

# Product Privacy Information

## Legal Tracker 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' Legal Tracker 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 Legal Tracker?

Legal Tracker is the #1 system for matter management, e-billing performance, and analytics.

Legal Tracker is a legal department management system that features powerful matter management, e-billing and reporting functionality. Suitable for departments of all sizes, the online platform provides in-house legal teams with greater visibility over their legal work and transparency over costs.

Legal Tracker provides a variety of benefits to in-house customers, including giving them greater workflow and costs visibility that in turn helps them with strategic decision-making and ensuring 'value for money' for their organisation. The product's e-billing capability benefits law firms by shortening their billing cycles and therefore improving cashflow; and its Worldwide Directory feature provides the opportunity to market services to thousands of corporate Legal Tracker users.

### How is personal data used within Legal Tracker?

(1) **Standard Personal Data** is used in the following scenarios:

(a) Law Firm Engagement - law firm users' email addresses, roles, office addresses, charge-out rates and professional experience (it may include, for example the legal bar identification number for a US lawyer) are stored to help in-house counsel select a firm to engage on a particular matter.

(b) Budgeting and billing - in-house and law firm users' name and address data is used for drafting/addressing invoices and paying bills. Users can also record the number of hours a lawyer has worked, plus lawyer narratives for relevant matters.

(c) Worldwide Directory - law firms are listed in Legal Tracker's Worldwide Directory (a searchable database of e-billing enabled law firms), for other users to refer to and contact at their discretion. Information in the directory includes lead counsel name, business contact details (email address and office address), and professional background (e.g. employment history, significant transactions, publications and education).

(d) End user preferences for product customisation - IP address, type of browser used, frequency and duration of visits, and login information may be collected to help Thomson Reuters improve the way the service is provided.

(e) Other - customers can also use the product to upload documents to share with law firms working on a particular matter, e.g. draft contracts or supporting documentation for a sale/merger.

(2) **Sensitive Personal Data:** Thomson Reuters is aware that certain companies using the product may require law firms to provide legal team-member ethnicity and gender information according to their inclusion and diversity policies.

### Role of customers and Thomson Reuters

With respect to processing personal data in Legal Tracker, Thomson Reuters acts as a Processor as defined by the GDPR. Where Thomson Reuters acts as a Processor, the customer is the Controller.

For the purposes of EU data protection laws, customers are Data Controllers of the data they enter into Legal Tracker. In instances where customers are the Controller, customers should ensure that they are aware of, and comply with, any obligations they may have as a Data Controller under applicable laws (including any obligations to use data lawfully and in a proportionate manner). Data 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 Legal Tracker?

Legal Tracker 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.
- 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

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

- Racial or ethnic origin

## Who can access personal data?

Thomson Reuters, in general, limits access to personal data only to our affiliates, 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.

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 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.

Legal Tracker has only four global instances, located in the United States, the United Kingdom, Canada and Australia. Data entered into Legal Tracker resides in the global instance selected by the customer and is not accessed by Thomson Reuters employees unless specifically requested by the customer, for example for support purposes.

Measures that Thomson Reuters uses for Legal Tracker 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 by sub-processors.

Thomson Reuters also ensures 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 Legal Tracker customers with adding, amending, or deleting the data that users have entered into Legal Tracker.

## 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 Legal Tracker. Legal Tracker includes functionality that allows customers to delete personal data as desired or upon request.

Following the expiry or termination of a customer's contract for Legal Tracker, 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 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 Legal Tracker rely on the standardization of our security and data protection methodologies.

## Can customers audit Thomson Reuters?

As the Legal Tracker 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. For additional details on our information security policies and standards, and the types of independent third party security assessments that are performed, 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 Legal Tracker, 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>.