

## CreateiQ Privacy Notice

Effective from 30 September 2024

# Linklaters | CreateiQ

Linklaters LLP  
One Silk Street  
London EC2Y 8HQ

Telephone (+44) 20 7456 2000  
Facsimile (+44) 20 7456 2222

# Contents

Background.....	1
What personal data we collect about you .....	2
How we obtain your personal data .....	2
How we use cookies .....	2
How and on what basis we use your personal data .....	2
How we use your personal data for marketing .....	4
How long we retain your personal data .....	4
Who we share your personal data with.....	5
How we protect your personal data .....	5
What countries we transfer your personal data to .....	6
Your rights regarding your personal data.....	6
Who are the data controllers.....	7
Changes to our Notice .....	7
Who to contact with concerns or complaints .....	7

## Background

CreateiQ by Linklaters is an innovative contract lifecycle platform that facilitates the creation, negotiation, and execution of contracts online in a simple and secure manner. At CreateiQ, we prioritise your privacy and are committed to safeguarding your personal data.

This Privacy Notice (“Notice”) details CreateiQ’s privacy practices, explaining how we may gather information from you through the [CreateiQ platform](#) and [website](#), and other websites we may operate periodically.

In addition to our Notice, your use of CreateiQ platform and websites is subject to the terms and conditions of our [Legal Notices](#).

References in this Notice to “**Linklaters**”, “**CreateiQ**”, “**we**”, “**us**” or “**our**” are references to Linklaters LLP and the other “**Linklaters BCR Group Entities**” (as defined in and listed in schedule 2 of our Binding Corporate Rules (“**BCRs**”), which can be found in the Linklaters [Global Data Protection Standards](#). CreateiQ is part of Linklaters Business Services, which is a service entity established under English law whose registered office is at One Silk Street, London EC2Y 8HQ, England.

## What personal data we collect about you

Personal data refers to information that identifies you. We gather this data from you during our business activities, including when you use CreateiQ.

The personal data that we process includes:

- **Basic data:** such as your full name (including prefix or title), the company you work for, and your title or position.
- **Contact data:** such as your email address and contact number.
- **Data about your preferences:** in relation to CreateiQ.
- **Technical data:** such as how you access and use the platform, your IP address, login data, browser type and version, time zone settings and location, browser plug-in types and versions, operating system and platform, and other technology on the devices you are using.

Before providing us with data about someone else, you must have the required permissions to share this data for the purposes outlined in this Notice.

If you fail to provide us with personal data, we may not be able to offer you our products or services.

## How we obtain your personal data

- **When you complete the registration form for a free trial or demonstration**, or when you register to use CreateiQ in any other way.
- **During your use of CreateiQ**, including all the data you submit through our website and the materials you upload to CreateiQ.
- **When you update your preferences**, such as subscribing to website alerts.
- **When you contact us directly** by emailing [support@createiq.tech](mailto:support@createiq.tech).
- **While we monitor the usage** of CreateiQ.
- **When you provide us with data through direct communications**, such as when interacting with our staff.
- We may also gather personal data from **third-party sources and information that is publicly available**.

## How we use cookies

We use cookies on our website. To find out more about our use of cookies and how to disable them please view our [cookie notice](#).

## How and on what basis we use your personal data

We have set out below, in a table format, a description of how and on what legal basis we use your personal data. Where appropriate, we have also identified our legitimate interests in processing your personal data.

Purpose and/or activity	Legal basis for processing
To deliver client and visitor services to you, including (among others) to provide you client services, technology solutions, access to our website.	<ul style="list-style-type: none"> <li>• Performance of a contract.</li> <li>• Legal or regulatory obligation.</li> <li>• Legitimate interests: Ensuring that you are provided with the best client services and visitor services we can offer, and securing a prompt payment of any fees, costs and debts in respect of our services.</li> </ul>
To manage our relationship with you which will include notifying you about changes to our terms of business or this Notice.	<ul style="list-style-type: none"> <li>• Performance of a contract.</li> <li>• Legal or regulatory obligation.</li> <li>• Legitimate interests: Ensuring we can notify you about changes to our terms of business or this Notice.</li> </ul>
To invite you to take part in marketing or other promotional events, or seminars or similar events, and to manage your participation in them.	<ul style="list-style-type: none"> <li>• Legitimate interests: Ensuring our client records are up to date, promoting our client services and visitor services, receiving feedback, improving our services and identifying ways to grow our business.</li> </ul>
To send you marketing (including paper and electronic marketing communications) or to contact you by other means to offer you our client services or visitor services.	<ul style="list-style-type: none"> <li>• Legitimate interests: Promoting our client services and visitor services, identifying ways to grow our business.</li> </ul>
To ask you for feedback (for instance, in a survey) about our client services or visitor services, and to manage, review and act on the feedback we are getting.	<ul style="list-style-type: none"> <li>• Legitimate interests: Reviewing how clients use, and what they think of, our client services and visitor services, improving them and identifying ways to grow our business.</li> </ul>
To interact with governmental or regulatory bodies or other authorities in relation to you.	<ul style="list-style-type: none"> <li>• Performance of a contract.</li> <li>• Legal or regulatory obligation.</li> <li>• Public interest.</li> </ul>

