



Droit Privacy Statement

Version 2.0

23rd September 2018

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This Privacy Statement provides you with information about the personal data we collect in connection with your use of Droit services or enquiries to Droit, and activities undertaken by Droit. It details:

- the personal data that we collect about you (called "personal information" in this Privacy Statement)
- why and how we use that personal information
- our legal basis for handling your personal information; and
- your rights regarding that personal information.

This Privacy Statement also outlines Droit’s security, access and data retention practices.

Your personal information is collected and controlled by Droit Public Limited Company, 29 Throgmorton Street, London, EC2N 2AT, United Kingdom, and Droit Financial Technology LLC, 145 West 28th St, 12th Floor, New York, NY, 10001, USA, both referred to in this Privacy Statement as "**Droit**", "**we**" and "**us**".

If you have any questions or concerns regarding this Privacy Statement, please contact: privacy@droitfintech.com.

1. Information we collect

In order for us to provide services, we need to collect and process certain personal information. The personal information we collect will depend upon your interaction with Droit:

Information you provide by using Droit products or completing forms on Droit websites

What we collect	How /why we collect it	How we use it
Contact details <i>(your name, email address and postal address, and your telephone number.)</i>	We need this information to register you or your employer as a user of Droit software or services	We use this information to provide you or your employer with access to Droit software and services. We also use this information to send you certain communications (including by email [or post]) about our products and services such as administrative messages (for example, setting out changes to our terms and conditions and keeping you informed about our fees and charges).

	If you contact us for support, or send us questions or comments.	We use this information to respond to your requests, or provide you with support you have requested.
	If you apply for a job with us.	We use this information to process your application, and communicate with you in relation to that application.
	To send you marketing materials about our business and services	If it is in our legitimate interests for business development and marketing purposes, to contact you (including by telephone or post) with information about our products and services or the products and services of our suppliers which either you request, or which we feel will be of interest to you

Cookies

We use cookies on our websites and online services to give us information about your visit to our sites and how you interact with us. This information is used to enable you to browse our websites and use our online features as a logged in user and to remember any preferences that you have set for the site whilst you are on our site. If you disable cookies in your web browser, certain features of our site may not be available.

What we collect	How /why we collect it	How we use it
Information about the ways people visit and interact with our websites, in the form of traffic analytics.	Droit uses Google Analytics which uses cookies that are stored on your computer	These cookies facilitate the analysis of your use of our websites and online features
Aggregated information about your operating system and browsers.	We use AWS CloudFront in our services, a content delivery network of Amazon Web Services, Inc. AWS CloudFront uses cookies to [●].	This information is used for testing new versions of the software.

Where we use cookies on our website, you may block these at any time. To do so, you can activate the setting on your browser that allows you to refuse the setting of all or some cookies. However, if you use your browser settings to block all cookies (including essential cookies), you may not be able to access all or parts of our website or to use all the functionality provided through our website. You can also opt out of being included in Google Analytics here at <https://tools.google.com/dlpage/gaoptout>.

Information we collect from third parties

We also collect information from certain third-party organisations relating to individuals' roles and contact information, where appropriate, and in the legitimate course of our business activities. This includes information we collect from business directories, information collected at corporate events, from social media sites or where you are referred to us by another individual. We use this information to send you marketing materials about our business and services on the basis that it is in our legitimate interests for business development and marketing purposes, to contact you (including by telephone or post) with information about our products and services or the products and services of our suppliers which we feel will be of interest to you.

2. Our legal basis for processing your information

The laws in some jurisdictions require us to tell you about the legal ground we rely upon to use or disclose your personal data. To the extent those laws apply, our legal grounds are as follows:

Contractual commitments:

In some cases, our processing of personal data is necessary to meet our contractual obligations to you or to take steps at your request in anticipation of entering into a contract with you. For example, we handle personal data on this basis so that we can create your online account and provide you with access to Droit software or services.

Legitimate interests:

In many cases, we handle personal data on the ground that it furthers our legitimate interests in ways that are not overridden by the interests or fundamental rights and freedoms of the affected individuals. These legitimate interests include:

- Operating our websites and services;
- Providing a safe and enjoyable user experience;
- Providing you (or your employer) with necessary Customer service;
- Undertaking business development activities to grow our business;
- Protecting our users, personnel, and property;
- Analysing and improving our business, websites and services;
- Processing job applications so that we can employ new staff members;
- Managing legal issues and defending ourselves from claims.

