



LEGATICS

TRANSFORMING LEGAL TRANSACTIONS

Privacy Policy and Cookie Notice

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1 Introduction

Legatics Limited ("**Legatics**") is a company registered in England and Wales. Legatics is committed to respecting your privacy and protecting your personal data. This privacy policy ("**Privacy Policy**") sets out:

- (a) The scope of this Privacy Policy;
- (b) The types of personal data we may collect about you;
- (c) How your personal data is collected;
- (d) How your personal data is used;
- (e) The purposes for which we will use your personal data;
- (f) How third party links are handled;
- (g) Disclosures of your personal data;
- (h) International transfers of your personal data;
- (i) Data security;
- (j) Data retention;
- (k) Your legal rights;
- (l) Our contact details; and
- (m) Details on changes to this Privacy Policy and changes to your personal data.

2 Scope of this Privacy Policy

Legatics provides both the Legatics front end website hosted on the www.legatics.com subdomain (the "**Website**") and the Legatics legal transaction management platform (the "**Transaction Management Platform**"). You may also interact with Legatics in the course of other aspects of our business, such as if you contact us for information, liaise with our business development or Engagement teams, attend an event we organise, are asked to supply us with a service, or otherwise come into contact with us in the course of our business ("**Course of Business Interactions**").

If you are a Subscriber, this Privacy Policy is subject to any terms agreed in the contract for that subscription (a "**Subscription Contract**") and, in the event of any conflict, the terms of the relevant subscription agreement shall prevail.

2.1 Scope in relation to Transaction Management Platform

If you have been granted access to the Transaction Management Platform, your personal data held in that environment will be controlled by either Legatics or the Legatics subscriber ("**Subscriber**") as set out under '*Who is 'controller' in respect of your personal data?*', below. Where your data is controlled by Legatics, our relationship in respect of your personal data is covered by this privacy policy. Where your personal data is controlled by the Subscriber, the personal data will be subject to that Subscriber's personal data and privacy policies.

In the unlikely event that a court deems the controller to be another party to that stated in this privacy policy, then the decision of that court shall prevail. If Legatics is deemed to be a controller where this was not envisaged by this privacy policy, then Legatics will treat that data in line with the principles set out in this Privacy Policy for the most similar category, where it has been envisaged that Legatics is controller.

2.2 Who is ‘controller’ in respect of your personal data?

Subject to the application of applicable law and any contrary position agreed between Legatics and you in a Subscription Contract, the table below sets out who is controller in respect of your personal data personal data.

Source of Data	Type of data	Data Controller
<p>Data entered into your user profile page within the Transaction Management Platform</p> <p>Data collected by automated and technical means in relation to use of the Transaction Management Platform</p>	<p>Identity Data</p> <p>Contact Data</p> <p>Profile Data</p> <p>Technical Data</p> <p>Usage Data</p> <p>Marketing and Communications Data</p>	Legatics
Data entered within the context of a Subscriber matter within the Transaction Management Platform	Any personal data types, as may be set out within the relevant Subscribers’ privacy policies.	<p>Subscriber who is the owner of the relevant matter.</p> <p>Please note that Legatics is processor in respect of this data under the relevant Subscription Contract.</p>
Data collected in the Course of Business Interactions and any personal data not covered by a source in the rows above.	<p>Identity Data</p> <p>Contact Data</p> <p>Profile Data</p> <p>Technical Data</p> <p>Usage Data</p> <p>Marketing and Communications Data</p>	Legatics

Where your personal data is controlled by the Subscriber, the personal data will be subject to that Subscriber’s personal data and privacy policies. You should contact that Subscriber in relation to any queries you may have around their data protection policies and the exercise of your legal rights in relation to the data they control.

2.3 Children

Legatics services and website is not intended for children and we do not knowingly collect data relating to children.

2.4 Specific privacy policies

It is important that you read this privacy policy together with any other privacy policy or fair processing policy we may provide on specific occasions when we are collecting or processing personal data about you so that you are fully aware of how and why we are using your data. In the event of you being provided with such a specific privacy policy, this Privacy Policy shall supplement and not override that policy.