Purpose and/or activity	Legal basis for processing
To manage and protect our business, including improving data security, troubleshooting data and systems, system maintenance and testing, and data hosting.	<ul style="list-style-type: none"> <li>• Legal or regulatory obligation.</li> <li>• Legitimate interests: Ensuring the efficient and secure running of our business, including through office and facilities administration, maintaining information technology services, network and data security, fraud prevention and improving or reorganising our infrastructure or the Linklaters group.</li> </ul>
To audit and monitor the use of the CreateiQ website and platform.	<ul style="list-style-type: none"> <li>• Legitimate interests: Improving and ensuring security of our products and services.</li> <li>• Consent: In relation to our use of certain cookies.</li> </ul>
<p>To share information about individual use of CreateiQ to the organisation that has paid for the subscription for the platform.</p> <p>The organisation receiving the data will be responsible for ensuring the use of the data complies with Data Protection Law.</p>	<ul style="list-style-type: none"> <li>• Legitimate interest: For the organisation who pays to the subscription to understand who is using the platform and how it is used.</li> </ul>
To fulfil our legal, regulatory and risk management obligations including, exercising or defending legal claims.	<ul style="list-style-type: none"> <li>• Legitimate interest: Ensuring that we can mitigate risks, protect our reputation and comply with our legal obligations.</li> <li>• Legal and regulatory obligations.</li> </ul>

Please contact us at [data.protection@linklaters.com](mailto:data.protection@linklaters.com) if you need details about the specific legal basis we are relying on to process your personal data where more than one ground has been set out in the table above.

## How we use your personal data for marketing

We will not use your personal data to send you marketing materials if you have requested not to receive them. If you request that we stop processing your personal data for marketing purposes, we will stop.

We would encourage you to make such requests via the forms and links provided for that purpose in the marketing materials we send you or by contacting our Marketing team at [hello@createiq.tech](mailto:hello@createiq.tech). You may alternatively make any such request to the data privacy manager by emailing [data.protection@linklaters.com](mailto:data.protection@linklaters.com).

## How long we retain your personal data

Your personal data will be retained according to Linklaters' Global Retention Policy. This policy specifies the appropriate retention period for all data held by us, in line with applicable laws. We

always retain data for the minimum period necessary, based on the reasons for which the data is collected and used. We take into account legal and regulatory requirements for minimum retention periods, limitation periods for taking action, best practices, and Linklaters' business purposes.

If you would like to know more about the retention periods, we apply to your personal data please contact [data.protection@linklaters.com](mailto:data.protection@linklaters.com).

## **Who we share your personal data with**

We may have to share your personal data with the entities and persons set out below for the purposes for which we collected your personal data.

Your personal data may be shared within Linklaters between the Linklaters BCR Group Entities (which are listed in schedule 2 of our BCRs, accessible on the Linklaters [Global Data Protection Standards](#)). As a legal tech platform developed by an international firm, we support the efficient operation of CreateiQ (for instance, to ensure that adequate customer support is available when needed) and to provide the highest quality of client services by sharing your personal data within Linklaters offices in accordance with our BCRs. Your commercial data is not shared in this way.

We may also share your personal data with the International Swaps and Derivatives Association (ISDA) and S&P Global in accordance with the governance of our working partnerships and integrations. We only do so under the following conditions: when there is a legal obligation, or when we are satisfied that there is a legitimate business need to share the personal data. In all cases, appropriate checks and safeguards are implemented to ensure the data is shared and protected in accordance with our data protection obligations.

Where required we will disclose your personal data to:

- Any person or entity to whom we are required or requested to make such disclosure by any court of competent jurisdiction or by any governmental, taxation or other regulatory authority, law enforcement agency or similar body.
- Our professional advisers or consultants, including lawyers, bankers, auditors, accountants and insurers providing consultancy, legal, banking, audit, accounting or insurance services to us.
- Any financial institutions providing finance to us.
- Service providers who provide information technology and system administration services to us; and
- Any external auditors who may carry out independent checks of your file as part of our accreditations.

