

PRIVACY POLICY

Applicable from 27 September 2024

At .legal A/S (".legal", "we", "us", "our"), we give high priority to confidentiality and data protection. This privacy policy applies to our processing of your personal data as a data controller and establishes guidelines for the way .legal processes your personal data and provides you with the information that you are entitled to receive under applicable data protection laws, including the General Data Protection Regulation (hereinafter "GDPR"). You should read this privacy policy before you hand over your personal data.

1. WHAT IS PERSONAL DATA

Personal data is any information that can lead to the identification of a specific person. It can be your name and phone number, but it can also be other kinds of data such as your IP address and payment details. In order to manage our business, we need to process certain personal data.

We therefore collect and process your personal data when, for example, you visit our website, communicate with us, interact with us on social media, subscribe to our newsletter/marketing communication, or use our services, including our free trials and freemium (hereinafter the "Services").

Sensitive personal data

A subset of personal data is referred to as 'sensitive personal data'. Sensitive personal data includes information revealing race and ethnic origin, political opinions, religious or philosophical beliefs, membership in trade unions, genetic data, biometric data for unique identification, health information, and sexual relations or sexual orientation, cf. GDPR art. 9(1). The processing of such data is subject to stringent data protection measures to safeguard individuals' privacy and rights.

legal would like to decline to receive sensitive personal data, both on our website and through general communications with us, unless we specifically request it. Should you nevertheless provide us with sensitive personal data, we will make sure to delete it to avoid processing sensitive personal data.

2. WHEN YOU VISIT OUR WEBSITES

When you visit any of .legal's websites, we may process your personal data through cookies and pixels. We use cookies and pixels on the following websites: <u>dotlegal.com</u>, <u>signup.dotlegal.com</u> and <u>help.dotlegal.com</u> (hereinafter the "websites", "our websites").

Types of personal data

.legal may collect, process, and store the following types of your personal data (depending on your choice of consent when you visit the websites):

- IP address, MAC address
- Device and browser type/version



- Operating system and screen resolution
- Pages visited and time spent on each page
- Clicks and interactions with websites
- Referring website or search engine
- Products or Services viewed or searched for
- Cookie ID and settings/preferences
- Session duration and expiration along with date and time of website visits

You can read more about the use of cookies and pixels in our Cookie Policy, which you can find <u>here.</u> Furthermore, you can read more about which specific personal data we collect in our pop-up consent banner on our websites.

Purposes of the process

Your personal data may be processed for the following purposes:

- Ensuring our website's functionality
- Statistics and analysis
- Marketing
- Remembering your settings and preferences

Legal basis for processing

We process your personal data on the following basis:

- a. <u>Legitimate interests:</u> By automatically consenting to *necessary* cookies and pixels, certain data is processed by us, which cannot be withdrawn. We rely on our legitimate interests in processing your personal data to ensure the proper functioning of our website, cf. GDPR art. 6(1)(f).
- b. <u>Consent:</u> .legal will only use your personal data for marketing/statistics/analysis/preferences purposes depending on your choice. If you have given your prior written consent to this via the consent banner on the website, cf. GDPR art. 6(1)(a), you have the right to withdraw your consent at any time; you can read more concerning how to change or withdraw your consent in our Cookie Policy, which is available <u>dotlegal.com/en/cookie-policy</u>.

Retention period

Personal data collected on our websites using cookies and pixels is deleted in accordance with our <u>Cookie Policy</u>. We do not store your personal data beyond this point.

Additionally, it is possible to retain personal data for longer periods in anonymised form.

3. WHEN YOU GENERALLY COMMUNICATE WITH US

When you utilise a contact form on any of our websites, contact customer service, send an email, engage in a chat, make a phone call, or communicate with .legal in any other way, .legal processes your personal data. This section governs *all interactions* with .legal and serves as the *foundation* for the subsequent sections regarding communication.



