

FROMCOUNSEL LIMITED

PRIVACY & COOKIES POLICY

Last updated: 8 September 2023

1. About this Privacy & Cookies Policy

- 1.1 The website www.fromcounsel.com, the Document Automation service at fromcounsel.documentdrafter.com, and the training platform at training.fromcounsel.com (together the **Website**), are operated by FromCounsel Limited (**FromCounsel, our, us or we**), a company incorporated in England and Wales under company number 07258019. Our registered office is at Suite 2, 43 Bedford Street, London, WC2E 9HA. Our registered VAT number is 294 7616 59.
- 1.2 We are committed to protecting your privacy. We comply with the principles set out in the UK General Data Protection Regulation, the Data Protection Act 2018 and other applicable EU and national privacy legislation (**Data Protection Legislation**).
- 1.3 The aim of this privacy and cookies policy (**Policy**) is to tell you how we will use any personal information collected from or about users of the Website and those who communicate with us (**you, your**). Please read it carefully before you proceed.
- 1.4 We may modify this Policy from time to time. We will use reasonable endeavours to notify you of any material amendments to this Policy by placing a clear notice about them on the Website or by other means. Please review this Policy whenever you use the Website as any changes apply from the date that we make them.
- 1.5 As our customer or as a visitor to the Website, we and the companies that work on our behalf collect information about you. This includes your personal information and information on your use of the Website as set out in this Policy at paragraph 2.1. If you would like further information about this Policy you can contact us on the details provided in paragraph 9.

2. What information do we collect?

- 2.1 We may collect, store and use the following personal information about you:
 - 2.1.1 information that you or your subscribing organisation provide us when registering with the Website or in relation to purchases of or subscriptions for our products and services (including your name, gender, email address, other contact details, password and, if payment is required, card details);
 - 2.1.2 information that you or your subscribing organisation provide us for the purpose of subscribing to our notifications, newsletters or bulletins, such as your name, email address and email preferences;
 - 2.1.3 information about you that your subscribing organisation provides to us (including the details of persons who are authorised users of the Website and our products and services), including your name and email address;

- 2.1.4 information contained in or relating to any communications between you and us, or that you send to us through the Website or by other means (including the content and metadata associated with the communication, and in the case of calls between you and us, any recording of such call);
- 2.1.5 information provided to us by you, your subscribing organisation or its authorised users when interacting with the Document Automation service at fromcounsel.documentdrafter.com (**FC Documents**), such as name, gender, date of birth, nationality, contact details (including home address, email address and phone number) and job details (including job title, job profile, compensation details and qualifications);
- 2.1.6 information generated by your usage of the training platform at training.fromcounsel.com (**FC Training**), including in particular course completion status, results and scores from your answers to questions, and other learning tracking information;
- 2.1.7 publicly available information, including information available on the Companies House public register, such as name, date of birth, nationality, country of residence, occupation and service address, and information published on your business or organisation's website and on business networking sites such as LinkedIn;
- 2.1.8 information that you provide us on other interactive areas on the Website (for example, annotation and comment facilities);
- 2.1.9 information collected about your browser, device and your use of the Website (including your IP address or other device ID, browser type and version, operating system, referral source, length of visit, page views and website navigation paths). Some of this information will be collected by cookies: see paragraph 5 for discussion;
- 2.1.10 information generated in the course of the use of our products and services (including the timing, frequency and pattern of service use);
- 2.1.11 information collected through cookies and similar technologies (see paragraph 5 below); and
- 2.1.12 any other personal information that you choose to send to us.

3. How will we use your personal information?

- 3.1 We may use your personal information for the following purposes:
 - 3.1.1 to provide you with the services on the Website (including our current awareness email updates), to generate draft documentation from information provided to us on FC Documents, to perform our contract with you (or your subscribing organisation), to fulfil your requests, and to administer your account;
 - 3.1.2 to administer and improve the Website and our products and services;
 - 3.1.3 to contact you with information, newsletters, bulletins and marketing materials about our products and services, including by email, telephone and post;

- 3.1.4 for internal research and development purposes and to improve and test the features and functions of our products and services;
 - 3.1.5 to report to your subscribing organisation about its authorised users and their usage of the Website and the subscribed products and services;
 - 3.1.6 to conduct and store site usage analytics, statistical and trend analysis and market research;
 - 3.1.7 to assign or sub-contract, procure goods or services for, or outsource any part of our normal business functions to third parties;
 - 3.1.8 to investigate and respond to any queries or complaints about the Website, us or our business;
 - 3.1.9 to personalise your experience of the Website and suggest tailored content such as news, research, reports and articles;
 - 3.1.10 where relevant, to establish, exercise or defend legal claims;
 - 3.1.11 to protect the rights, property, or safety of us, our business, our clients or other persons;
 - 3.1.12 to detect, investigate or prevent security or cyber incidents;
 - 3.1.13 to monitor and analyse the use of any account to prevent, investigate and/or report fraud, misrepresentation, security incidents or crime; and
 - 3.1.14 to meet applicable legal, regulatory and compliance requirements.
- 3.2 We will also use information collected through cookies and similar technologies as set out in paragraph 5 below.

