# **PRIVACY POLICY**

# Thank you for visiting the 42law!

I.	APPLICABILITY OF THIS PRIVACY POLICY	. 2
II.	INFORMATION WE COLLECT AND RECEIVE	. 2
III.	HOW WE USE INFORMATION	. 5
IV.	LEGAL BASIS	. 6
٧.	DATA RETENTION	. 6
VI.	RECIPIENTS OF THE DATA	. 6
VII.	COOKIES	. 9
VIII.	SECURITY	11
IX.	AGE LIMITATIONS	11
X.	EFFECTIVE DATE AND CHANGES TO THIS PRIVACY POLICY	12
XI.	INTERNATIONAL DATA TRANSFERS	12
XII.	DATA PROTECTION OFFICER	12
XIII.	IDENTIFYING THE DATA CONTROLLER AND PROCESSOR	13
XIV.	YOUR RIGHTS	13
XV.	DATA PROTECTION AUTHORITY	13
XVI.	CONTACT INFORMATION	14

The column on the right provides a short explanation of the terms of use and is not legally binding.

## I. APPLICABILITY OF THIS PRIVACY POLICY

- § 1.1 Scope. This "Privacy Policy" applies to the services (the "42law Services") provided on <a href="www.42law.com">www.42law.com</a> and other websites owned by us (the "42law Websites"), as well as other interactions (e.g., customer service requests, user conferences, etc.) you may have with us. 42law Services specifically include your visit of the 42law Websites.
- § 1.2 <u>Consent</u>. If you do not agree to the terms of our Privacy Policy, do not access or use the 42law Services, the 42law Websites, or any other aspect of our business.
- § 1.3 <u>Third Party Providers</u>. This Privacy Policy does not apply to any third party applications or software that are integrated with the 42law Services through the Websites ("<u>Third Party Services</u>"), or any other products, services or businesses of any other third party.
- § 1.4 <u>Definitions</u>. "We", "our" and "us" refer to the persons listed in Art. XVI.

## II. INFORMATION WE COLLECT AND RECEIVE

- § 2.1 <u>Other Information</u>. We collect, generate and/or receive other information and data ("<u>Other Information</u>"):
  - (a) Usage Information.
    - 42law Services Metadata. When you use the 42law Services, metadata is generated that provides additional context about the way you use the 42law Services. For example, we may log features, content, links or Third Party Services (as defined below) that you have viewed or used.
    - ii. Log Data. Like most websites, our servers also automatically collect information when you access the 42law Websites and record it in log files. This log data includes the Internet Protocol (IP) address, the address of the website visited prior to your use of the 42law Websites,

## Basically,

whenever you browse our 42law Websites, or use our 42law Services, please observe this Privacy Policy.

## Basically,

there's information we collect and receive from you as you browse the 42law Websites and use the 42law Services. Please read on regarding our obligations in connection with such information.

- browser type and settings, the date and time you used the 42law Websites, browser configuration and plug-in information, language settings, and cookie data.
- iii. Device Information. We may also collect information about devices used to access the 42law Services, including information on the type of device, the operating system, device settings, application IDs, unique device identifiers, and crash data.
- iv. Location Information. We may receive information from you and other third parties that helps us approximate your location, such as an IP address received from your browser or your device. We may also collect location information from devices in accordance with the settings of your device.

## (b) Newsletter.

- We may send you a newsletter if you subscribe to it. This
  newsletter is sent out at regular intervals and features the
  latest news and information about our company and product
  information for users of 42law Services, as well as
  customized advertising.
- ii. In order to receive our newsletter, you will need a valid email address. We will verify the email address you provide when subscribing to the newsletter to ascertain whether the email address is correct, and you do actually wish to receive newsletters. To do this, we will send an email to the email address you have specified. This email contains a link you can click on to confirm receipt. Once you have confirmed that you have received this email, you will be signed up for our newsletter (double opt-in). When you sign up for our newsletter, some data is automatically collected, such as your IP address, the date and time of your registration or subscription and the language you use. This is for security purposes, in case your e-mail address is used by third

parties without your knowledge. In addition, we receive the data you provide through any questions answered during registration or separate sign up for the newsletter. We do not collect or process any other data for your newsletter subscription and the data is used solely for the purposes of delivering the newsletter to you.

