

INTERLAW PRIVACY AND CONSENT TO USE OF DATA POLICY

INTRODUCTION

Welcome to Interlaw Limited's privacy policy. Interlaw Limited (Interlaw, we, us and our) are committed to protecting the privacy and confidentiality of personal data. This privacy policy will inform you as to how we look after your personal data and tell you about your privacy rights and how the law protects you.

PURPOSE OF THIS PRIVACY POLICY

This privacy policy aims to give you information on how we collect and process your personal data through your use of our website, through data collected from you directly, through data collected from Interlaw member firms, your organisation and your clients.

It is important that you read this privacy policy together with any other privacy policy or fair processing policy we may provide on specific occasions when we are collecting or processing personal data about you so that you are fully aware of how and why we are using your data. This privacy policy supplements other notices and privacy policies and is not intended to override them.

CONTROLLER

Interlaw Limited is the data controller and responsible for your personal data.

Our registered address is Centrum House, 36 station Road, Egham, Surrey, TW20 9LF. If you have any questions about this privacy policy or our privacy practices, please contact us in the following ways:

- **By email:** adaniels@interlaw.org
- **By telephone:** +818 929 2060

You have the right to make a complaint at any time to the Information Commissioner's Office (ICO), the UK regulator for data protection issues (www.ico.org.uk). We would, however, appreciate the chance to deal with your concerns before you approach the ICO so please contact us in the first instance.

CHANGES TO THE PRIVACY POLICY AND YOUR DUTY TO INFORM US OF CHANGES

We keep our privacy policy under regular review. This version was last updated in April 2023.

It is important that the personal data we hold about you is accurate and current. Please keep us informed if your personal data changes during your relationship with us.



THIRD-PARTIES

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. We do not control these third-party websites and are not responsible for their privacy statements. When you leave our website, we encourage you to read the privacy policy of every website you visit.

THE DATA WE COLLECT ABOUT YOU

Personal data, or personal information, means any information about an individual from which that person can be identified. It does not include data where the identity has been removed (anonymous data).

We may collect, use, store and transfer different kinds of personal data about you which we have grouped together as follows:



IDENTITY DATA

Includes first name, maiden name, last name, job title, date of birth and gender.



CONTACT DATA

Includes email address and telephone and fax numbers.



TECHNICAL DATA

Includes internet protocol (IP) address, 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 our website.



PROFILE DATA

Includes your username and password and preferences where you have registered for access to the Interlaw Members' Portal.



MARKETING AND COMMUNICATIONS DATA

Includes your preferences in receiving marketing from us and our third parties and your communication preferences.

We also collect, use and share Aggregated Data such as statistical or demographic data for any purpose. Aggregated Data could be derived from your personal data but is not considered personal data in law as this data will not directly or indirectly reveal your identity. For example, we may aggregate your Usage Data to calculate the percentage of users accessing a specific website feature. However, if we combine or connect Aggregated Data with your personal data so that it can directly or indirectly identify you, we treat the combined data as personal data which will be used in accordance with this privacy policy.

We do not collect any Special Categories of Personal Data about you (this includes details about your race or ethnicity, religious or philosophical beliefs, sex life, sexual orientation, political opinions, trade union membership, information about your health, and genetic and biometric data). Nor do we collect any information about criminal convictions and offences.



IF YOU FAIL TO PROVIDE PERSONAL DATA

Where we need to collect personal data 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 a service). 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.

HOW IS YOUR PERSONAL DATA COLLECTED?

