

REACH

Data protection and privacy policy

January 2021



Data protection and privacy policy

Introduction

Taylor Wessing LLP (also referred to as "TW UK" in this policy) is committed to safeguarding your privacy. This policy sets out our approach to data protection and data privacy, explaining why and how we may process your personal information where we are the data controller of that information (also referred to here as "personal data"), and your rights in relation to that information.

Except where this policy explains otherwise, we are the controller in relation to the personal data processed in accordance with this policy. This policy applies to the reach.taylorwessing.com ("the Reach Website") and the Reach App.

Our Data Privacy Manager is responsible for responding to questions relating to this policy, including any requests to exercise your legal rights in relation to your personal data, and can be contacted via the email address dataprivacyuk@taylorwessing.com. Our full contact details are set out at the end of this policy.

Taylor Wessing is the trading name used by a number of separate and distinct law firms and their affiliated entities which provide professional services to clients around the world. Each Taylor Wessing entity has its own privacy policy which may differ from that of Taylor Wessing LLP. Further information about Taylor Wessing's international structure can be found on our regulatory page at www.taylorwessing.com.

Contents

- Information we collect about you
- How we use your information
- Cookies and other technologies
- Our updates and communications
- Who we give your information to
- Where do we store your information?
- How we protect your information
- How long we keep your information
- Your rights
- Changes to this policy
- Contact Information
- Glossary

Information we collect about you

- We may process your personal data (which we have either obtained directly from you or from somewhere else) if:
 - you are a visitor to the Reach Website or Reach App;
 - you apply to become a member of the Reach Network; or
 - you are a member or former member of the Reach Network or otherwise use the services available on the Reach Website or Reach App.
- Personal data which is not collected directly from you may be collected from:
 - records retained by Taylor Wessing LLP as your employer, former employer or contracting party as applicable;
 - other members of the Reach Network ("Reach Members") via their participation in Reach Network benefits;
 - third parties we work closely with, including but not limited to business partners, sub-contractors in technical, delivery services, and analytics providers;
 - governmental bodies, regulators, institutions, courts or any other similar establishments;
 - public sources or providers of public information for identification and verification purposes for membership eligibility purposes; or
 - your engagement on our pages on the social media sites we engage with such as Facebook, LinkedIn and Twitter.
- Personal data collection methods we may use include:
 - communication in person;
 - communication by phone, email, fax, SMS or any other electronic communication method;
 - communication by letters, notices, information sheets or any other paper-based communication methods; or
 - using the Reach Website, the Reach App, social media channels, or other technologies.
- Personal data relating to you that we may process includes:
 - Identity Data including first name, maiden name, last name, username or similar identifier, marital status, title, date of birth, and gender. We will also process your username and password in relation to setting up, membership administration and your use of the Reach Network;
 - Contact Data including postal address, email address and telephone numbers (these details may relate to your work or to you personally, depending on the profile you chose to create within your Reach Network);
 - TW UK Employment Profile. This will appear on your Reach Network profile and is created from the human resources records we hold regarding, as applicable, your employment or former employment, with Taylor Wessing LLP. This comprises your joining date, leaving date (as applicable), job title, office location, business group, department and team. We also designate you as a specific user type according to your role within TW UK;
 - Profile, Preferences and Settings Data additional to those described above. These will comprise the personal and professional details according to the preferences and credentials you set within your Reach Network profile and pages within the Reach Website

and Reach App. It also includes information you give us or that we obtain when you subscribe to and use the Reach Website or Reach App, make enquiries or contact us to report a problem in this regard, or where you complete a survey on or through the Reach Website or App;

