

Aspirant Analytics

Privacy Policy - For Featured Lawyers in Pirical Legal Professionals

1. Introduction

This Privacy Policy (the “Policy”) explains how Aspirant Analytics, with an operating name of Pirical (“we”, “us”, “our”) may process your Personal Data for the purpose of using our Services. This Policy may be amended or updated from time to time to reflect changes in our practices with respect to the Processing of Personal Data, or changes in applicable law. Defined terms are given the meaning in Section 15.

2. Aspirant Analytics, the Controller and Data Protection Officer

2.1. Aspirant Analytics is a limited company registered in England and Wales (Company Number 08406864) whose registered office is 20-22 Wenlock Road, London, N1 7GU, United Kingdom.

2.2. For the purposes of this Policy, Aspirant Analytics is the Controller.

2.3. Many of the capitalised terms used in the Policy derive their meaning from defined terms in applicable data privacy law and we use those terms in the same way as they are used in applicable data privacy law. The definitions of the terms which are capitalised in this Policy are in Section 15 below. If you have any comments, questions or concerns about any of the information in this Policy, or any other issues relating to the Processing of Personal Data carried out by us, or on our behalf, please contact our Data Protection Officer:

Hok-Him Poon
Aspirant Analytics
20-22 Wenlock Road
London, N1 7GU
United Kingdom
hokhim@aspirantanalytics.com

3. Collection of Personal Data

Summary – Collection of Personal Data

We may collect or obtain Personal Data about you: when you make your Personal Data public (e.g., through your employer’s website or if you make a public post on social media or public networking sites). We may also receive Personal Data about you from third parties (e.g., press agencies and regulatory bodies).

We may collect Personal Data about you from the following sources:

- 3.1. Data you make public: we may collect or obtain your Personal Data that you manifestly choose and/or consent to make public, including via social media, employer websites, regulatory bodies, press agencies, etc.
- 3.2. Third party information: we may collect or obtain your Personal Data from third parties who provide it to us (e.g., press agencies, regulatory bodies etc.).

4. Processing of Personal Data

Summary – Processing of Personal Data

We may Process: your personal details (e.g., your name); your contact details (e.g., your office phone and office email address); and details of your employer (where relevant); and any views, information or opinions you have made public.

We may Process the following categories of Personal Data about you:

- 4.1. Personal details: given name(s); title, name and position;
- 4.2. Contact details: office correspondence address; office telephone number; office email address;
- 4.3. Employer details: the name, address, telephone number and email address of your employer, to the extent relevant;
- 4.4. Professional Qualifications, Memberships and Regulatory Status: your degree, professional qualifications and any other details to your professional standing, or regulated status;
- 4.5. Views and opinions: any views and opinions that you have made public via social media platforms, employer websites, regulatory bodies, press agencies, etc.

5. Lawful Basis for Processing of Personal Data

Summary – Lawful basis for Processing Personal Data

We may Process your Personal Data where we have a valid legitimate interest in the Processing for the purpose of managing, operating or promoting our business, and that legitimate interest is not overridden by your interests, fundamental rights, or freedoms.

- 5.1. In Processing your Personal Data in connection with the purposes set out in this Policy, the legal basis on which we rely is legitimate interests. We may Process your Personal Data where we have a legitimate interest in carrying out the Processing for the purpose of managing, operating or promoting our business, and that legitimate interest is not overridden by your interests, fundamental rights, or freedoms. When we process your Personal Information for our legitimate interests, we make sure to consider and balance any potential impact on you (both positive and negative), and your rights under data protection legislation. Our legitimate interests do not automatically override your interests - we will not use your Personal Data for activities where our interests are overridden by the impact on you (unless we have your consent or are otherwise required or permitted to by law).
- 5.2. If you have any concerns about our Processing you have the right to object to Processing that is based on our legitimate interests. For more information on your rights, please see “Your Legal Rights” at Section 16 below.

6. Purposes for which we may Process your Personal Data

Summary – Purposes for which we may Process your Personal Data

We may Process your Personal Data for the following purposes: operating our Sites, Software and Services; communicating with you; managing our IT systems; ensuring the security of our systems; conducting investigations where necessary; compliance with applicable law; and improving our Sites, Software, and Services.

