

INTEGRITY POLICY
Contact persons at customers and users of the Results Portal

Lexplore Inc
Version 1.1, updated 2019-01-24

1 INTRODUCTION

Subsidiaries or distributors of Lexplore AB (“**Lexplore**”) have entered into, or intend to enter into, an agreement with the company you represent (the “**Customer**”) regarding the results portal provided by Lexplore (the “**Results Portal**”). This privacy policy is intended to provide you, as contact person for the Customer and as a user of the Results Portal, with information on how Lexplore handles your personal data, and so that you will feel certain that processing takes place in accordance with the Data Protection Regulation and other applicable personal data legislation. The privacy policy also describes your rights against us and how you may assert your rights. Your access and use of the Results Portal signifies your consent to these policies, and agreement to act fully in accordance therewith.

2 WHO IS A PERSONAL DATA CONTROLLER?

Lexplore is a personal data controller in respect of the processing of the personal data compiled with respect to contact persons for customers of our subsidiaries and distributors, and for users of the Results Portal.

Lexplore’s contact details are set forth below.

Lexplore Inc
110 White Rock Road, Suite 3120
Verona, New Jersey 07044

In the event of questions concerning Lexplore’s processing of your personal data, kindly contact our data protection officer at the following email address: data.privacy@lexplore.com

3 PERSONAL DATA, PURPOSES, LEGAL GROUNDS AND STORAGE PERIOD

3.1 Contact person at the Customer

3.1.1 Customer administration

Lexplore processes the following personal data about you.

- (a) Name
- (b) System authorisation
- (c) Telephone number
- (d) Email address
- (e) Details of your employer

The processing of the above personal data is necessary to enable Lexplore’s subsidiaries or distributors to perform the agreement they have with the Customer. In the event such data is not provided, the agreement with the Customer cannot be performed. Processing is performed applying a balancing of interests as a legal ground, in which Lexplore’s legitimate interest is to be able to ensure that its subsidiaries and distributors are able to exercise their rights and obligations under the agreement with the Customer. Your name and contact details are stored in our register of contact persons for the duration of the contractual relationship with the Customer, or for such time as we otherwise require the information for

any circumstance associated with the contractual relationship with the Customer. In the event your employment with the Customer terminates or you otherwise cease to be a contact person for the Customer, we will remove your data from our register of contact persons if we come to be aware of such change in status. You warrant and represent that you consent to the storage and use of such personally identifiable information for the purposes stated.

Your data (e.g. your name) may be included in agreements, correspondence or other documentation regarding the relationship with the Customer which must be stored for commercial, business or legal reasons. The information is stored applying a balancing of interests, in which Lexplore's legitimate interest is to store information and documentation which is of commercial, business or legal importance for Lexplore's operations. To the extent that such information is included in any legal document, including, without limitation, a contract, it cannot be removed or retracted after being so provided.

Lexplore may also store your personal data for an extended period of time if necessary to perform a legal obligation which requires processing according to applicable law, or to enable Lexplore to establish, assert or defend legal claims.

3.1.2 *Direct marketing*

Lexplore also processes your email address in order to distribute marketing. In such case, the marketing is directed at the Customer (and not at you in your personal capacity, nor at any student) and based on the type of services that the Customer has previously purchased and which we believe to be relevant for you in the exercise of your profession. The marketing is sent for up to five years after the Customer's most recent purchase. Newsletters and marketing email are sent only on condition that you have not expressed opposition (opted out) to such marketing and you are entitled, at any time, to deregister from our newsletter and marketing emails. To deregister, kindly contact Lexplore at data.privacy@lexplore.com or use the opt out link stated in each newsletter/email. Marketing takes place with a balancing of interests as a legal ground, in which Lexplore's legitimate interest is to market and provide information about its products.

3.2 **Users of the Results Portal**

The Results Portal is a platform on which you, as user, can for example obtain access to results. As a user of the Results Portal, Lexplore processes the following data about you:

- (a) Name
- (b) System authorisation
- (c) Telephone number
- (d) Email address
- (e) Details of your employer

The information is processed to enable you to use the Results Portal. Your name and your authority role are used to enable the Customer to see which users are in the Results Portal. The details of your employer are used to allocate correct authorisation. Your email address is used as your unique login name and your telephone number is used solely to facilitate secure login using two-stage authorisation.