- Special Category Personal Data - we do not ask you for specific information to reveal sensitive information about you, but when you set your Reach Network preferences, your details will be used to connect you to your selected for example, LGBTQ+ and cultural diversity;
- Postings or credentials you make about yourself, and others in your Reach Network in chat facilities or in your profile, preferences and settings on the Reach Website and Reach App;
- Marketing and Communications Data according to your set preferences; and
- Technical Data including:
 - The Internet protocol (IP) address used to connect your computer to the Internet, your login information, browser type and version, time zone setting, browser plug-in types and versions, operating system and platform;
 - Information about your visit to the Reach Website and Reach App, such as the full Uniform Resource Locators (URL), clickstream to, through and from our website (including date and time), services 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), methods used to browse away from a page, any phone number used to call our central switchboard number, and direct dials or social media handles used to connect with us; and
 - Details of the place you have chosen to display to your Reach Network as your base location. (This does not currently involve the use of real-time location).

How we use your information

- The below table sets out the purposes for which we obtain your personal data, alongside the lawful basis for our processing such data:

Purpose/Activity	Type of data	Lawful basis for processing including basis of legitimate interest
To provide the Reach Website and Reach App and subscriber benefits to you and to other subscribers, including creating, verifying and administering your account, subscription eligibility changes, moderation of posts and	<ul style="list-style-type: none"> ■ Identity ■ Contact ■ Employment Profile ■ Profile, Preferences, Settings and Credentials ■ Special Category Data ■ Posts and Chat 	<ul style="list-style-type: none"> ■ Necessary for our legitimate interests i.e. the provision of the Reach Website and Reach App and the Reach Network and subscriber benefits ■ Legal and regulatory ■ Necessary to comply with a legal obligation or exercise a legal right

credentials, managing profile settings and preference changes	<ul style="list-style-type: none"> ■ Marketing and Communications ■ Technical 	
<p>To manage our relationship with you which will include:</p> <ul style="list-style-type: none"> ■ Notifying you about changes to our terms or privacy policy ■ Asking and facilitating you to leave a review or take a survey 	<ul style="list-style-type: none"> ■ Identity ■ Contact ■ Employment Profile ■ Profile, Preferences, Settings and Credentials, ■ Special Category Data ■ Posts and Chat ■ Marketing and Communications ■ Technical 	<ul style="list-style-type: none"> ■ Necessary for our legitimate interests (for example; to keep our records updated and to study how customers use our products/services) ■ Legal and regulatory ■ Necessary to comply with a legal obligation or exercise a legal right
To administer and protect our business and the Reach Website and Reach App and its users	<ul style="list-style-type: none"> ■ Identity ■ Contact ■ Technical 	<ul style="list-style-type: none"> ■ Necessary for our legitimate interests (for example; for running our business, provision of administration and IT services, network security, to prevent fraud and in the context of a business reorganisation or group restructuring exercise) ■ Legal and regulatory ■ Necessary to comply with a legal obligation
To deliver relevant content and information to you in the Reach Website and Reach App as a visitor or subscriber and to measure or understand the effectiveness of the information we serve to you	<ul style="list-style-type: none"> ■ Identity ■ Contact ■ Employment Profile ■ Profile, Preferences, Settings and Credentials ■ Special Category Data ■ Posts and Chat ■ Marketing and Communications ■ Technical 	<ul style="list-style-type: none"> ■ Necessary for our legitimate interests (for example: to study how visitors to the Reach Website and Reach App and subscribers to the Reach Network engage and use its benefits, to develop and grow these and our business and to inform our marketing and networking strategy) ■ Legal and regulatory Necessary to comply with a legal obligation
To derive and use data analytics to improve the Reach Website and Reach App, subscription benefits,	<ul style="list-style-type: none"> ■ Identity ■ Contact ■ Employment Profile 	<ul style="list-style-type: none"> ■ Necessary for our legitimate interests (for example: to develop and identify new types of connections and

