

INTRODUCTION

This is Epoq Inc.'s privacy notice.

We respect your privacy and are committed to protecting your personal data. This privacy notice will tell you how we look after your personal data and tell you about your privacy rights and how the law protects you.

This privacy notice is provided in a layered format so you can click through to the specific areas set out below. You can also download a pdf version of the notice [here](#).

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1. IMPORTANT INFORMATION AND WHO WE ARE

1.1 Purpose of this privacy notice

1.2 In the course of our dealings with a business that you own, work for or are a representative of, or when marketing our products and services to such a business, we may hold personal data about you. This privacy notice gives you information about how Epoq, Inc. collects and deals with that personal data. In this privacy notice, we use the word **process** to cover all the different ways in which we handle your personal data, such as collection, use, storage and transfer.

1.3 We only process your personal data in the context of, and for the purpose of, our business-to-business dealings and communications.

1.4 We do not knowingly collect data relating to children.

1.5 It is important that you read this privacy notice, as well as any other privacy notice we may give you on specific occasions when we are processing personal data about you, so you know how and why we are using your personal data.

1.6 **Controller**

1.7 Epoq, Inc. (referred to as **we, our, us** in this privacy notice) is the **controller**. In other words, we decide when, why and how to process your personal data and we are responsible for looking after it and protecting your rights. A group company of ours, Epoq Legal Ltd (based in the UK), processes your personal data for us.

1.8 We have appointed a data privacy manager who is responsible for overseeing questions in relation to this privacy notice. If you have any questions about this privacy notice, including any requests to exercise your legal rights, please contact the data privacy manager using the details set out below.

1.9 **Contact details**

1.10 Our full details are:

Full name of legal entity: Epoq, Inc.

Data privacy manager: dataprivacy@epoq.co.uk

Postal address: 275 E. Hillcrest Drive, Suite No. 160-247, Thousand Oaks, CA 91360

1.11 You may have the right to make a complaint at any time to the Information Commissioner's Office (**ICO**), the UK supervisory authority 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 first.

1.12 **Changes to the privacy notice and your duty to inform us of changes**

1.13 This version was last updated on [DATE].

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

2. THE DATA WE COLLECT ABOUT YOU

2.1 Personal data 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**).

2.2 We may process different kinds of personal data about you which we have grouped together as follows:

(a) **Contact Data** includes names(s), address, email address and telephone numbers.

(b) **Marketing and Communications Data** includes your preferences in receiving marketing from us and your communication preferences.

- (c) **Usage Data** includes information about how you respond to our communications.

2.3 We collect, use and share **Aggregated Data** such as statistical or demographic data for any purpose. Aggregated Data may be derived from your personal data but is not considered personal data in law as this data does not directly or indirectly reveal your identity. For example, we may aggregate your Usage Data to calculate the percentage of recipients responding positively to a particular email campaign. 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 notice.

3. HOW IS YOUR PERSONAL DATA COLLECTED?

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

- (a) **Direct interactions.** You may give us your personal data by filling in forms or by corresponding with us by post, phone, email or otherwise. This also includes personal data you provide when you:
 - (i) request a product or service demonstration;
 - (ii) request our publications to be sent to you;
 - (iii) enter a competition, promotion or survey; or
 - (iv) give us some feedback.
- (b) **Third parties.** We may receive personal data about you from various publicly available sources (such as LinkedIn, professional and business directories) or from your colleagues.

4. HOW WE USE YOUR PERSONAL DATA

4.1 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:

- (a) 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. **Legitimate Interests** means our interests in developing our business, products and services; protecting our business; and managing it efficiently. We make sure we consider and balance any potential impact on you (both positive and negative) and your rights before we process your personal data for our legitimate 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.

(b) Where we need to comply with a legal or regulatory obligation. **Comply with a legal or regulatory obligation** means processing your personal data where it is necessary for compliance with a legal or regulatory obligation that we are subject to.

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

4.3 **Purposes for which we will use your personal data**

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

4.5 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 below.