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

- **DIRECT INTERACTIONS.**
You may give us your Identity, Contact and Marketing and Communications data by filling in forms or by corresponding with us by post, phone, email or otherwise. This includes personal data you provide when you:
 - Or your organisation or member firm contacts us directly;
 - Provide us with your information at events or conferences;
 - Request marketing to be sent to you; or
 - Give us feedback or contact us.
- **REFERRALS FROM INTERLAW MEMBER FIRMS OR YOUR CLIENTS.**
An organisation who is a member firm of the Interlaw network, or a client of yours, may provide us with your Identity and Contact data by corresponding with us by post, phone, email or otherwise.
- **AUTOMATED TECHNOLOGIES OR INTERACTIONS.**
As you interact with our website, we will automatically collect Technical Data about your equipment, browsing actions and patterns. We collect this personal data by using cookies and other similar technologies.
- **THIRD PARTIES OR PUBLICLY AVAILABLE SOURCES.**
We will receive personal data about you from various third parties, such as via prospect lists provided by other organisations. We may also collect personal data via publicly available sources, such as your organisation's website.

HOW WE USE YOUR PERSONAL DATA

We will only use your personal data when the law allows us to. Most commonly, we will use your personal data in the following circumstances:

- Where we need to perform the contract we are about to enter into or have entered into with you.
- Where you ask us to provide your contact details to an Interlaw member firm.
- 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. We do not use your personal data 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.
- Where we need to comply with a legal obligation.



Generally, we do not rely on consent as a legal basis for processing your personal data although 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.

PURPOSES FOR WHICH WE WILL USE YOUR PERSONAL DATA

We have set out below, in a table format, a description of all the ways we plan to use your personal data, and which of the legal bases we rely on to do so. We have also identified what our legitimate interests are where appropriate.

Note that we may process your personal data for more than one lawful ground depending on the specific purpose for which we are using your data. Please contact us if you need details about the specific legal ground we are relying on to process your personal data where more than one ground has been set out in the table below.

PURPOSE/ACTIVITY	TYPE OF DATA	LAWFUL BASIS FOR PROCESSING INCLUDING BASIS OF LEGITIMATE INTEREST
Introduction	a. Identity b. Contact	a. Performance of a contract with you b. Necessary for our legitimate interests (to keep our records updated)
Internally, to administer the Interlaw website to help us improve our services.	a. Identity b. Contact c. Marketing and Communications	a. Performance of a contract with you b. Necessary for our legitimate interests (to keep our records updated)
Allow you to participate in interactive features of our website.	a. Identity b. Contact c. Marketing and Communications	Necessary for our legitimate interests (to understand how customers view our services)
To manage our relationship with you which will include: <ul style="list-style-type: none">Notifying you about changes to our terms or privacy policyAsking you to complete a survey	a. Identity b. Contact c. Marketing and Communications d. Profile	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 customers use service)
Provide you with news, offers, events, webinars and general information about services we provide and the opportunities available to you when you have opted to receive those.	a. Identity b. Contact c. Marketing and Communications d. Profile	Necessary for our legitimate interests (to develop our services and grow our business)
Inform you of updates on issues that may be of interest to you, when you have opted in to receive these.	a. Identity b. Contact c. Marketing and Communications d. Profile	Necessary for our legitimate interests (to develop our services and grow our business)



PURPOSE/ACTIVITY	TYPE OF DATA	LAWFUL BASIS FOR PROCESSING INCLUDING BASIS OF LEGITIMATE INTEREST
Provide your contact details to an Interlaw member firm when you request that we assist you with locating a law firm to provide you with legal advice.	a. Identity b. Contact	Necessary for our legitimate interests (to develop our services and grow our business)
Analyse the usage of our website, mobile applications and to understand basic demographics of users in order to improve the content and functionality of our website and mobile applications.	a. Identity b. Contact c. Marketing and Communications d. Technical e. Profile	Necessary for our legitimate interests (to develop our services and grow our business)

MARKETING

We strive to provide you with choices regarding certain personal data uses, particularly around marketing and advertising.

PROMOTIONAL OFFERS FROM US

We may use your Identity, Contact, Profile, Technical and Marketing and Communications data to form a view on what we think you may want or need, or what may be of interest to you.

THIRD-PARTY MARKETING

We will get your express opt-in consent before we share your personal data with any third party for marketing purposes.

