergers and Acquisitions.** For the purpose of developing and expanding its business, CaseCraft and Fortuna-Insights, Inc. may share, rent, sell or buy business assets. In such transactions, customer information is generally one of the transferred business assets. In the event CaseCraft is acquired, customer information will be one of the transferred assets.

- (c) **Agents.** CaseCraft employs or engages other companies and individuals to perform business functions on behalf of CaseCraft. These persons are provided with personal identifying information required to perform their functions, but are prohibited by contract from using the information for other purposes. These persons engage in a variety of functions which include, but are not limited to, fulfilling orders, delivering packages, removing repetitive information from customer lists, analyzing data, providing marketing assistance, processing credit card payments and providing customer services.
- (d) **Affiliated Businesses.** CaseCraft works closely with affiliated businesses operating web site stores, providing services or selling products on each other's Web sites. These businesses identify themselves to customers. Customer information related to a transaction with an affiliated business is shared with that affiliated business.
- (e) **Marketing Analysis by Third Parties.** CaseCraft reserves the right to disclose to third parties personal information about customers for marketing analysis; however, any information disclosed will be in the form of aggregate data that does not describe or identify an individual customer.
- (f) **Disclosure to Governmental Authorities.** Under certain circumstances, personal information may be subject to disclosure pursuant to a judicial or other government subpoenas, warrants or orders.

## 5. Use of Computer Tracking Technologies.

- (a) **No Tracking of Personal Information.** CaseCraft's Website(s) are not set up to track, collect or distribute personal information not entered by visitors. Through web site access logs CaseCraft does collect clickstream data and HTTP protocol elements, which generate certain kinds of non-identifying site usage data, such as the number of hits and visits to Our sites. This information is used for internal purposes by technical support staff for research and development, user analysis and business decision making, all of which provides better services to the public. The statistics garnered, which contain no personal information and cannot be used to gather such information, may also be provided to third parties.
- (b) **Use of Cookies.** CaseCraft, or its third party vendors, collects non-identifiable and personal information through the use of various technologies, including "cookies." A cookie is an alphanumeric identifier that a Web site can transfer to customer's hard drive through customer's browser. The cookie is then stored on customer's computer as an anonymous tag that identifies the customer's computer, but not the customer. Cookies may be sent by CaseCraft or its third party vendors. Customer can set its browser to notify customer before a cookie is received, giving an opportunity to decide whether to accept the cookie. Customer may also set its browser to turn off cookies; however, some Web sites may not then work properly.
- (c) **Use of Web Beacon Technologies.** CaseCraft may also use Web beacon or other technologies to better tailor its Web site(s) to provide better customer service. If these technologies are in use, when a visitor accesses these pages of the Web site, a non-identifiable notice of that visit is generated which may be processed by CaseCraft or by its suppliers. Web beacons usually work in conjunction with cookies. If customer does

not want cookie information to be associated with customer's visits to these pages, customer can set its browser to turn off cookies; however, Web beacon and other technologies will still detect visits to these pages, but the notices they generate cannot be associated with other non-identifiable cookie information and are disregarded.

- (d) **Collection of Non-Identifiable Information.** CaseCraft may collect non-identifiable information from user visits to the CaseCraft Web site(s) in order to provide better customer service. Examples of such collecting include: traffic analysis, such as tracking of the domains from which users visit, or tracking numbers of visitors; measuring visitor activity on CaseCraft Web site(s); Web site and system administration; user analysis; and business decision making. Such information is sometimes known as "clickstream data." CaseCraft or its contractors may use this data to analyze trends and statistics.
- (e) **Collection of Personal Information.** CaseCraft collects personal identifying information from customer during a transaction. CaseCraft may extract some personally identifying information about that transaction in a non-identifiable format and combine it with other non-identifiable information, such as clickstream data. This information is used and analyzed only at an aggregate level (not at an individual level) to help CaseCraft understand trends and patterns. This information is not reviewed at an individual level.