3 Types of personal data we may collect about you

Personal data, or personal information, means any information about an individual from which that person can be identified. It does not include data where the identifiable data has been removed (anonymous data).

Legatics may collect, use, store and transfer different kinds of personal data about you which we have grouped together as follows:

- (a) **Identity Data** includes first name, maiden name, last name, job title and any similar such identity data you choose to provide us with.
- (b) **Contact Data** includes email address, office, address and telephone numbers.
- (c) **Profile Data** includes your username or similar identifier, password, and any system preferences.
- (d) **Technical Data** includes internet protocol (IP) address, your login data, browser type and version, time zone setting and location, browser plug-in types and versions, operating system and platform, and other technology on the devices you use to access the Website or the Transaction Management Platform.
- (e) **Usage Data** includes information about how you use the Website, the Transaction Management Platform, products and services.
- (f) **Marketing and Communications Data** includes your preferences in receiving marketing from us and our third parties and your communication preferences.

We also collect, use and share Aggregated Data such as statistical or demographic data for any purpose. Aggregated Data could be derived from your personal data but is not considered personal data in law as this data will not directly or indirectly reveal your identity. For example, we may aggregate your Usage Data to calculate the percentage of users accessing a specific feature. However, if we combine or connect Aggregated Data with your personal data so that it can directly or indirectly identify you, we treat the combined data as personal data which will be used in accordance with this privacy policy.

We do not collect any Special Categories of Personal Data about you (this includes details about your race or ethnicity, religious or philosophical beliefs, sex life, sexual orientation, political opinions, trade union membership, information about your health, and genetic and biometric data). Nor do we collect any information about criminal convictions and offences.

Where data you provide on the Transaction Management Platform is deemed not to be controlled by Legatics, the relevant Subscriber of the matter to which you have access will be the controller of your data. You will be subject to that Subscriber's privacy policy in respect of that information. This will include any information relating to a specific matter or transaction hosted on the Transaction Management Platform.

3.1 If you fail to provide personal data

Where we need to collect personal data by law, or under the terms of a contract we have with you, and you fail to provide that data when requested, we may not be able to perform the contract we have or are trying to enter into with you (for example, to provide you with goods or services). In this case, we may have to cancel a product or service you have with us but we will notify you if this is the case at the time.

4 How we collect your personal data

We use different methods to collect data from and about you, as set out below.

4.1 Direct interactions.

You may give us your Identity, Contact and Profile Data by filling in forms or by corresponding with us by post, phone, email or otherwise. This includes personal data you provide when you:

- (a) apply for or use our products or services;
- (b) request marketing to be sent to you;
- (c) enter a competition, promotion or survey; or
- (d) give us feedback or contact us.

4.2 Automated technologies or interactions.

As you interact with the Website or the Transaction Management Platform, we will automatically collect Technical Data about your equipment, browsing actions and patterns. We collect this personal data by using cookies, server logs and other similar technologies. We may also receive Technical Data about you if you visit other websites employing our cookies. Please see our cookie policy below for further details.

4.3 Third parties or publicly available sources.

We may receive personal data about you from various third parties and public sources as set out below:

- (a) analytics such as Google (whose services may be based outside the EU);
- (b) advertising networks such as Google (whose services may be based outside the EU);
- (c) search information providers such as Google (whose services may be based outside the EU); and
- (d) technical partners or subcontracts that may provide a service to us, such as log in management or your organisations' single sign on service provider.

5 How we use your personal data

We will only use your personal data when the law allows us to. Most commonly, we will use your personal data in the following circumstances:

- (a) Where we need to perform the contract we are about to enter into or have entered into with you.
- (b) Where it is necessary for our legitimate interests (or those of a third party) and your interests and fundamental rights do not override those interests.
- (c) Where we need to comply with a legal obligation.
- (d) Please refer to the Glossary below to find out more about the types of lawful basis that we will rely on to process your personal data.

Generally, we do not rely on consent as a legal basis for processing your personal data although we will get your consent before sending direct marketing communications to you via email or text message. You have the right to withdraw consent to marketing at any time by contacting us.