Types of personal data

.legal may collect, process, and store the following types of your personal data:

- Name, email address, phone number
- What your inquiry is about
- Date and time of your inquiry
- IP address
- Other information you provide in connection with your inquiry

Purposes of the process

Your personal data may be processed for the following purposes:

- Handling of your inquiry
- General communication
- Analysis and statistics, including e.g., the order in which website links should be presented to be relevant to our target audience

Legal basis for processing

We process your personal data on the following basis:

- a. <u>Legitimate interests:</u> We may process your personal data primarily based on our legitimate interests in handling your inquiry, communicating with you, and developing our products and Services, cf. GDPR art. 6(1)(f). For instance, if you were to send us an email with inquiries about our product, we would have a legitimate interest in responding.
- b. <u>Contractual obligations:</u> Secondly, in certain cases, the processing of your personal data is necessary in implementing measures taken at the request of the data subject prior to the conclusion of a contract, e.g., after communicating with .legal's customer service, cf. GDPR art. 6(1)(b).

Retention period

Your personal data will be stored until your inquiry is finally resolved.

If you are a customer or employee of one of our customers, a supplier, or another kind of business partner, we refer to the sections below, as they specify the terms that apply to you *in addition* to the general terms in this section. Should there be a specific need to retain your personal data for a longer period in a particular case, this may be the situation.

Additionally, the data may be retained for a longer period in anonymised form.

Specifics regarding tracking pixels

.legal occasionally gathers information on you, including tracking email opens and potential link clicks, identifying your device and/or browser, logging IP address, collecting device details, and observing user behaviour. This practice is designed to enhance your email experience, ensuring that you receive tailored content and avoiding the repetition of emails you have already accessed. For instance, this may involve



registering whether you have opened the email. Furthermore, this data is collected to generate insightful statistics about the relevance of our emails to your interests.

This data is acquired using tracking pixels, commonly referred to as 'web beacons'. This process is implemented when you engage with our social media platforms (Section 4), subscribe to webinars and/or marketing communications (Section 5 and/or Section 6), contemplate or initiate a business partnership (Section 7), or utilise our Services (Section 8).

4. WHEN YOU VISIT OUR SOCIAL MEDIA PROFILES

When you visit or interact with .legal's social media profiles, we process data. One or more of the social media platforms mentioned below can be considered a joint data controller with .legal. Therefore, .legal and the specific social media provider are jointly responsible for processing your personal data collected during your visit to .legal's social media profiles. This means that the current privacy policy of various social media platforms applies, as well as your own customised choices of privacy settings and your personal interactions.

.legal has social media profiles or pages on the following social media platforms:

- Meta Platforms Ireland Ltd., namely Facebook and Instagram (see Meta's Privacy Policy)
- LinkedIn Ireland Unlimited Company (see <u>LinkedIn's Privacy Policy</u>)

The following pertains to .legal's own regulation of our social media. For more detailed information, please refer to the various privacy policies provided by the specific social media provider.

Furthermore, legal may occasionally utilise your personal data to enhance your experience with us and our Services, particularly in relation to emails, visits to our website, and similar. For further details, please refer to the section on pixel tracking in Section 3.

Types of personal data

.legal may, in relation to your use of our social media profiles, collect, process, and store the following types of your personal data:

- Information available on your profile, including your name, gender, workplace, interests, image, and your city
- Whether you 'like' or have applied other reactions to our profile
- Comments you leave on our posts
- Shared posts
- Messages which you have sent to us
- Visits to our profile
- Information gathered by tracking pixels following Section 3, e.g., the time and date for when you potentially open our marketing communication, which website links are used and from which device the website link is clicked on



Purposes of the process

.legal processes your personal data for the following purposes:

- Improving our products and Services, including our social media profiles and pages
- Analysis and statistics
- To be able to communicate with you if you comment on a post, make a review or send us a message
- Marketing in general

Legal basis for processing

We process your personal data on the following basis:

a. <u>Legitimate interests</u>: legal bases the processing of your personal data on our legitimate interests in being able to communicate with and market us to you on our social media profiles in regards to branding and sales, as well as our legitimate interest in improving our products and Services, cf. GDPR art. 6(1)(f).

Retention period

Please refer to the privacy policy for each social media platform for information on how long they store your personal data.

Your personal data will be stored for as long as your 'like', 'follow', 'comment', 'message', etc. is active on our social media profile and until you delete it. Direct messages will not be deleted unless you delete them on your own initiative.

Additionally, it is possible to retain personal data for longer periods in anonymised form.

