

*Last Updated: May 11, 2024*

## **Privacy Policy**

This Privacy Policy outlines the methods Lexring.com ("Lexring", "we", "us", or "our") employs to collect, store, utilize, and share various types of personal data:

(i) **Customer Data:** This includes personal data that we gather, process, and on behalf of our clients ("Customers"), which is submitted through Lexring.com's process management solutions. These solutions encompass our platforms, products, applications, APIs, tools, and all related or additional Lexring services available online (collectively referred to as the "Platform"). We handle this Customer Data as a "data processor" at the direction and on behalf of our Customers, in line with our Data Processing Addendum with them.

As such, this Privacy Policy – outlining Lexring.com's own privacy and data management practices as a "data controller" – applies to our Platform, various web properties (subsequently defined), and all other services Lexring.com provides to Customers ("Services"). It does not govern the processing of Customer Data. For inquiries or requests concerning Customer Data, please directly contact your account administrator(s) ("Account Admin").

(ii) **User Data:** This category includes personal data regarding our Customers' internal contacts who manage their Lexring.com accounts, such as billing contacts and authorized signatories, alongside Customers' Account Admins and authorized platform users (collectively, "Users").

(iii) **Prospect Data:** This pertains to information collected from visitors to our website (including but not limited to www.lexring.com), event participants, and potential customers, users, or partners ("Prospects") who engage with our promotional, marketing, and social activities or visit our controlled digital platforms, advertisements, content, emails, and communications ("Sites").

(iv) **Technology Partner Data:** Information related to individuals who participate as candidates, applicants, or potential or current technology partners (including developers or tech ambassadors) interacting with our Platform, Sites, or events, or other platforms used by Lexring.com ("Technology Partner").

This Privacy Policy specifically addresses our approach to:

- Collection and Processing of Data
- Usage and Legal Grounds for Data Processing
- Data Storage and Duration of Retention
- Disclosure of Data
- Use of Cookies and Tracking Technologies
- Communication Practices
- Protection of Data
- Rights of Data Subjects
- Roles in Data Management
- Supplementary Notices

We encourage all Clients, Users, Prospects, and Technology Partners to review this Privacy Policy thoroughly to fully understand our practices.

Providing your personal data is not mandated by law, and you can choose to do so voluntarily. If you prefer not to provide your personal data or to have it managed by us or our service providers, we request that you abstain from engaging with our Sites or using our Services.

Additionally, you may opt out of providing "optional" personal data (i.e., fields on forms that are not marked as required). However, please be aware that this may affect our ability to deliver the full spectrum of our Services or enhance your user experience.

## **1. Processing**

In this Privacy Policy, "personal data" refers to information that can identify, relate to, describe, has the potential to be associated with, or could be linked, directly or indirectly, to an individual. It does not cover data that has been aggregated or anonymized in a way that prevents it from being connected to an individual.

We compile and generate various types of personal data in connection with the Services:

**Usage and Device Information for our Users, Prospects, and Technology Partners:**

We collect data such as IP addresses and their derived approximate locations, details about devices and applications (including type, operating system, unique device or app identifiers, browser specifications, and settings like language and location), activity records, cookies and pixels on your devices, and interactions with our services (such as session lengths, clicks, feature usage, and other activity metrics). This data is gathered automatically, often through analytics tools that also track how often visitors come to our Sites, which pages they visit and when, the sources of their visits (like specific websites, advertisements, or email messages), and how they interact with our Platform.

**Contact and Profile Information for our Customers, Users, Prospects, and Technology Partners:**

This includes names, emails, phone numbers, professional titles, places of employment, profile pictures, login information, contractual and billing information, and any other details provided by Account Admins and Users during registration, login (either directly or via organizational single-sign-on systems), or while updating their profiles. We obtain this information directly from individuals or indirectly from other sources such as the organizations they are affiliated with, event organizers, or through widely used professional networking tools and databases.