6 Purposes for which we will use your personal data

We have set out below, in a table format, a description of all the ways we plan to use your personal data, and which of the legal bases we rely on to do so. We have also identified what our legitimate interests are where appropriate. Note that we may process your personal data for more than one lawful ground depending on the specific purpose for which we are using your data.

Purpose/Activity	Type(s) of data	Lawful basis for processing including basis of legitimate interest
To register you as a new customer	Identity Data Contact Data Technical Data	Performance of a contract with you
To manage our relationship with you which may include notifying you about changes to our terms or privacy policy	Identity Data Contact Data Usage Data Marketing and Communications Data	(a) Performance of a contract with you (b) Necessary to comply with a legal obligation (c) Necessary for our legitimate interests (to keep our records updated and to study how customers use our products/services)
To carry out our obligations arising from any contracts entered into between us and a	Identity Data Contact Data Profile Data	(a) Performance of a contract with you or a Subscriber

Subscriber, including storage and management of data		(b) Necessary to comply with a legal obligation
To enable you to partake in a survey where we have a reasonable basis to assume you may wish to take part	Identity Data Contact Data Profile Data Usage Data Marketing and Communications Data	(a) Performance of a contract with you or a Subscriber (b) Necessary for our legitimate interests (to study how customers use our products/services, to develop them and grow our business)
To administer and protect our business and this website (including troubleshooting, data analysis, testing, system maintenance, support, reporting and hosting of data)	Identity Data Contact Data Technical Data	(a) Necessary for our legitimate interests (for running our business, provision of administration and IT services, network security, to prevent fraud and in the context of a business reorganisation or group restructuring exercise) (b) Necessary to comply with a legal obligation
To operate, deliver, support and protect the Legatics Transaction Management Platform, including management of your profile within the platform, the sending of notifications from the platform and collection of marketing preference data.	Identity Data Contact Data Profile Data Usage Data Marketing and Communications Data Technical Data	(a) Necessary for our legitimate interests (for running our business, provision of the Transaction Management Platform, performance of contracts, administration and IT services, network security, to prevent fraud and in the context of a business reorganisation or group restructuring exercise) (b) Necessary to comply with a legal obligation (c) Performance of a contract with you or a Subscriber
To deliver relevant website content as well as advertisements to you and measure or understand the effectiveness of the advertising we serve to you	Identity Data Contact Data Profile Data Usage Data Marketing and Communications Data	Necessary for our legitimate interests (to study how customers use our products/services, to develop them, to grow our business and to inform our marketing strategy)

	Technical Data	
To deliver information about new product releases, information on how to best use the Transaction Management Platform, information on rolling out the Transaction Management Platform within your organisation and other similar matters.	Identity Data Contact Data Profile Data Usage Data Marketing and Communications Data Technical Data	(a) Necessary for our legitimate interests (to develop our products/services and grow our business) (b) Performance of a contract with you or a Subscriber
To use data analytics to improve our website, products/services, marketing, customer relationships and experiences	Technical Data Usage Data	Necessary for our legitimate interests (to define types of customers for our products and services, to keep our website updated and relevant, to develop our business and to inform our marketing strategy)
To make suggestions and recommendations to you about goods or services that may be of interest to you where (a) you have previously engaged with our products and services; (b) expressed an interest in our products or services; (c) given us your details in a context that suggests our products and services may be of interest to you, such as giving us a business card at a trade fair, giving us your details in relation to an event where we discuss our products or services, or submitting an enquiry on our website; or (c) made your details publicly available with a context that suggests our products and services may be of interest to you.	Identity Data Contact Data Technical Data Usage Data Profile Data Marketing and Communications Data	Necessary for our legitimate interests (to develop our products/services and grow our business)

6.1 Marketing

We strive to provide you with choices regarding certain personal data uses, particularly around marketing and advertising.

6.2 Promotional offers from us

We may use your Identity, Contact, Technical, Usage and Profile Data to form a view on what we think you may want or need, or what may be of interest to you. This is how we decide which products, services and offers may be relevant for you.

You will receive marketing communications from us if you have requested information from us or purchased products/services from us and you have not opted out of receiving that marketing.

6.3 Third-party marketing

We will get your express opt-in consent before we share your personal data with any third party for marketing purposes.