<p>marketing, customer relationships and experiences</p>	<ul style="list-style-type: none"> ■ Profile, Preferences, Settings and Credentials ■ Special Category Data ■ Posts and Chat ■ Marketing and Communications ■ Technical 	<p>links that those within the Reach Network may be interested in, to keep our website updated and relevant, to develop our business and to inform our marketing and networking strategy</p> <ul style="list-style-type: none"> ■ Legal and regulatory ■ Necessary to comply with a legal obligation
<p>To provide you the information and communications such as newsletters which are interests of yours</p>	<ul style="list-style-type: none"> ■ Identity ■ Contact ■ Employment Profile ■ Profile, Preferences, Settings and Credentials ■ Special Category Data ■ Posts and Chat ■ Marketing and Communications ■ Technical 	<ul style="list-style-type: none"> ■ Your consent ■ Where legally permitted and according to the method of contact involved, necessary for our legitimate interests in promoting TW UK products and services ■ Legal and regulatory ■ Necessary to comply with a legal obligation

Cookies and other technologies

- Our use of cookies and other similar technologies to process personal data is explained in our cookie policy, which please read.

Our updates and communications

- Where permitted in our legitimate interest or with your prior consent where required by law, we will use your personal information for marketing analysis and to provide you with newsletters and information about membership benefits, events and our services by email, letter, telephone or using the Reach Website and Reach App. You stay in control of this and can change your preferences at any time by updating your profile and settings, or selecting the “unsubscribe” link at the end of our marketing communications to you.

Who we give your information to

- We may share your personal data with:
 - Any other member of the Taylor Wessing group, which means any Taylor Wessing firm (as listed on our regulatory page at www.taylorwessing.com) and their subsidiaries and affiliates, who support our processing of personal data under this policy. If any of these

parties are using your information for direct marketing purposes, we will only transfer the information to them for that purpose with your prior consent.

- Appropriate third parties including:
 - our business partners, suppliers and sub-contractors for the performance of any contract we enter into or other dealings we have in the normal course of dealing with you;
 - our auditors, legal advisors and other professional advisors or service providers;
 - credit reference agencies for the purpose of assessing your credit score where this is in the context of us entering into a contract with you or the person that you work for; and
 - public information providers for the purpose of carrying out identification and verification checks for membership eligibility purposes

In relation to information obtained via our website or app:

- analytics and search engine providers that assist us in the improvement and optimisation of the Reach Website and Reach App, subject to the cookie section of this policy.
- We may disclose your personal information to appropriate third parties:
 - in the event that we sell or buy any business or assets, in which case we will disclose your personal data to the prospective seller or buyer of such business or assets, subject to the terms of this privacy policy;
 - if Taylor Wessing LLP or substantially all of its assets are acquired by a third party, in which case personal data it holds about its clients will be one of the transferred assets;
 - if we are under a duty to disclose or share your personal data in order to comply with any legal obligation, or in order to enforce or apply our contractual terms or other agreements with you; or
 - to protect the rights, property, or safety of Taylor Wessing LLP, our clients, or others. This includes exchanging information with other companies and organisations for the purposes of fraud protection and to prevent cybercrime.

Where do we store your information?

- The data that we process in relation to you may be transferred to, and stored at, a destination outside the European Economic Area (“EEA”) that may not be subject to equivalent data protection laws. It may also be processed by staff situated outside the EEA who works for us or for one of our suppliers.
- We may transfer your personal information outside the EEA in order to:
 - store it;
 - enable us to provide products or services to (and fulfil our contract with) you. This includes order fulfilment, processing of payment details, and the provision of support services;
 - facilitate the operation of our group of businesses, where it is in our legitimate interests and we have concluded these are not overridden by your rights; or
 - meet any legal requirement to transfer such information outside the EEA.
- In particular, we may transfer your personal information to the following countries outside the EEA:

- Hong Kong, Singapore, Ukraine, United Arab Emirates (Dubai), United States of America, Vietnam, China, Saudi Arabia and South Korea.
- Where your information is transferred outside the EEA, we will take all steps reasonably necessary to ensure that your data is subject to appropriate safeguards, such as relying on recognised jurisdictions that provides the same level of protection as EEA countries and ensure that your data is treated securely and in accordance with this privacy policy.