Purpose/Activity	Legal ground for processing and (where applicable) nature of legitimate interest
To develop commercial leads, negotiate commercial arrangements and agree contract documentation with clients, we will process Contact Data.	Necessary for our legitimate interests (for running our business)
To send service communications and to manage ongoing client relationships, we will process Contact Data.	Necessary for our legitimate interests (for running our business)
To send marketing communications (for the business that you own, work for or represent) to you and make suggestions and recommendations to you about products or services that may be of interest to your business, we will process Contact Data and Marketing and Communications Data	Necessary for our legitimate interests (to develop our products/services and grow our business)
To ensure that we do not send marketing communications to you if you have indicated that you do not wish to receive these, we will process Contact Data and Marketing and Communications Data	Necessary to comply with a legal obligation

<p>To deal with suppliers (including agreeing commercial terms, agreeing contractual documentation and managing the ongoing relationship) and other third parties in the course of our business, we will process Contact Data.</p>	<p>Necessary for our legitimate interests (for running our business)</p>
<p>To identify possible developments and improvements to our marketing, we will process Contact Data and Usage Data.</p>	<p>Necessary for our legitimate interests (to study how recipients respond to our marketing campaigns, to develop them and to inform our business development strategy)</p>

4.6 Marketing

4.7 Our marketing is only intended for the business that you own, work for or represent and is, therefore, sent to you in your professional capacity. We do not send any marketing communications to you in your private capacity. Nonetheless, you can ask us to stop sending you marketing messages at any time by following the opt-out link on any marketing message sent to you or by contacting us at any time.

4.8 We do not share your personal data with any outside company for marketing purposes.

4.9 Change of purpose

4.10 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.

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

4.12 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.

5. DISCLOSURES OF YOUR PERSONAL DATA

5.1 We may have to share your personal data with the parties set out below for the purposes set out in the table in paragraph 4 above:

- (a) Our service providers based in the UK and the Republic of Ireland who provide IT and system administration services.

- (b) Professional advisers including lawyers, bankers, auditors and insurers who provide consultancy, banking, legal, insurance and accounting services.
- (c) Regulators, taxation and other authorities who require reporting of processing activities in certain circumstances.
- (d) Third parties to whom we may choose to sell, transfer, or merge 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 data in the same way as set out in this privacy notice.

5.2 We require all third-party service providers processing your personal data for us to respect the security of your personal data and to treat it in accordance with the law. We do not allow them 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.

6. INTERNATIONAL TRANSFERS

We do not transfer your personal data outside the European Economic Area (EEA).

7. DATA SECURITY

7.1 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.

7.2 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.

8. DATA RETENTION

8.1 How long will you use my personal data for?

8.2 We will only retain your personal data for as long as necessary to fulfil the purposes we collected it for, including for the purposes of satisfying any legal, accounting, or reporting requirements.

8.3 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 requirements.

- 8.4 Details of retention periods for different aspects of your personal data are available in our retention policy which you can request from us by contacting us.
- 8.5 In some circumstances you can ask us to delete your data: see below for further information.
- 8.6 In some circumstances we may anonymise your personal data (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.

9. YOUR LEGAL RIGHTS

9.1 Under certain circumstances, you have rights under data protection laws in relation to your personal data.

9.2 You have the right to:

- (a) **Request access** to your personal data (commonly known as a “data subject access request”). This enables you to receive a copy of the personal data we hold about you and to check that we are lawfully processing it.
- (b) **Request correction** of the personal data 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.
- (c) **Request erasure** of your personal data. This enables you to ask us to delete or remove personal data 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 data 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 data to comply with local law. Note, however, that we may not always be able to comply with your request for erasure for specific legal reasons which will be notified to you, if applicable, at the time of your request.
- (d) **Object to processing** of your personal data 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 data 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.
- (e) **Request restriction of processing** of your personal data. This enables you to ask us to suspend the processing of your personal data in the following situations:
 - (i) if you want us to establish the data’s accuracy;

- (ii) where our use of the data is unlawful but you do not want us to erase it;
 - (iii) 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; or
 - (iv) you have objected to our use of your data but we need to verify whether we have overriding legitimate grounds to use it.
- (f) **Request the transfer** of your personal data to you or to a third party. We will provide to you, or a third party you have chosen, your personal data 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.
- (g) **Withdraw consent at any time** where we are relying on consent to process your personal data. 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 products or services to you. We will advise you if this is the case at the time you withdraw your consent.

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

9.4 **No fee usually required**

9.5 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 may refuse to comply with your request in these circumstances.

9.6 **What we may need from you**

9.7 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.

9.8 **Time limit to respond**

9.9 We try to respond to all legitimate requests within one month. Occasionally it may 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.