The purposes for which we may Process Personal Data, subject to applicable law, include:

- 6.1. Our Sites, Software and Services: operating and managing our Sites, Software and Services;
- 6.2. Communications: communicating with you via any means (including via email, telephone, text message, social media, post or in person) news items, new Software and Services and other information in which you may be interested, subject to ensuring that such communications are

- provided to you in compliance with applicable law; maintaining and updating your contact information where appropriate; and obtaining your prior, opt-in consent where required;
- 6.3. Communications and IT operations: management of our communications systems; operation of IT security systems; and IT security audits;
 - 6.4. Security: electronic security (including login records and access details);
 - 6.5. Investigations: detecting, investigating and preventing breaches of policy, and criminal offences, in accordance with applicable law;
 - 6.6. Legal proceedings: establishing, exercising and defending legal rights;
 - 6.7. Legal compliance: compliance with our legal and regulatory obligations under applicable law; and/or
 - 6.8. Improving our Sites, Software, Services: identifying issues with our Sites, our Software, or our Services; planning improvements to our Sites, our Software, or our Services; and creating new Sites, Software, or Services.

7. Sensitive Personal Data

Summary – Sensitive Personal Data

We do not seek to collect or otherwise Process your Sensitive Personal Data.

We do not seek to collect or otherwise Process your Sensitive Personal Data in the ordinary course of our business.

8. Disclosure of Personal Data to third parties

Summary – Disclosure of Personal Data to third parties

We may disclose your Personal Data to our customers (e.g. recruitment agencies and in-house recruiters) for legitimate business purposes (including operating and providing our Sites, Software and Services to our customers in accordance with applicable law. In addition, we may disclose your Personal Data to: legal and regulatory authorities; our external advisors; our Processors; any party as necessary in connection with legal proceedings; any party as necessary for investigating, detecting or preventing criminal offences; any purchaser of our business.

We may disclose your Personal Data to other entities within the Aspirant Analytics group of companies, to our customers (e.g. recruitment agencies and in-house recruiters) for legitimate business purposes (including operating and providing our Sites, Software and Services to our customers in accordance with applicable law. In addition, we may disclose your Personal Data to:

- 8.1. legal and regulatory authorities, upon request, or for the purposes of reporting any actual or suspected breach of applicable law or regulation;
- 8.2. accountants, auditors, lawyers and other outside professional advisors to Aspirant Analytics, subject to binding contractual obligations of confidentiality;
- 8.3. third party Processors (such as payment services providers or other providers of services to us located anywhere in the world). These third party Processors are required to Process your Personal Data to carry out the provision of service to us. However, we will enter into a written agreement which will impose obligations on the service provider to protect your Personal Data and not to Process it except in accordance with our instructions and subject to applicable laws or regulations;
- 8.4. any relevant party, law enforcement agency or court, to the extent necessary for the establishment, exercise or defence of legal rights;
- 8.5. any relevant party where we are obliged to do so in connection with prevention, investigation, detection or prosecution of criminal offences or the execution of criminal penalties, including safeguarding against and the prevention of threats to public security; and/or
- 8.6. any relevant third party acquirer(s), in the event that we sell or transfer all or any relevant portion of our business or assets (including in the event of a reorganization, dissolution or liquidation).

9. International Transfer of Personal Data

We may transfer your Personal Data within Aspirant Analytics, and to third parties as noted in Section 8, in connection with the purposes set out in this Policy. We may transfer your Personal Data for such reasons to other countries that are considered to be Adequate Jurisdictions - please note, this may mean these countries have different laws and data protection compliance requirements to those that apply in the country in which you are located.

10. Data Accuracy

We take reasonable steps to ensure that:

- 10.1. your Personal Data that we Process are accurate and, where necessary, kept up to date; and
- 10.2. any of your Personal Data that we Process that are inaccurate (having regard to the purposes for which it is Processed) is erased or rectified without delay.

From time to time we may ask you to confirm the accuracy of your Personal Data.

11. Data Minimisation

We take reasonable steps to ensure that your Personal Data that we Process are limited to the Personal Data reasonably necessary in connection with the purposes set out in this Policy.

12. Data Retention

We take every reasonable step to ensure that your Personal Data is only Processed for the minimum period necessary for the purposes set out in this Policy. However, the period of time for which we hold your Personal Data will vary depending upon the type of information and the reason why we Process it.

