

GDPR Privacy Notice

Law Squared

1. Overview

ZDD Pty Ltd (ACN: 605 466 617) and ZDD 1 UK Limited (No. 13966451) trading as Law Squared (**Law Squared, we, us, our**) is committed to protecting your privacy. We have prepared this GDPR Privacy Notice to describe to you our practices regarding the Personal Data provided to us and information about visitors to our website.

Our primary privacy obligations are derived from Australian law. Our Privacy Policy sets out how we comply with these obligations. Sometimes, we also handle the information of United Kingdom (**UK**) citizens, share data with other organisations which do so, or provide services to individuals located in the UK. To the extent that we do so, this GDPR Privacy Notice for UK General Data Protection Regulation applies (**UK GDPR**).

The processing of Personal Data will always be in line with the Australian Privacy Principles contained in the *Privacy Act 1988* (Cth), the UK GDPR, and in accordance with country-specific data protection regulations and other laws applicable to Law Squared.

We have implemented a number of technical and organisational measures to ensure the most complete protection of the Personal Data we collect and process.

2. Your rights

The UK GDPR provides you with eight key rights, being the right to:

- (a) Be informed: anyone processing your data must make clear what they are processing, why and who else the data may be passed to.
- (b) Access: the right to access what data is held about you.
- (c) Rectification: the right to have your data corrected or amended if what is held is incorrect.
- (d) Erasure: the right to ask for your personal data to be deleted, also known as the right to be forgotten, if permitted under applicable laws.
- (e) Restrict processing: the right to require a temporary halt to the processing of Personal Data.
- (f) Data portability: the right to request for any data supplied by you to us to be provided in a structured, commonly used and machine-readable format.
- (g) Object: the right to object to further processing of your data which is inconsistent with the primary purpose for which it was collected.
- (h) Consider automated decision making and profiling: the right not to be subject to a decision based solely on automated processing.

This Privacy Notice sets out, among other things, how you can exercise these rights when dealing with Law Squared.

3. Personal Data we collect

We will only collect Personal Data from you if it is reasonably necessary for one or more of our functions or activities.

Personal Data means any information related to an identified or identifiable person (in this case, you). Some example of Personal Data are your name, telephone number, e-mail address or date of birth.

3.1 Information you provide to us

(a) Contact Details

During your interaction with our website and online services, you may enter your details on different forms or provide us with additional content.

We may collect Personal Data from you, such as:

- (i) your name, email address and phone number;
- (ii) address;
- (iii) employment details including your job title and the organisation you work for;
- (iv) information about the legal assistance you are seeking; and
- (v) information you have provided in communications we have with you.

This data is used to enable us to identify and verify you and provide you with support, services, mailings, sales and marketing actions.

The legal basis for this processing is based on:

- (i) your consent through your voluntary submission of the form and agreeing to these terms;
- (ii) the Personal Data being necessary for the performance of a contract to which you are a party; and/or
- (iii) any other legitimate interests as detailed below.

(b) Contact and Messaging Data

If you provide us feedback or contact us via e-mail, or other means including by phone call or by contracting with us, we will collect your name and e-mail address, as well as any other content included in the e-mail or conversation, in order to send you a reply. We will store and process your communications and information as needed.

The legal basis for this processing is based on:

- (i) your consent by submitting the contact form or submitting your data to us by other means;
- (ii) the Personal Data being necessary for the performance of a contract to which you are a party; and/or
- (iii) any other legitimate interests as detailed below.

(c) Subscription Data

When you use our website or online services, you may have the ability to subscribe to our newsletters or other forms. We may collect the data when you input your details for subscription purposes.

The Personal Data is processed for the purpose of informing you regularly by means of a newsletter or other offer form. The Personal Data collected during the subscription will only be used for marketing materials or for reasons made known on the form.

The legal basis for this processing is based on:

- (i) your consent through your voluntary submission of the form and/or
- (ii) any other legitimate interests as detailed below.

