

## On-line Privacy Statement

aosphere LLP values your privacy and cares about the way in which your personal information is treated.

This online privacy statement (“Privacy Statement”) describes aosphere’s privacy practices in relation to the aosphere platform and websites available at <https://www.aosphere.com> (the aosphere homepage), <https://www.aoslogin.com> (the subscriber login page to access and use the aosphere platform) and <https://www.aosapplied.com> (the platform for delivery of aosphere Apps), or such other websites as we may operate from time to time.

The aosphere homepage provides information about aosphere’s online legal risk management products and services (referred to in this Privacy Statement as the “aosphere platform”), and the aosphere subscriber login pages provide the means by which authorised subscribers access and use the aosphere platform. In addition to our Privacy Statement, your use of the aosphere platform and websites is subject to the terms and conditions of [the Legal Notices](#).

This statement describes:

1. what personal information we collect about you
2. how we obtain your personal information
3. how we use cookies and analytics
4. how and on what basis we use your personal information
5. how we use your personal information for marketing
6. how long we keep your personal information
7. who we share your personal information with
8. how we protect your personal information
9. which countries we transfer your personal information to
10. your rights regarding your personal information
11. who are the data controllers
12. changes to our Privacy Statement
13. who to contact with questions or concerns

Please click on the relevant heading below for more information on each of these areas.

aosphere LLP is a wholly owned subsidiary of Allen & Overy. When used in this Privacy Statement, Allen & Overy refers to Allen & Overy LLP, its subsidiaries and other partnerships, corporations, undertakings and entities which are authorised to practice using the name ‘Allen & Overy’. See the section entitled ‘**Data controllers**’ below for more information on the entity that controls and processes personal data.

## 1. What personal information do we collect about you?

In this Privacy Statement, where we use the term personal information, we use this term to describe information that is about you and which identifies you. We collect personal information from you during the course of your use of the aosphere websites and platform, as described in this Privacy Statement.

If you visit the aosphere homepage (<https://www.aosphere.com>) and use the “Contact us” feature or if you sign up for a trial, we collect your full name, company name, phone number, email address and any other information you provide to us. We also collect technical information about your use of the website (such as pages viewed or IP address used to access the website).

If you are a registered user of the aosphere platform, we will also collect the following personal information:

- Basic information about you, such as your name (including name prefix or title), the company you work for, and your title or position
- Contact information, such as your email address and phone number(s)
- Information about your preferences in relation to the aosphere platform
- Technical information to the extent that it constitutes personal information, including your IP address and other online identifiers, and information about your access to and use of the aosphere platform (such as your access dates/times and what areas of the platform you have visited)
- Any other information relating to you (or other individuals) which you may provide to us (such as information provided through the support functionality on the platform), or which is otherwise provided to us or generated by us in the course of providing the aosphere platform

Before providing us with personal information about another individual you must (unless otherwise agreed) have the appropriate and necessary permissions to share such personal information with us for the purposes described in this Privacy Statement and any other applicable privacy notices.

If we do not collect, or you do not provide, your personal information to us, we may not be able to provide our products and services to you.

## 2. How we obtain your personal information

We collect personal information from you in various ways:

- when you complete the form to register for a free trial or demonstration, or when you otherwise register to use the aosphere platform
- in the course of your use of the aosphere websites and platform, including all information that you submit through the websites and material that you upload to the aosphere platform
- when an organisation that subscribes to the aosphere platform requests access for you to the website and platform
- when you edit your profile or set your preferences, including subscribing for alerts on the website
- when you contact or communicate with us (including through the website “Contact us” form, by email to [info@aosphere.com](mailto:info@aosphere.com) or otherwise)
- while monitoring the website and aosphere platform
- when you provide information to us, or interact with us directly, for instance engaging with our staff

We may collect or receive information about you from other third party sources. For example, we may use publically available sources to keep the contact details we hold for you accurate and up to date.

## 3. How we use analytics and cookies

Our [www.aosphere.com](http://www.aosphere.com) website uses Google Analytics, a web-based analytics tool that tracks and reports on the manner in which the website is used to help us to improve it. Google Analytics does this by placing small text files called ‘cookies’ on your device. Cookies enable a website to recognise and remember your device when you visit the site. The information that the Google Analytics cookies collect, such as the number of visitors to the site, the pages visited and the length of time spent on the site, is aggregated and anonymous. We also use cookies on the aosphere platform log-in page to store your user credentials if you choose to remember your login information.

You may refuse the use of cookies or withdraw your consent at any time by selecting the appropriate settings on your browser but please note that this may affect your use and experience of our website. By continuing to use our website without changing your privacy settings, you are agreeing to our use of cookies. To find out more about cookies, including how to manage and delete them, visit [www.allaboutcookies.org](http://www.allaboutcookies.org).