6.4 Opting out

You can ask us or third parties to stop sending you marketing messages at any time by contacting us at any time. We may still use or retain personal data about you where this has been collected for a different purpose and is covered by a lawful interest.

6.5 Cookies

You can set your browser to refuse all or some browser cookies, or to alert you when websites set or access cookies. If you disable or refuse cookies, please note that some parts of Website or the Transaction Management Platform may become inaccessible or not function properly. For more information about the cookies we use, please see below.

6.6 Change of purpose

We will only use your personal data for the purposes for which we collected it, unless we reasonably consider that we need to use it for another reason and that reason is compatible with the original purpose. If you wish to get an explanation as to how the processing for the new purpose is compatible with the original purpose, please contact us.

If we need to use your personal data for an unrelated purpose, we will notify you and we will explain the legal basis which allows us to do so.

Please note that we may process your personal data without your knowledge or consent, in compliance with the above rules, where this is required or permitted by law.

7 Third-party links

The Website or the Transaction Management Platform may include links to third-party websites, plug-ins and applications. Clicking on those links or enabling those connections may allow third parties to collect or share data about you. We do not control these third-party websites and are not responsible for their privacy statements. When you leave our website, we encourage you to read the privacy policy of every website you visit.

8 Disclosures of your personal data

We may share your personal data with the parties set out below for the purposes we set out in 'Purposes for which we will use your personal data':

- (a) External Third Parties as set out in the Glossary.
- (b) Third parties to whom we may choose to sell, transfer or merge parts of our business or our assets. Alternatively, we may seek to acquire other businesses or merge with them. If a change happens to our business, then the new owners may use your personal data in the same way as set out in this privacy policy.

We require all third parties to respect the security of your personal data and to treat it in accordance with the law. We do not allow our third-party service providers to use your personal data for their own purposes and only permit them to process your personal data for specified purposes and in accordance with our instructions.

9 International transfers

In respect of data provided on the Transaction Management Platform that is deemed not to be controlled by Legatics, transfers of data will be governed in accordance with your agreement with the Subscriber and their privacy policy as controller of that data. Please always refer to your agreement with the Subscriber and their privacy policy for information as to how data that is processed, but not controlled, by Legatics is transferred outside of the EEA.

In respect of data controlled by Legatics, Legatics may transfer data to our external third parties. Some of our external third parties are based outside the EEA so their processing of your personal data will involve a transfer of data outside the EEA.

Whenever we transfer your personal data out of the EEA, we ensure a similar degree of protection is afforded to it by ensuring at least one of the following safeguards is implemented:

- (a) We will only transfer your personal data to countries that have been deemed to provide an adequate level of protection for personal data by the European Commission. For further details, see European Commission: Adequacy of the protection of personal data in non-EU countries.
- (b) Where we use certain service providers, we may use specific contracts approved by the European Commission which give personal data the same protection it has in Europe. For further details, see European Commission: Model contracts for the transfer of personal data to third countries.
- (c) Where we use providers based in the US, we may transfer data to them if they are part of the Privacy Shield which requires them to provide similar protection to personal data shared between Europe and the US. For further details, see European Commission: EU-US Privacy Shield.

Please contact us if you want further information on the specific mechanism used by us when transferring your personal data out of the EEA.

10 Data security

We have put in place appropriate security measures to prevent your personal data from being accidentally lost, used or accessed in an unauthorised way, altered or disclosed. In addition, we limit access to your personal data to those employees, agents, contractors and other third parties who have a business need to know. They will only process your personal data on our instructions and they are subject to a duty of confidentiality.

We have put in place procedures to deal with any suspected personal data breach and will notify you and any applicable regulator of a breach where we are legally required to do so.

11 Data retention

11.1 How long your personal data will be retained

We will only retain your personal data for as long as reasonably necessary to fulfil the purposes we collected it for, including for the purposes of satisfying any legal, regulatory, tax, accounting or reporting requirements. We may retain your personal data for a longer period in the event of a complaint or if we reasonably believe there is a prospect of litigation in respect to our relationship with you.