By voluntarily providing us with your data, you are providing consent to the use of such data by us for the purpose of providing subscription based materials.

You may withdraw your consent by following the unsubscribe link found in each subscription email or by contacting us at privacy@lawsquared.com.

Where you are a client of ours, or work for a client of ours, we may be required to send you emails for legitimate reasons including but not limited to billing and reminders.

In some circumstances, Personal Data is provided to us by third parties such as our related entities, service providers or other organisations conducting activities on our behalf. With your express consent, your Personal Data may be used and disclosed to us this way. The purposes as outlined above may include the processing of such Personal Data to the extent necessary for us to comply with a law, regulation or legal request, or to protect the safety of any person or to prevent fraud.

3.2 Information we collect as you interact with our website and online services

(a) Log Data

To make our website and online services more useful to you, our servers (which may be hosted by a third-party service provider) gather information automatically and store it in log files. This information includes Internet Protocol (IP) addresses, browser type and language, Internet service provider (ISP), referring and exit websites and applications, operating system, date/time stamp, and clickstream data.

We use this information to understand and analyse trends, to administer the Services, to learn about individuals' behaviour regarding our website and online services, to improve our services, and to gather demographic information about the individuals who interact with our website and online services. Law Squared may use this information for our marketing and advertising services.

In some of our email messages, we use a "click-through URL" linked to content on our website. When customers click one of these URLs, they pass through a separate web server before arriving at the destination page on our website. We track this click-through data to help us determine interest in particular topics and measure the effectiveness of our customer communications. If you prefer not to be tracked in this way, you should not click text or graphic links in the email messages.

(b) Analytics

We use third party analytics tools to collect information anonymously and report website trends without identifying individual visitors. These tools collect information sent by your device, including the web pages you visit, add-ons, and other information that assists us in improving our website.

3.3 Information we collect from others

(a) Data that our clients, counterparties of our clients provide to us

We may also collect information and communications that other people or organisations provide when they interact with us for the purpose of the provision of our services to them. This can include information about you such as when others send messages, documents and information about you.

If you are an employee of a business, this might include information that the organisation you work for provides to us. This may include information such as

- your name;
- phone number;
- corporate or personal email address;
- date of birth;
- gender;
- employment details including your job title and the organisation you work for;
- employment history;
- business registration details if you are a sole trader;
- any photos provided to us;
- billing and financial information;
- credit details;
- information relevant to providing you or our client with legal services;
- information about your preferences and opinion about our services;
- information about your dealings with our clients; and
- information contained in any communications between you and us.

We will only collect information about you directly from you, except where it is unreasonable or impracticable to do so.

The legal basis for this processing is based on:

- (i) your consent to the processing (where necessary) or the organisation you work for has obtained your consent (where necessary);
- (ii) the processing being necessary in connection with a legal or regulatory obligation; and/or
- (iii) we or a third party having a legitimate interest which is not overridden by your interests or your rights and freedoms.

4. How we use your Personal Data

4.1 Use of Personal Data

We will only use or disclose your Personal Data for the purposes for which we advised you we were collecting it for as noted in this Privacy Notice, including to:

- (a) provide our services to you or the organisation you work for;
- (b) enable you to access and use our website or other online services;
- (c) maintain and develop our relationship with you and our clients;
- (d) maintain internal records and administrative purposes;
- (e) comply with our legal obligations and resolve any disputes that we may have;
- (f) maintain your contact details;
- (g) provide personalised content and information to you and others;

- (h) send marketing communications to you;
- (i) conduct our business, generate content, provide customer support, and payment options (including updates and improvements);
- (j) administer contracts including to negotiate, execute and/or manage a contract with you or our clients;
- (k) communicate with you;
- (l) conduct surveys to determine use and satisfaction with our services;
- (m) detect, investigate and prevent potentially unlawful acts or omissions or acts or omissions with the potential to breach our Terms of Engagement, this Privacy Notice or any other policy;
- (n) enforce our Terms of Engagement, this Privacy Notice or any other policy;
- (o) verify information for accuracy or completeness;
- (p) comply with our legal obligations;
- (q) monitor metrics;
- (r) combine or aggregate your Personal Data with information we collect from third parties and use it for the purposes set out in this Privacy Notice;
- (s) protect a person's rights, property or safety;
- (t) process transactions to which you are a party;
- (u) resolve disputes and to identify, test and resolve problems;
- (v) improve our services; and
- (w) any other purpose made known in this Privacy Notice or other policy.

