

Lex Trado EDS (Pty) Ltd operates <https://www.lextrado.com/> and is committed to protecting your privacy and complying with applicable data protection and privacy laws. This Privacy Policy will inform you as to how we process your Personal Information and tell you about your privacy rights and how the law protects you (as Data Subject).

By submitting Personal Information to LexTrado, it will be seen as your consent to us to process the Personal Information. Reference to "consent", "your consent" or "your explicit consent" shall include the ticking of a tick box or clicking on a "Subscribe", "Submit" or "I agree" button on our site(s), as the case may be, or submitting an email to us or completing a form where we require more information from you for use of our Services.

1. Important Information And Who We Are

a) Purpose of this Privacy Policy

- i) This Privacy Policy aims to give you information on how LexTrado processes Personal Information through your use of this website, including any data you may provide when you contact us using the "[Contact Us](#)"-form, or Personal Information we process when you send to us or receive from us other electronic communications (i.e. emails, electronic forms or, where available, any of our social media sites).
- ii) This website is not intended for children and we do not knowingly collect data relating to children.
- iii) **It is important that you read this Privacy Policy so that you are fully aware of how and why we are using your Personal Information. This Privacy Policy supplements other notices and privacy policies and is not intended to override them.**

b) Responsible Party

- i) LexTrado EDS (Pty) Ltd is the Responsible Party and responsible for your Personal Information (collectively referred to as "LexTrado", "we", "us" or "our" in this Privacy Policy). Take note that occasionally we may act as Operator where we only act on instructions from the applicable Responsible Party, i.e. when making available one of our software as a service solutions. Where we act as Operator we will Process Personal information in accordance with the Service Agreement agreed to between Us and the Responsible Party.
- ii) We have appointed an Information Officer (IO) who is responsible for overseeing questions in relation to this Privacy Policy. If you have any questions about this Privacy Policy, including any requests, please contact the IO using the details set out below.

c) Contact details

- i) Our Information Officer's name: Marius Myburgh
 - (1) Full name of legal entity: Lex Trado EDS (Proprietary) Limited
 - (2) Contact details: Website ([click here](#) to communicate via our website) or telephone at Tel: 021 664 0066
 - (3) Email: marius@cyanre.co.za
 - (4) Registered address: Unit 5, Norma Jean Square, 244 Jean Avenue, Centurion, Gauteng, 0157
 - (5) Postal address: P.O. Box 10312, Centurion, Gauteng, 0046
- ii) You have the right to make a complaint at any time to the Information Regulator's office (IR), the Republic of South Africa's authority for data protection issues (<http://www.justice.gov.za/inforeg/>). We would, however, appreciate the chance to deal with your concerns before you approach the IR, so please contact us in the first instance.

d) Changes to the Privacy Policy and your duty to inform us of changes

- i) We keep our Privacy Policy under regular review. This version was last updated on 30.6.2021. Archived versions (if available) can be obtained by contacting us. Any changes made to our Privacy Policy in future will be posted on our website or made available during your engagement with LexTrado. The new version will apply the moment it is published on our website or incorporated by reference in any communication.
- ii) **It is important that the Personal Information we hold about you is accurate and current. Please keep us informed if your Personal Information changes during your relationship with us.**

e) **Integration into other sites:** This Privacy Policy applies to our website(s) and our electronic communications only. We do not exercise control over the sites who provide services or products to LexTrado as part of their own offering. These other sites may place their own cookies or other files on your computer, collect data or solicit Personal Information from you. We cannot be held responsible for any wrongful handling of end users' information by other sites.

f) **Third-Party links:** Our website 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. If you disclose your Personal Information to a Third-Party, such as an entity which operates a website linked to this website or social media sites (if any), **LEXTRADO SHALL NOT BE LIABLE FOR ANY LOSS OR DAMAGE, HOWSOEVER ARISING, SUFFERED BY YOU AS A RESULT OF THE DISCLOSURE OF SUCH INFORMATION TO THE THIRD-PARTY.** This is because we do not regulate or control how that Third-Party uses your Personal Information. You should always ensure that you read the privacy policy of any Third-Party. When you leave our website, we encourage you to read the privacy policy of every website you visit.