4. Sharing your personal information

- 4.1 When we share personal information, we do so in accordance with Data Protection Legislation.
- 4.2 We share personal information with our 100% parent company, Chancery Ventures Limited, a company registered in England and Wales with company number 07258023 whose registered office is at Suite 2, 43 Bedford Street, London, WC2E 9HA.
- 4.3 We employ the services of third parties to help us in certain areas, including provision of FC Documents, FC Training, software development, data hosting, user analytics, email services, payment processing, advertising, and user notification and feedback functionality. We will share your personal data with one or more of these third parties for the purpose of making the Website and our services available to you and to administer any contract we have with your subscribing organisation.
- 4.4 We will share your personal information with government authorities and other third parties when compelled to do so by government and law enforcement authorities or as otherwise required or permitted by law, including but not limited to in response to court orders. We may also disclose personal information when we have reason to believe that someone is causing injury to or interference with our rights or property, other users or anyone else that could be

harmed by such activities. We also cooperate with law enforcement inquiries and other third parties to enforce laws, intellectual property rights and other rights.

- 4.5 In the event that our business is sold or integrated with another business, your personal information may be disclosed to our advisers, a prospective purchaser and any prospective purchaser's advisers and will be passed to the new owners of the business.

5. Use of cookies and similar technologies

- 5.1 We and our third-party service providers use cookies and similar technologies to collect information about, and relevant to, your usage of the Website. Cookies are small pieces of information sent by a web server to a web browser which allows the server to uniquely identify the browser on each page.

- 5.2 We use (or will use in future) the following categories of cookies (or other technologies having similar function and effect) on the Website from time to time:

5.2.1 **Strictly necessary cookies:** These cookies are essential to enable you to move around the Website and use its features. Without these cookies, services you have asked for (such as remembering your login details) cannot be provided.

5.2.2 **Performance cookies:** These cookies collect information about how visitors use the Website, for instance which pages visitors go to most often, and if they get error messages from web pages. Information these cookies collect will be used to improve how the Website works (or, otherwise, to provide information about a user's interaction with the Website).

5.2.3 **Functionality cookies:** These cookies allow the Website to remember choices you make (such as your user name) and provide enhanced, more personal features. These cookies can also be used to remember changes you have made to aspects of the Website that you can customise. These cookies cannot track your browsing activity on other websites.

5.2.4 **Security cookies:** These cookies form part of our security features, for example, by helping us detect malicious activity and violations of our Terms of Use and subscription agreements with subscribers.

5.2.5 **Social media cookies:** These cookies allow you to share your activity on the Website on social media such as LinkedIn and Twitter. These cookies are not within our control. Please refer to the privacy policies of the social networks in question for information regarding how their cookies work.

- 5.3 Specific details of the cookies used on the FC Training service can be found in the Cookies Policy available on the FC Training site.

- 5.4 When you visit the Website for the first time (and periodically after that), we will request your consent to the setting of all cookies other than strictly necessary cookies.

- 5.5 If you want to delete any cookies that are already on your computer, please refer to the help and support area on the toolbar of your internet browser. Most browsers will tell you how to stop accepting cookies and disable existing cookies.

5.6 Please note that by deleting our cookies or disabling future cookies you may not be able to access certain areas or features of the Website.

5.7 To find out more about cookies please visit www.allaboutcookies.org.

6. Third party links and data

The Website contains links to and imports data from other websites over which we have no control. We are not responsible for and do not review or endorse the privacy policies or practices of other websites which you choose to access from the Website. We encourage you to review the privacy policies of those other websites so you can understand how they collect, use and share your personal information.

7. Security

We have implemented appropriate technical and organisational measures designed to secure your personal information from accidental loss and from unauthorised access, use, alteration and disclosure. However, the internet is an open system and we cannot guarantee that unauthorised third parties will never be able to defeat those measures or use your personal information for improper purposes.

8. Updating your information and unsubscribing from communications

8.1 You may review, correct, update or change your personal information at any time by contacting us as set out in paragraph 9 below.

8.2 You can unsubscribe from our current awareness updates or marketing communications by using the unsubscribe link in those communications or, otherwise, by contacting us at support@fromcounsel.com or using the functionality provided through the Website.

