# **Cookie Policy of Blue Ocean Law Group**

To find more information on California consumers and their privacy rights, Users may read the privacy policy.

To find more information on Virginia consumers and their privacy rights, Users may read the privacy policy.

To find more information on Colorado consumers and their privacy rights, Users may read the privacy policy.

To find more information on Connecticut consumers and their privacy rights, Users may read the privacy policy.

To find more information on Utah consumers and their privacy rights, Users may read the privacy policy.

This document informs Users about the technologies that help Blue Ocean Law Group to achieve the purposes described below. Such technologies allow the Owner to access and store information (for example by using a Cookie) or use resources (for example by running a script) on a User's device as they interact with Blue Ocean Law Group.

For simplicity, all such technologies are defined as "Trackers" within this document – unless there is a reason to differentiate. For example, while Cookies can be used on both web and mobile browsers, it would be inaccurate to talk about Cookies in the context of mobile apps as they are a browser-based Tracker. For this reason, within this document, the term Cookies is only used where it is specifically meant to indicate that particular type of Tracker.

Some of the purposes for which Trackers are used may also require the User's consent. Whenever consent is given, it can be freely withdrawn at any time following the instructions provided in this document.

Blue Ocean Law Group uses Trackers managed directly by the Owner (so-called "first-party" Trackers) and Trackers that enable services provided by a third-party (so-called "third-party" Trackers). Unless otherwise specified within this document, third-party providers may access the Trackers managed by them.

The validity and expiration periods of Cookies and other similar Trackers may vary depending on the lifetime set by the Owner or the relevant provider. Some of them expire upon termination of the User's browsing session.

In addition to what's specified in the descriptions within each of the categories below, Users may find more precise and updated information regarding lifetime specification as well as any other relevant information – such as the presence of other Trackers - in the linked privacy policies of the respective third-party providers or by contacting the Owner.

# Activities strictly necessary for the operation of Blue Ocean Law Group and delivery of the Service

Blue Ocean Law Group uses so-called "technical" Cookies and other similar Trackers to carry out activities that are strictly necessary for the operation or delivery of the Service.

# **First-party Trackers**

Storage duration: indefinite

# **Third-party Trackers**

# Spam and bots protection

This type of service analyses 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 recognised 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 <u>privacy policy</u> and <u>terms of use</u>.

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

Place of processing: United States - Privacy Policy.

Storage duration:

• \_GRECAPTCHA: duration of the session

- rc::a: indefinite
- rc::b: duration of the session
- rc::c: duration of the session

# 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 customisable and can host websites from simple blogs to complex e-commerce platforms.

Personal Data processed: Trackers, Usage Data and 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.

# **Tag Management**

This type of service helps the Owner to manage the tags or scripts needed on Blue Ocean Law Group in a centralised 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 and Usage Data.

Place of processing: United States - Privacy Policy.

# Traffic optimisation and distribution

This type of service allows Blue Ocean Law Group to distribute their content using servers located across different countries and to optimise 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 optimisation 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 – <u>Privacy Policy</u>.

# Infrastructure monitoring

This type of service allows Blue Ocean Law Group to monitor the use and behaviour 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.

# 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.

# 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 and Trackers.

Place of processing: Italy – <u>Privacy Policy</u>.

Storage duration:

• ConS JS library localStorage (IUB\_DATA): indefinite

#### **Other Trackers**

# Traffic optimisation and distribution

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

# **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

# 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 it 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: https://www.jsdelivr.com/terms/privacy-policy-jsdelivr-net

# Other activities involving the use of Trackers

# **Functionality**

Blue Ocean Law Group uses Trackers to enable basic interactions and functionalities, allowing Users to access selected features of the Service and facilitating the User's communication with the Owner.

#### 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

#### Selling goods and services online

This type of service helps the Owner to sell goods, provide services or monetise 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 and Usage Data.

Place of processing: United States – Privacy Policy.

#### 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 and various types of Data as specified in the privacy policy of the service.

Place of processing: United States – <u>Privacy Policy</u>.

Storage duration:

- \_\_hs\_gpc\_banner\_dismiss: 6 months
- \_\_\_\_\_hssc: 30 minutes
- \_\_hssrc: duration of the session
- \_\_hstc: 2 months
- hubspotutk: 2 months
- messagesUtk: 2 months

# Experience

Blue Ocean Law Group uses Trackers to improve the quality of the user experience and enable interactions with external content, networks and platforms.

# 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 visualisation service provided by Google LLC that allows Blue Ocean Law Group to incorporate content of this kind on its pages.

Personal Data processed: Trackers and Usage Data.

Place of processing: United States - Privacy Policy.

Storage duration:

- PREF: 8 months
- VISITOR\_INFO1\_LIVE: 8 months
- YSC: duration of the session

# 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 and Usage Data.

Place of processing: United States - Privacy Policy.

Storage duration:

• personalization\_id: 2 years

# Measurement

Blue Ocean Law Group uses Trackers to measure traffic and analyse User behaviour to improve the Service.

