

PRIVACY POLICY

For individuals featured in Pirical Legal Professionals

Version 2.2 | Effective 19 August 2026 | Supersedes the policy dated 4 June 2020

1. About this policy

- 1.1. Pirical maintains Pirical Legal Professionals, a database of legal professionals compiled from publicly available information. If you are a lawyer whose professional details appear in Pirical Legal Professionals, this policy explains what information we hold about you, where we obtained it, what we do with it, and the rights you have.
- 1.2. This policy applies wherever you are located. It includes specific provisions for individuals in Australia, in the United Kingdom and in the European Economic Area, which are identified where they apply.
- 1.3. A separate privacy policy applies to our customers, to visitors to our websites and to our own personnel. This policy concerns only individuals featured in Pirical Legal Professionals.
- 1.4. We may update this policy from time to time. The version number and effective date above will change when we do.

2. Who we are and how to contact us

- 2.1. Pirical Legal Professionals is operated by Aspirant Analytics Limited, a company registered in England and Wales with company number 08406864, whose registered office is at 20-22 Wenlock Road, London, N1 7GU, United Kingdom, trading as Pirical ("Pirical", "we", "us").
- 2.2. Pirical is the data controller of your personal data for the purposes of the UK GDPR and the EU GDPR.
- 2.3. Australia. Pirical carries on business in Australia and has an Australian link for the purposes of section 5B of the Privacy Act 1988 (Cth) (the "Privacy Act"). We are an APP entity and we comply with the Australian Privacy Principles ("APPs"). We do not rely on the small business operator exemption in section 6D of the Privacy Act.
- 2.4. You can contact our Privacy Officer about anything in this policy, or to exercise any of your rights, at:
 - Email: support@pirical.com
 - Post: Privacy Officer, Pirical, 20-22 Wenlock Road, London, N1 7GU, UK
- 2.5. This policy is our APP privacy policy for the purposes of APP 1.3, and is available free of charge on request in an alternative format.

3. Dealing with us anonymously

- 3.1. You may contact us with a general question about this policy, or about how we handle personal information, without identifying yourself or by using a pseudonym.
- 3.2. We will need to identify you if you ask us to give you access to the information we hold about you, or to correct or remove it, because we cannot locate your record otherwise. We will ask only for the information we need in order to do that.

4. What information we hold about you

- 4.1. We hold professional information about you. Depending on what is publicly available, this may include:
- Your name and professional identity: your name, title and any post-nominals.
 - Your role: your job title, seniority, practice area, sector focus and the office in which you are based.
 - Your employer: the name and location of the firm or organisation you work for, and your work history, including previous employers and the dates of your moves between them.
 - Your professional contact details: the email address, telephone number and office address published for you in a professional context. Where your employer has published a mobile number for you, this may include that number.
 - Your qualifications and regulatory status: your law degree and other qualifications, your year of qualification or admission, and your standing on a public register of legal practitioners.
 - Your professional association memberships, where you or your employer have published them. Section 6 explains how we treat these.
 - A photograph, where your employer or you have published one on a professional profile.
 - Publicly reported professional activity: recognition in legal directories, reported transactions or matters, and professional commentary you have published.
- 4.2. We hold only contact details that have been published for you in a professional context. We do not hold your home address, your date of birth, your personal email address, your salary, your performance information or any information about your private life.
- 4.3. If you would rather we did not hold a particular detail, such as a telephone number or a photograph, tell us and we will remove it from your profile and will not reinstate it. We do not charge for this and we will act on your request within 30 days.

5. Where we obtain your information

- 5.1. We collect your information from publicly available sources rather than from you. These sources include:
- the website of the firm or organisation you work for;
 - public registers maintained by legal regulators and admitting authorities;
 - professional networking profiles and other professional information you have chosen to make public;
 - legal directories, the legal press and other published sources; and
 - third-party information providers.
- 5.2. We do not collect your information from you directly. We hold information about a large number of legal professionals, and contacting each individual to ask for the professional information they have already published would be impracticable and would be more intrusive than relying on what is already public. This is the basis on which we rely for the

purposes of APP 3.6 and, for individuals in the United Kingdom and the European Economic Area, Article 14 of the UK GDPR and the EU GDPR.

- 5.3. You are not obliged to provide us with any information. If information about you is not available publicly, we will not hold it.

