

Privacy Statement

aosphere Limited (“aosphere”) values your privacy and cares about the way in which your personal information is treated. aosphere (“we” or “us”) is responsible for the processing of your personal data as it decides why and how it is processed, thereby acting as the “controller”.

This privacy statement (“Privacy Statement”) describes aosphere’s privacy practices in relation to how we may collect information directly from our customers, users, website visitors and other third-parties (“you”, “your”, “them”, “they”, “their” or “data subject”) in the course of our interactions or business with them and their use of our aosphere platform and websites, or from interactions at events and exhibitions, or indirectly from other sources.

We maintain separate privacy statements for the other groups we interact with, including job applicants and employees. If you are applying for a job or are employed by us, please refer to the relevant privacy statement provided during the recruitment process or through internal channels.

The aosphere platform and websites consists of the Homepage (<https://www.aosphere.com>), which provides information about aosphere’s online legal risk management products and services (referred to in this Privacy Statement as the “aosphere platform”); the aosphere subscriber login page (<https://www.aoslogin.com>) which provides the means by which authorised subscribers access and use the aosphere platform; a platform for delivery of certain aosphere in-product applications (<https://www.aosapplied.com>); and such other websites as we may operate from time to time. In addition to our Privacy Statement, your use of the aosphere platform and websites is subject to the terms and conditions of [the Legal Notices](#).

This statement describes:

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1. What personal information do we collect about you?

In this Privacy Statement, where we use the term personal information, we use this term to describe information that is about you and which identifies you. We collect personal information from you (our data subjects) during the course of our business and your use of the aosphere platform and websites, as described in this Privacy Statement.

If you visit the aosphere Homepage (<https://www.aosphere.com>) and use the “Contact us” form , or communicate with us by emailing info@aosphere.com or otherwise, or if you sign up for a trial or demonstration, we collect your full name, company name, phone number, email address and any other information you provide to us. When you subscribe to our platform, request access for your team members and they edit their profile or set their preferences, including subscribing for alerts on the website, we collect this information and ongoing customer relationship data, sales activities, and business records, as well as material that you upload to our platform. When you interact with us directly, for instance engaging with our staff at exhibitions and events, we collect the information you provide to us.

We also collect your information indirectly, for instance, technical information about your use of the website (such as pages viewed or IP address used to access the website) from our monitoring of the website and aosphere platform. We may collect or receive information about our data subjects from other third-party sources. For example, we may use publicly available sources to keep the contact details we hold accurate and up to date.

The personal information that we process includes:

- Basic information about you, such as your name (including name prefix or title), the company you work for, and your title or position
- Contact information, such as your email address and phone number(s)
- Information about your preferences in relation to the aosphere platform
- Information about your marketing and communication contact preferences
- Technical information to the extent that it constitutes personal information, including your IP address and other online identifiers, and information about your access to and use of the aosphere platform (such as your access dates/times and what areas of the platform you have visited)
- Any other information relating to you (or other individuals) which you may provide to us (such as information provided through the support functionality on the platform), or which is otherwise provided to us or generated by us in the course of providing the aosphere platform

Before providing us with personal information about another individual you must (unless otherwise agreed) have the appropriate and necessary permissions to share such personal information with us for the purposes described in this Privacy Statement and any other applicable privacy notices.

If we do not collect, or you do not provide, your personal information to us, we may not be able to provide our products and services to you

2. How we obtain your personal information

We collect personal information directly from you in various ways:

- when you complete the form to register for a free trial or demonstration, or when you otherwise register to use the aosphere platform
- in the course of your use of the aosphere websites and platform, including all information that you submit through the websites and material that you upload to the aosphere platform
- when an organisation that subscribes to the aosphere platform requests access for you to the website and platform
- when you edit your profile or set your preferences, including subscribing for alerts on the website
- when you contact or communicate with us (including through the website “Contact us” form, by email to info@aosphere.com or otherwise)
- while monitoring the website and aosphere platform
- when you provide information to us, or interact with us directly, for instance engaging with our staff

We may collect or receive information about you indirectly from other third-party sources. For example, we may use publicly available sources to keep the contact details we hold for you accurate and up to date.

If we acquire or merge with other companies, affiliates or their assets, as part of our business growth and development, we may receive personal information that was previously collected by those companies, in accordance with applicable data protection laws.

3. How we use cookies

We use cookies on our websites. To learn more about the cookies we use and how to disable them please view our cookie policy for aosphere.com [here](#), and our cookie policy for aoslogin.com [here](#).