OPTING OUT

You can ask us or third parties to stop sending you marketing messages at any time by contacting us using the details provided in this privacy policy.

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 our website may become inaccessible or not function properly.



CHANGE OF PURPOSE

We will only use your personal data 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.

If we need to use your personal data for an unrelated purpose, we will notify you and we will explain the legal basis which allows us to do so.

Please note that we may process your personal data without your knowledge or consent, in compliance with the above rules, where this is required or permitted by law.

DISCLOSURES OF YOUR PERSONAL DATA

We do not disclose any personal data with unrelated third parties, except for the following circumstances and in accordance with the purposes set out in the table above:

- **INTERLAW MEMBER FIRMS:** In order to provide you with the information or services requested, we may share your personal data or transfer it to Interlaw member firms.
- **INTERLAW MEMBER GROUPS:** If you have registered for access to the Interlaw Members' Portal on our website or joined an Interlaw member group, we may share your personal data with other members in Interlaw member groups.
- **EVENT ATTENDANCE:** If you attend an Interlaw event, we will share basic contact information or information necessary to secure travel/attendance arrangements with other event attendees.
- **INTERLAW WEBSITE:** If designated by your firm as an industry expert or person of contact, we will include your contact information on the Interlaw website.
- **THIRD PARTY PROCESSORS:** On occasion, we may transfer personal data to third party processors in accordance with the purposes set out in the table above. For example, a third party may have access to your Identity and Contact Data for purposes of event registration.

We require all third parties to respect the security of your personal data and to treat it in accordance with the law. We do not allow our third-party service providers to use your personal data for their own purposes and only permit them to process your personal data for specified purposes and in accordance with our instructions.

INTERNATIONAL TRANSFERS

Whenever we transfer your personal data out of the UK, we ensure a similar degree of protection is afforded to it by ensuring at least one of the following safeguards is implemented:

- We will only transfer your personal data to countries that have been deemed to provide an adequate level of protection for personal data.
- Where we use certain service providers, we may use specific contracts approved for use in the UK which give personal data the same protection it has in the UK.

Please contact us if you want further information on the specific mechanism used by us when transferring your personal data out of the UK.



DATA SECURITY

We have put in place appropriate security measures to prevent your personal data from being accidentally lost, used or accessed in an unauthorised way, altered or disclosed. In addition, we limit access to your personal data to those employees, agents, contractors and other third parties who have a business need to know. They will only process your personal data on our instructions and they are subject to a duty of confidentiality.

We have put in place procedures to deal with any suspected personal data breach and will notify you and any applicable regulator of a breach where we are legally required to do so.

DATA RETENTION

HOW LONG WILL YOU USE MY PERSONAL DATA FOR?

We will only retain your personal data 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 data for a longer period in the event of a complaint or if we reasonably believe there is a prospect of litigation in respect to our relationship with you.

To determine the appropriate retention period for personal data, we consider the amount, nature and sensitivity of the personal data, the potential risk of harm from unauthorised use or disclosure of your personal data, the purposes for which we process your personal data and whether we can achieve those purposes through other means, and the applicable legal, regulatory, tax, accounting or other requirements.

YOUR LEGAL RIGHTS

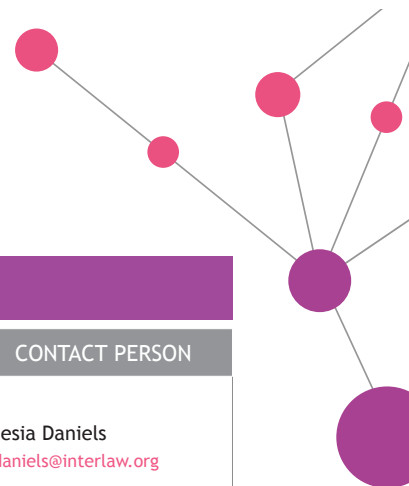
Under certain circumstances, you have rights under data protection laws in relation to your personal data, these include the right to:

- Request access to your personal data.
- Request correction of your personal data.
- Request erasure of your personal data.
- Object to processing of your personal data.
- Request restriction of processing your personal data.
- Request transfer of your personal data.
- Right to withdraw consent.