We agree to not use or disclose this information for a secondary purpose unless you consent to us doing so, or another exception applies under applicable laws.

For the purposes of the law, some information we hold about you may be considered 'sensitive' as a special category of data and therefore subject to greater protection. If we hold sensitive information about you, we will only disclose or use that information with your consent or if another exception applies under applicable laws.

We will also use or disclose your Personal Data or sensitive information if we are required to do so by law or a court / tribunal order, or if we reasonably believe that the use or disclosure of the information is reasonably necessary for an enforcement related activity or on behalf of an enforcement body, in which case we will make a written note of the use or disclosure or another exception applies under relevant laws.

4.2 Creation of anonymous data

We also collect data in a form that does not, on its own, permit direct association with any specific individual. We may collect, use, transfer, and disclose non-Personal Data for any purpose.

We may collect information regarding customer activities on our the website. This information is aggregated and used to help us provide more useful information to our customers and to understand which parts of our website, products, and Services are of most interest. Aggregated data is considered non-Personal Data for the purposes of this Privacy Notice.

5. Disclosure of your Personal Data

Subject to our professional obligations, we may disclose your Personal Data to third parties for the purposes contained in this Privacy Notice, including without limitation to:

(a) Service Providers

We may share your Personal Data with service providers to:

- (i) provide you or our clients with our services;
- (ii) to conduct quality assurance testing; and/or
- (iii) to provide other services to Law Squared.

The service providers (and if necessary, data processors) include:

- (i) information technology service providers such as cloud service providers, web host providers, and analytical providers;
- (ii) mailing houses;
- (iii) advertising partners;
- (iv) market research organisations to enable them to measure the effectiveness of our advertising; and
- (v) specialist consultants.

These third party service providers are prohibited from using your Personal Data other than to provide the services requested by Law Squared.

(b) Affiliates and Acquisitions

We may share some or all of your Personal Data with any of our parent companies, subsidiaries, joint ventures, or other companies under a common control (**Affiliates**), in which case we will require our Affiliates to honour this Privacy Notice. In the event we are involved in a merger, acquisition or sale of assets we may disclose Personal Data collected by us to such entities that we propose to merge with or be acquired by and will assume the rights and obligations regarding your Personal Data as described in this Privacy Notice. This includes the disclosure of information to our clients where we act as a data processor.

(c) Third parties including our clients, your professional advisers and the organisation that you work for

We may disclose your Personal Data to third parties to whom you expressly ask to us to send the Personal Data to, to our clients, your professional advisers, the organisation you work for, or barristers and other legal specialists, governmental or regulatory authorities, enforcement agencies, courts and tribunals.

We may also, with your consent or at your direction, disclose your Personal Data to your authorised representatives.

(d) Other disclosures

Regardless of any choices you make regarding your Personal Data (as described below), Law Squared may disclose Personal Data if it believes in good faith that such disclosure is necessary:

- (i) in connection with any legal investigation;

- (ii) to comply with relevant laws, regulations, enforceable governmental requests or to respond to subpoenas or warrants served on Law Squared;
- (iii) to protect or defend the rights or property of Law Squared;
- (iv) to investigate or assist in preventing any violation or potential violation of the law, this Privacy Notice, or our Terms of Engagement;
- (v) to protect the safety of any person; or
- (vi) detect, prevent or otherwise address fraud, security or technical issues.