2. The Data We Collect About You

a) **Personal Information means the information as per the Definitions. It does not include data where the identity has been removed (anonymous data).**

b) We may collect, use, store and transfer different kinds of Personal Information about you which we have grouped together. When you decide to engage with us, we may collect Personal Information in the following ways:

- i) **Identity Data** includes first name, last name, age, nationality, username or similar identifier, job title, date of birth and gender;
- ii) **Contact Data** includes billing address, physical address, email address and telephone numbers;
- iii) **Financial Data** includes banking details and/ or payment card details;

- iv) **Transaction Data** includes details about payments to and from you and other details of Services you have accessed on our website;
 - v) **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 this website;
 - vi) **Usage Data** includes information about how you use our website and Services. This information shall include the full Uniform Resource Locators (URL) Clickstream to, through and from our website (including the date and time) and the Services you viewed or searched for, page response times, download errors, length of visits to certain pages, page interaction information (such as scrolling, clicks, and mouse-overs) and methods used to browse away from the page and any phone number used to call us, service transaction instructions from and to you via our APIs; or
 - vii) **Marketing and Communications Data** includes your preferences in receiving marketing from us and our third parties and your communication preferences.
- c) **COVID-19 Data** includes the prescribed questions we may ask as required by regulations and to ensure a safe and healthy environment, such as whether you have any symptoms or have been in contact with someone who had tested positive for COVID-19.
- d) We also collect, use and share **Aggregated Data** and **Pattern Data** such as (but not limited to) statistical or demographic data or service transactional data for any purpose. Aggregated Data or Pattern Data could be derived from your Personal Information but is not considered Personal Information in law as this data will not directly or indirectly reveal your (the data subject's) identity. For example, we may aggregate your Usage Data to calculate the percentage of users accessing a specific website feature or executing a specific transaction type (where applicable). However, if we combine or connect Aggregated Data or Pattern Data with your Personal Information so that it can directly or indirectly identify you, we will treat the combined data as Personal Information which will be used in accordance with this Privacy Policy.
- e) You may choose to provide additional Personal Information to us, in which event you agree to provide accurate and current information, and not to impersonate or misrepresent any person or entity or falsely state or otherwise misrepresent your affiliation with anyone or anything.
- f) We do not collect any Special Personal Information about you (as a customer). We may Process Special Personal information where we act as an Operator, however will only Process same as per instructions from the Responsible Party as per the agreement between us and the Responsible Party.
- g) **Submission of Personal Information on behalf of another:** If you provide information on behalf of someone else, then it is your responsibility to obtain the necessary consent from the person/ user before making the Personal Information available to us. On receipt of Personal Information, we assume that the necessary consent has been obtained and will process the Personal Information as per your instructions. By submitting such Personal Information on behalf of another person/ user, you indemnify us against any Third-Party claim, where such Third-Party claim relates to Personal Information that has been processed without the necessary consent or other available exception allowed by law.
- h) **If you fail to provide Personal Information:** Where we need to collect Personal Information 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 Services (including Services for no charge)). In this case, we may have to cancel a Service you have with us, but we will notify you if this is the case at the time.

3. How Is Personal Information Collected?

We use different methods to collect data from and about you including through:

- a) **Direct interactions.** You may directly provide us with your Personal Information when you:
 - i) engage with us via Zoom, Skype or any other Video conferencing facility;
 - ii) subscribe to our news letter;
 - iii) sign up for any of our Services;
 - iv) visit our premises
 - v) request marketing material from us;
 - vi) give us feedback; or
 - vii) contact us via our contact form ([click here](#)).
- b) **Automated technologies or interactions.** As you interact with our Services or website, we will automatically collect Technical Data about your equipment, browsing actions, patterns and device(s). We collect this Personal Information by using cookies (see clause [4 below](#)), server logs and other similar technologies. We may also receive Technical Data about you if you visit other websites employing our cookies.
- c) **Third-parties or publicly available sources.** We will receive Personal Information about you from various third-parties and public sources as set out below:
 - i) **Technical Data from the following parties:**
 - (1) analytics providers such as Google ("How Google uses information from sites or apps that use our services", (located at <https://policies.google.com/technologies/partner-sites>))
 - (2) advertising networks; and
 - (3) search information providers.
 - ii) **Contact, Financial and Transaction Data** from providers of technical, payment and delivery services.
 - iii) **Technical and Transactional Data** from Third-Party service providers that provide a service or product to you, subject to your consent to us to collect the information.
 - iv) **Identity and Contact Data** from data brokers or aggregators.
 - v) **Identity and Contact Data** from publicly available sources such as CIPC.