4. How we use your personal information and on what basis we use your personal information

aosphere collects and processes personal information about you in a number of ways, including through your use of the aosphere platform and our websites. We have set out below the principal purposes for which we use your personal information and the legal basis (as set out in data protection law) that we rely on to justify this use of your information.

Purpose	Legal Basis
To provide the aosphere websites and platform to you and others in your organisation	For our legitimate business purposes (i.e. the provision of online legal risk management products and services) and, depending on the circumstances, to perform a contract between you and us
To create and administer your account	For our legitimate business purposes (i.e. the provision of online legal risk management products and services) and, depending on the circumstances, to perform a contract between you and us
To audit and monitor the use of the website and the aosphere platform	For our legitimate business purposes (i.e. the provision of online legal risk management products and services, as well as to improve and ensure the security of those products and services) We may request your consent in circumstances where a legal justification over and above legitimate interests is required by applicable law (e.g. in relation to our use of certain cookies)
To provide information requested by you and to respond to your communications, queries and feedback	For our legitimate business purposes (i.e. the provision and support of online legal risk management products and services)
To notify you of changes to the website and aosphere platform, including to notify you if you have signed up for any notifications via the aosphere platform	For our legitimate business purposes (i.e. the provision of online legal risk management products and services)
To improve our website and aosphere platform, including our services to you and to our clients, with the assistance of third-party advisors where required	For our legitimate business purposes (i.e. the provision and improvement of our online legal risk management products and services)
To promote our website and aosphere platform, including sending information about other products and services that you may be interested in	For our legitimate business purposes (i.e. the promotion of our online legal risk management products and services) We may request your consent in circumstances where a legal justification over and above legitimate interests is required by applicable law
To manage and administer our relationship with you and our clients or other third parties	For our legitimate business purposes (i.e. the provision of online legal risk management products and services)
To share information about individual user use of the aosphere platform to the organisation that has paid the subscription for the platform The organisation receiving the information is responsible for ensuring its use of the data complies with data protection law	For our legitimate business purposes and those of the organisation with whom we share the information (e.g. to demonstrate the value and use of our online legal risk management products and services)
To compile (aggregated and anonymous) statistics about individual user usage information and send these to clients and other third parties	For our legitimate business purposes and those of the organisation with whom we share the information (e.g. to demonstrate the value and use of our online legal risk management products and services)
To fulfil our legal, regulatory and risk management obligations, including establishing, exercising or defending legal claims	For our legitimate business purposes and for compliance with legal obligations to which we are subject

5. Marketing and other emails

From time to time, we, other entities within our group of companies, or third-parties acting on our behalf, may wish to send you information about other products and services which we offer and we believe you may be interested in. We may use personal information for this purpose. If you do not wish to receive this information, or if you are already receiving this information from us or third parties acting on our behalf and you no longer wish to do so, please email us at info@aosphere.com

We may also use a relationship management tool, where permitted by applicable local law, to assess the strength of the relationship between individuals in aosphere and our clients or potential clients based on the frequency of email contact between them. We use that information in order to assess, analyse and improve the services that we provide.

6. How long we keep your personal information

Your personal information will be retained in accordance with our data retention policy which categorises the information held by aosphere and specifies the appropriate retention period for each category of data. Those periods are based on the requirements of applicable data protection laws and the purpose for which the information is collected and used, taking into account legal and regulatory requirements to retain the information for a minimum period, limitation periods for taking legal action, good practice and aosphere's business purposes.

7. Who we share your personal information with

If requested by the organisation that pays for your subscription, we may share information about your use of the aosphere platform with that organisation. The organisation receiving the information is responsible for ensuring its use of the data complies with data protection law.

For ISLA members only, we may share subscriber information with the International Securities Lending Association ("ISLA"). In order to manage your subscription to the ISLA Opinions effectively, ISLA requires that we provide them with access to personal information about authorised users of the ISLA Opinions (which we host on their behalf). We will therefore share authorised users' names, email addresses and business contact information (including, if provided, job title and department) with them for this limited purpose. If you have any questions about their use of such personal information, you can contact them at yvette.hall@isla.co.uk.

For ICMA members only, we may share subscriber information with the International Capital Markets Association ("ICMA"). In order to manage your subscription to the ICMA Opinions effectively, ICMA requires that we provide them with access to personal information about authorised users of the ICMA Opinions (which we host on their behalf). We will therefore share authorised users' names, email addresses and business contact information (including, if provided, job title and department) with them for this limited purpose. If you have any questions about their use of such personal information, you can contact them at <https://www.icmagroup.org/contact/>.

