

1.0. Introduction

- 1.1. This Privacy Notice is served by LegalinX Limited and governs the privacy of its service users. We offer information services to a wide range of customers across the EEA, and globally.
- 1.2. We are committed to safeguarding your privacy in accordance with the General Data Protection Regulations (GDPR), Data Protection Act (DPA), and the Privacy and Electronic Communications Regulations (PECR).
- 1.3. This Privacy Notice supplements other agreements, including our Terms & Conditions, and is not intended to override them.
- 1.4. This Notice will explain how we handle your data in accordance with the above Regulations and should provide clear information about what data we collect, how we use and store it, and your rights in relation to data that we hold about you.
- 1.5. For the purposes of this Notice, “Personal Data” is as defined by Article 4(1) of the GDPR.
- 1.6. We may update this Notice from time to time. When we do, we will either notify you via email, or by publishing a notice on our website prior to the change taking effect. To keep up to date with the latest information on our privacy practices, you should review this policy periodically.

2.0. How we collect information about you

- 2.0. *‘Directly Provided Data’* is your personal data, collected directly from you when you set up an account to use a LegalinX service. This data can be collected through face-to-face contact with a LegalinX employee, over the telephone, digitally by email, or through an electronic contact request form.
- 2.1. *‘System Collected Data’* is any data associated with the commission of a LegalinX service, or any data collected when using our website[s]. This would include data regarding any orders placed, the name of the individual who placed the order, the date of the order, the products ordered, and a copy of the returned items.
- 2.2. We collect information about user behaviour on our website using *Google Analytics*. The data that we collect is *not* personally identifiable data and is collected using Cookies through our website.
- 2.3. *‘Marketing Data’* – We sometimes collect information about you if you make an enquiry about a product or service we offer, or if you use the contact form on our website. We may also collect data about you at external events if you provide us with a business card or contact details. If you are an existing client we may use your account data for these purposes.



- 2.4. *'Publicly Available Sources'* – We may collect personal data from publicly available sources, such as Companies House.

3.0. The types of information we collect about you

- 3.1. *'Account Data'* – Personal Data included within account data includes the name and the email address that is provided to access our services. We also hold other, non-personal information about the company from whom you work, alongside details of that company. We may store associated information if it was provided to us by you when your account is registered with us.
- 3.2. *'Website Usage Data'* – This data includes Cookies, IP addresses, and data captured through Google Analytics. This also includes location data, browser information, and other information about the site usage, such as how often a user visited our site, how long they stayed on a page, and the sites that they used prior to visiting ours. Any data stored by these cookies can only be seen by relevant LegalinX teams and relevant teams within Google.
- 3.0. *'Order Data'* – This is the data associated with the order, including the date of an order, the products ordered, the full cost of the service requested, and a copy of the completed reports. This data will also include all of the information required from you for us to fulfil our contractual obligation to you and is both used and stored in accordance with [4.2](#) and [7.2](#) below.
- 3.3. *'Marketing Data'* – The data that we hold for these purposes is basic contact data. This includes your name, email address, and the company for whom you work. We may also have additional information, but only if you have provided us with the same. We may also store data about your preferences in receiving marketing communications from us.

4.0. How we use your personal data

- 4.1. We will only ever use your personal data for the purposes for which it was provided.
- 4.2. In order to provide services to you we use your **account data** [see 3.1. below]. This is used to manage your account and to manage any orders placed by you. This data is used to provide our services, allow access to our website[s], and to communicate with you in relation to any services or products that you have commissioned from us.
- 4.3. For the continued provision of our web services we are required to collect and store **website usage data** [see 3.2.] - such as Cookies. We also collect data through **Google Analytics**. We use this data in accordance with our Cookie policy, to improve the service that we provide to you, and to monitor our website[s] usage. The handling and storage of this data - and how it is used - are dealt with at **8.0**.below.



- 4.4. For tax, compliance and legal purposes, we keep a full history of products ordered through our Platform for 7 years. This data is used to look-up, audit, and track service requests. Once the request has been fulfilled the order data is stored in case of any future requirement from either party to access an order history arising from a dispute, audit, to prevent fraud or abuse, enforce our terms and conditions, or at the request of the ordering party for the same.
- 4.5. We use **marketing data** to notify you of any new products or services that we may have on offer. We also use it to provide bulletins about existing products and updates about the services that we offer (i.e. if a current service is unavailable). We tailor our outgoing correspondences specifically to your needs, and make every attempt to only contact you regarding promotions or service updates that affect you.

5.0. The lawful basis for holding your data

- 5.1. Any Personal Data that we hold about you, or any other subject, is held in accordance with Article (6) of the GDPR.
- 5.2. We hold all **account data** and **order data** in pursuance of Article (6)(a) and (6)(f), which allow us to hold the information for a legitimate business interest, and with your consent to allow us to fulfil our contractual obligations to you.
- 5.3. Any marketing information is held on the basis of **consent** in accordance with Article (6)(a). Your rights relating to this are explained below at **8.0.**

6.0. Providing your data to third parties

- 6.1. Your personal data is accessible only to LegalinX employees for the sole purpose of pursuing our business relationship with you [see 4.0.]. We will **never** share your personal data with third party marketing, advertisers, ad networks or on to any party for research purposes.

We reserve the right to share your personal data with third parties in the below circumstances only;

- 6.2. Occasionally we may be required to disclose your personal data to third party platform hosts, and other service providers in order for us to fulfil our contractual duty to you. We **only** use suppliers who are GDPR compliant, and whom we have contracted with accordingly to specifically protect your personal data in accordance with our instructions.
- 6.3. We may disclose your personal data where the disclosure of such data is a legal obligation put upon us, or in order to protect your vital interests or the interests of another natural person.