6. Sensitive information

- 6.1. We do not seek out, infer or derive information about your racial or ethnic origin, your political opinions or membership of a political association, your religious or philosophical beliefs, your membership of a trade union, your sexual orientation, your health, your genetic characteristics or any criminal record. We hold no field for any of those characteristics, we do not analyse, categorise, score or search our records by reference to them, and we do not use them for any purpose.
- 6.2. We do not create biometric templates and we do not apply facial recognition or any other form of automated image analysis to profile photographs. Where a photograph appears on your profile it is there to help our customers identify the right person, and for no other purpose.
- 6.3. We do record your membership of professional associations relevant to legal practice, where you or your employer have published it, because it forms part of your professional profile. Under the Privacy Act this is sensitive information. We record only what has been published in a professional context, we do not seek it out from private sources, and we do not use it for any purpose other than those described in section 7.
- 6.4. Your admission to practise, and your standing on a public register of legal practitioners, is a regulatory status conferred by a court or regulator rather than membership of an association. We record it as such.
- 6.5. If you would prefer that we did not record your professional association memberships, tell us and we will remove them from your profile and will not reinstate them. We do not charge for this and we will act on your request within 30 days.

7. What we use your information for

- 7.1. We make Pirical Legal Professionals available to our customers, which are law firms, in-house legal teams, recruitment agencies and professional services organisations. They use it to understand the legal market, to map the make-up of firms and practice areas, to identify legal professionals who may be suitable for a role, and to identify legal professionals they may wish to contact about their own products, services or events. Section 9 explains what that means for you and how you can opt out.
- 7.2. We use your information to:
- compile and maintain Pirical Legal Professionals and make it available to our customers, including for the business development and marketing purposes described in section 9;
 - keep the information we hold about you accurate and up to date;
 - produce aggregated and de-identified analysis of the legal market, from which no individual can reasonably be identified;
 - operate, secure and improve our platform; and

- comply with our legal obligations and establish, exercise or defend legal claims.

7.3. We do not use your information for any purpose that is unrelated to the professional purposes described above, and we do not use it to make automated decisions about you.

8. Our basis for handling your information

- 8.1. Australia. We collect your information because it is reasonably necessary for our functions and activities as a provider of legal market intelligence, as required by APP 3.2. We use and disclose it only for that purpose, or for a directly related purpose that you would reasonably expect, as required by APP 6.
- 8.2. United Kingdom and European Economic Area. We rely on our legitimate interests, and those of our customers, in understanding the legal market and in identifying legal professionals for professional opportunities. We have assessed those interests against your rights and freedoms and, because the information we hold is professional rather than private, is already public, and is used for professional purposes only, we consider the balance is met. You have the right to object, as set out in section 13.

9. Marketing and business development by our customers

- 9.1. Our customers may use Pirical Legal Professionals to identify legal professionals to contact, including about roles, and about their own products, services and events. This means that making your information available to our customers may facilitate direct marketing to you by them. Where a customer contacts you it does so on its own behalf and is responsible for its own compliance with privacy and marketing law.
- 9.2. We have not asked for your consent to this, because we hold information about a large number of legal professionals and obtaining individual consent would be impracticable. Instead, you have the following rights, which are given to you by APP 7 if you are in Australia and which we extend to everyone:
- You can ask us to stop. You may ask us not to make your information available for direct marketing or business development purposes. We will give effect to your request within a reasonable period and in any event within 30 days.
 - You can ask us where we got your information. We will tell you the source, unless it is impracticable or unreasonable to do so.
 - We will not charge you. There is no fee for making either request or for us acting on it.
- 9.3. To make either request, contact our Privacy Officer as set out in section 14. If you have already asked a customer of ours to stop contacting you, that request is made to them and not to us, so please tell us separately if you also want us to stop including you.

10. Government related identifiers

- 10.1. We do not collect, use or disclose government related identifiers, such as a tax file number, Medicare number, passport number or driver licence number, and we do not adopt any such identifier as our own identifier for you.

11. Who we make your information available to

- 11.1. We make your information available to:
- our customers, being the law firms, in-house legal teams, recruitment agencies and professional services organisations that subscribe to Pirical Legal Professionals, under

contracts that restrict what they may do with it;

- our service providers, who host, secure and support our platform, and who act on our instructions only;
- our professional advisers, including auditors and lawyers, where they are subject to confidentiality obligations;
- regulators, courts and law enforcement, where we are required or permitted by law to do so; and
- an acquirer of our business, in the event of a sale, reorganisation or similar transaction.

- 11.2. Access to Pirical Legal Professionals is by paid subscription, and every customer is bound by contractual restrictions on what it may do with the information, including a prohibition on passing it on. We do not make your information available for consumer advertising or for advertising targeting of any kind.

