

Product Privacy Information

Infolex 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' Infolex 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 Infolex?

The Infolex product helps customers to manage information about a matter, analyse the information and to share the information with members of their firm/legal department. It is a matter management solution so the customer can organise information and connect Infolex with government systems (e.g. the Spanish government has a system to notify the lawyer about court information). The product can also store economic information about the matter, such as time sheets and billing information. The result is that Infolex enables legal teams to be more efficient.

How is personal data used within Infolex?

Customers/lawyers add information to Infolex manually in a new matter, and can upload documentation in many formats. Customer/lawyer can connect through a web service to the government and download documentation of the matter to Infolex through the government's web service. There are different screens on the Infolex interface to view information, to produce reports, to send emails to other lawyers or to the customer. PII is uploaded to Infolex by the customer through free text boxes and relevant documents. TR does not upload any information to this product. All information stored on Infolex is uploaded by the customer firms. Data subjects can be anyone involved with the relevant matter (e.g. the law firm's client, the counterparties and court personnel). Data can be uploaded to Infolex via data fields and free

text or included in uploaded documents (e.g. court filings, submissions, advice notes, work in progress, etc.). As a result, there are many different types of PII (and Sensitive PII) that could be stored on Infolex, depending on the case being worked on by the customer firm.

Role of customers and Thomson Reuters

With respect to processing personal data in Infolex, Thomson Reuters acts as a Processor as defined by the GDPR. Where Thomson Reuters acts as a Processor, you are the Controller. In some instances, both you and Thomson Reuters may be identified as Joint Controllers of certain personal data.

For the purposes of EU data protection laws, customers are data controller of the data they enter into Infolex. In instances where you are the Controller, you should ensure that you are aware of, and comply with, any obligations they 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 Infolex?

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

- Contact details, such as address, phone number, e-mail address
- User / account names
- Gender
- Logs of internet usage / system usage (e.g. IP address, log-on/off, user actions, websites)
- Personal data that may be entered into free text fields
- End user preferences or product customization
- Date of Birth

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

- Racial or ethnic origin
- Religious or philosophical beliefs
- Health information
- Criminal convictions/offences including register thereof
- Political opinions
- Sexual life or sexual orientation
- Trade union membership
- Personal financial records

Who can access personal data?

We limit access to personal data only to our 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 and preserve the confidentiality and integrity 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.

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 logically from countries outside of the EEA in accordance with applicable laws.

Measures that Thomson Reuters uses for Infolex 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 processes in place to assist Infolex customers with adding, amending, or deleting the data that users have entered into Infolex.

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 Infolex. Infolex includes functionality that allows you to delete data as desired or upon your request.

Following the expiry or termination of a customer's contract for Infolex, 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 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 ask your account manager for additional information.

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

Can customers audit Thomson Reuters?

As the Infolex 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 ask 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 Infolex, please contact your account manager.

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