**Communications with our Customers, Users, Prospects, and Technology Partners:**

We process personal data that may be included in communications such as support requests, social media interactions, messaging apps, event registrations, and community participation, both online and offline. This category also encompasses feedback, surveys, and testimonials; articulated or inferred preferences and needs; and sensory data from phone calls and video conferences (for instance, with customer support), as well as written communications, screen recordings, and other documented interactions. This information is used for analysis, quality enhancement, training, and documentation.

## 2. Use of Data

We utilize personal data as needed for the effective delivery of our Services ("Performance of Contract"); to fulfill our legal and contractual commitments ("Legal Obligations"); and to support our legitimate business interests in enhancing and maintaining our Services, such as improving our understanding of how our Services are utilized, optimizing our marketing strategies, providing customer support, and safeguarding our Users, Customers, Prospects, and Technology Partners, as well as our own operations ("Legitimate Interests").

For users residing in or accessing the Services from regions with specific privacy regulations where "consent" is required or preferred as the legal basis for processing personal data, your agreement to our Terms of Service and this Privacy Policy will constitute your consent to the processing of your personal data for all the purposes outlined herein, unless otherwise stipulated by law. Should you choose to withdraw your consent, please contact us at [insert contact email].

The personal data we collect is used for the following purposes, based on the legal grounds provided:

**For Customers and Users:**

- To enable, manage, improve, and deliver our Services (Performance of Contract; Legitimate Interests).
- For billing and payment processing (Performance of Contract; Legitimate Interests).
- To personalize and enhance the user experience on our platform, including recognizing users and adapting our services based on their preferences (Performance of Contract; Legitimate Interests).

**For Customers, Users, Prospects, and Technology Partners:**

- To provide support and resolve issues, monitor service performance, and train our client-facing teams (Performance of Contract; Legitimate Interests).

- To analyze and understand interactions with our Services to continually improve them and enhance user satisfaction through automated processing, including the use of artificial intelligence (Legitimate Interests).
- To generate aggregated or anonymized data for internal analysis and external sharing to improve our offerings and for broader business purposes (Legitimate Interests).
- To conduct and refine our marketing and advertising efforts, manage ads across platforms, and communicate with current and prospective clients through personalized and general messages, relying on both automated data processing and manual setups (Legitimate Interests; Consent).
- To enhance our data security practices, prevent fraud, and address other potential threats (Performance of Contract; Legitimate Interests; Legal Obligation).
- To engage and expand our market presence through collaborations and partnerships, and to organize and sponsor promotional events (Legitimate Interests).
- To gather feedback and user contributions for our public forums and blogs to foster community engagement (Performance of Contract; Legitimate Interests).
- To adhere to legal, contractual, and regulatory obligations, ensuring compliance with all applicable standards (Performance of Contract; Legitimate Interests; Legal Obligation).
- For any other legally permissible purpose, or as explicitly agreed upon by you, in relation to the provisioning of our Services (Legal Obligation; Consent).
- Supporting and enhancing user-facing features that are prominent in the Integrated Google Services (Performance of Contract; Legitimate Interests).
- Resolving issues and ensuring security, which may require user consent for accessing restricted personal data to address service problems (Performance of Contract; Legitimate Interests).
- Complying with applicable legal requirements (Legal Obligation).
- Conducting internal operations, provided the data is aggregated or anonymized (Legitimate Interests).
- In accordance with explicit user consent for other specific purposes.

### **3. Retention and Location**

#### **Data Location:**

Lexring.com, along with our authorized Service Providers, store and process personal data in the European Economic Area (EEA).

Privacy regulations vary across jurisdictions; however, Lexring.com, our affiliates, and our Service Providers are committed to safeguarding personal data in line with this Privacy Policy, accepted industry practices, and legally binding data protection measures, regardless of the data protection variations in the country to which data is transferred.

Lexring.com is headquartered in the EEA, recognized by international standards as providing an adequate level of data protection for personal data from entities in the United States of America (USA), the United Kingdom (UK), and Switzerland. Consequently, data transfers from the USA, the UK, and Switzerland to the US are based on this recognition.