We may share your Personal Data with such third parties subject to obligations consistent with this Privacy Notice and any other appropriate professional obligations, confidentiality, and security measures, and on the condition that the third parties use your Personal Data only on our behalf and pursuant to our instructions.

We will take reasonable steps to ensure that anyone to whom we disclose your Personal Data respects the confidentiality of the information and abides by the UK GDPR or equivalent privacy laws.

We will not share, sell, rent or disclose your Personal Data in ways different from what is disclosed in this Privacy Notice.

6. If we can't collect your data

If you do not provide us with the Personal Data described above, some or all of the following may happen:

- (a) we may not be able to provide our services to you, or to our clients, either to the same standard or at all;
- (b) we may not be able to run competitions and promotions in a way that benefits you or our clients; and/or
- (c) we may not be able to provide you with information about products and services that you may want.

7. Cookies Policy

7.1 What are cookies?

A cookie is a small piece of text sent to your browser by a website that you visit. It helps the website to remember information about your visit, like your preferred language and other settings. That can make your next visit easier and the website more useful to you.

7.2 Use of cookies

Law Squared's websites, online services, email messages, and advertisements, may use "cookies" and other technologies such as pixel tags and web beacons. These technologies help us better understand user behaviour, tell us which parts of our website people have visited, and facilitate and measure the effectiveness of advertisements and web searches.

We treat information collected by cookies and other technologies as non-Personal Data. However, to the extent that Internet Protocol addresses or similar identifiers are considered Personal Data by local law, we also treat these identifiers as Personal Data. Similarly, to the extent that non-Personal Data is combined with Personal Data, we treat the combined information as Personal Data for the purposes of this Privacy Notice.

Law Squared and our partners also use cookies and other technologies to remember Personal Data when you use our services. Our goal in these cases is to make your experience with us more convenient and personal. Knowing someone using your computer or device has used a particular service helps us make our advertising and email communications more relevant to your interests. Knowing your contact information, hardware identifiers, and information about your computer or device helps us personalize your operating system and provide you with better customer service.

Pixel tags enable us to send email messages in a format customers can read, and they tell us whether mail has been opened. We may use this information to reduce or eliminate messages sent to customers.

7.3 How to manage cookies

Some people prefer not to allow cookies, which is why most browsers give you the ability to manage cookies to suit you. Please note that certain features of our website, online services, email messages, and advertisements may not be available once cookies are disabled.

8. Third party websites

When you click on a link to any other website or location, you will leave our website and go to another site and another entity may collect Personal Data or Anonymous Data from you. We have no control over, do not review, and cannot be responsible for, these outside websites or their content. Please be aware that the terms of this Privacy Notice do not apply to these outside websites or content, or to any collection of data after you click on links to such outside websites.

9. Managing your Personal Data

Subject to the UK GDPR you may request to access the Personal Data we hold about you by contacting us. All requests for access will be processed within a reasonable time.

(a) Accessing or rectifying your Personal Data

You may submit a request to us to correct, delete or modify your Personal Data and download the data for you.

(b) Deletion

We keep data for as long as it is needed for the purpose we collected it.

If you wish to have us delete your data, please contact us.

(c) Object, restrict or withdraw consent

You may submit a request to us if you object to any Personal Data being stored, or if you wish to restrict or withdraw any consent given for the collection of your Personal Data.

You may withdraw your consent to the processing of all your Personal Data at any time. If you wish to exercise this right, you may do so by contacting us.

You may withdraw your consent or manage your opt-ins by clicking the unsubscribe link at the bottom of any marketing materials we send you.

(d) Portability

You may submit a request to us to receive the Personal Data that you have provided to us or ask us to transmit the Personal Data to another organisation. Please contact us for further information on how this can be arranged.

In certain instances, we may not be required or able to provide you with access to your Personal Data. If this occurs, we will give you reasons for our decision not to provide you with such access to your Personal Data in accordance with the requirements of the UK GDPR.