If you wish to exercise any of the rights set out above, please contact us using the contact details provided.

NO FEE USUALLY REQUIRED

You will not have to pay a fee to access your personal data (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.



INTERLAW SHARING PROTOCOL SCHEDULE

NAME	REGISTERED ADDRESS	COMPANY NUMBER	CONTACT PERSON
Interlaw Limited	2nd floor, Magna House, 18-32 London Road, Staines-Upon-Thames, TW18 4BP, United Kingdom	016 525 90	Alesia Daniels adaniels@interlaw.org

MEMBER FIRMS

NAME	REGISTERED ADDRESS	COMPANY NUMBER/OFFICIAL REGISTRATION NUMBER	CONTACT PERSON
Advokatfirmaet Haavind	Haakon Vlls gate 10, 0161 Oslo, Norway PB 359 Sentrum, NO-0101 Oslo, Norway	986 420 177	Gaute Krokann g.krokann@haavind.no
Aird & Berlis LLP	Brookfield Place 181 Bay St., Suite 1800 Toronto, Ontario M5J 2T9, Canada	110 476 264	Nick Torchetti ntorchetti@airdberlis.com
AKD	Wilhelminakade 1, 3072 AP, Rotterdam, The Netherlands	243 668 20	Eric Bernaert EBernaert@akd.nl
AMOSS LLP	Warrington House, Mount Street Crescent, Dublin 2, D02 R256, Ireland	<i>LLPs do not have a Company Number or Official Registration Number in Ireland</i>	John O'Sullivan josullivan@AMOSS.ie
Andrey Delchev & Partners - Eurolex Bulgaria	6 Nikolay Gogol Street, 1124 Sofia, Bulgaria	175 470 730	Andrey Delchev a.delchev@eurolex.bg
Arias, Fábrega & Fábrega	ARIFA Building, 10th Floor, West Boulevard, Santa Maria Business District, Panama, Republic of Panama	Ruc 71-415-5555 / DV 05	Laura Arango larango@arifa.com
ARNECKE SIBETH DABELSTEIN	Guterplatz 1, (Spin Tower) 60327 Frankfurt am Main, Germany	AG Frankfurt am Main: PR 2404	Michael Siebold m.siebold@asd-law.com
Arzinger	Senator Business Centre, 32/2 Knyaziv Ostroz'kykh Str., Kyiv, Ukraine	369 589 68	Timur Bondaryev timur.bondaryev@arzinger.ua
B M Musau & Co., Advocates LLP	P.O. Box 16393 - 00100 GPO, Nairobi Reinsurance Plaza, 10th Floor - Taifa Road Nairobi, Kenya	LLP - D81 AX9	Dr. Benjamin Musau @bmmusau.co.ke

