

FROMCOUNSEL LIMITED

PRIVACY POLICY

Last updated: 26 February 2016

1. ABOUT THIS PRIVACY POLICY

- 1.1 This website (**Site**) is operated by FromCounsel Limited (**FC, our, us or we**), a company incorporated in England and Wales under company number 07258019. Our registered office is at Ground Floor, 14-18 Emerald Street, London, WC1N 3QA and our registered VAT number is 171 1052 52.
- 1.2 The aim of this privacy policy (**Policy**) is to tell you how we will use any personal information collected from and about those who communicate with us, our customers and the users of this Site (**you**). Please read it carefully before you proceed.
- 1.3 We may modify this Policy from time to time. We will use our reasonable endeavours to notify you of any material amendments to this Policy by placing a clear notice about them on this Site or by other means, but do not guarantee to do so. Please review this Policy whenever you use this Site as any changes apply from the date that we make them.

2. WHAT INFORMATION DO WE COLLECT?

We may collect, store and use the following kinds of personal information about you:

- (a) information that you provide to us when registering with this Site or in relation to purchases of or subscriptions for our products and services (including your name, email address, other contact details, password and, if payment is required, card details);
- (b) information that you provide to us for the purpose of subscribing to our notifications, newsletters or bulletins;
- (c) information about you that your employer or our Customer provides to us (including the details of persons who are authorised users of this Site and our products and services). For the purposes of this Policy, a "**Customer**" is a law firm, company, organisation or person who has a service agreement with us to subscribe to the Site and the products and services provided via the Site;
- (d) information contained in or relating to any communications that you send to us through this Site or by other means (including the content and metadata associated with the communication);
- (e) information collected about your device and your use of this Site (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);
- (f) information generated in the course of the use of our products and services (including the timing, frequency and pattern of service use);

- (g) information collected through cookies and similar technologies (see section 5 (*Use of Cookies on this Site*) below); and
- (h) any other personal information that you choose to send to us.

3. HOW WILL INFORMATION ABOUT YOU BE USED AND SHARED?

3.1 The information we collect allows us to:

- (a) provide you and your employer or our Customer with the subscribed products and services;
- (b) administer and improve this Site;
- (c) communicate with you and provide customer services;
- (d) contact you with information, newsletters, bulletins and marketing materials about our products and services, including by email and post;
- (e) report to your employer or our Customer about its users and their usage of the Site and the subscribed products and services;
- (f) conduct statistical and trend analysis and market research;
- (g) improve our products and services;
- (h) investigate any queries or complaints about this Site;
- (i) personalise your experience of this Site;
- (j) monitor and analyse the use of any account to prevent, investigate and/or report fraud, misrepresentation, security incidents or crime; and
- (k) meet applicable legal, regulatory and compliance requirements.

3.2 We may employ the services of a third party to help us in certain areas, such as website hosting. In some cases the third party may receive your personal information. However, at all times, we will control and be responsible for the use of your information where a third party acts on our behalf.

3.3 We will also use your information collected through cookies and similar technologies as set out in section 5 (*Use of cookies on the Site*) below.

4. INTERNATIONAL DATA TRANSFERS

We may transfer some or all of your information to countries outside the European Economic Area (for example, to third party service providers). Some of these countries may not have data protection laws equivalent to those in force in the European Economic Area.

5. USE OF COOKIES ON THIS SITE

- 5.1 We use cookies to collect information about your online preferences. 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 the following categories of cookies on this Site:
- (a) **Category 1 – Strictly necessary cookies:** These cookies are essential in order to enable you to move around this Site and use its features. Without these cookies, services you have asked for (such as remembering your login details) cannot be provided.
 - (b) **Category 2 – Performance cookies:** These cookies collect anonymous information on how people use this Site. For example, we use Google Analytics cookies to help us understand how customers arrive at this Site, browse or use this Site and highlight areas where we can improve areas such as navigation, user experience and marketing campaigns. The data stored by these cookies never shows personal details from which your individual identity can be established.
 - (c) **Category 3 – Functionality cookies:** These cookies remember choices you make such as the country you visit this Site from, language and search parameters. These can then be used to provide you with an experience more appropriate to your selections and to make the visits more tailored and pleasant. The information these cookies collect may be anonymised and the cookies cannot track your browsing activity on other websites.
- 5.3 If you want to delete any cookies that are already on your computer, please refer to the help and support area on your internet browser for instructions on how to locate the file or directory that stores cookies.
- 5.4 Please note that by deleting our cookies or disabling future cookies you may not be able to access certain areas or features of this Site.
- 5.5 To find out more about cookies please visit www.allaboutcookies.org or see www.youronlinechoices.eu which contains further information about behavioural advertising and online privacy.

6. LINKS

This Site contains links to other websites over which we have no control. We are not responsible for privacy policies or practices of other websites to which you choose to visit from this Site. We encourage you to review the privacy policies of those other websites so you can understand how they collect, use and share your information.

7. SECURITY

We have implemented reasonable technical and organisational measures designed to secure your personal information from accidental loss and from unauthorised access, use, alteration or 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. SALE OF THE BUSINESS

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

9. ACCESS TO YOUR INFORMATION

You are entitled to see the information held about you. If you wish to do this, please contact us as set out in section 11 (*How to contact us*) below. We may require you to provide verification of your identity and to pay an administration fee (which is currently £10) to provide a copy of the information we hold. Please note that in certain circumstances we may withhold access to your information where we have the right to do so under current data protection legislation.

10. UPDATING YOUR INFORMATION

- 10.1 You may review, correct, update or change your personal information at any time by contacting us as set out in section 11 (*How to contact us*) below.
- 10.2 You can manage your communication preferences by using any unsubscribe mechanism provided within the communications that you receive.

11. 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.