Our business operates within a group structure and as such your personal information may be shared with and processed by other entities within our group including but not limited to BRP Bizzozero & Partners SA.

We may also share your personal information with certain trusted third-parties in accordance with contractual arrangements in place with them, including:

- Our professional advisers and auditors
- Our suppliers and services providers that provide services and products to us, such as our CRM provider
- Our IT systems providers, cloud service providers, database providers and consultants

Where necessary, or for the reasons set out in this statement, personal information may also be shared with regulatory authorities, courts, tribunals, government agencies and law enforcement agencies. While it is unlikely, we may be required to disclose your information to comply with legal or regulatory requirements. We will use reasonable endeavours to notify you before we do this, unless we are legally restricted from doing so.

If in the future we re-organise or transfer all or part of our business, we may need to transfer your information to new aosphere entities or to third-parties through which the business of aosphere will be carried out.

We do not sell, rent or otherwise make personal information commercially available to any third party, except with your prior permission.

8. How we protect your personal information

We use a variety of technical and organisational measures to help protect your personal information from unauthorised access, use, disclosure, alteration or destruction consistent with applicable data protection laws.

When we engage a third-party service provider to collect or otherwise process personal information on our behalf, the third party is selected carefully and will be required to have appropriate security measures in place.

9. Which countries we transfer your personal information to

In order to provide our services we may need to transfer your personal information to locations outside the jurisdiction in which you provide it or where you are viewing this website for the purposes set out in this Privacy Statement. This may entail a transfer of your information from within the United Kingdom (UK) to outside the UK. Please see '**Who we share your personal information with**' for more detail on how the information may be shared with third party service providers.

The level of information protection in countries outside the UK may be less than that offered within the UK. Where this is the case, we will implement appropriate measures to ensure that your personal information remains protected and secure in accordance with applicable data protection laws. Where our third-party service providers process personal data outside the UK in the course of providing services to us, our written agreement with them will include appropriate measures. Please contact us using the details at the end of this Privacy Statement if you would like to see a copy of the safeguards applied to the export of your personal data.

10. Your rights regarding your personal information

The UK's General Data Protection Regulation and other applicable data protection laws provide certain rights for data subjects.

You are entitled to request a copy of the information we hold about you and information about how we process it. You may also have a right in accordance with applicable data protection law to have it rectified or deleted, to restrict or suspend our processing of that information, to object to our processing of your information and, in some circumstances, to request receipt or transmission to another organisation, in a machine-readable form, personal information relating to you that you have provided to us. Where we rely on your consent to process your personal information, you have the right to withdraw your consent at any time. You also have the right to lodge a complaint in relation to aosphere's processing of your personal information with a local supervisory authority. However, we would appreciate the opportunity to address your concerns directly so please reach out to us first as shown below.

If you object to the processing of your personal information, or if you have provided your consent to processing and you later choose to withdraw it, we will respect that choice in accordance with our legal obligations.

Your objection (or withdrawal of any previously given consent) could mean that we are unable to perform the actions necessary to achieve the purposes set out above (see section entitled '**How we use your personal information**') or that you may not be able to make use of the services and products offered by us. Please note that even after you have chosen to withdraw your consent we may be able to continue to process your personal information to the extent required or otherwise permitted by law, in particular in connection with exercising and defending our legal rights or meeting our legal and regulatory obligations.

We must ensure that your personal information is accurate and up to date. Therefore, please advise us of any changes to your information by emailing: info@aosphere.com.

If you have any reason to believe that your interaction with us is no longer secure (for example, if you feel that the security of any personal information you might have sent to us has been compromised), please immediately notify us (see section below '**Who to contact with questions or concerns**').

11. Changes to our Privacy Statement

Any changes we make to this Privacy Statement in the future will be posted on this page and, where appropriate, notified to you by e-mail. The updated Privacy Statement will take effect as soon as it has been updated or otherwise communicated to you.

12. Who to contact with questions or concerns

Account Questions/General Complaints: If you have complaints, questions about or need additional assistance setting up an account or using the aosphere platform, please contact info@aosphere.com.

Privacy Questions/Complaints: We have appointed a Data Protection Officer (DPO) to oversee our data protection compliance. However, if you have questions, concerns or requests, or need further information about our Privacy Statement or practices, please contact privacy@aosphere.com.