- d) **GDPR.** When using LexTrado Services embedded in another site, certain disclosures must be given to and consent obtained from end-users in the European Union where the law requires such disclosures and consents. For end users in the European Union you must use commercially reasonable efforts to ensure that an end user is provided with clear and comprehensive information about this site's policies. If you have end users in the European Union, you will need to ensure that your use of the system complies with the General Data Protection Regulation (GDPR).

4. Cookies

- a) Refer to our Cookies Policy.

5. How We Use Your Personal Information

- a) We will not sell your Personal Information. We will only use Personal Information within the framework of the law. Most commonly, we will use Personal Information in the following circumstances:
 - i) where you have given us your consent; or
 - ii) where we need to perform the contract we are about to enter into or have entered into with you; or
 - iii) 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; or
 - iv) where we need to comply with a legal obligation.
- b) We will get your consent before sending Third-Party 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 or using such automated facilities made available by us.
- c) **Purposes for which we will use Personal Information:**
 - i) We have set out in the table below a description of all the ways we plan to use Personal Information, and which of the legal bases we rely on to do so. We have also identified what our legitimate interests are where appropriate.
 - ii) Note that we may process Personal Information for more than one lawful ground depending on the specific purpose for which we are using the data. Please contact us if you need details about the specific legal ground, we are relying on to process your Personal Information where more than one ground has been set out in the table below.
- d) LexTrado only shares Personal Information with other companies or individuals outside of LexTrado in the following circumstances:
 - i) We have your consent. We may require informed consent for the sharing of any Special Personal Information (where applicable).
 - ii) We may provide such information to collaborating companies or other trusted businesses or persons for the purpose of processing Personal Information on our behalf. We require that these parties agree to process such information based on our instructions and in compliance with this Privacy Policy and any other appropriate confidentiality and security measures.
 - iii) We have a good faith belief that access, use, preservation or disclosure of such information is reasonably necessary to:
 - (1) satisfy any applicable law, regulation, legal process or enforceable governmental request;
 - (2) enforce applicable Terms of Use, including investigation of potential violations thereof;
 - (3) detect, prevent, or otherwise address fraud, security or technical issues; or
 - (4) protect against imminent harm to the rights, property or safety of LexTrado, our Personnel, users of this website or the public as required or permitted by law.

Purpose/Activity	Type of data	Lawful basis for processing including basis of legitimate interest
To receive newsletters / communication as customer To sign you up for our newsletter where you're not a customer yet	(a) Identity and (a) Contact	Existing customer (as per POPIA) Your Consent
To process and assist with payment for Services executed or Products requested by you: (a) Manage payments, fees and charges (b) Collect and recover money owed to us	(b) Identity, (c) Contact, (d) Financial, (e) Transaction, (f) Marketing and Communications	(a) Performance of a contract with you (b) Necessary for our legitimate interests (to recover debts due to us) [TAKE NOTE: we do not store credit card information – we use Third-Party service providers to execute transactions where you use your card. You should read their privacy policy].
To manage our relationship with you as client: (a) To deliver the Services (b) Notifying you about changes to our terms or Privacy Policy or Service terms and conditions (where applicable) (c) To reply to your submission via our "Contact Us" page	(a) Identity, (b) Contact, (c) Financial Data (d) Marketing and Communications, (e) COVID-19 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 clients use our Services)

To administer and protect our business, website and other electronic platforms (including troubleshooting, data analysis, testing, system maintenance, support, reporting and hosting of data)	(a) Identity, (b) Contact, (c) Technical	(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 exercise) (b) Necessary to comply with a legal obligation
To deliver relevant website content and advertisements to you and measure or understand the effectiveness of the advertising we serve to you, if and when we direct advertisements to you	(a) Identity, (b) Contact, (c) Usage, (d) Marketing and Communications, (e) Technical	Necessary for our legitimate interests (to study how clients use our Services, to develop them, to grow our business and to inform our marketing strategy)
To use data analytics to improve our website, Services, marketing, client relationships and experiences	(a) Technical, (b) Usage	Necessary for our legitimate interests (to define types of clients for our 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 Services that may be of interest to you	(a) Identity, (b) Contact, (c) Technical, (d) Usage, (e) Marketing and Communications	Necessary for our legitimate interests (to develop our Services and grow our business)

e) **Marketing:** We strive to provide you with choices regarding certain Personal Information uses, particularly around marketing and advertising (where applicable).