5. WHEN YOU SIGN UP FOR OUR DEMOS, EVENTS, WEBINARS, AND THE LIKE

When we host demos, webinars, and similar events, we always strive to improve ourselves and our product, which is why we e.g., may ask participants to provide feedback. We aim to prepare our participants who have signed up for a webinar, demo, or similar event, by sending out service emails before the event, detailing the participation process. Additionally, after the event, a follow-up email will be sent, including e.g., information about the specific product. Consequently, personal data is processed in this context.

Types of personal data

.legal may collect, process, and store the following types of your personal data:

- Name and email address
- Information gathered by tracking pixels following Section 3, e.g., your interests regarding links and pages accessed through our emails

Purposes of the process

Your personal data may be processed for the following purposes:

- Communication directly related to the sign-ups, e.g., follow-up emails.



- Communication improvement
- Analysis and statistics
- Direct sales in regards to the product of which you have shown interest in

Legal basis for processing

We process your personal data on the following basis:

a. <u>Legitimate interests:</u> We primarily process your personal data to keep you informed as a participant about the webinar, demo, or similar event, along with information regarding the specific service the participant would like to learn about, as well as potential feedback regarding future event organisation. We may also provide you information about a specific product if you have shown interest in that product, e.g., by signing up for a webinar about this specific product. Furthermore, we may send client satisfaction surveys to improve our Services based on our legitimate interest, cf. GDPR art. 6(1)(f).

Retention period

Documentation of your marketing registration is maintained for 2 years after inactivity, reflecting .legal's legitimate interest in documenting sign-ups in accordance with applicable legislation, cf. GDPR art. 6(1)(f). However, if you qualify as a potential business partner under Section 7, your personal data will be retained for as long as necessary to serve our legitimate interest in you as a prospect. However, if no such justifications apply, and in the event of inactivity surpassing 2 years, your personal data will be deleted.

Additionally, it is possible to retain personal data for longer periods in anonymised form.

Specifics about partners of .legal and other purposes

Our partners, which include webinar providers, newsletter services, and instructors, have access to your data. If you have registered for a webinar on our website, you will receive information about the webinar, including any potential business partners involved in providing the specific webinar; if you register at a webinar with a business partner involved, you may also receive information about how they handle personal data.

If we intend to use your personal data for purposes other than those for which it was collected (such as for marketing purposes), we will always collect your consent and inform you about this before proceeding with any such processing, cf. GDPR art. 6(1)(a). Furthermore, if you consent to marketing and wish to withdraw it, you can always use the 'unsubscribe'-link at the bottom of the email or by writing to us at hello@dotlegal.com, cf. GDPR art. 7(3). For more information regarding marketing communication, please refer to Section 6.

6. WHEN YOU SIGN UP FOR OUR MARKETING COMMUNICATION

When you receive or sign up for marketing communications regarding product specific news, efficiency tricks and/or our newsletter, .legal collects, processes, and stores your personal data for marketing purposes. You subscribe to marketing communications when you e.g., sign up for a demo and choose to sign up for marketing communications such as our newsletter as an opt-in or if you are a business partner of .legal.



Furthermore, legal may occasionally utilise your personal data to enhance your experience with us and our Services, particularly in relation to emails, visits to our website, and similar. For further details, please refer to the section on pixel tracking in Section 3.

Types of personal data

.legal may collect, process, and store the following types of your personal data:

- Name, email address and phone number
- Your consent
- Your interests
- IP address
- Information gathered by pixel tracking following Section 3, e.g., the time and date for when you potentially open our marketing communication, which website links are used and from which device the website link is clicked on

Purposes of the process

Your personal data may be processed for the following purposes:

- Purpose of sale
- Direct marketing
- Marketing improvement
- Analysis and statistics, including e.g., the order in which website links should be presented to be relevant to our target audience

Legal basis for processing

We process your personal data on the following basis:

- a. <u>Consent</u>: .legal will only use your personal data for direct marketing and pixel tracking, including sending our newsletters, if you have given your prior consent to this or if you are using the Services as a business partner of .legal, cf. GDPR art. 6(1)(a). Please note that you receive specific marketing communication depending on your prior consent, cf. GDPR art. 6(1)(a).
- b. <u>Legitimate interests:</u> The processing of your personal data will, in connection with analysis and statistics, secondly be based on our legitimate interests in being able to improve and develop our marketing communication, cf. GDPR art. 6(1)(f). Furthermore, the processing is carried out based on our legitimate interest in being able to organise future newsletters based on the data collected, cf. GDPR art. 6(1)(f).