- iii. Unless you object, we will share your data within our company for analysis purposes and to send you information for promotional purposes. The data you have provided for subscription purposes will be matched with data we have collected for other purposes (e.g. booking a service) within the company. We do not share data that you have provided when subscribing to the newsletter with third parties that are not part of our company.
- iv. You may withdraw your consent to receive the newsletter at any time. Details of such termination can be found in the confirmation email and in each newsletter.
- (c) Third Party Data. We may receive data about your visits to the 42law Websites, marketing campaigns and other matters related to our business from affiliates, our partners, or others that we use to improve our offers or make content provided to you more useful. This data may be combined with Other Information we collect and might include aggregate-level data such as the language and the country you access the 42law Services from. Or it might be more specific: for example, how well an online marketing or email campaign performed.
- (d) Additional Information Provided to Us. We also receive Other Information when submitted to the 42law Websites or in other ways, such as if you participate in an event, apply for a job, request support, interact with our social media accounts or otherwise communicate with us.

§ 2.2 <u>Automatic Collection</u>. Generally, no one is required by law or contract to provide registration data or other information (collectively, the "<u>Information</u>"). However, certain Information is collected automatically and, if certain information is not provided, we may be unable to provide the 42law Services.

#### III. HOW WE USE INFORMATION

- § 3.1 Other Information. We use Other Information to protect our legitimate interests in operating the 42law Services, 42law Websites and our business. Specifically, we use Other Information to
  - (a) provide, update, maintain and protect the 42law Services and 42law Websites;
  - (b) as required by applicable law, legal process or regulation;
  - (c) to communicate with you by responding to your requests. If you contact us, we may use your Other Information to respond;
  - (d) to send emails and other communications. We may send you service, technical and other administrative emails and other types of messages, e.g. push-notifications. We may also contact you to inform you about changes in our 42law Services, our 42law Services' offerings, and important 42law Services-related notices, such as security and fraud notices. These communications are considered part of the 42 law Services and you may not opt out of them. In addition, we sometimes send emails or other messages about new product features, promotional communications or other news about our business. These are marketing messages, so you can control whether you receive them. If you have additional questions about a message you have received from us, please contact us;
  - (e) to investigate and help prevent security issues and abuse.

#### Basically,

we only use the data we hold to provide and improve the 42law Services, and for related business purposes. Of course, we always comply with all applicable laws.

§ 3.2 Personal Data and Anonymized Data. If Information is aggregated or de-identified, so that it is no longer reasonably associated with an identified or identifiable natural person, we may use it for any business purpose. To the extent Information is associated with an identified or identifiable natural person and is protected as personal data under applicable data protection law, it is referred to in this Privacy Policy as "Personal Data".

#### IV. LEGAL BASIS

- § 4.1 We process your data in accordance with the provisions of
  - (a) the General Data Protection Regulation (GDPR);
  - (b) Austrian data protection laws, such as the Data Protection Act (Datenschutzgesetz, DSG); and/or
  - (c) other countries, if applicable. These may be laws of the state you reside in.

#### V. DATA RETENTION

§ 5.1 We may retain Other Information pertaining to you for as long as necessary for the purposes described in this Privacy Policy.

#### VI. RECIPIENTS OF THE DATA

§ 6.1 Policies and Practices. This section describes how we may share and disclose Information. In general, you determine your own policies and practices for the sharing and disclosure of Information, and we do not control how they or any other third parties choose to share or disclose Information.

## Basically,

we don't sell your data or share it otherwise with third parties, unless it helps provide the 42law Services or we are legally required to do so.

§ 6.2 Applicable Law. We will solely share and disclose Registration Data in accordance with applicable law and legal process.