i) **Promotional offers from us**

(1) As a Customer:

- (a) When you acquire any of our Services or make use of our website (browse wrap agreement) we will deal with you as a customer under the POPIA;
- (b) We will use your Identity and Contact information to submit to you information/material of our other services and/or products that are related and that we feel may be of interest to you.
- (c) Important: you may ask us on submission of your Identity, and Contact information not to send you the above-mentioned information. At any time subsequent to our initial engagement you can make use of the opting out options under par. **Error! Reference source not found.**iii) below;

(2) Not a customer of yet:

- (a) We may collect through one of our employees or through our mailing system your email address; however
- (b) Before we use same for any direct marketing purposes we will ask you for Consent (opt-in) prior to sending you direct marketing material.

ii) **Third-party marketing.**

- (1) We will get your express opt-in consent before we share your Personal Information with any Third-Party for marketing purposes.
- (2) TAKE NOTE: We may provide (without your consent) Third-Party marketing parties/ advertisers with anonymous aggregate information (Aggregate Data (see above)) about our users (for example, we may inform them that 500 men aged under 30 have clicked on a specific product or advertisement on any given day). We may also use such aggregate information to help advertisers reach the kind of audience they want to target (for example, women in a specific region). We may make use of the Personal Information we have collected from you to enable us to comply with our advertisers' wishes by displaying their advertisement to that target audience. **IMPORTANT: We do not disclose information about identifiable individuals to our advertisers.**

iii) **Opting out.**

- (1) You can ask us or Third-Parties to stop sending you marketing messages at any time on the email communication or by contacting us at any time and requesting to opt-out of our marketing services.
- (2) Where you opt out of receiving these marketing messages, this will not apply to Personal Information provided to us as a result of a Service purchase, Service experience or other transactions.

iv) **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 this website may become inaccessible or not function properly. For more information about our use of cookies please refer to our Cookies Policy.

f) **Change of purpose.**

- i) We will only use your Personal Information 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.
- ii) If we need to use your Personal Information for an unrelated purpose, we will notify you and we will explain the legal basis which allows us to do so.
- iii) Please note that we may process your Personal Information without your knowledge or consent, in compliance with the above rules, where this is required or permitted by law.

6. Disclosures Of Personal Information

- a) We may share Personal Information with the parties set out below for the purposes set out in the table above.
 - i) **Internal Third-Parties** as set out in the Definitions. Where we share Personal Information to collaborating companies/ partners/ agents, as the case may be, we ensure your Personal Information is protected by requiring all Internal Third-Parties to follow this Policy when processing your Personal Information.
 - ii) **External Third-Parties** as set out in the Definitions.
 - iii) **Third-Parties** to whom we may choose to sell, transfer or merge all or 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 Information in the same way as set out in this Privacy Policy.
- b) We require all Third-Parties to respect the security of your Personal Information and to treat it in accordance with the law. We do not allow our Third-Party service providers to use your Personal Information for their own purposes and only permit them to process your Personal Information for specified purposes and in accordance with our instructions.

7. International Transfers

- a) Some of our External Third-Parties may be based outside South Africa, so their processing of your Personal Information could involve a transfer of data outside the Republic.
- b) Whenever we transfer your Personal Information out of the Republic, we ensure a similar degree of protection is afforded to it by ensuring at least one of the following safeguards is implemented:
 - i) We will only transfer your Personal Information to countries that have appropriate data protection and privacy legislation to protect your Personal Information.
 - ii) Where we use certain service providers, we conclude an agreement with them to confirm that your Personal Information is confidential, they can only process on our instructions and that they should establish and maintain appropriate technological and organisational measurements to protect your Personal Information.
 - iii) 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 protection to personal information similar to the conditions under the POPI Act, which we believe are good principles to ensure compliance.
- c) By submitting your Personal Information to us you consent to the transfer of your Personal Information outside the borders of South Africa (when required).

8. Data Security

- a) We have put in place appropriate technological and organisational measures to prevent Personal Information from being accidentally lost, used or accessed in an unauthorised way, altered or disclosed. In addition, we limit access to Personal Information to those employees, agents, contractors and other third-parties who have a business need to know. They will only process Personal Information on our instructions, and they are subject to a duty of confidentiality.
- b) We have put in place procedures to deal with any suspected Personal Information breach and will notify you and any applicable regulator of a breach where we are legally required to do so.