Retention period

Your personal data will be used for marketing purposes as long as your consent is active.

Documentation of your marketing communication consent is kept for 2 years from the time you have withdrawn your consent to receive direct marketing material. The retention period is based on .legal's legitimate interest in being able to document that direct marketing has been carried out in accordance with the applicable legislation, cf. GDPR art. 6(1)(f).



Additionally, it is possible to retain personal data for longer periods in anonymised form.

Withdrawal of consent

You can withdraw your consent at any time by unsubscribing from marketing communications, which is done by following the 'unsubscribe' link at the bottom of the email or by writing to us at hello@dotleqal.com, cf. GDPR art. 7(3).

If you decide to withdraw your consent, you will be promptly excluded from our marketing communication mailing list and will no longer receive marketing messages concerning the specific opt-out options you have chosen from us, as stipulated by GDPR art. 21(3). However, withdrawing your consent will not invalidate our prior processing of your personal data based on your earlier given consent. Therefore, any revocation of your consent will only apply to our processing activities from the moment you withdraw your consent going forward.

7. WHEN YOU ARE OR COULD BE A BUSINESS PARTNER

When you are a current or potential business partner, e.g., customers, suppliers, collaborators, and such working with or interested in .legal, we process your personal data. You are considered a business partner if your company or the company you work at enters into an agreement or collaborates with .legal. You are considered a *potential* business partner if you or your company have shown interest in .legal's products and Services, or if .legal identified you or your company as a potential partner or user of those products and Services.

Furthermore, legal may occasionally utilise your personal data to enhance your experience with us and our Services, particularly in relation to emails, visits to our website, and similar. For further details, please refer to the section on pixel tracking in Section 3.

Types of personal data

.legal may collect, process, and store the following types of your personal data:

- Name, email address, phone number, and corresponding contact information
- Organisational information such as the name and address of the company, job title, employment area, primarily place and country of work
- Financial information such as payment terms, bank details and credit ratings (e.g., in the case of a sole proprietorship)
- Contractual information such as orders, invoices, contracts, and other agreements between your company (or your employer) and .legal that may contain e.g., your contact information, namely if you are a business partner already
- Information obtained from third-party sources e.g., LinkedIn, company websites, and the like
- Information gathered by tracking pixels following Section 3, e.g., the time and date for when you potentially open our marketing communication, which website links are used and from which device the website link is clicked on



Purposes of the process

Your personal data may be processed for the following purposes:

- General planning, fulfilment, and the management of collaborations, including contracts
- Providing support
- Conducting inquiries from you
- General communication
- Product and service development
- Analysis and statistics, including e.g., the order in which website links should be presented to be relevant to our target audience
- Administration such as the processing of payments, rating evaluations, accounting and auditing, namely if you are a business partner

Legal basis for processing

We process your personal data on the following basis:

- a. <u>Contractual obligations:</u> We process your personal data based on the necessity of fulfilling our contract with you, cf. GDPR art. 6(1)(b).
- b. <u>Legitimate interests:</u> We may process your personal data based on our legitimate interests in, for example, managing day-to-day operations in accordance with legitimate and fair business practices including planning, execution and management of the cooperation or, for example, performing credit ratings, statistics, analyses, provide support and as well as improvement and development of our products and Services. The processing may also be necessary for our legitimate interest in preventing fraud or establishing, defending, or asserting legal claims. Lastly, we may process your personal data from social media platforms with the intention of selling our products and Services. The processing of your personal data is based on our legitimate interest, cf. GDPR art. 6(1)(f), as we believe that the benefits of the processing outweigh the potential impact on your rights and freedoms. We have assessed that the processing activities do not infringe your fundamental rights and freedoms.

Retention period

If you are an active business partner of .legal, your personal data will not be deleted.

If you are no longer an active business partner of .legal, we will retain your personal data, including contacts from the company, emails, and similar information, for as long as we either have a legal obligation or a legitimate interest to preserve it. If no such justifications apply, the data will be securely preserved for a period of 5 years following the termination of the contractual relationship.