There is no application fee for making a request to access your Personal Data. However, we may charge an administrative fee for the provision of information in certain circumstances, such as if you make repeated requests for information or where the information is held by a third-party provider.

10. Storage and Security of Your Personal Data

Law Squared stores Personal Data through a number of different layers including:

- (a) holding your Personal Data electronically in secure ISO compliant databases operated by our third-party service providers;
- (b) having secure authentication requirements for all staff, including multi-factor authentication for access;
- (c) providing staff training and policies on cyber security; and
- (d) actively monitoring errors and logs using industry level tooling.

Law Squared takes the security of your Personal Data very seriously. We will take all steps reasonable under the circumstances to protect your Personal Data from misuse, interference, loss, and unauthorised access, modification or disclosure. We will process Personal Data securely and apply and maintain appropriate technical and organisational measure to protect Personal Data.

Although we take measures to safeguard against unauthorised disclosures of information, we cannot assure you that Personal Data that we collect will not be disclosed in a manner that is inconsistent with this Privacy Notice.

11. International Transfer and Disclosure of Personal Data

Where we transfer Personal Data from within the UK to outside of the UK, we ensure an adequate level of protection for the rights of data subjects based on the adequacy of the receiving country's data protection laws.

We may disclose Personal Data to our Affiliates, third-party suppliers, and service providers located overseas for some of the purposes listed above. We take reasonable steps to ensure that the overseas recipients of your Personal Data do not breach the privacy obligations relating to your Personal Data.

12. Notifiable Data Breaches

We take data breaches very seriously. We will endeavour to meet the 72-hour deadline as imposed by the UK GDPR, to report any data breach to the Information Commissioner's Office where a data breach occurs that will likely be a risk to your rights and freedoms. Further, where there is likely to be a high risk to your rights and freedoms, we will endeavour to contact you without undue delay. We will review every incident and take action to prevent future breaches.

13. Automated individual decision-making, including profiling

You have the right not to be subject to a decision based solely on automated processing, including profiling, which produces legal effects concerning you, or similarly significantly affects you, as long as the decision is not necessary for entering into, or the performance of, a contract between us, or is not authorised by any UK law to which we are subject and which also lays down suitable measures to safeguard your rights and freedoms and legitimate interests, or is not based on your explicit consent. If you wish to exercise your rights, please contact us.

14. Integrity and Retention of Data

We take all reasonable steps to ensure that the Personal Data we collect about you is accurate, up to date and complete. Where we collect that information from you directly, we rely on you to supply accurate information. Law Squared makes it easy for you to keep your Personal Data accurate, complete, and up to date. Where we use or disclose your Personal Data, we will also ensure that your Personal Data is relevant.

We will retain your Personal Data for the period necessary to fulfil the purposes outlined in this Privacy Notice unless a longer retention period is required or permitted by law.

We may retain your information for fraud prevention or similar purposes.

15. Contact Information

We welcome your comments or questions regarding this Privacy Notice.

If you have a question regarding this Privacy Notice or you would like to make a complaint, please contact us by email by using the details below.

If you reside in the UK, the data controller that is responsible for your Personal Data is:

ZDD 1 UK Limited

UK Company Number: 13 966 451

Email: privacy@lawsquared.com

UK Address: The Stanley Building, 7 Pancras Square, King's Cross, London
NIC 4AG

If you wish to raise a concern about our use of your information you have the right to do so with the Information Commissioner's Office.

16. Changes to this Privacy Notice

This Privacy Notice is subject to occasional revision and Law Squared reserves the right, at its sole discretion, to modify or replace any part of this Agreement. It is your responsibility to check this Privacy Notice periodically for changes. Continued use of our services including the website shall indicate your acknowledgement that it is your responsibility to review the Privacy Notice periodically and become aware of any modifications.

We may amend this Privacy Notice from time to time. Not all changes to our Privacy Notice will require your consent, for example where office security procedures are changed. We will notify you of any change to our information handling policy that requires your consent before being implemented.