9. Data Retention

How long will we use your Personal Information for?

- a) We will only retain your Personal Information 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 Information for a longer period in the event of a complaint or if we reasonably believe there is a prospect of litigation in respect of our relationship with you.
- b) To determine the appropriate retention period for Personal Information, we consider the amount, nature and sensitivity of the Personal Information, the potential risk of harm from unauthorised use or disclosure of your Personal Information, the purposes for which we process your Personal Information and whether we can achieve those purposes through other means, and the applicable legal, regulatory, tax, accounting or other requirements.
- c) By law we have to keep basic information about our clients (including Contact, Identity and Transaction Data) for five years after they cease being clients for tax purposes.
- d) In some circumstances you can ask us to delete your data: see [12 below](#) for further information.
- e) In some circumstances we will anonymise your Personal Information (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.

10. Records

We will keep detailed, accurate and up-to-date written records regarding any Processing of Personal Information it carries out, including but not limited to, the access, control and security of the Personal Information and approved subcontractors, the processing purposes, categories of processing, any transfers of Personal Information to a third country and related safeguards, the instructions as received from our customers and a general description of the technical and organisational security measures and retention and destruction of Personal Information.

11. Social Media

- a) Our website or Services may, in certain circumstances, provide you with social plug-ins from various social media networks. If you choose to interact with a social network such as Facebook, Instagram or LinkedIn (for example by registering an account or click on the links from our website), your activity on our website will also be made available to that social network. This is necessary for the performance of your contract with us which allows you to interact with a social network. If you are logged in on one of these social networks during your visit to our website or are interacting with one of the social plug-ins, the social network might add this information to your respective profile on this network based on your privacy settings. If you would like to prevent this type of information transfer, please log out of your social network account before you enter our website, or change the necessary privacy settings, where possible.
- b) Communication, engagement and actions taken through external social media networks that we participate in are custom to the terms and conditions as well as the privacy policies held with each social media platform respectively.
- c) You are advised to use social media networks wisely and communicate/ engage with them with due care and caution in regard to their own privacy policies. **PLEASE NOTE: WE WILL NEVER ASK FOR PERSONAL OR SENSITIVE INFORMATION THROUGH SOCIAL MEDIA NETWORKS AND ENCOURAGE USERS, WISHING TO DISCUSS SENSITIVE DETAILS OR TO RESOLVE ISSUES/ CONCERNS, TO CONTACT US THROUGH PRIMARY COMMUNICATION CHANNELS SUCH AS BY TELEPHONE OR EMAIL.**
- d) Our social media network page(s) may share web links to relevant web pages. By default, some social media platforms shorten lengthy URL's. You are advised to exercise caution and due care before clicking on any shortened URL's published on social media platforms by this website. Despite our best efforts to ensure that only genuine URL's are published, many social media platforms are prone to spam and hacking and therefore our website and its owners cannot be held liable for any damages or implications caused by visiting any shortened links.

12. Your Legal Rights

- a) Under certain circumstances, you have the following rights under data protection laws in relation to your Personal Information:
 - i) **Request for Access:** Request access to Personal Information (commonly known as a "data subject access request"). There may be a fee associated with this request – see [c\) below](#). This enables you to receive a copy of the Personal Information we hold about you and to check that we are lawfully processing it. This enables you to receive a copy of the Personal Information we hold about you and to check that we are lawfully processing it. See our Promotion of Access to Information Manual ("PAI Manual").
 - ii) **Request Correction** of the Personal Information 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.
 - iii) **Request erasure** of your Personal Information. This enables you to ask us to delete or remove Personal Information 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 Information 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 Information 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. Take Note: Erasure of your Personal Information shall further not limit our rights in terms of Aggregate Data and Pattern Data
 - iv) **Object to processing** of your Personal Information 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 Information 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.
 - v) **Request restriction of processing** of your Personal Information. This enables you to ask us to suspend the processing of your Personal Information in the following scenarios:
 - (1) If you want us to establish the data's accuracy.
 - (2) Where our use of the data is unlawful, but you do not want us to erase it.
 - (3) 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.
 - (4) You have objected to our use of your data, but we need to verify whether we have overriding legitimate grounds to use it.
 - vi) **Request the transfer** of your Personal Information to you or to a third-party. We will provide to you, or a third-party you have chosen, your Personal Information 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. Contact us if you need to transfer your Personal Information.
 - vii) **Withdraw consent** at any time where we are relying on consent to process your Personal Information. 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 Services to you. We will advise you if this is the case at the time you withdraw your consent.
- b) If you wish to exercise any of the rights set out above, please contact us at the details mentioned at [1.c\) above](#).
- c) **Fee required:** Apart from any prescribed fees under any applicable data protection legislation, you will not have to pay a fee to access your Personal Information (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.
- d) **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 Information (or to exercise any of your other rights). This is a security measure to ensure that Personal Information 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.
- e) **Time limit to respond:** We try to respond to all legitimate requests within 30 (thirty) days. Occasionally it could take us longer than 30 (thirty) days if your request is particularly complex or you have made a number of requests. In this case, we will notify you and keep you updated.