MEMBER FIRMS			
NAME	REGISTERED ADDRESS	COMPANY NUMBER/OFFICIAL REGISTRATION NUMBER	CONTACT PERSON
Barrocas Advogados	Av. Engº Duarte Pacheco, Amoreiras, Torre 2 - 15ºA, 1070-102 Lisboa, Portugal	502 308 001	Manuel Barrocas mpb@barrocas.pt Carlos Soares csoares@barrocas.pt João Nuno Barrocas jnb@barrocas.pt
Binder Grösswang	Sterngasse 13, 1010 Vienna, Austria	ATU 651 59 008	Andreas Hable hable@bindergroesswang.at
Bishop & McKenzie LLP	2300, 10180-101 Street NW Edmonton, AB T5J 1V3, Canada	121 483 010	Blair Willie bwillie@bmlp.ca Shanna Hunka shunka@bmlp.ca
BLP	Edificio BLP, Centro Empresarial Vía Lindora, 5to piso Radial Santa Ana - Belén, 500 N del Automercado Santa Ana, San Jose Costa Rica	3-101-587195	Neftalí Garro ngarro@blplegal.com
Blumenthal Richter & Sumet	990 Abdulrahim Place, 31st Floor, Suite 3101, Rama 4 Road, Kwaeng Silom, Khet Bangrak, Bangkok, Thailand	0 105 537 138 319	Andreas Richter richter@brslawyers.com
Brons & Salas	Olga Cossettini 363, City of Buenos Aires, (Zip Code: C1107CCG) Argentina	305 990 174 33	Leandro Cáceres lcaceres@brons.com.ar
BRP Renaud und Partner mbB	Königstraße 28, 70173 Stuttgart, Germany	Amtsgericht Stuttgart (<i>Stuttgart local court</i>), PR 42	Thomas Janssen thomas.janssen@brp.de Roman Wexler-Uhlich roman.wexler-uhlich@brp.de Data Protection Officer datenschutzbeauftragte@brp.de
Camilleri Preziosi	34, Level 3 Valletta Buildings, South Street, Valletta, VIT1103, Malta	<i>As a partnership there is no official registration number in Malta</i>	Donald Vella donald.vella@camilleripreziosi.com Stephanie Heitkemper stephanie.heitkemper@camilleripreziosi.com

MEMBER FIRMS			
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Cariola Díez Pérez-Cotapos	Av. Andrés Bello 2711, 19th floor, Las Condes, Santiago	79 589 710 0	Sergio Díez sdiez@cariola.cl
CNPLaw	600 North Bridge Road, #13-01 Parkview Square, Singapore 188778	632 383 83 / T08LL0403K	Lisa Theng lisatheng@cnplaw.com Bill Jamieson billjamieson@cnplaw.com
De Berti Jacchia Franchini Forlani	Via San Paolo, 7 20121 Milano, Italy	021 526 501 52	Massimiliano Gazzo m.gazzo@dejalex.com Antonella Terranova a.terranova@dejalex.com
De Grandpré Chait LLP	2600-800 René-Lévesque West Montreal, Quebec, H3B 1X9, Canada	334 204 252 3	Stephen Solomon ssolomon@dgchait.com Eric Lalanne elalanne@dgchait.com
DELTA legal advokátní kancelář s.r.o.	Na příkopě 988/31, Staré Město, 110 00 Praha 1, Czech Republic	032 192 59	Libor Vacek libor.vacek@deltalegal.cz
Femil Čurt Law Office	Maršala Tita 50, 71 000 Sarajevo, Bosnia and Herzegovina	430 141 237 000 1	Femil Čurt femil.curt@curtlaw.ba
Fortune Manning	Level 3, 25 Teed Street, Newmarket, Auckland 1023, New Zealand	94-290 434 999 84	Shafraz Khan shafraz.khan@fortunemanning.co.nz
GKG Law, P.C.	1055 Thomas Jefferson St., NW Suite 620, Washington, DC 20007, U.S.A.	52 - 214 167 1	Rich Bar rbar@gkglaw.com
Glinska & Mišković	Ulica grada Vukovara 269f, 10 000 Zagreb, Croatia	246 728 3	Beata Adrianna Glinska beata.glinska@gamc.hr
Gökçe Attorney Partnership	Abide-i Hürriyet Caddesi No:158, 34381 Şişli, Istanbul, Turkey	400 031 042 8	Elif Aksöz elif.aksoz@gokce.av.tr
Goldman, Antonetti & Córdova, LLC	AIG Plaza, Suite 1500, 250 Munoz Rivera Avenue, San Juan 00918, Puerto Rico	38 78	Carlos A. Rodriguez-Vidal Crodriguez-vidal@gaclaw.com
Gomez-Acebo & Pombo Abogados, S.L	P.º de la Castellana, 216 - 28046 Madrid, Spain	B 810 893 28	Richard Silberstein silberstein@ga-p.com Alex Carbonell acarbonell@ga-p.com