- § 6.3 Third Party Service Providers and Partners. We may engage third party companies or individuals as service providers or business partners to process Other Information and support our business. These third parties may, for example, provide virtual computing and storage services, or we may share business information to develop strategic partnerships with Third Party Service providers to support our common customers. Prior to engaging any third party Subprocessor, we perform diligence to evaluate their privacy, security and confidentiality practices, and executes an agreement implementing its applicable obligations.
  - (a) Tools and applications linked to our Platform & Services.
    - We use the following services of Google Inc., a company headquartered at 1600 Amphitheatre Parkway, Mountain View, CA 94043, USA, as described below.
      - Google Analytics: Google Analytics is a web analysis service. This service uses so-called "Cookies" (as described in Art. VII). These Cookies generate information and such information is usually transmitted to a server in the USA. Google will, on our behalf, use this information to evaluate your usage of the 42law Websites, to compile reports on website activities, and to provide us with additional services associated with website and internet usage. However, Google Analytics may also use data for its own purposes, existing independently of the services provided to us.

We have extended Google Analytics on the 42law Websites with the code "gat.\_anonymizelp();" to ensure anonymized collection of IP addresses. The IP address that your browser sends as part of the Google Analytics service will not be merged by Google with other data.

You can prevent the collection, transmission and processing of data generated by cookies and related to your use of the 42law Websites, including your IP address, by Google Analytics by downloading and installing the browser plugin available at the following link: http://tools.google.com/dlpage/gaoptout?hl=de. You can also prevent the storage of cookies required by Google Analytics by configurating the settings in your browser.

- (b) More Information. Should you require any further information on the type, scope, purposes and possibility to opt-out of the services described in § 6.3(a), we recommend that you read the companies' respective data protection policies.
- (c) Links. We also include links to other websites on the 42law-Websites. These are for informational purposes only. We have no control over these websites and their content, which means that they are not covered by the provisions of this Privacy Policy. If you click on a link, the operator of the website may collect data on you and process this in accordance with their own data protection policy, which may deviate from ours.
- (d) Tools and applications that go beyond the platform. In addition, you may have the option of interacting with certain social networks on the 42law Websites via plugins. Clicking on a plugin for one of these social networks will activate it and the plugin will establish a connection to the server of the respective network. We have no influence on the scope or the content of the data that is transmitted to the operator of the respective social network when you click on the plugin.
- § 6.4 <u>Corporate Affiliates</u>. We may share Other Information with our corporate affiliates.

- § 6.5 <u>Changes to our Business.</u> If we engage in a merger, acquisition, bankruptcy, dissolution, reorganization, sale of some or all of our assets or stock, financing, public offering of securities, acquisition of all or a portion of our business, a similar transaction or proceeding, or steps in contemplation of such activities, some or all Other Information may be shared or transferred, subject to standard confidentiality arrangements.
- § 6.6 <u>Aggregated or De-identified Data</u>. We may disclose or use aggregated or de-identified Other Information for any purpose. For example, we may share such data with prospects or partners for business or research purposes.
- § 6.7 <u>Complying with Laws</u>. If we receive a request for information, we may disclose Other Information, if we reasonably believe disclosure is in accordance with or required by any applicable law, regulation, or legal process.
- § 6.8 Enforcing our rights, prevent fraud, and for safety. To protect and defend the rights, property, or safety of ourselves or third parties, including enforcing contracts or policies, or in connection with investigating and preventing fraud or security issues.
- § 6.9 <u>Consent.</u> We may share Other Information with third parties when we have consent to do so.