#### Anonymised analytics services

The services contained in this section allow the Owner, through the use of third-party Trackers, to collect and manage analytics in an anonymised form.

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

Google Analytics (Universal Analytics) is a web analysis service provided by Google LLC ("Google"). Google utilises 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 contextualise and personalise the ads of its own advertising network. This integration of Google Analytics anonymises 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.

Personal Data processed: Trackers and Usage Data.

Legal basis for processing: Consent.

Place of processing: United States - Privacy Policy - Opt Out.

Storage duration:

- AMP\_TOKEN: 1 hour
- \_ga: 2 years
- \_gac\*: 3 months
- \_gat: 1 minute
- \_gid: 1 day

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

The services contained in this section allow the Owner to track and analyse the User response concerning web traffic or behaviour 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 and Usage Data.

Place of processing: United States – <u>Privacy Policy</u>.

# Marketing

Blue Ocean Law Group uses Trackers to deliver personalised marketing content based on User behaviour and to operate, serve and track ads.

Some of the advertising services used by the Owner adhere to the <u>IAB Transparency and Consent Framework</u>, an initiative that facilitates responsible privacy practises across the digital advertising industry - providing Users with enhanced transparency and control over how their data are used for advertising tracking purposes. Users can customise their advertising preferences at any time by accessing the advertising preferences panel from within the cookie notice or via the relevant link on Blue Ocean Law Group.

Blue Ocean Law Group participates in the IAB Europe Transparency & Consent Framework and complies with its Specifications and Policies. Blue Ocean Law Group uses iubenda (identification number 123) as a Consent Management Platform.

# How to manage preferences and provide or withdraw consent

There are various ways to manage Tracker related preferences and to provide and withdraw consent, where relevant:

Users can manage preferences related to Trackers from directly within their own device settings, for example, by preventing the use or storage of Trackers.

Additionally, whenever the use of Trackers is based on consent, Users can provide or withdraw such consent by setting their preferences within the cookie notice or by updating such preferences accordingly via the relevant consent-preferences privacy widget, if available.

It is also possible, via relevant browser or device features, to delete previously stored Trackers, including those used to remember the User's initial consent preferences.

Other Trackers in the browser's local memory may be cleared by deleting the browsing history.

With regard to any third-party Trackers, Users can manage their preferences via the related opt-out link (where provided), by using the means indicated in the third party's privacy policy, or by contacting the third party.

#### **Locating Tracker Settings**

Users can, for example, find information about how to manage Cookies in the most commonly used browsers at the following addresses:

- <u>Google Chrome</u>
- Mozilla Firefox
- <u>Apple Safari</u>
- <u>Microsoft Internet Explorer</u>
- <u>Microsoft Edge</u>
- Brave
- Opera

Users may also manage certain categories of Trackers used on mobile apps by opting out through relevant device settings such as the device advertising settings for mobile devices, or tracking settings in general (Users may open the device settings and look for the relevant setting).

#### How to opt out of interest-based advertising

Notwithstanding the above, Users may follow the instructions provided by <u>YourOnlineChoices</u> (EU and UK), the <u>Network</u> <u>Advertising Initiative</u> (US) and the <u>Digital Advertising Alliance</u> (US), <u>DAAC</u> (Canada), <u>DDAI</u> (Japan) or other similar services. Such initiatives allow Users to select their tracking preferences for most of the advertising tools. The Owner thus recommends that Users make use of these resources in addition to the information provided in this document.

The Digital Advertising Alliance offers an application called <u>AppChoices</u> that helps Users to control interest-based advertising on mobile apps.

#### Consequences of denying the use of Trackers

Users are free to decide whether or not to allow the use of Trackers. However, please note that Trackers help Blue Ocean Law Group to provide a better experience and advanced functionalities to Users (in line with the purposes outlined in this document). Therefore, if the User chooses to block the use of Trackers, the Owner may be unable to provide related features.

# **Owner and Data Controller**

James D. Ford General Practice Lawyer | Founder & M.D. Blue Ocean Law Group c/- Work Club Level 8, 99 Elizabeth Street Sydney NSW 2000

#### Owner contact email: privacy@blueocean.law

Since the use of third-party Trackers through Blue Ocean Law Group cannot be fully controlled by the Owner, any specific references to third-party Trackers are to be considered indicative. In order to obtain complete information, Users are kindly requested to consult the privacy policies of the respective third-party services listed in this document.

Given the objective complexity surrounding tracking technologies, Users are encouraged to contact the Owner should they wish to receive any further information on the use of such technologies by Blue Ocean Law Group.

# **Definitions and legal references**

# Personal Data (or Data)

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.

#### **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 utilised by the Users who use Blue Ocean Law Group, the URI addresses (Uniform Resource Identifier), the time of the request, the method utilised 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 utilised 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.

#### **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, including Art. 13/14 of Regulation (EU) 2016/679 (General Data Protection Regulation).

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

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