9. How to contact us

If you have any questions about this Policy or your personal information, please contact us at support@fromcounsel.com or on +44 (0)20 7242 9993.

10. Additional information for the UK and EEA

In order to meet applicable data protection and privacy law in the UK and European Economic Area (**EEA**), we provide certain additional information below.

11. Who is responsible for your personal data?

11.1 In relation to personal data supplied to us by your subscribing organisation and all personal data entered into FC Documents by a subscribing organisation and its authorised users (**Supplied Personal Data**), FromCounsel acts as data processor; the relevant subscribing organisation will be the data controller for this information.

11.2 In relation to other personal information collected through, and in relation to, the Website and our services, including personal data you supply to us but excluding the Supplied Personal Data, FromCounsel is the data controller.

12. Lawful basis for processing

- 12.1 We have documented the lawful bases for our processing activities in Annex 2.
- 12.2 On some occasions, we process your personal information on the basis of your consent (for example, when you agree that we may set cookies other than those that are strictly necessary). Where we do process data based on consent, your consent is revocable at any time.
- 12.3 On other occasions, we process your data when we are required to do this by law (for example, if we are required by court order or any applicable law to process data).
- 12.4 When we ask you to supply us with personal information we will make it clear whether the information we are asking for: (i) must be supplied so that we can provide services to you under the subscription agreement you or your subscribing organisation enters into with us or because it is required by law; or (ii) is optional, and the consequences of not providing the information.
- 12.5 The processing of some of your personal information (eg, your login details, certain information entered into FC Documents, and information provided in order to purchase products or services from us) is necessary in order to provide services on the Website to you pursuant to the subscription agreement that you or your subscribing organisation enters into with us. Without this information, we would not be able to provide certain services to you.
- 12.6 We also process your personal information when it is in our, or a third party's, legitimate interests to do so, provided that your data protection rights do not override these interests. Where we are not relying on consent, legal requirements or contractual necessity, we process your personal information for the legitimate interests as described in this Policy.
- 12.7 Annex 1 summarises the lawful bases pursuant to which we may process your personal data in accordance with applicable Data Protection Legislation. For each type of processing described in paragraph 3 of this Privacy Policy, Annex 2 identifies the relevant lawful basis or bases for such processing.

13. International data transfers

- 13.1 We will transfer your personal information to our service providers as identified above in paragraph 4.3, which will in some cases involve the transfer of personal information to countries outside the UK or EEA which have different data protection standards to those which apply in the UK or EEA, for the purposes set out in this Policy. In accordance with the data processing terms set out in our Terms of Use and Data Protection Legislation, save in respect of the circumstances set out in paragraph 13.2, we will put in place approved standard contractual clauses to protect this data or will rely upon another appropriate safeguard. You have a right to ask us for a copy of the safeguard (by contacting us as set out in paragraph 9 above).
- 13.2 Where a user accesses or otherwise uses the Website from a location outside of the UK or EEA and personal data is transferred outside the UK or EEA as a result, you or your subscribing organisation shall ensure that appropriate safeguards are in place in respect of and before any such access and transfer.

14. How long will we keep your personal information?

- 14.1 We will only keep your personal information for as long as is necessary for the purposes in paragraph 3.
- 14.2 We will keep your profile until you or your subscribing organisation requests that we deactivate it. You can request deactivation of your profile by contacting us via the contact details in paragraph 9. We will endeavour to remove your profile from our production system within 7 days of a request to do so.
- 14.3 If our subscription agreement with you or your subscribing organisation expires or is terminated in accordance with its terms, we will generally delete your account information and de-identify any logs or other backup information within 90 days, except as noted in our Terms of Use.
- 14.4 You will not be able to access your account or its contents after your account is deactivated.
- 14.5 Following deactivation of your account, we will retain information about usage of the website collected during the period your account was active, including your usage information.

15. Your rights

- 15.1 We respect your rights to access and control your information and will respond to requests in accordance with Data Protection Legislation. We may ask you to verify your identity and to provide other details to help us to respond to your request.
- 15.2 Depending on the lawful basis for processing upon which we rely, you have a right to:
 - 15.2.1 request access to your personal information;
 - 15.2.2 request that we correct or complete personal information that is inaccurate or incomplete;
 - 15.2.3 request that we erase your personal information, which we will do where required by Data Protection Legislation;
 - 15.2.4 restrict our processing of your personal information, in certain circumstances;
 - 15.2.5 request that we provide you with copies of your personal information in a machine-readable format or transfer it across different services;
 - 15.2.6 object to certain types of processing, including where we process your personal information on the basis of our legitimate interests and for direct marketing purposes; and
 - 15.2.7 where we have asked for your consent to process your data, to withdraw this consent.
- 15.3 These rights are limited in some situations under Data Protection Legislation – for example, where we can demonstrate that we are under a legal obligation or have other legitimate grounds to process your data.
- 15.4 If you wish to exercise these rights, please contact us using the contact details in paragraph 9 above. We hope that we can satisfy any queries you may have about the way we process

your data. However, if you have unresolved concerns you also have the right to complain to data protection authorities.