To determine the appropriate retention period for personal data, we consider the amount, nature and sensitivity of the personal data, the potential risk of harm from unauthorised use or disclosure of your personal data, the purposes for which we process your personal data and whether we can achieve those purposes through other means, and the applicable legal, regulatory, tax, accounting or other requirements.

In some circumstances you can ask us to delete your data: see *your legal rights* below for further information.

In some circumstances we will anonymise your personal data (so that it can no longer be associated with you) for research or statistical purposes, in which case we may use this information indefinitely without further notice to you.

In respect of any information provided on the Transaction Management Platform, this is controlled by the Subscriber and you should refer to your agreement with the Subscriber and their privacy policy.

12 Your legal rights

Under certain circumstances, you have the following rights under data protection laws in relation to your personal data:

- (a) Request access to your personal data.
- (b) Request correction of your personal data.
- (c) Request erasure of your personal data.
- (d) Object to processing of your personal data.
- (e) Request restriction of processing your personal data.
- (f) Request transfer of your personal data.

(g) Right to withdraw consent.

Please see the Glossary below to find out more about these rights.

If you wish to exercise any of the rights set out above, please contact us.

12.1 No fee usually required

You will not have to pay a fee to access your personal data (or to exercise any of the other rights). However, we may charge a reasonable fee if your request is clearly unfounded, repetitive or excessive. Alternatively, we could refuse to comply with your request in these circumstances.

12.2 What we may need from you

We may need to request specific information from you to help us confirm your identity and ensure your right to access your personal data (or to exercise any of your other rights). This is a security measure to ensure that personal data is not disclosed to any person who has no right to receive it. We may also contact you to ask you for further information in relation to your request to speed up our response.

12.3 Time limit to respond

We try to respond to all legitimate requests within one month. Occasionally it could take us longer than a month if your request is particularly complex or you have made a number of requests. In this case, we will notify you within a month and keep you updated.

13 Contact details and data protection officer

We have appointed a data protection officer (DPO) who is responsible for overseeing questions in relation to this privacy policy. If you have any questions about this privacy policy, including any requests to exercise your legal rights, please contact the DPO using the details set out below.

13.1 Contact details

If you have any questions about this privacy policy or our privacy practices, please contact our DPO in the following ways:

Full name of legal entity: Legatics Limited

Email address: support@legatics.com

Postal address: Legatics Limited, Fuse, Level 1, One Bishops Square, London E1 6AD, United Kingdom.

13.2 Complaints

You have the right to make a complaint at any time to the Information Commissioner's Office (ICO), the UK supervisory authority for data protection issues (www.ico.org.uk). We would, however, appreciate the chance to deal with your concerns before you approach the ICO so please contact us in the first instance.

14 Changes to the privacy policy and your personal data

We keep our privacy policy under regular review. We may in the future ask you to confirm updates to our privacy policy and the acceptance of such updates may be a pre-requisite to using some of our services.

It is important that the personal data we hold about you is accurate and current. Please keep us informed if your personal data changes during your relationship with us.

15 Glossary

15.1 Lawful Basis

A **“Lawful Basis”** means any of the bases set out below.

15.1.1 Legitimate Interest

“Legitimate Interest” means the interest of our business in conducting and managing our business to enable us to give you the best service/product and the best and most secure experience. We make sure we consider and balance any potential impact on you (both positive and negative) and your rights before we process your personal data for our legitimate interests. We do not use your personal data for activities where our interests are overridden by the impact on you (unless we have your consent or are otherwise required or permitted to by law). You can obtain further information about how we assess our legitimate interests against any potential impact on you in respect of specific activities by contacting us.

15.1.2 Performance of a Contract

“Performance of Contract” means processing your data where it is necessary for the performance of a contract to which you are a party or to take steps at your request before entering into such a contract.

15.1.3 Compliance with a Legal Obligation

“Comply with a Legal Obligation” means processing your personal data where it is necessary for compliance with a legal obligation that we are subject to.

15.2 External Third Parties

“External Third Parties” are:

- (a) Service providers acting as processors who provide IT, support and system administration services including Amazon Web Services, Acquia Inc, who may operate these services on an international basis.
- (b) Subscribers and other users of the Legatics Transaction Management Platform, who may be located internationally.
- (c) Providers of our customer relationship management software, who may be located internationally.
- (d) Business partners, suppliers and sub-contractors for the performance of any contract we enter into with them or you.
- (e) If Legatics or substantially all of its assets are acquired by a third party, in which case personal data held by it about its customers will be one of the transferred assets.