## VII. COOKIES

- § 7.1 <u>Definition</u>. "<u>Cookies</u>" are small text files that are sent to your computer or mobile device by us to enable the functionality of the 42kaw Services or to facilitate their use.
- § 7.2 <u>Types of Cookies</u>. Cookies can be divided into different categories, depending on their characteristics, as shown in the following.
  - (a) Storage Duration.
    - i. Temporary Cookies only exist as long as your browser is open and are automatically deleted when you close your

- browser. They exist only for the particular period of use of the 42law Services, i.e., a "session".
- ii. Permanent Cookies will exist until deleted by you or your browser or their expiration.
- (b) Creator of the Cookies.
  - i. First-party Cookies are set by us.
  - ii. Third-party Cookies are set by third parties.
- (c) Necessity.
  - i. Necessary Cookies are technically required for the operation of the 42law Websites and 42law Services.
  - ii. Non-necessary Cookies are used to improve and facilitate your use of the 42law Services but are not technically essential. These include, for example, Cookies that are used to create personalized advertising for you.
- § 7.3 Our Cookies. We use the following cookies:
  - (a) Necessary Cookies;
  - (b) Analytics Cookies; and
  - (c) Advertising and social media Cookies.
- § 7.4 A detailed list of the cookies we use is attached to this Privacy Policy as **Schedule § 7.4** of this Privacy Policy.
- § 7.5 Refusing Cookies. You may reject all Cookies, except for necessary Cookies,
  - (a) when visiting the 42law Website, via the Cookie banner; or
  - (b) in your browser settings. How this works, depends on the browser you are using. A link to the instructions for the most common browsers can be found here:

- Microsoft Edge: https://support.microsoft.com/dede/windows/l%C3%B6schen-und-verwalten-von-cookies-168dab11-0753-043d-7c16-ede5947fc64d.
- Mozilla Firefox: http://support.mozilla.com/en-US/kb/Cookies.
- iii. Google Chrome: http://www.google.com/support/chrome/bin/answer.py?hl= en&answer=95647.
- iv. Safari: http://support.apple.com/kb/PH5042.
- v. Opera: http://www.opera.com/browser/tutorials/security/privacy/.

## VIII. SECURITY

§ 8.1 Security. We take security of your data very seriously. We work hard to protect Other Information you provide from loss, misuse, and unauthorized access or disclosure. These steps take into account the sensitivity of the Other Information we collect, process and store, and the current state of technology. Given the nature of communications and information processing technology, we cannot guarantee that Information during transmission through the Internet or while stored on our systems or otherwise in our care will be absolutely safe from intrusion by others. When you click a link to a third-party site, you will be leaving our site and we don't control or endorse what is on third-party sites.

## Basically,

we constantly try to improve the security of our system to protect your data. It is a top concern for us.

## IX. AGE LIMITATIONS

- § 9.1 Minimum Age. We allow only persons who are
  - (a) at least 18 years old; or

## Basically,

if you are below 18, you must not use the 42law Services without you legal guardian's consent.

(b) younger than 18 years old and have consent of their legal guardian,

to use the 42law Services.

# X. EFFECTIVE DATE AND CHANGES TO THIS PRIVACY POLICY

- § 10.1 <u>Effective Date</u>. This Privacy Policy becomes effective on August 11, 2022
- § 10.2 Changes. We may change this Privacy Policy from time to time. Laws, regulations, and industry standards evolve, which may make those changes necessary, or we may make changes to our services or business. We will post the changes to this page and encourage you to review our Privacy Policy to stay informed. If we make changes that materially alter your privacy rights, we will provide additional notice, such as via email or through the Services. If you disagree with the changes to this Privacy Policy, you should not use the 42law Services.

## XI. INTERNATIONAL DATA TRANSFERS

- § 11.1 We may transfer your Personal Data to countries outside the European Economic Area (EEA). In this case we ensure that the level of protection specified by the GDPR is maintained.
- § 11.2 The processing pursuant to § 11.1 is based on a data processing contract that contains the standard contractual clauses, published by the Commission of the European Union.

#### XII. DATA PROTECTION OFFICER

## Basically,

please check regularly as this Privacy Policy might change over time.

## Basically,

we have contracts in place to make sure that all your data is safe, even if it is processed outside the EEA.

## Basically,

this is the person you can approach for any concerns regarding data protection.

§ 12.1 To communicate with our Data Protection Officer, please email office@42law.com.

## XIII. IDENTIFYING THE DATA CONTROLLER AND PROCESSOR

§ 13.1 Data protection law in certain jurisdictions differentiates between the "controller" and "processor" of information. In general, we are the controller of Other Information.