Lexplore also processes data about your activity in the Results Portal, referred to as user data. Lexplore processes the following user data about you:

- (a) System authorisation

- (b) Date of most recent login
- (c) Performed administrative measures
- (d) User log (incl. time, city and country, IP address and information regarding your entity, including browsers)
- (e) Cookies

Your role is associated with the organisation, school or class for which you use the Results Portal and decide which authorisation you possess. Other data is processed to enable the Results Portal to function in the best manner. By processing such data we are able, among other things, to follow up if something goes wrong or if the Results Portal has in some way been misused. For more information about how Cookies are used in the Results Portal, see www.lexplore.com

Your data is stored for the duration of the contractual relationship with the Customer and during the period in which Lexplore provides results to the Customer via the Results Portal. In the event your employment with the Customer terminates or you otherwise cease to be a user of the Results Portal, your data will be deleted/anonymized.

4 WITH WHOM MIGHT WE SHARE YOUR PERSONAL DATA?

Lexplore may share your personal data with providers of various accounting systems that provide services to Lexplore, if you are a contact person for the Customer. The data which we process about you as a user of the Results Portal is processed on Microsoft's servers, or similar reputable third party providers of such servers. Such recipients are only entitled to process your personal data on behalf of Lexplore in connection with their performance of a service for Lexplore as stated in this privacy policy. Lexplore takes all commercially reasonable legal, technical and organisational measures to ensure that your data is processed safely and with an adequate protection level in conjunction with transfer to, or sharing with, such selected third parties. Your data may also be shared with companies that are related to or affiliated with Lexplore, including, without limitation, all parents, subsidiaries and foreign and domestic affiliates of Lexplore, and shared with the distributor, reseller or third party sales representative with whom you may have entered into an agreement, as applicable.

The data we use for marketing purposes may be shared with providers of various mailout systems, subject to the opt-out options referred to in section 3.1.2.

Lexplore may also provide your personal data to public authorities if we reasonably feel we are obliged to do so by law. Upon a sale of all or parts of Lexplore's business, Lexplore may transfer your personal data to a purchaser of the business.

5 WHERE DO WE PROCESS YOUR DATA?

Your personal data will be processed only within the United States, subject to the exceptions below.

The processing of your email address for marketing purposes is conducted by a provider located in the US. The company has taken appropriate safety measures to protect your personal data by means of the recipient of the personal data having signed up to Privacy Shield regulations which include a number of obligations concerning the processing of personal data that have been approved by the EU Commission.

6 YOUR RIGHTS

You have certain statutory rights which you are entitled to assert against Lexplore. A summary of those rights is presented below. For complete information about your rights, kindly see the Data Protection Regulation, Sections 3–5.

- (a) **Right of access/register extract.** You are entitled to receive a reply as to whether Lexplore processes your personal data. If such is the case, you are entitled to information as to which personal data is processed, the purposes of the processing, which external recipients receive your personal data and how long we store your personal data.
- (b) **Rectification of incorrect data.** You are entitled to request that Lexplore rectify incorrect or incomplete data about you.
- (c) **Deletion of certain data.** You are entitled to request that Lexplore delete your personal data under certain conditions, e.g. if the personal data is no longer necessary for the purpose for which we have compiled the personal data.
- (d) **Right to object to Lexplore’s processing of personal data.** Under certain conditions you are entitled to object to Lexplore’s processing of your personal data.
- (e) **Right to restrict processing of personal data.** In certain cases you are entitled to request a restriction on Lexplore’s processing of your personal data. For example, if you have contested that your personal data is correct, you may request restriction of the processing during a period of time which allows Lexplore to check that the personal data is correct.
- (f) **Complaints.** If you have any complaint regarding Lexplore’s processing of your personal data, you are entitled to submit a complaint to the Privacy Protection Authority.

If you wish to submit a request for a register extract, rectification, deletion, objection or restriction, kindly contact Lexplore on data.privacy@lexplore.com.

7 AMENDMENTS TO THE PRIVACY POLICY

Lexplore reserves the right to make amendments to this privacy policy. If such amendments take place, the fact will be notified by email or relevant communication channel.