If you are a potential business partner of .legal, we will only retain your personal data as long as necessary for the purpose for which it was collected, namely our legitimate interest in you as a prospect, or as required by law. If no such justifications apply, and if you are inactive for more than 2 years, your personal data will be deleted.

Additionally, it is possible to retain personal data for longer periods in anonymised form.



8. WHEN YOU USE .LEGAL ONLINE SERVICES

When you as a user of any of the .legal Services, .legal collects and processes your personal data. The Services can be distributed to customers and their users.

Furthermore, .legal may occasionally utilise your personal data to enhance your experience with us and the Services, particularly in relation to emails, visits to our website, and similar. For further details, please refer to the section on pixel tracking in Section 3.

Types of personal data

.legal may collect, process, and store the following types of your personal data:

- Name and email address
- Work position
- User behaviour
- IP address
- Browser type, browser settings, browser configuration, and plugins
- Date and time of using the Services
- Information about the device you use to access the Services, including the type of device you are using, operating system, device settings, application ID, unique device identifiers, and crash data
- Information gathered by tracking pixels following Section 3, e.g., the time and date for when you potentially open our marketing communication, which website links are used and from which device the website link is clicked on

We use cookies and pixels to collect some of the above-mentioned personal data. You can read more about the use of these in our Cookie Policy, which you can find <u>here.</u>

Purposes of the process

Your personal data will be processed for the following purposes:

- To make the Services available to you
- Analysis and statistics, including e.g., the order in which website links should be presented to be relevant to our target audience
- Product communication, e.g., emails regarding product related updates along with efficiency tricks regarding the Services

Legal basis for processing

We process your personal data on the following basis (depending on your use of the Services):

- a. <u>Contractual obligations:</u> We process your personal data due to the necessity of fulfilling a contract or in implementing measures taken at the request of the data subject prior to the conclusion of a contract, cf. GDPR art. 6(1)(b).
- b. <u>Legitimate interests:</u> Furthermore, we process your personal data based on our legitimate interest in developing and improving our Services and making the Services' features available to you, cf. GDPR art. 6(1)(f). Additionally, we process your personal data in order to send out emails concerning product news as well as tips on how to use the Services; the process is based on our



legitimate interest in you using our Services in the most effective and productive way, cf. GDPR art. 6(1)(f).

Retention period

If you are an active user of any of the .legal Services, your personal data will not be deleted.

If you are no longer an active user of any of the of .legal Services, we will retain your personal data, including contacts from the company, emails, and similar information, for as long as we either have a legal obligation or a legitimate interest to preserve it. If no such justifications apply, the data will be securely preserved for a period of 5 years following the termination of the contractual relationship.

Additionally, it is possible to retain personal data for longer periods in anonymised form.

9. WHEN YOU VISIT OUR PHYSICAL LOCATION

.legal's physical office in both Aarhus and Copenhagen does not collect, process, or store any personal data about you since both offices does not have monitoring, guest registration or the like.

10. WHEN YOU APPLY FOR A JOB AT LEGAL

When you apply for a job at .legal through our e-mail, <u>job@dotlegal.com</u>, .legal processes your personal data in relation to recruitment and staffing needs.

Types of personal data

.legal may collect, process, and store the following types of your personal data:

- Personal data which you have disclosed in your job application (e.g., birth date) and resume (CV)
 as well as any attachments, including information regarding your previous jobs, activities,
 competencies and/or performance
- References from your previous and/or current employers
- Additional information you will provide in relation to the recruitment process
- .legal may administer a personality test and/or logical test

Purposes of the process

Your personal data may be processed for the following purpose:

- Your personal data will be processed for the purpose of assessing whether we can offer you a position at .legal.

Legal basis for processing

We process your personal data on the following basis:

a. <u>Contractual obligations:</u> We process your personal data for the purpose of carrying out measures concerning potential employment at the applicant's request prior to entering into an



employment/contract agreement, cf. GDPR art. 6(1)(b).

- b. <u>Legitimate interests</u>: We may process your personal data based on our legitimate interests in carrying out assessments of whether we want to hire you, cf. GDPR art. 6(1)(f).
- c. <u>Consent</u>: In some cases, and only when no other legal basis can be applied, .legal may ask for your consent to process your personal data, cf. § 12(3) of the Danish Data Protection Act, cf. GDPR art. 6(1)(a). .legal will, for instance, only collect references from your previous and/or current if you have consented to this.