For data transfers to countries not recognized as providing adequate protection, we rely on established Standard Contractual Clauses approved by the European Commission, the UK Information Commissioner's Office, and the Swiss Federal Data Protection and Information Commissioner to ensure data is protected appropriately.

In cases where Lexring.com processes personal data on behalf of a customer, the processing and location specifications are agreed upon in our Data Processing Addendum and other relevant contracts.

#### **Data Retention:**

We retain personal data as long as necessary to maintain our relationship with you, provide our Services, comply with our legal obligations, or protect ourselves from legal claims. The retention period is determined by the volume, nature, and sensitivity of the data, the potential risk of harm from unauthorized access or disclosure, the purposes for which we process the data, and legal requirements. For more information on our data retention policies, please contact us.

### **4. Data Sharing**

#### **Service Providers:**

Lexring.com engages various third-party companies and individuals, referred to as "Service Providers," to perform tasks on our behalf or to assist us in providing our services. These services include hosting

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and server co-location, data security, billing and payment processing, fraud detection, web and mobile analytics, communication services, and support systems, among others. Our agreements with these Service Fulfillers ensure they only use personal data according to our directives to aid in delivering or enhancing our services.

**Partnerships:**

We collaborate with business partners, resellers, distributors, and professional service providers to extend our reach and enhance service delivery. Through these partnerships, we may share relevant contact details and usage information with our partners to better engage and serve our customers and users. The management of data shared in this context is governed by the terms agreed upon directly with these partners and is outside the scope of Lexring.com's direct control or this Privacy Policy.

**Application Providers and Event Sponsors:**

When authorized by you or your Account Administrator, we may share your personal data, such as profile details and interaction records, with third-party application providers or during event registration. This allows for enhanced functionality and tailored user experiences, and for event organizers and sponsors to offer relevant information and opportunities directly related to the event.

**Customers and Other Users:**

Personal data may be disclosed to the owner of the account under which you are registered as well as to other users authorized to access the same data sets within our services. This includes any interactions within service platforms that may be reviewed or used by account administrators for managing team dynamics or service issues.

**Integration with Third-party Services:**

With appropriate authorization, your account may be linked with external services, allowing for a seamless integration that may involve sharing specific data with third-party providers to enhance the functionality of both services. We do not store passwords for these services but may require API keys for integration purposes. If you wish to prevent data sharing with integrated services, please consult your Account Administrator.

**Feedback and Community Interaction:**

Any feedback you provide may be publicly displayed on our sites and services. Similarly, contributions to community forums or blogs are publicly accessible and may be read, collected, and used by others. For removal of personal information from our community platforms, please reach out to us as specified in our contact section.

**Legal Compliance and Protection of Rights:**

In certain scenarios, we may be required to disclose your personal data in response to legal requests by authorities or to protect the rights, property, or safety of Lexring.com, our users, or the public. This includes complying with legal processes or addressing fraud and security concerns.

**Corporate Transactions:**

In the event of a merger, acquisition, or any form of sale of some or all of our assets, personal data may be part of the transferred assets. We will provide notice before your personal data is transferred and becomes subject to a different privacy policy.

**Transparency with Personal Data:**

We disclose personal data within our organization and to third parties involved in the delivery and enhancement of our services, under the conditions outlined above. For any additional manners of personal data usage or disclosure, your explicit consent will be sought, or the data will be used in a manner that is anonymized and non-identifiable.

**5. Cookies and similar solutions**

Our websites and services, including those provided by our Service Providers, employ cookies, anonymous identifiers, pixels, container tags, and other similar tracking technologies. These tools are essential for delivering and optimizing our Services, ensuring proper functionality, analyzing our performance, enhancing our marketing efforts, and personalizing your user experience. You may find cookies and similar tracking technologies temporarily stored on your device, with certain technologies specifically used to remember personal data like IP addresses.

For a detailed understanding of how we utilize cookies and tracking technologies, please refer to our Cookie Policy. You have the ability to manage your cookie preferences through the "Cookie settings" feature in our services, which may vary based on your location and activities within our Services.

