

# Product Privacy Information

## 3E Business Development 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® Business Development® (formerly Business Development Premier) 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 Business Development?

Thomson Reuters 3E Business Development (3E BD) is a CRM solution built on Microsoft Dynamics with integration to a proprietary 3E Business Development Data Engine that automates the CRM database population and update process. The Data Engine not only populates contact and company information, but also colleague relationships, allowing firms to easily identify who-knows-who within their CRM solution. This assists law firms in operating their CRM processes more cost effectively and efficiently. It also ensures that any centralised communications from a law firm to clients are appropriately tailored for those clients. 3E BD's provision of key customer/competitor information and analysis also helps law firms enhance client service and the products delivered by the law firm. 3E BD also assists law firms in widening their client base and operating a more cost effective business, which in turn can assist in delivering value for money to law firm clients.

### How is personal data used within 3E Business Development?

The Data Engine component of 3E BD gathers information from Microsoft Exchange including vcards, calendar appointments, and analyzes the

email logs to deduplicate the information to a single contact record for an individual, and to also determine the relationships between an employee of the company using the system and the external contacts. Within the Data Engine user interface, the end users can view (but not edit) the contact information and relationships. An administrative user can also hide or remove information or apply security in accordance with the requirements of the company using the system.

3E BD also contains certain fields that request/allow for free text input of personally identifiable information (PII). These fields include names, business contact details, client activities (e.g. the fact that a client lunch took place), background company information, educational/employment history and a record of the projects/matters worked on.

The Data Engine component also sends contact and relationship information to the customer relationship management component of the system which is based on Microsoft Dynamics 365 technology. The user interface of Microsoft Dynamics 365 allows for data entry and editing of fields including fields that an organization may interpret as personally identifiable information. The system also provides fields to manage the marketing preferences of an individual. The product also stores contacts' marketing preferences (manually input by users and/or tracked and

recorded by a module called "e-Marketing"), for users to refer to when sending out marketing information/updating relevant mailing lists.

The capabilities of Microsoft Dynamics 365 allow an organization to use and configure the system according to their data management requirements.

## Role of customers and Thomson Reuters

With respect to processing personal data in 3E Business Development, Thomson Reuters acts as a Processor as defined by the GDPR. Where Thomson Reuters acts as a Processor, the customer is the Controller. In some instances, both the customer and Thomson Reuters may be identified as Joint Controllers of certain personal data.

For the purposes of the GDPR, customers are data controller of the data they enter into 3E Business Development. 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 ensure that the processing of any such special categories of data is lawful and proportionate.

## What types of personal data flow through 3E Business Development?

3E Business Development is designed to gather the following categories of personal data regarding your personnel and your clients' and prospective clients' personnel:

- Contact details, such as name, title, organization (employer), address, phone number, e-mail address
- User / account names
- Personal data that may be entered by users into free text fields
- Matters that a person was involved with for the customer
- End-user profiling or behavioral data
- Date of Birth
- Background company information
- Educational history
- Employment history

## Who can access personal data?

We limit the access of personal data for our third parties including vendors, e.g. hosting providers, 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 recognised protections) to safeguard the processing of the personal data.

We 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](http://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 organisation 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 logically from countries outside of the EEA in accordance with applicable laws.

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

- Intra-group agreements for transfers within the Thomson Reuters group of entities
- Model contracts for transfers outside of Thomson Reuters
- 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 rest.

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

As data controllers, our customers are responsible for complying with any requests received from individuals to exercise rights under data protection laws. We have capabilities in place to assist 3E Business Development customers with adding,

amending, or deleting the data that has been entered into 3E Business Development.

## How long is data retained for?

Customers are responsible for setting and respecting appropriate retention periods for the personal data that has been entered into 3E Business Development. 3E Business Development includes functionality that allows you to deactivate data as desired upon your request.

Following the expiry or termination of a customer's contract for 3E Business Development, Thomson Reuters returns and/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 security organisation 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 to bespoke security and data protection specifications for customers as the stability and integrity of 3E Business Development rely on the standardisation of our security and data protection methodologies.

## Can customers audit Thomson Reuters?

As the 3E Business Development 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 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 Business Development, please contact your account manager.

For general questions on how Thomson Reuters deals with privacy, please contact us at [privacy.enquiries@thomsonreuters.com](mailto:privacy.enquiries@thomsonreuters.com).

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