How do we protect your information

- We have put in place appropriate security measures to prevent your personal data from being accidentally lost, used, altered, disclosed or accessed in an unauthorised way. For example, all information you provide to us is stored on our secure servers.
- In addition, we limit access to your personal data to those employees, agents, contractors and other third parties who have a business need to access your data. 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.
- Where we have given you (or where you have chosen) a password which enables you to access certain parts of the Reach Website or Reach App, you are responsible for keeping this password confidential. We ask you not to share your password with anyone.
- The transmission of information via the internet is never completely secure. Although we will do our best to protect your personal data, we cannot guarantee the security of your data transmitted to the Reach Website or Reach App any transmission is at your own risk. Once we have received your information, we will use strict procedures and security features to try to prevent unauthorised access.
- The Reach Website or Reach App from time to time, contain links to external sites. We are not responsible for the privacy policies or the content of such sites.

How long we keep your information

- We will only retain your personal data for as long as necessary to fulfil the purpose we collected it for, including for the purposes of satisfying any legal, accounting, or reporting requirements.
- 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.
- Details of retention periods for different aspects of your personal data can be requested from us using our contact details.
- 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 notifying you.

Your rights

- You have the right under certain circumstances to:
 - be provided with a copy of your personal data held by us;
 - request the rectification or erasure of your personal data held by us;
 - request that we restrict the processing of your personal data (while we verify or investigate your concerns with this information, for example);
 - object to the further processing of your personal data, including the right to object to marketing as mentioned in 'Our updates and communications' section of this document; and
 - request that your provided personal data be moved to a third party.
- To find out more about cookies, including how to manage and delete them, visit www.allaboutcookies.org.
- Your right to withdraw consent:
 - Where the processing of your personal information by us is based on consent, you have the right to withdraw that consent without detriment at any time by contacting us at the contact details at the end of this policy. You can also change your marketing preferences at any time as described in the Our updates and communications section.
- How to exercise your rights:
 - You can also exercise the rights listed above at any time by contacting us at dataprivacyuk@taylorwessing.com.
- 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 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.
- If your request or concern is not satisfactorily resolved by us, you may approach the Information Commissioner's Office which is the supervisory authority in the UK They can provide further information about your rights and our obligations in relation to your personal data, as well as deal with any complaints that you have about our processing of your personal data.

Changes to this policy

- We may from time to time make changes to this policy. Any changes will be published on our privacy notices at www.taylorwessing.com (and in the case of substantive changes, will be notified to you by email) and will be effective as of the date of publication (which will also be noted on our website). This policy was last updated in July 2020.

Contact Information

Taylor Wessing LLP
5 New Street Square
London
EC4A 3TW
UK

Data privacy Manager dataprivacyuk@taylorwessing.com

Taylor Wessing LLP is registered with the UK Information Commissioner's Officer under the following ICO Registration number: Z9884633

Glossary

■ Lawful Basis

- Legitimate Interest means the interest of our business in conducting and managing our business to enable us to give you the best alumni and networking facility 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 data for our legitimate interests. We do not use your personal data for activities where our interests are overridden by the impact on your rights (unless we have your consent to do so or are otherwise required or permitted to by law).
- Performance of Contract means processing your data where it is necessary for the performance of a contract to which you are a party.
- 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.

■ Your legal rights

- Request access to your personal data (commonly known as a “data subject access request”). This entitles you to receive a copy of the personal data we hold about you and to check that we are processing it lawfully.
- 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, although we may need to verify the accuracy of the new data you provide to us.
- 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.
- 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.
- 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 scenarios: (a) if you want us to establish the data’s accuracy; (b) where our use of the data is unlawful but you do not want us to erase it; (c) 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 (d) you have objected to our use of your data but we need to verify whether we have overriding legitimate grounds to use it.
- 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.

- 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.

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www.taylorwessing.com

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