Retention period

If you are offered a position at .legal, your application and additional relevant personal data obtained during the recruitment process will be stored in your employee file.

If you are not offered a position, we will store your application and any additional personal data obtained during the recruitment process for a period of 6 months following our rejection; the files will be deleted afterwards.

Upon recruitment

If you are offered a position, .legal will be contractually obligated to process possible, additional personal data about you beyond what is mentioned above, such as your address, working hours, salary information, date of employment, etc. in order to prepare a contract for you in accordance with our employment obligations, cf. § 12(1) of the Danish Data Protection Act, cf. GDPR art. 6(1)(b).

11. SHARING OF PERSONAL DATA

Your personal data is generally not disclosed to a third party without your consent; however, in connection with the purposes mentioned above, we may give third parties access to your personal data, which, based on a contractual relationship with .legal, provides relevant Services; this could be IT suppliers or other suppliers that process your personal data on behalf of us. Such suppliers will only process your personal data in accordance with our values and methods, and in compliance with the agreed-upon data processing agreements.

In some cases, we can pass on your personal data to our affiliate companies to the extent that it is reasonably necessary to the purpose listed in this privacy policy.

The corporate structure of .legal may change, e.g., by the total or partial sale of the company. In the case of a partial transfer of assets containing personal data, the legal basis for the related transfer of personal data is, as a rule, GDPR art. 6(1)(f), since .legal has an interest in transferring parts of its assets and making commercial/structural changes.

However, in certain circumstances and in accordance with the law, it may be necessary to disclose your personal data to e.g., lawyers, accountants, potential buyers, and group-linked companies. cf. GDPR art. 6(1)(c).



If your personal data is to be transferred to data processors or controllers established in countries outside the EU/EEA, then such a transfer will only occur after securing a valid transfer basis. A valid transfer basis is secured if the company is an active participant certified under the EU-U.S. Data Privacy Framework. If the company is not certified, such a transfer will only occur after ensuring an alternative secure transfer basis, specifically through the EU Commission's Standard Contractual Clauses (SCCs) and a Transfer Impact Assessment (TIA). If you have any inquiries regarding the transfer of data to countries outside the EU/EEA, please reach out to us at hello@dotlegal.com.

12. YOUR RIGHTS

You have certain rights concerning the processing of your personal data. Your rights are listed below. If you wish to assert your one or more of these rights, please contact us at helio@dotlegal.com.

Right to access

You have the right to know if we process any of your personal data, and - if it is the case - access the personal data we process about you.

Right to object

You have the right to object to our collection and further processing of your personal data. However, the personal data about you can still be used for other legitimate purposes.

Right to rectification and deletion

You have the right to rectification and deletion of your personal data, however there are certain statutory exceptions, including the Bookkeeping Act.

Right to restrict the processing

You have the right to ask us to restrict the processing of your personal data.

Right to data portability

In certain circumstances, you may also request to receive a copy of your personal data and to transmit the personal data you have provided to us to another data controller. The right concerns only the information you have provided to us. The copy of your personal data will be in a structured, commonly used and machine-readable format.

Right to withdraw consent



Right to not be profiled

You have the right to not be profiled; however, this does not apply if you have given your consent, if we have a legitimate interest, or if it is necessary for entering into or performance of a contract.

Right to complain

You always have the right to ask questions or complaint. If this is relevant for you, please see our Section 13.

13. QUESTIONS AND COMPLAINTS

If you have any questions about this privacy policy or if you wish to complain about the way we process your personal data as the data controller, please feel free to contact us:

.legal A/S Store Torv 14, 2. sal 8000 Aarhus C CVR: 40888888

Phone Number: +45 7027 0127 E-mail: <u>hello@dotlegal.com</u>

Contact site

If your complaint is not resolved by us and you want to proceed with the case, you can complain to the Danish Data Protection Agency:

The Danish Data Protection Agency
Carl Jacobsens Vej 35
2500 Valby
CVR: 11883729

Phone Number: +45 3319 3200 E-mail: <u>dt@datatilsynet.dk</u>

Contact site