- (f) Professional advisers acting as processors or joint controllers including lawyers, bankers, auditors and insurers based in and outside the EU who provide consultancy, banking, legal, insurance and accounting services.
- (g) If we are under a duty to disclose or share your personal data in order to comply with any legal obligation, or to protect the rights, property, or safety of Legatics Limited our customers, or others, including HM Revenue & Customs, regulators and other authorities acting as processors or joint controllers based in the United Kingdom who require reporting of processing activities in certain circumstances.

15.3 Your Legal Rights

"Your Legal Rights" are set out below.

15.3.1 Request access

Request access to your personal data (commonly known as a "data subject access request"). This enables you to receive a copy of the personal data we hold about you and to check that we are lawfully processing it.

15.3.2 Request correction

Request correction of the personal data that we hold about you. This enables you to have any incomplete or inaccurate data we hold about you corrected, though we may need to verify the accuracy of the new data you provide to us.

15.3.3 Request erasure

Request erasure of your personal data. This enables you to ask us to delete or remove personal data where there is no good reason for us continuing to process it. You also have the right to ask us to delete or remove your personal data where you have successfully exercised your right to object to processing (see below), where we may have processed your information unlawfully or where we are required to erase your personal data to comply with local law. Note, however, that we may not always be able to comply with your request of erasure for specific legal reasons which will be notified to you, if applicable, at the time of your request.

15.3.4 Object to processing

Object to processing of your personal data where we are relying on a legitimate interest (or those of a third party) and there is something about your particular situation which makes you want to object to processing on this ground as you feel it impacts on your fundamental rights and freedoms. You also have the right to object where we are processing your personal data for direct marketing purposes. In some cases, we may demonstrate that we have compelling legitimate grounds to process your information which override your rights and freedoms.

15.3.5 Request restriction of processing

Request restriction of processing of your personal data. This enables you to ask us to suspend the processing of your personal data in the following scenarios:

- (a) If you want us to establish the data's accuracy.
- (b) Where our use of the data is unlawful but you do not want us to erase it.
- (c) Where you need us to hold the data even if we no longer require it as you need it to establish, exercise or defend legal claims.

(d) You have objected to our use of your data but we need to verify whether we have overriding legitimate grounds to use it.

15.3.6 Request a transfer

Request the transfer of your personal data to you or to a third party. We will provide to you, or a third party you have chosen, your personal data in a structured, commonly used, machine-readable format. Note that this right only applies to automated information which you initially provided consent for us to use or where we used the information to perform a contract with you.

15.3.7 Withdraw consent

Withdraw consent at any time where we are relying on consent to process your personal data. However, this will not affect the lawfulness of any processing carried out before you withdraw your consent. If you withdraw your consent, we may not be able to provide certain products or services to you. We will advise you if this is the case at the time you withdraw your consent.

Cookie notice

Our website uses cookies to distinguish you from other users of our website. This helps us to provide you with a good experience when you browse our website and also allows us to improve our site. By continuing to browse the site, you are agreeing to our use of cookies.

A cookie is a small file of letters and numbers that we store on your browser or the hard drive of your computer if you agree. Cookies contain information that is transferred to your computer's hard drive.

We use the following cookies:

- (a) Strictly necessary cookies. These are cookies that are required for the operation of our website. They include, for example, cookies that enable you to log into secure areas of our website.
- (b) Analytical/performance cookies. They allow us to recognise and count the number of visitors and to see how visitors move around our website when they are using it. This helps us to improve the way our website works, for example, by ensuring that users are finding what they are looking for easily.
- (c) Functionality cookies. These are used to recognise you when you return to our website. This enables us to personalise our content for you, greet you by name and remember your preferences (for example, your choice of language or region).

You can manage website cookies in your browser settings, and you always have the choice to change these settings by accepting, rejecting, or deleting cookies. If you choose to change your settings, you may find that certain functions and features will not work as intended.