If you would like further details on these legitimate interests and our assessment of why they apply, please contact us via email at privacy@droitfintech.com.

3. Where your information is processed or transferred

When sharing information, we will make sure your personal information is properly protected.

Droit is based and operates inside and outside the European Union (EU). In addition, we operate and utilise sub-processors and third-party service providers globally, and some of these are based outside the EU. As a result, if you are resident in the EU, the processing of your personal information will involve a transfer of data outside the EU.

Whenever we transfer your personal information out of the EU, we ensure a similar degree of protection is afforded to it by ensuring at least one of the following safeguards is implemented:

- We will transfer your personal data to countries that have been deemed to provide an adequate level of protection for personal data by the European Commission.
- If the recipient entity or service provider is not in a country deemed to provide an adequate level of protection, we may use specific contracts approved by the European Commission which give personal data transferred outside the EU an adequate level of protection.
- Alternatively, if the recipient entity or service provider is based in the US, we may transfer data to them if they are part of the EU-US Privacy Shield, which has been approved by the European Commission as giving personal data an adequate level of protection.

Please contact us at privacy@droitfintech.com if you would like further information on the specific mechanism used by us when transferring your personal data out of the EU.

4. How your information is shared

Droit will share your information with its group companies where it is in our legitimate interests to do so for internal administrative purposes (for example, for corporate strategy, compliance, auditing and monitoring, research and development and quality assurance). Individuals within Droit will only have access to information that is required for them to perform their roll within the firm.

Droit will share your personal information with the following categories of trusted third-party service providers, to help us provide, improve, or protect Droit's services:

- Cloud infrastructure hosting services, specifically Amazon Web Services, Inc.;
- Our other service providers and sub-contractors, including payment processors, utility providers, suppliers of technical and support services, insurers, and logistic providers;
- Companies that assist in our marketing, advertising and promotional activities, this includes but not limited to Salesforce;

We may also share information that's aggregated and anonymized in a way that it doesn't directly identify you. For example, we may disclose and use anonymised, aggregated reporting and statistics about users of our website or our services for the purpose of internal reporting or reporting to our group or other third parties, and for our marketing and promotion purposes.

Droit reserves the right to disclose personal information when:

- it is in our legitimate interests to do so to run, grow and develop our business, such as:
 - if we sell or buy any business or assets, we may disclose your personal information to the prospective seller or buyer of such business or assets;
 - if substantially all of our or any of our affiliates' assets are acquired by a third party, in which case personal information held by us will be one of the transferred assets;
- we believe that doing so is reasonably necessary to comply with the law or law enforcement;
- to prevent fraud or abuse; or
- to protect Droit's legal rights, property, or the safety of Droit, its employees, users, or others.

We will never sell or rent your information to any third parties for any reason, without notifying you and, where necessary, obtaining your consent. If you have given your consent for us to use your personal information in a particular way, but later change your mind, you should contact us and we will stop doing so.

5. Data retention

We only retain personal data for so long as it may be necessary for the purposes identified within this Policy Statement.

The length of time for which we retain personal information depends on the purposes for which we collect and use it and/or as required to comply with applicable laws and to establish, exercise or defend our legal rights. We retain your details as follows:

- **Account information:** We will use your contact information to administer the account to which your information relates for as long as the relevant contract is in place. Once the relevant contract is terminated, we will delete your contact information unless we have alternative reasons to process it (such as to send you marketing materials).

- **Marketing information:** Where we process your personal information for marketing purposes, we will continue to process your information for as long as we consider it in our legitimate interests to do so, and provided you do not ask us to stop processing your information for this purpose.
- **Financial information:** We are required [by law] to keep financial information for 7 years after each transaction, so we will continue to store any financial information you provide to us for 7 years following the last transaction you make with us.

To dispose of personal data, we may anonymize it, delete it or take other appropriate steps. Data may persist in copies made for backup and business continuity purposes for additional time.

6. Your rights

You have certain rights in relation to your personal information. If you would like further information in relation to these or would like to exercise any of them, please contact us via email at privacy@droitfintech.com at any time. You have the following rights:

- **Right of access:** You have a right of access to any personal information we hold about you. You can ask us for a copy of your personal information; confirmation as to whether your personal information is being used by us; details about how and why it is being used; and details of the safeguards which are in place if we transfer your information outside of the United Kingdom or the European Economic Area ("EEA").
- **Right to update your information:** You have a right to request an update to any of your personal information which is out of date or incorrect.
- **Right to delete your information:** You have a right to ask us to delete any personal information which we are holding about you in certain specific circumstances. You can ask us for further information on these specific circumstances by contacting us using the details below.