It is important to note that our practices are not altered in response to "Do Not Track" signals from web browsers or mobile applications. However, most browsers provide you with the ability to manage cookies, including blocking or deleting them if you choose to do so.

## **6. Service Communications**

We may contact you with essential information regarding our Services, such as notifications of updates, changes, billing issues, or security alerts. Similarly, other users within your account may also receive or send notifications related to the service usage. You can manage your communication and notification preferences through your User Profile settings, although it is not possible to opt-out of receiving crucial service-related communications (e.g., password resets or billing information).

## **7. Security**

To safeguard your personal data, we implement industry-standard physical, procedural, and technical measures, including encryption where appropriate. Despite our efforts, please be aware that no security system is impervious, and thus, we cannot guarantee the absolute security of your personal data, whether stored with us or with third-party providers as previously described.

## **8. Data Subject Rights**

You are entitled to exercise certain privacy rights under applicable law (e.g., GDPR, CCPA), which include requesting access to or correction of your personal data, requesting its deletion, objecting to or restricting its processing, or requesting a copy of your personal data. To exercise these rights, please contact us via email at [privacy@lexring.com](mailto:privacy@lexring.com).

Should you choose to use an authorized agent to exercise your rights, we require written proof of their authorization and may request additional information to verify their identity and authority.

We may direct you to manage specific requests through your User Profile settings or require detailed information to process your request adequately, such as verifying your identity or understanding the scope of your request. This information will be retained for legal purposes, such as proving the identity of the person making the request and how it was processed.

For any personal information to be made available to you, we will exclude any data that could affect the privacy or confidentiality of another individual.

## **9. Data Processing Roles and Responsibilities**

Under certain data protection laws and regulations, such as the GDPR or the CCPA, the roles of "data controller" and "data processor" are distinct. The data controller determines the purposes and means of processing personal data, while the data processor handles data on behalf of the controller.

Lexring.com functions primarily as the data controller for the personal data of its Prospects, Users, Technology Partners, and Customers, as outlined in earlier sections. This means we are responsible for overseeing the processing of personal data in accordance with applicable laws, as specified in this Privacy Policy.

Additionally, Lexring.com acts as a data processor for personal data included within Customer Data, processing such data under the instructions of our Customers, who are the data controllers for that data. Our processing activities are governed by our agreements with these Customers, including our Terms and Data Processing Addendum.

Customers are responsible for ensuring that the use of our Services complies with applicable laws, including providing necessary notices and obtaining required consents for the processing of personal data, as well as responding to data subject rights requests from Users and others whose data they process through our Services.

## 10. Miscellaneous

**Updates and Amendments:** We regularly review and may update this Privacy Policy to reflect changes in our practices or relevant regulations. Any amendments will be posted on our Services, and the revised version will be effective immediately upon posting. We will notify you of significant changes through our Services or through direct communication.

**Accessibility:** This Privacy Policy can be made available in alternative formats upon request. For assistance, please contact us at [privacy@lexring.com](mailto:privacy@lexring.com).

**Third-Party Websites and Services:** Our Services may link to third-party websites and integrate with third-party services not governed by this Privacy Policy. We recommend reviewing the privacy policies of these third-party sites and services to understand their data handling practices.

**Services Directed to Children:** Our Services do not target children under the age of 16, and we do not knowingly collect personal data from children. If we become aware of such collection, we will take steps to delete the information as quickly as possible. If you believe we might have any data from a child under 16, please contact us at [privacy@lexring.com](mailto:privacy@lexring.com).

**Data Protection Contacts:**

For specific questions regarding our privacy practices or data protection, please contact our DPO at [privacy@lexring.com](mailto:privacy@lexring.com). Should you have any concerns or complaints about how your personal data is handled, please reach out to us at [privacy@lexring.com](mailto:privacy@lexring.com) for resolution.

*LexRing spółka z ograniczoną odpowiedzialnością with its registered office in Warsaw, located at 18 Twarda Street, Spektrum Tower 19 floor, 00-105 Warsaw, Poland*