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Honigman LLP	660 Woodward Ave., Suite 2290, Detroit, MI 48226, U.S.A.	802 275 561	Mark A. Stern mstern@honigman.com
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Lang & Rahmann	Kaistraße 20, 40221 Düsseldorf, Germany	Partnerschaftsregister des Amtsgerichts Essen, PR 5231	Dr. Felix Klopmeier, LL. M. felix.klopmeier@lang-rahmann.de



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Manucci Advogados	Rua Antonio de Albuquerque, 194 andar 10 - Savassi, CEP: 30.112-011 - Belo Horizonte/MG Brasil	CNPJ: 8.686.394/0001-95	Daniel Manucci Daniel.manucci@manucciadv.com.br
Mazanti-Andersen	Amaliegade 10, 1256 Copenhagen, Denmark	CVR-no 358 920 52	Henrik B. Sanders hbs@mazanti.dk
Mochtar Karuwin Komar (MKK)	WTC 1 Floor 11th, Jalan Jendral Sudirman Kav. 29-31, Jakarta, Indonesia 12920	NIB (Business License Number) No.0202010131688	Ariani Nugraha Ariani.nugraha@mkklaw.net Miranti Ramadhani mirantimr@mkklaw.net Ananda Aviati ananda@mkklaw.net
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MEMBER FIRMS			
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Owen Bird Law Corporation	2900-733 Seymour Street, Vancouver, BC V6B 0S6 Canada	BC 068 392 1	Jocelyn Bellerud jbellerud@owenbird.com
Pashman Stein Walder Hayden P.C.	Court Plaza South, East Wing, 21 Main Street, Suite 200, Hackensack, NJ 07601, U.S.A.	EIN 22-3384189	Michael Stein mstein@pashmanstein.com

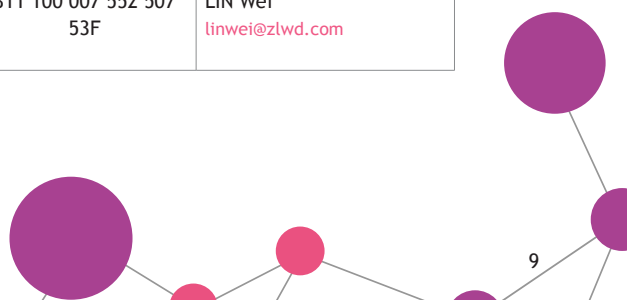
MEMBER FIRMS			
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Pereyra & Asociados	Av. Abraham Lincoln No. 1069, Torre Ejecutiva Sonora, Suite 701, Ensanche Serralles, Santo Domingo, República Dominicana	RM No. 17104SD	Luis Miguel Pereyra lpereyra@pereyralaw.com Lorena Pereyra lorenapereyra@pereyralaw.com Massiel Peña mpena@pereyralaw.com
Pérez Bustamante & Ponce	República de El Salvador N36-140 y NNUU, Edificio Mansión Blanca, Quito, Ecuador	179 176 600 800 1	Sandra Reed sreed@pbplaw.com Juliana Calvo jcalvo@pbplaw.com
PLK Advokati	Svetozara Markovica 42, 81000 Podgorica, Montenegro	033 448 51	Djordje Kuzmanovic djordje.kuzmanovic@plk-advokati.me
POLÁČEK & PARTNERS s.r.o.	Hurbanovo námestie 1, 811 06 Bratislava, Slovak Republic	50 568 124	Pavol Poláček ppolacek@polacekpartners.sk
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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 data (or to exercise any of your other rights). This is a security measure to ensure that personal data 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.

TIME LIMIT TO RESPOND

We try to respond to all legitimate requests within one month. Occasionally it could take us longer than a month 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.