## 6. Information Security.

- (a) **Commitment to Online Security.** CaseCraft intends to protect customer personal information and to maintain its quality. To achieve information security and quality, CaseCraft implements appropriate measures and processes.
- (b) **No Liability for Acts of Third Parties.** CaseCraft will exercise all reasonable efforts to safeguard the confidentiality of customer personal information. However, transmissions protected by industry standard security technology and implemented by human beings cannot be made absolutely secure. Consequently, CaseCraft shall not be liable for unauthorized disclosure of personal information due to no fault of CaseCraft including, but not limited to, errors in transmission and unauthorized acts of CaseCraft staff and third parties.

## 7. Privacy Policy Changes and Opt-Out Rights.

- (a) **Changes to Privacy Policy.** This privacy notice was last updated on April 14, 2023. CaseCraft reserves the right to change its privacy policy statement at any time. A notice of any material change will be posted on the CaseCraft Web site home page for thirty (30) days prior to the implementation of such change.
- (b) **Opt-Out Right.** Customer has the right at any time to cease permitting personal information to be collected, used or disclosed by CaseCraft and/or by any third parties with whom CaseCraft has shared and/or transferred such personal information. Right of cancellation may be exercised by contacting CaseCraft via e-mail at [support@fortuna-insights.com](mailto:support@fortuna-insights.com), telephone or certified postal mail. After processing the

cancellation, CaseCraft will delete customer or prospective customer's personal information from its data base.

## 8. Access Rights to Data.

- (a) **Information Maintained by CASECRAFT.** Upon customer's request, CaseCraft will provide a reasonable description of customer's personally identifiable information that CaseCraft maintains in its data bank. CaseCraft can be contacted by e-mail at [supoport@fortuna-insights.com](mailto:supoport@fortuna-insights.com), telephone at (949) 531-8579, or certified postal mail at 251 Little Falls Drive, Wilmington, DE 19808.
- (b) **Corrections and Changes to Personal Information.** Help CaseCraft to keep customer personal information accurate. If customer's personal information changes, or if customer notes an error upon review of customer information that CaseCraft has on file, please promptly e-mail CaseCraft at [support@fortuna-insights.com](mailto:support@fortuna-insights.com) and provide the new or correct information.
- (c) **Your California Privacy Rights.** Beginning on January 1, 2005, California Civil Code Section 1798.83 permits customers of CaseCraft who are California residents to request certain information regarding CaseCraft's disclosure of personal information for their direct marketing purposes. To make such a request, please write to: [support@fortuna-insights.com](mailto:support@fortuna-insights.com). Within 30 days of receiving such a request, CaseCraft will provide a list of the categories of personal information disclosed to third parties for third-party direct marketing purposes during the immediately preceding calendar year, along with the names and addresses of these third parties. This request may be made no more than once per calendar year. CaseCraft reserves its right not to respond to requests submitted other than to the address specified in this paragraph.

California's privacy laws require a company to provide notice to California users of their rights to receive information on to which entities their information was shared for marketing purposes.

## 9. Accountability.

- (a) **Questions, Problems and Complaints.** If you have a question about this policy statement, or a complaint about CaseCraft compliance with this privacy policy, you may contact CaseCraft by e-mail at [support@fortuna-insights.com](mailto:support@fortuna-insights.com). If CaseCraft is unable to resolve your complaint to your reasonable satisfaction or if customer does not receive acknowledgment of an inquiry, customer may elect to proceed by contacting [support@fortuna-insights.com](mailto:support@fortuna-insights.com).
- (b) **Terms of Use.** If customer chooses to enter into a purchase order or to subscribe to CaseCraft's services, customer's action is hereby deemed acceptance of CaseCraft practices described in this policy statement. Any dispute over privacy between customer and CaseCraft is subject to the provisions of this notice and to CaseCraft's Software Agreement.