## **How we protect your personal data**

We implement appropriate technical and organisational measures to ensure a level of security appropriate to the risk of processing, including:

- Pseudonymisation and encryption of personal data.
- The ability to ensure the ongoing confidentiality, integrity, availability and resilience of processing systems and services.

- The ability to restore the availability and access to personal data in a timely manner in the event of a physical or technical incident
- A process for regularly testing, assessing and evaluating the effectiveness of technical and organisational measures for ensuring the security of the processing.
- We ensure that those who have permanent or regular access to personal data, or that are involved in the processing of personal data, or in the development of tools used to process personal data, are trained and informed of their rights and responsibilities when processing personal data.

## **What countries we transfer your personal data to**

When we share your personal data within Linklaters LLP, this may involve transferring your personal data outside the European Economic Area ("EEA"). Your personal data is shared in accordance with our BCRs, which require all Linklaters entities to follow the same rules when processing your personal data. A copy of our BCRs is accessible on our website in the [Global Data Protection Standards](#). Alternatively, you can request a copy of our BCRs at any time by contacting us at [data.protection@linklaters.com](mailto:data.protection@linklaters.com).

In some cases, the parties who we use to process personal data on our behalf are based outside the EEA. Where this is the case, we will only share the minimal amount of personal data necessary for the purpose of processing and, where possible, we will share the personal data in an anonymised form. Whenever we transfer your personal data out of the EEA, we ensure a similar degree of protection is afforded to it by ensuring at least one of the following safeguards is implemented:

- Where we use certain service providers, we may use specific contracts approved by the European Commission which gives personal data the same protection it has within the EEA; and
- Where we use providers based in the US, we may transfer personal data to them if they are certified under the EU-U.S. Data Privacy Framework and the UK Extension to the EU-U.S. The Data Privacy Framework requires certified providers to have in place and maintain a similar level of protection to the personal data as if it was processed within the EEA.

Please contact us at [data.protection@linklaters.com](mailto:data.protection@linklaters.com) if you would like further information about the specific mechanism used by us when transferring your personal data out of the EEA.

## **Your rights regarding your personal data**

Under Data Protection Law you have certain rights in relation to your personal data. It is our policy to respect your rights, and we will act promptly and in accordance with any applicable law, rule or regulation relating to the processing of your personal data.

Details of your rights are set out below:

- Right to be informed about how personal data is used.
- Right to access personal data.
- Right to have inaccurate personal data rectified.
- Right to have personal data erased in certain circumstances.
- Right to restrict processing of personal data in certain circumstances.

- Right to data portability.
- Right to object to processing of personal data in certain circumstances including where personal data is used for marketing purposes.
- Right not to be subject to automated decisions where the decision produces a legal effect or a similarly significant effect.

You may exercise any of your rights by contacting the:

Data Privacy Manager  
Linklaters LLP, One Silk Street, London EC2Y 8HQ  
Email: [data.protection@linklaters.com](mailto:data.protection@linklaters.com)  
Telephone: (+44) 20 7456 2000

You will not have to pay a fee to access your personal data (or to exercise any of the other rights). However, we may charge a reasonable fee if your request is clearly unfounded, repetitive or excessive. Alternatively, we may refuse to comply with your request in these circumstances.

We may need to request specific information from you to help us confirm your identity and ensure your right to access your personal data (or to exercise any of your other rights). This is a security measure to ensure that personal data is not disclosed to any person who has no right to receive it. We may also contact you to ask you for further information in relation to your request to speed up our response.

We try to respond to all legitimate requests within one calendar month. Occasionally it may take us longer than one calendar month if your request is particularly complex or you have made a number of requests. In this case, we will notify you and keep you updated.

## **Who are the data controllers**

Unless we notify you otherwise Linklaters Business Services is the controller for your personal data.

## **Changes to our Notice**

Any changes will be uploaded to this page and where appropriate, notified to you by email. The Notice will take effect as soon as it has been updated or otherwise communicated to you. This was last updated on 30 September 2024. Any prior versions of this notice can be obtained by contacting us at [support@createiq.tech](mailto:support@createiq.tech).

## **Who to contact with concerns or complaints**

If you have any concerns or would like to make a complaint about our processing of your personal data, please refer to our Global Data Protection Complaints Procedure, which is available on the privacy section of the Linklaters website at [www.linklaters.com/en/legal-notices/privacy-portal](http://www.linklaters.com/en/legal-notices/privacy-portal). You may raise your concerns with your local data protection authority directly, without going through our Global Data Protection Complaints Procedure. However, we would encourage you to contact us in the first instance as we aim to promptly, efficiently, and satisfactorily resolve any concerns or complaints you may have in relation to Linklaters' processing of your personal data.