12. Where your information is held

- 12.1. We are based in the United Kingdom, and your information is held and processed outside Australia. We are likely to disclose your information to recipients in the following countries:

Country or region	Why
United Kingdom	Our own operations and personnel
Ireland and the European Economic Area	Data hosting, storage, communications and internal business systems
United States	Product analytics and application error reporting, limited to account login details

- 12.2. Our customers are located in the United Kingdom, the United States, Australia and other countries. Where a customer accesses Pirical Legal Professionals, your information may be viewed in the country in which that customer operates.
- 12.3. Before we disclose your information to a recipient outside Australia we take reasonable steps to ensure that the recipient handles it in a way that is consistent with the APPs, as required by APP 8. For individuals in the United Kingdom and the European Economic Area, transfers outside those areas are made on the basis of an adequacy decision or of standard contractual clauses together with any additional safeguards required.
- 12.4. A current list of the service providers we use, and the countries in which they operate, is available from our Privacy Officer on request.

13. Your rights

- 13.1. Everyone whose information appears in Pirical Legal Professionals may:
- ask us what we hold about you and obtain a copy of it;
 - ask us to correct it if it is inaccurate, out of date, incomplete, irrelevant or misleading; and

- ask us to remove you from Pirical Legal Professionals, or to stop using your information in a particular way.

- 13.2. Australia. Your rights of access and correction are those given to you by APP 12 and APP 13. If we refuse a request for access or correction, we will tell you in writing why, and how you may complain. If we refuse to correct information and you ask us to, we will associate with that information a statement that you consider it to be inaccurate, out of date, incomplete, irrelevant or misleading.
- 13.3. United Kingdom and European Economic Area. In addition to access and rectification, you have the right to erasure, the right to restrict or object to our processing, the right to data portability, and the right to lodge a complaint with a supervisory authority.
- 13.4. We do not charge you for making a request. We do not charge for correcting your information, and we do not charge for giving you access to it.

14. How to make a request

- 14.1. Email our Privacy Officer at support@pirical.com, or write to the address in section 2.4. Tell us what you would like us to do. It helps if you tell us the firm you work for and your job title, so that we can find the right record.
- 14.2. We will ask you for enough information to satisfy ourselves that you are the person the record relates to. We will not ask for more than we need.
- 14.3. We will respond within 30 days. If your request is complex and we need longer, we will tell you before the 30 days is up, explain why, and tell you when to expect our response.

15. Accuracy

- 15.1. We take reasonable steps to ensure that the information we hold about you is accurate, up to date, complete, relevant and not misleading, having regard to the purposes for which we hold it.
- 15.2. Because we rely on public sources, information can become out of date, for example when you change role and the public record has not caught up. If you tell us that something is wrong we will correct it, and where we have already made the incorrect information available to a customer we will make the correction available to them through our platform.

16. Security, retention and deletion

- 16.1. We take reasonable steps to protect your information from misuse, interference and loss, and from unauthorised access, modification and disclosure. Our measures include access controls, encryption, annual penetration testing and staff confidentiality obligations.
- 16.2. We hold your information for as long as you are active in the legal profession and it remains relevant to the purposes described in section 7. We review our records and remove information we no longer need.
- 16.3. Where we no longer need your information, we delete it or de-identify it so that you can no longer reasonably be identified from it. Aggregated and de-identified market analysis derived from the information may be retained, because it is not personal information.
- 16.4. If we suffer a data breach that is likely to cause you serious harm, we will assess it and, where the law requires, notify you and the relevant regulator, including the Office of the Australian Information Commissioner.

17. Complaints

- 17.1. If you are unhappy with how we have handled your information or your request, contact our Privacy Officer at support@pirical.com and tell us what has gone wrong. We will acknowledge your complaint within five business days and respond substantively within 30 days.
- 17.2. If you are not satisfied with our response, you may complain to a privacy regulator:
- Australia: the Office of the Australian Information Commissioner, oaic.gov.au, telephone 1300 363 992.
 - United Kingdom: the Information Commissioner's Office, ico.org.uk, telephone 0303 123 1113.
 - European Economic Area: the supervisory authority in the country in which you live or work.

18. Definitions

- 18.1. In this policy, "personal information" and "sensitive information" have the meanings given to them in section 6 of the Privacy Act, and "personal data" has the meaning given to it in the UK GDPR and the EU GDPR. References to the "APPs" are to the Australian Privacy Principles in Schedule 1 to the Privacy Act. Where this policy refers to information being "de-identified", it means that the information is no longer about an individual who is reasonably identifiable.

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