The criteria for determining the duration for which we will keep your Personal Data are as follows: we will retain copies of your Personal Data in a form that permits identification only for as long as is necessary in connection with the purposes set out in this Policy, unless applicable law requires a longer retention period. In particular, we may retain your Personal Data for the duration of any period necessary to establish, exercise or defend any legal rights.

13. Your Legal Rights

Summary – Your legal rights

Under applicable law, you may have a number of rights, including: the right not to provide your Personal Data to us; the right of access to your Personal Data; the right to request rectification of inaccuracies; the right to request the erasure, or restriction of Processing, of your Personal Data; the right to object to the Processing of your Personal Data; the right to have your Personal Data transferred to another Processor; the right to withdraw consent; and the right to lodge complaints with Data Protection Authorities. We may require proof of your identity before we can give effect to these rights.

Subject to applicable law, you may have a number of rights regarding the Processing of your Relevant Personal Data, including:

- 13.1.the right not to provide your Personal Data to us;
- 13.2.the right to request access to, or copies of, your Relevant Personal Data, together with information regarding the nature, Processing and disclosure of those Relevant Personal Data;
- 13.3.the right to request rectification of any inaccuracies in your Relevant Personal Data; 1
- 13.4.the right to request, on legitimate grounds:
 - 13.4.1. erasure of your Relevant Personal Data; or
 - 13.4.2. restriction of Processing of your Relevant Personal Data;
- 13.5.the right to object, on legitimate grounds, to the Processing of your Relevant Personal Data by us or on our behalf;
- 13.6.the right to have certain Relevant Personal Data transferred to another Processor, in a structured, commonly used and machine-readable format, to the extent applicable;
- 13.7.where we Process your Relevant Personal Data on the basis of your consent, the right to withdraw that consent (noting that such withdrawal does not affect the lawfulness of any Processing performed prior to the date on which we receive notice of such withdrawal, and does not prevent the Processing of your Personal Data in reliance upon any other available legal bases); and
- 13.8.the right to lodge complaints with a Data Protection Authority regarding the Processing of your Relevant Personal Data by us or on our behalf. This does not affect your statutory rights.

14. Exercising Your Legal Rights

To exercise one or more of the legal rights in Section 13, or to ask a question about these rights or any other provision of this Policy, or about our Processing of your Personal Data, please contact our Data Protection Officer whose details are provided in Section 2.3. Please note that:

- 14.1.we may require proof of your identity before we can give effect to these rights; and
- 14.2.where your request requires the establishment of additional facts (e.g., a determination of whether any Processing is non-compliant with applicable law) we will investigate your request reasonably promptly, before deciding what action to take.

15. Definitions

- **“Adequate Jurisdiction”** a jurisdiction that has been formally designated by the European Commission as providing an adequate level of protection for Personal Data.
- **“Controller”** means the entity that decides how and why Personal Data are Processed. In many jurisdictions, the Controller has primary responsibility for complying with applicable data protection laws.
- **“Data Protection Authority”** means an independent public authority that is legally tasked with overseeing compliance with applicable data protection laws.
- **“Personal Data”** means information that is about any individual, or from which any individual is directly or indirectly identifiable, in particular by reference to an identifier such as a name, an identification number, location data, an online identifier or to one or more factors specific to the physical, physiological, genetic, mental, economic, cultural or social identity of that individual.
- **“Process”, “Processing” or “Processed”** means anything that is done with any Personal Data, whether or not by automated means, such as collection, recording, organisation, structuring, storage, adaptation or alteration, retrieval, consultation, use, disclosure by transmission, dissemination or otherwise making available, alignment or combination, restriction, erasure or destruction.
- **“Processor”** means any person or entity that Processes Personal Data on behalf of the Controller (other than employees of the Controller).
- **“Relevant Personal Data”** means Personal Data in respect of which we are the Controller. It expressly does not include Personal Data of which we are not the Controller.

- “**Services**” means the services provided under any applicable agreement between Us and our clients/customers which includes use of our Sites and/or Software.
- “**Sensitive Personal Data**” means Personal Data about race or ethnicity, political opinions, religious or philosophical beliefs, trade union membership, physical or mental health, sexual life, any actual or alleged criminal offences or penalties, national identification number, or any other information that may be deemed to be sensitive under applicable law.
- “**Software**” means any application, software or platform made available by us (including where we make such applications available *via* third party stores or marketplaces, or by any other means).
- “**Site**” means any website operated, or maintained, by us or on our behalf.