#### 4. How we use your personal information and on what basis we use your personal information

aosphere collects and processes personal information about you in a number of ways, including through your use of our websites and the aosphere platform. We have set out below the principal purposes for which we use your personal information and the legal basis (as set out in data protection law) that we rely on to justify this use of your information.

Purpose	Legal Basis
To provide the aosphere websites and platform to you and others in your organisation	For our legitimate business purposes (ie the provision of online legal risk management products and services) and, depending on the circumstances, to perform a contract between you and us
To create and administer your account	For our legitimate business purposes (ie the provision of online legal risk management products and services) and, depending on the circumstances, to perform a contract between you and us
To audit and monitor the use of the website and the aosphere platform	For our legitimate business purposes (ie the provision of online legal risk management products and services, as well as to improve and ensure the security of those products and services)  We may request your consent in circumstances where a legal justification over and above legitimate interests is required by applicable law (eg in relation to our use of certain cookies)
To provide information requested by you and to respond to your communications, queries and feedback	For our legitimate business purposes (ie the provision and support of online legal risk management products and services)
To notify you of changes to the website and aosphere platform, including to notify you if you have signed up for any notifications via the aosphere platform	For our legitimate business purposes (ie the provision of online legal risk management products and services)
To improve our website and aosphere platform, including our services to you and to our clients	For our legitimate business purposes (ie the provision and improvement of our online legal risk management products and services)
To promote our website and aosphere platform, including sending information about other products and services that you may be interested in	For our legitimate business purposes (ie the promotion of our online legal risk management products and services)  We may request your consent in circumstances where a legal justification over and above legitimate interests is required by applicable law

Purpose	Legal Basis
To manage and administer our relationship with you and our clients or other third parties	For our legitimate business purposes (ie the provision of online legal risk management products and services)
<p>To share information about individual user use of the aosphere platform to the organisation that has paid the subscription for the platform</p> <p>The organisation receiving the information is responsible for ensuring its use of the data complies with data protection law</p>	For our legitimate business purposes and those of the organisation with whom we share the information (eg to demonstrate the value and use of our online legal risk management products and services)
To compile (aggregated and anonymous) statistics about individual user usage information and send these to clients and other third parties	For our legitimate business purposes and those of the organisation with whom we share the information (eg to demonstrate the value and use of our online legal risk management products and services)
To fulfil our legal, regulatory and risk management obligations, including establishing, exercising or defending legal claims	For our legitimate business purposes and for compliance with legal obligations to which we are subject

## 5. Marketing and other emails

From time to time, we, or third parties acting on our behalf, including Allen & Overy, may wish to send you information about other products and services which we offer and we believe you may be interested in. We may use personal information for this purpose. If you do not wish to receive this information, or if you are already receiving this information from us or third parties acting on our behalf and you no longer wish to do so, please email us at [info@aosphere.com](mailto:info@aosphere.com).

We may also use a relationship management tool, where permitted by applicable local law, to assess the strength of the relationship between individuals in aosphere and our clients or potential clients based on the frequency of email contact between them. We use that information in order to assess, analyse and improve the services that we provide.

## 6. How long we keep your personal information

Your personal information will be retained in accordance with our global data retention policy which categorises all of the information held by Allen & Overy and specifies the appropriate retention period for each category of data. Those periods are based on the requirements of applicable data protection laws and the purpose for which the information is collected and used, taking into account legal and regulatory requirements to retain the information for a minimum period, limitation periods for taking legal action, good practice and Allen & Overy's business purposes.

## 7. Who we share your personal information with

aosphere LLP is a wholly owned subsidiary of Allen & Overy LLP, which is an international law firm and any information that you provide to us may be shared with and processed by any entity in the worldwide network of Allen & Overy and its associated firms. You can see a list of our offices at <http://www.allenoverly.com/locations/>.

The aosphere website and service is powered by our service providers HighQ Solutions ("HighQ") and Neota Logic ("Neota"). HighQ and Neota each serve as a processor for the aosphere platform and will have access to personal information.

If requested by the organisation that pays for your subscription, we may share information about your use of the aosphere platform with that organisation. The organisation receiving the information is responsible for ensuring its use of the data complies with data protection law.

For ISLA subscribers only, we may share subscriber information with the International Securities Lending Association ("ISLA"). In order to manage your subscription to the ISLA Opinions effectively, ISLA requires that we provide them with access to personal information about authorised users of the ISLA Opinions (which we host on their behalf). We will therefore share authorised users' names, email addresses and business contact information (including, if provided, job title and department) with them for this limited purpose. If you have any questions about their use of such personal information, you can contact them at [yvette.hall@isla.co.uk](mailto:yvette.hall@isla.co.uk).

We also share your personal information with certain trusted third parties in accordance with contractual arrangements in place with them, including:

- Our professional advisers and auditors
- IT and other service providers, such as our CRM provider

Where necessary, or for the reasons set out in this statement, personal information may also be shared with regulatory authorities, courts, tribunals, government agencies and law enforcement agencies. While it is unlikely, we may be required to disclose your information to comply with legal or regulatory requirements. We will use reasonable endeavours to notify you before we do this, unless we are legally restricted from doing so.