We will pass your request on to other recipients of your personal information unless that is impossible or involves disproportionate effort. You can ask us who the recipients are, using the contact details below.

- **Right to restrict use of your information:** You have a right to ask us to restrict the way in which we process your personal information in certain specific circumstances. You can ask us for further information on these specific circumstances by contacting us using the details below.

We will pass your request on to other recipients of your personal information unless that is impossible or involves disproportionate effort. You can ask us who the recipients are using the contact details below.

- **Right to stop marketing:** You have a right to ask us to stop using your personal information for direct marketing purposes. If you exercise this right, we will stop using your personal information for this purpose.
- **Right to data portability:** You have a right to ask us to provide your personal information to a third-party provider of services.

This right only applies where we use your personal information on the basis of your consent or performance of a contract; and where our use of your information is carried out by automated means.

- **Right to object:** You have a right to ask us to consider any valid objections which you have to our use of your personal information where we process your personal information on the basis of our or another person's legitimate interest.

We will consider all such requests and provide our response within a reasonable period (and in any event within one month of your request unless we tell you we are entitled to a longer period under applicable law). Please note, however, that certain personal information may be exempt from such requests in certain circumstances, for example if we need to keep using the information to comply with our own legal obligations or to establish, exercise or defend legal claims.

If an exception applies, we will tell you this when responding to your request. We may request you provide us with information necessary to confirm your identity before responding to any request you make.

If you would like to exercise any of these rights, you can contact Droit at privacy@droitfintech.com, or write to us at 145 West 28th St, 12th Floor, New York, NY, 10001, USA.

7. Security of your information

The safety and security of your personal information is very important to us. We take technical, administrative and physical security measures designed to protect your information from loss, misuse, and unauthorized access, disclosure, alteration, or destruction. Examples include tight network security, multi factor authentication to file repositories where sensitive client information is held, and physical security of our premises.

However, communications over the internet (such as emails) aren't secure unless they have been encrypted. Your communications may go through a number of countries before being

delivered as is the nature of the internet. We cannot accept responsibility for any unauthorised access or loss of personal information that is beyond our control.

Where we have given you (or where you have chosen) a password which enables you to access your online account, you are responsible for keeping this password confidential. We ask you not to share your password with anyone.

8. Links to other websites

This Privacy Statement applies only to the products and services that Droit provides or websites that Droit operates. These services and websites may contain links to other websites not operated or controlled by Droit. The policies and procedures described in this Policy Statement do not apply to these third-party sites. Any links from Droit websites or services do not imply that we endorse or have reviewed the third-party sites or their policies. We suggest contacting those sites directly for information on their privacy policies.

9. A word about children

You must be aged 18 or over to receive services from us. Our website and services are not directed at children and we do not knowingly collect any personal information from children.

If you are a child and we learn that we have inadvertently obtained personal information from you from our websites, or from any other source, then we will delete that information as soon as possible.

Please contact us at privacy@droitfintech.com if you are aware that we may have inadvertently collected personal information from a child.

10. Changes to this Privacy Statement

Droit may update this Privacy Statement from time to time. Any changes we make to our Privacy Statement in the future will be posted on this page and, where appropriate, notified to you by post or email. Please check back frequently to see any updates or changes to our Privacy Statement.

New versions of this Privacy Statement will never apply retroactively, and the effective date will be indicated within this document.

11. Contact us

If you have any queries or complaints about our collection, use or storage of your personal information, or if you wish to exercise any of your rights in relation to your personal information, please contact privacy@droitfintech.com. We will investigate and attempt to



resolve any such complaint or dispute regarding the use or disclosure of your personal information.

Depending in your location, you may also have a right to make a complaint to the data protection regulator in the country where you usually live or work, or where an alleged infringement of the EU's General Data Protection Regulation (where applicable) has taken place. Alternatively, you may seek a remedy through the courts if you believe your rights have been breached.

If you need to contact us more generally about this Privacy Statement or to make a data request you can also email us at privacy@droitfintech.com.