## XIV. YOUR RIGHTS

- § 14.1 Individuals located in certain countries, including the European Economic Area and the United Kingdom, have certain statutory rights in relation to their personal data. Subject to any exemptions provided by law, you may have the right to request access to Information, as well as to seek to update, delete or correct this Information. We will strive to let you do this using the settings and tools provided in your 42law Services account. If you cannot use the settings and tools, contact us for additional access and assistance.
- § 14.2 To the extent that our processing of your Personal Data is subject to the General Data Protection Regulation, or applicable laws covering the processing of Personal Data in the United Kingdom, we rely on our legitimate interests, described above, to process your data. We may also process Other Information that constitutes your Personal Data for direct marketing purposes, and you have a right to object to our use of your Personal Data for this purpose at any time.

## XV. DATA PROTECTION AUTHORITY

§ 15.1 <u>Data Protection Authority</u>. Subject to applicable law, you also have the right to

## Basically,

we acknowledge our responsibilities in handling you data and our crucial role in keeping it secure and safe.

#### Basically,

you have the right to know which personal data we hold regarding you as an individual.

# Basically,

our handling of data protection matters is supervised by government authorities that you can turn to, if you have question or concerns.

- (a) restrict our use of Other Information that constitutes your Personal Data; and
- (b) lodge a complaint with your local data protection authority or the Austrian Data Protection Authority, which is our lead supervisory authority in the European Union. If you are a resident of the European Economic Area and believe we maintain your Personal Data within the scope of the General Data Protection Regulation (GDPR), you may direct questions or complaints to our lead supervisory authority:

Austrian Data Protection Authority

Barichgasse 40-42,

1030 Vienna

Austria / Europe

Telephone: +43 1 52 152-0

E-Mail: dsb@dsb.gv.at

§ 15.2 <u>United Kingdom.</u> If you are a resident of the United Kingdom and believe we maintain your Personal Data within the scope of the applicable laws relating to personal data in the United Kingdom, you may direct questions or complaints to the UK supervisory authority, the <u>Information</u> Commissioner's Office.

#### XVI. CONTACT INFORMATION

§ 16.1 Please also feel free to contact us if you have any questions about this Privacy Policy or our practices, or if you are seeking to exercise any of your statutory rights. We will respond within a reasonable timeframe. You may contact us at <a href="mailto:office@42law.com">office@42law.com</a> or at our mailing address below:

42law, Am Patz 5/4, 1130 Wien, Austria.

# Schedule § 7.4 Cookies

Name	Purpose	Creator	Necessity	Storage Duration
cookielawinfo-checkbox- advertisement	To record the user consent for the cookies in the category "Advertisement"	GDPR	Necessary	1 year
cookielawinfo-checkbox- analytics	To store the user consent for the cookies in the category "Analytics"	GDPR	Necessary	11 months
cookielawinfo-checkbox- functional	To record the user consent for the cookies in the category "Functional"	GDPR	Necessary	11 months
cookielawinfo-checkbox- necessary	To store the user consent for the cookies in the category "Necessary"	GDPR	Necessary	11 months
cookielawinfo-checkbox-others	To store the user consent for the cookies in the category "Other"	GDPR	Necessary	11 months
cookielawinfo-checkbox- performance	To store the user consent for the cookies in the category "Performance"	GDPR	Necessary	11 months

viewed_cookie_policy	To store whether or not user has consented to the use of cookies	GDPR	necessary	11 months
_ga	To calculate visitor, session, campaign data and keep track of site usage for the site's analytics report	Google Analytics	Analytical cookie, not necessary	2 years
_ga_C5Y8QG1183		Google Analytics	Analytical cookie, not necessary	2 years
_gat_UA-196727449-1	To limit the amount of data recorded by Google on high traffic volume websites	Google Analytics	Analytical cookie, not necessary	1 minute
_gid	To store information of how visitors use a website and helps in creating an analytics report of how the website is doing	Google Analytics	Analytical cookie, not necessary	1 day