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6.4. We may disclose your personal data to a third party in order to pursue any other interest only having **obtained written consent** from you prior to doings.

7.0. Data Storage

7.1. We store your **account data**, which is the data that allows you access to our website[s] until such time as we are instructed by you to close the account.

7.0. We will retain **order data** securely on our servers and keep it for 7 years after the date of order. After this period the order history is removed, and all information about the ordering party is cleansed.

7.2. Personal Data that we process for any purpose shall **not** be kept for longer than is necessary for that purpose. This includes Personal Data obtained about a **subject** through you. Any personal data that is provided to us from you about a data subject will only be kept until the service or product that you have requisitioned from us has been completed.

7.3. **Marketing Data** is stored securely on our Client Relationship Management system and is hosted securely in the UK on AWS. Access to this system is restricted to members of staff who require the information for the purposes specified in this Privacy Notice only.

8.0. Your rights

8.1. You have the right to instruct us at any given point to provide you with any personal information which we hold about you. We will request proof of identity before passing this data on to you and there is no charge for this service.

8.2. Where the lawful basis for holding your personal information is **consent**, you may withdraw this consent at any time. You can also request a change to any data that you know to be incorrect. Please note that any data which is held for a legitimate business interest is stored for 7 years in accordance with **4.0.** above.

8.3. If you have any concerns about how your personal data is being handled and used, then you have the right to contact the Information Commissioners Office (ICO - <https://ico.org.uk/>) to lodge your concern. We would however, appreciate the chance to deal with your concerns before you approach the ICO, so please contact us in the first instance, on the details below.

8.4. You can opt out of receiving any marketing content from LegalinX by contacting your designated account manager, or contacting the office (on the details below at **11.0**) and speaking to a member of the team. Once we have received your instruction to be removed, you will receive no further marketing communications.

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9.0. Cookie Policy

9.1. What are cookies?

Cookies are small pieces of data, stored as text files, which are stored on your device when websites are loaded in your browser. They are used to 'remember' your preferences, either for a specific visit (session 'cookies'), or for repeat visits to the site (persistent 'cookies').

Cookies do not typically contain personally identifiable information. None of the cookies used on our site contain Personal Data.

9.2. What cookies do we use?

Functional Cookies

The cookies that we use on our website are critical cookies for the functionality of the site. The sorts of data that we capture and store in cookies relate to authentication and preferences. These authentication cookies remember your log-in details, and keep you logged in when you are using the site.

We do not capture any Personally Identifiable Information in our cookies.

Performance Cookies

We also use cookies to optimise your experience of the website, and there are cookies that are used for performance purposes that remember previous pages that you have visited, and product lists.

External Tracking Cookies (Analytics)

We use cookies to analyse User Behaviour on our website. These allow us to optimise user experience, as they allow us to identify navigation trends and determine what elements of our website are or aren't being utilised.

There is no personally identifiable information in these cookies.

External tracking cookies		
__utm*family __utma __utmc __utmz __utmt __utmb	Tracking cookies set by Google Analytics, these are used to monitor how visitors access and use this website.	6 month expiry

9.3. Your rights regarding cookies

By using our website, you agree to us using the above cookies. Preventing cookies on our website[s] may cause some features of the website to stop working, or may greatly diminish your experience of the website[s].

9.4. How to disable cookies

You may wish to restrict the use of cookies when using our website[s]. If so, you can do this through your browser settings. The 'Help' or 'Cookies' option in your browser should provide you with more instructions on how to do this.

A helpful guide to controlling cookies can be found at <http://www.aboutcookies.org/default.aspx?page=1>

You can opt out of being tracked by Google Analytics across all websites by visiting <http://tools.google.com/dlpage/gaoptout>

10.0. Email Mailing List, Marketing and online advertising

10.1. Service Related Emails

When necessary, we may send you service related announcements via email. For example, if our service is affected for a specific reason, we might send you an update email regarding this. You will have the option to opt out of these emails, however, these are not intended to be promotional.

10.2. Email Newsletters

On subscribing to our newsletter(s), we will use your email address and name to distribute the newsletter to you. Should you no longer wish to receive our newsletters, each email communication you receive will contain an unsubscribe link, with clear unsubscribe information included.

10.3. Marketing or promotional emails

We may send you these types of emails from time to time, this is providing that you have opted in to receive these communications, either by explicitly ticking an opt in box on one of our forms, or by providing consent through an offline form. Each email communication you receive will contain an unsubscribe link, with clear unsubscribe information included.

10.4. Remarketing and display advertising

You may notice that after visiting our website, you begin to see banner or display adverts related to our products or services on third party websites. This is because we use Remarketing with Google Analytics to advertise online.



Third-party vendors, including Google, display our ads on sites across the internet. We, and other third-party vendors including Google, utilise first-party cookies and third-party cookies together to inform, serve or optimise ads based on your past visits to your website.

11.0. Our Details

- 11.1.** The website is operated by LegalinX-7side Limited.
- 11.2.** We are registered in England and Wales under registration number 2357470, and our registered office is at Churchill House, Churchill Way, Cardiff, CF10 2HH
- 11.3.** If you need to contact us then we can be reached by email to helpdesk@globalx.co or by telephone on 08009758080.

12.0. Data Protection Officer

- 12.1.** Our appointed Data Protection Officer is;

Charlotte Blair

Churchill
House,
Churchill Way,
Cardiff
CF10 2HH

charlotte.blair@globalx.co

This Policy was last updated April 2019

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