If in the future we re-organise or transfer all or part of our business, we may need to transfer your information to new Allen & Overy entities or to third parties through which the business of Allen & Overy will be carried out.

We do not sell, rent or otherwise make personal information commercially available to any third party, except with your prior permission.

#### **8. How we protect your personal information**

We use a variety of technical and organisational measures to help protect your personal information from unauthorised access, use, disclosure, alteration or destruction consistent with applicable data protection laws. Allen & Overy LLP holds the internationally recognised security standard BS ISO/IEC 27001:2013 in respect of its document management and email systems and the supporting infrastructure for Allen & Overy's offices globally (aosphere LLP utilizes these document management and email systems and supporting infrastructure). This is an independently verified certification that information security is managed in line with international best practice.

When we engage a third party service provider to collect or otherwise process personal information on our behalf, the third party is selected carefully and will be required to have appropriate security measures in place. As noted above, HighQ powers aosphere and is ISO27001 certified and maintains a range of security features, such as access controls, automated monitoring systems and firewalls.

#### **9. Which countries we transfer your personal information to**

In order to provide our services we may need to transfer your personal information to locations outside the jurisdiction in which you provide it or where you are viewing this website for the purposes set out in this Privacy Statement. This may entail a transfer of your information from a location within the European Economic Area (the "EEA") to outside the EEA, or from outside the EEA to a location within the EEA. Please see '**Who we share your personal information with**' for more detail on how the information may be shared with Allen & Overy offices and third party service providers.

The level of information protection in countries outside the EEA may be less than that offered within the EEA. Where this is the case, we will implement appropriate measures to ensure that your personal information remains protected and secure in accordance with applicable data protection laws. EU standard contractual clauses (as contemplated by Article 46(2) of the European Union's General Data Protection Regulation) are in place between all Allen & Overy entities that share and process personal data. Where our third party service providers process personal data outside the EEA in the course of providing services to us, our written agreement with them will include appropriate measures, usually standard contractual clauses. For more information about the measures in place, please contact us (see section below '**Who to contact with questions or concerns**').

## 10. Your rights regarding your personal information

The European Union's General Data Protection Regulation and other applicable data protection laws provide certain rights for data subjects.

You are entitled to request a copy of the information we hold about you and information about how we process it. You may also have a right in accordance with applicable data protection law to have it rectified or deleted, to restrict or suspend our processing of that information, to object to our processing of your information and, in some circumstances, to request receipt or transmission to another organisation, in a machine-readable form, personal information relating to you that you have provided to us. Where we rely on your consent to process your personal information, you have the right to withdraw your consent at any time. You also have the right to lodge a complaint in relation to aosphere's processing of your personal information with a local supervisory authority.

If you object to the processing of your personal information, or if you have provided your consent to processing and you later choose to withdraw it, we will respect that choice in accordance with our legal obligations.

Your objection (or withdrawal of any previously given consent) could mean that we are unable to perform the actions necessary to achieve the purposes set out above (see section entitled '**How we use your personal information**') or that you may not be able to make use of the services and products offered by us. Please note that even after you have chosen to withdraw your consent we may be able to continue to process your personal information to the extent required or otherwise permitted by law, in particular in connection with exercising and defending our legal rights or meeting our legal and regulatory obligations.

We must ensure that your personal information is accurate and up to date. Therefore, please advise us of any changes to your information by emailing: [info@aosphere.com](mailto:info@aosphere.com).

If you have any reason to believe that your interaction with us is no longer secure (for example, if you feel that the security of any personal information you might have sent to us has been compromised), please immediately notify us (see section below '**Who to contact with questions or concerns**').



### **11. Who are the data controllers**

aosphere LLP is the principal data controller.

### **12. Changes to our Privacy Statement**

Any changes we make to this Privacy Statement in the future will be posted on this page and, where appropriate, notified to you by e-mail. The updated Privacy Statement will take effect as soon as it has been updated or otherwise communicated to you.

This Privacy Statement was last updated in May 2018.

### **13. Who to contact with questions or concerns**

Account Questions/General Complaints: If you have complaints, questions about or need additional assistance setting up an account or using the aosphere platform, please contact [info@aosphere.com](mailto:info@aosphere.com).

Privacy Questions/Complaints: If you have questions, complaints or need further information about our Privacy Statement or practices, please contact our Head of Data Privacy, using the details below:

Jennifer Brannigan  
Head of Data Privacy  
Allen & Overy LLP  
68 Donegall Quay  
Belfast  
Northern Ireland  
BT1 3NL  
Email: [BusinessProtectionUnit@allenoverly.com](mailto:BusinessProtectionUnit@allenoverly.com)  
Tel: +44 (0) 28 9060 7500