13. Subcontractors

- a) We may authorise a third party (subcontractor) to Process the Personal Information on our behalf. Were we uses sub-contractors, we will:
 - i) enter into a written contract with the subcontractor that contains terms substantially the same as those set out in this Privacy Policy, in particular, in relation to requiring appropriate technical and organisational data security measures; and
 - ii) maintain control over all Personal Information it entrusts to the subcontractor;
- b) We agree to select subcontractors carefully according to their suitability and reliability.
- c) A subcontractor within the meaning of this Privacy Policy shall not exist if we commission third parties with additional services, that are not an essential part of this Privacy Policy.
- d) Where the subcontractor fails to fulfil its obligations under such written agreement, we remain fully liable to you for the subcontractor's performance of its agreement obligations.
- e) The Parties consider Cyanre to control any Personal Information controlled by or in the possession of its subcontractors.
- f) We undertake to ensure that all subcontractors who process Personal Information of Data Subjects shall not amend, modify, merge or combine such Personal Information and Process same as per our instructions.

14. Definitions

- a) **Data Subject** means the person to whom Personal Information relates and, in this document, refers to you as the party providing Personal Information that will be processed by LexTrado or a relevant third-party.
- b) **Legitimate Interest** means the interest of our business in conducting and managing our business to enable us to give you the best Service 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 Information for our legitimate interests. We do not use your Personal Information 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.
- c) **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.
- d) **Personal Information** means information relating to an identifiable, living, natural person, and where it is applicable, an identifiable, existing juristic person, including, but not limited to (related to our business): information relating to the race, gender, sex, pregnancy, marital status, national, ethnic or social origin, colour, sexual orientation, age, physical or mental health, well-being, disability, religion, conscience, belief, culture, language and birth of the person, information relating to financial history of the person; any identifying number, symbol, e-mail address, physical address, telephone number, location information, online identifier or other particular assignment to the person; the personal opinions, views or preferences of the person; correspondence sent by the person that is implicitly or explicitly of a private or confidential nature or further correspondence that would reveal the contents of the original correspondence.
- e) **Personnel** means LexTrado employees, agents or authorised sub-contractors.
- f) **Responsible Party** means a public or private body or any other person which, alone or in conjunction with others, determines the purpose of and means for processing Personal Information.
- g) **Services** refers to our website and the services as reflected on our website and promoted via other sites of ours (if any).
- h) **Special Personal Information** means information that may be sensitive information, such as details about your race or ethnicity, religious or philosophical beliefs, sex life, sexual orientation, political opinions, trade union membership, information about your health, and biometric information or criminal convictions and offences.
- i) **Third-Parties**
 - i) **Internal Third-Parties:** Partners, affiliates, employees, shareholders, directors and/ or agents of LexTrado (if applicable), acting as joint responsible parties or operators and who may also provide IT and system administration services and undertake leadership reporting.
 - ii) **External Third-Parties:**
 - (1) Service providers acting as operators who provide IT and system administration services.
 - (2) Professional advisers acting as operators or joint Responsible Parties, including lawyers, bankers, auditors and insurers who provide consultancy, banking, legal, insurance and accounting services.
 - (3) The Revenue Services, regulators and other authorities acting as operators or joint Responsible Parties who require reporting of processing activities in certain circumstances.
 - (4) Courts of law or any other authorities where we have an obligation under law to share your Personal Information.
 - (5) In the event that we sell or buy any business or assets, in which case we may disclose your Personal Information to the prospective seller or buyer of such business or assets.

END OF POLICY