Annex 1

Summary of the lawful bases for processing under Data Protection Legislation

Lawful basis	Description
Consent	You have given consent to the processing of your personal data for one or more specific purposes.
Contract	Processing is necessary for the performance of a contract to which you are a party or in order to take steps at your request prior to entering into a contract.
Legal obligation	Processing is necessary for compliance with a legal obligation to which we are subject.
Vital interests	Processing is necessary in order to protect the vital interests of you or another natural person.
Public task	Processing is necessary for the performance of a task carried out in the public interest or in the exercise of official authority vested in the controller.
Legitimate interests	Processing is necessary for the purposes of legitimate interests pursued by us or by a third party, except where such interests are overridden by your interests or fundamental rights and freedoms which require protection of personal data.

Annex 2

Lawful bases for processing under this Privacy Policy

Para.	Type of and purpose of processing	Lawful basis for processing
3.1.1	Provide you with the services on the Website (including our current awareness email updates), to generate draft documents from the information provided to us, to perform our contract with you (or your subscribing organisation), to fulfil your requests, and to administer your account;	<ul style="list-style-type: none"> • Contract • Legitimate interest in facilitating users' interaction with the Website.
3.1.2	Administer and improve the Website and our products and services.	<ul style="list-style-type: none"> • Legitimate interest in administering and improving the Website and our products and services for the benefit of users.
3.1.3	Contact you with information, newsletters, bulletins and marketing materials about our products and services, including by email, telephone and post.	<ul style="list-style-type: none"> • Consent (individual subscribers) • Legitimate interest in providing corporate subscribers with information about our products and services
3.1.4	For internal research and development purposes and to improve and test the features and functions of our products and services.	<ul style="list-style-type: none"> • Legitimate interest in administering and improving the Website and our products and services for the benefit of users.
3.1.5	Report to your subscribing organisation about its authorised users and their usage of the Website and the subscribed products and services.	<ul style="list-style-type: none"> • Contract • Legitimate interest in providing subscribing organisations aggregated information about their users' usage of the Website.
3.1.6	Conduct and store site usage analytics, statistical and trend analysis and market research.	<ul style="list-style-type: none"> • Legitimate interest in continually improving the user experience of the Website and our products and services generally.
3.1.7	Assign or sub-contract, procure goods or services for, or outsource any part of our normal business functions to third parties.	<ul style="list-style-type: none"> • Contract • Legitimate interest in running a commercial enterprise which employs the services of appropriate third party service providers.
3.1.8	Investigate and respond to any queries or complaints about the Website, us or our business.	<ul style="list-style-type: none"> • Legitimate interest in being responsive to user queries and complaints about the Website.
3.1.9	Personalise your experience of the Website.	<ul style="list-style-type: none"> • Legitimate interest in enhancing the experience of users of the Website through personalisation.
3.1.10	Where relevant, to establish, exercise or defend legal claims.	<ul style="list-style-type: none"> • Legal obligation • Legitimate interest in bringing and defending legal claims to protect the business.
3.1.11	Protect the rights, property, or safety of us, our business, our clients or others.	<ul style="list-style-type: none"> • Legal obligation

		<ul style="list-style-type: none"> • Legitimate interest in the protection of personal rights, property and safety.
3.1.12	Detect, investigate or prevent security or cyber incidents.	<ul style="list-style-type: none"> • Contract • Legal obligation • Legitimate interest in detecting, investigating or preventing security or cyber incidents.
3.1.13	Monitor and analyse the use of any account to prevent, investigate and/or report fraud, misrepresentation, security incidents or crime.	<ul style="list-style-type: none"> • Contract • Legal obligation • Legitimate interest in preventing and investigating fraud, misrepresentation, security incidents and crime to protect (a) users of the Website, and (b) our directors, employees and consultants.
3.1.14	Meet applicable legal, regulatory and compliance requirements.	<ul style="list-style-type: none"> • Legal obligation • Legitimate interest in ensuring compliance with applicable UK and overseas laws and regulations.
5	Processing by way of cookies and similar technologies (see paragraph 5).	<ul style="list-style-type: none"> • Consent

Note: where more than one lawful basis for processing is identified above, depending on the circumstances (a) all such lawful bases may apply, or (b) one or more (but not all) of the lawful bases may apply.