

Product Privacy Information

3E Privacy Overview

Thomson Reuters has a long history of providing reliable and trustworthy information to our customers. We maintain this reputation through a variety of means, which are supported by a comprehensive privacy program.

This document provides an overview of how Thomson Reuters' 3E handles privacy, and in particular how we protect personal data. It answers questions that our customers often ask to assist in managing their legal, regulatory and business requirements.

What is 3E?

3E is an Enterprise software product primarily provided to legal and professional service firms (customers) to help them with their "work to cash flow" cycle: i.e., the length of time it takes customers to convert resource inputs into cash flows. The product's main purposes are time/work recording and billing management (e.g. generating and circulating invoices, and reporting payments as they come in, purchase-to-pay cycle, and accounting recordkeeping); it also provides some other additional/non-financial services, (e.g. conflict of interest management for taking on new clients).

The product is mainly used by customers' back office (e.g. administrative staff), but is also used to a lesser degree by front office (e.g. fee earners). The product contains fields that allow for personal data (as defined by the GDPR or other applicable privacy laws and regulations) to be input, including some sensitive personal data.

Currently, the product is installed on each customer's premises, and Thomson Reuters only receives personal data from a customer if a copy of the customer's database is provided for support, quality assurance, or testing purposes. However, Thomson Reuters plans for a cloud version of the product to be up and running for US customers in Q4 2017 and worldwide thereafter. This cloud hosted version would be offered in addition to the current on-premise version.

How is personal data used within 3E?

Customers input data into the product, which then uses the data to generate reports to help customers make determinations on that data as they wish.

Role of customers and Thomson Reuters

With respect to processing personal data in 3E, Thomson Reuters acts as a Processor as defined by the GDPR. For the 3E on-premise version, Thomson Reuters only processes data where it is received from a customer for support, quality assurance, or testing purposes.

For the 3E hosted solution, Thomson Reuters will be the Processor for personal data entered into 3E by the customer. Where Thomson Reuters acts as a Processor, the customer is the Controller. In some instances, both you and Thomson Reuters may be identified as Joint Controllers of certain personal data.

For the purposes of the GDPR, customers are Controller of the data they enter into 3E. In instances where you are the Controller, you should ensure that you are aware of, and comply with, any obligations you have as a data controller under applicable laws (including any obligations to use data lawfully and in a proportionate manner). Controllers should provide users with appropriate guidelines and/or training to their employees and data processors ensure that the processing of any

such special categories of data is lawful and proportionate.

What types of personal data flow through 3E?

3E is designed with the following categories of personal data in mind:

- Contact details, such as address, phone number, e-mail address
- User / account names
- Other identification numbers such as employee ID, Insurance/patient ID, Client number, etc.
- Government issued identifiers (e.g., Social Security Numbers, passport details)
- Personal financial records
- Date of Birth
- Mother's maiden name

In addition, the following special or sensitive categories of personal data may be processed:

- Racial or ethnic origin

Who can access personal data?

For the 3E on-premise solution, only the customer may access the personal data stored by the software, and must grant access to any third party (including Thomson Reuters) before that third party may access the personal data.

For the 3E hosted solution, Thomson Reuters limit access to personal data only to its vendors and suppliers, e.g. hosting providers. This may include both third parties and other members of the Thomson Reuters group. Where such access is granted, Thomson Reuters puts in place protections (e.g. contractual or other legally recognized protections) to safeguard the processing of the personal data.

Thomson Reuters occasionally use sub-processors to provide services. A list of the sub-processors that we may use can be found here: www.tr.com/privacy-information.

We may also disclose personal data as required by law or to assert, maintain or defend our legal rights.

Can personal data be accessed outside the EEA?

Thomson Reuters is a global organization that provides 24/7 solutions. In order to do this, we use a global team to provide services, support and maintenance. This means that personal data may be accessed locally from countries outside of the EEA in accordance with applicable laws. For the 3E on-premise solution, Thomson Reuters is only able to access and/or transfer customer personal data when the customer grants permission.

Measures that Thomson Reuters uses for 3E to safeguard the transfer of personal data outside the EEA include:

- Intra-group agreements for data transfers within the Thomson Reuters group of entities
- Model contracts for transfers to entities outside of the Thomson Reuters Group of companies
- Specific Processor clauses for processing outside of Thomson Reuters where we are the Controller

We also ensure that appropriate technical measures are in place to protect data when it is in transit and at while at rest or being stored.

How can Thomson Reuters assist with compliance with individual rights requests?

As data controllers, customers are responsible for complying with any requests received from individuals to exercise rights under data protection laws. We have processes in place to assist 3E customers with adding, amending, or deleting the data that users have entered into 3E.

How long is data retained for?

Customers are responsible for setting, and respecting, appropriate retention periods for the personal data that users have entered into 3E. 3E includes functionality that allows customers to delete data as desired or upon request.

Following the expiry or termination of a customer's contract for 3E, Thomson Reuters returns or deletes information in line with its contractual commitments.

How is personal data secured?

Securing personal data is an important aspect of protecting privacy. Our information security organization applies policies, standards and supporting security controls at the level appropriate to the risk level and the service provided. In addition, appropriate security controls are communicated to application owners and technology teams across the business to support secure development of products and a secure operating environment.

We pay specific attention to the protection of personal data and the risks associated with processing this data. If you would like to know more about our information security management system and the measures we take, please contact your account manager.

We do not agree bespoke security and data protection specifications for customers as the stability and integrity of 3E rely on the standardization of our security and data protection methodologies.

Can customers audit Thomson Reuters?

As the 3E hosted service is a shared service, to safeguard the security and confidentiality of the services and the data provided by users, no individual customer is permitted to carry out an audit. However, at our discretion, we may provide certificates, third party audit reports or other relevant information. For additional details on our information security policies and standards, and the types of independent third party security assessments that are performed, please review contact your account manager.

Personal data breaches

Thomson Reuters implements appropriate measures designed to prevent personal data breaches. These measures are reviewed and updated as necessary to meet changes in regulatory requirements.

More information on how we respond to personal data breaches appears in our customer contracts.

For more information

If you would like to know more about our approach to processing and protecting personal data for 3E, please contact your account manager.

For general questions on how Thomson Reuters deals with privacy, please contact us at privacy.issues@thomsonreuters.com.

General information can also be found at <http://ir.thomsonreuters.com>.