

PRIVACY POLICY

For visitors to **pirical.com**, enquirers, customers and contacts

Version 2.0 | Effective 19 August 2026 | Supersedes the policy dated 26 January 2021

1. About this policy

- 1.1. This policy explains how Pirical handles personal information about you if you visit **pirical.com**, contact us, sign up for or use one of our products, subscribe to something we publish, attend one of our events, or are a contact at a customer or prospective customer.
- 1.2. It applies wherever you are located, and includes specific provisions for individuals in Australia, in the United Kingdom and in the European Economic Area, identified where they apply.
- 1.3. Two things are covered by other documents:
 - If you are a lawyer whose professional details appear in Pirical Legal Professionals, a separate privacy policy applies to that information. It is available on our website.
 - If your employer has sent us information about you so that we can provide Pirical On Demand, Ruth or an analytics engagement to them, your employer decides how that information is used and its own privacy notice applies. We handle it on your employer's instructions under a data processing agreement. If you have a question about it, ask your employer, and you are also welcome to contact us and we will help.
- 1.4. We may update this policy. The version number and effective date above will change when we do.

2. Who we are and how to contact us

- 2.1. Pirical is the trading name of 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 ("Pirical", "we", "us").
- 2.2. For the purposes of the UK GDPR and the EU GDPR, Pirical is the controller of the personal data described in this policy.
- 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. This policy is our APP privacy policy for the purposes of APP 1.3.
- 2.4. To ask a question, exercise a right or make a complaint, contact our Privacy Officer:
 - Email: support@pirical.com
 - Post: Privacy Officer, Pirical, 20-22 Wenlock Road, London, N1 7GU, United Kingdom

3. Dealing with us anonymously

- 3.1. You can browse **pirical.com** without telling us who you are, and you can ask us a general question about this policy without identifying yourself or by using a pseudonym.
- 3.2. We will need to identify you if you ask for access to your information, or ask us to correct or

delete it, because we cannot find your record otherwise. We will ask only for what we need in order to do that.

4. What we collect

- 4.1. If you contact us or complete a form. Your name, job title, employer, work email address, work telephone number, the content of your enquiry and any documents you send us.
- 4.2. If you or your employer buys from us. Account and user details, your role in the relationship, correspondence with us, meeting notes, training and support records, contract and invoicing information, and billing details. We do not store full payment card numbers; card payments are handled by our payment provider.
- 4.3. If you use one of our products. Your login and account details, the pages and features you use, the searches and reports you run, timestamps, your IP address, and your device, browser and operating system type. We use this to run the service, keep it secure, support you and improve it. Where your employer has sent us its own data for us to process, that data belongs to your employer and your employer's privacy notice applies to it; this policy covers only the account and usage information described here.
- 4.4. If you subscribe to something we publish or attend an event. Your contact details, your preferences, whether you opened or clicked an email we sent you, and your attendance and any questions you asked.
- 4.5. If you are a contact at a customer or a prospective customer. Your name, job title, employer, work contact details, and a record of our dealings with you. We may also hold professional information about you from public sources, in the same way as we do for the legal market generally.
- 4.6. If you apply for a job with us. Your application and the information you give us during recruitment. We will tell you more at the point you apply.

5. Where we get it

- 5.1. Most of it comes from you, or from your employer where they are our customer. We also collect it automatically when you use pirical.com or our products, as described in section 6.
- 5.2. For business contacts, we also use publicly available professional sources, including employer websites, professional networking profiles, public registers and the legal press.

6. Cookies and similar technology

- 6.1. We use cookies and similar technology on pirical.com and in our products for the following purposes:
 - Essential: signing you in, keeping you signed in, remembering your session, and protecting your account and our systems from misuse. These are necessary for the site and products to work and cannot be switched off.
 - Preferences: remembering settings and choices you have made.
 - Analytics: understanding how our site and products are used so we can improve them, including which pages are visited and which features are used.
- 6.2. We ask for your consent before setting non-essential cookies. You can change or withdraw your choice at any time using the cookie settings on our site, and you can block or delete

cookies through your browser. If you block essential cookies, parts of our site and products will not work.

- 6.3. We do not use cookies for advertising, and we do not allow third parties to use cookies on our site to build advertising profiles about you.

7. What we use it for

- 7.1. We use your information to:

- respond to your enquiries and provide information you have asked for;
- provide, administer, support and improve our products and services, and provide training;
- manage our relationship with you and your employer, including billing, credit control and account management;
- keep our site, our products and our systems secure, and investigate and prevent misuse;
- send you information about our products, research and events, where you have asked for it or where section 9 applies;
- run surveys and gather feedback, and understand what our customers need;
- produce aggregated and de-identified analysis of how our products are used;
- comply with our legal and regulatory obligations, and establish, exercise or defend legal claims.

- 7.2. We do not make automated decisions about you that have a legal or similarly significant effect.

8. Our basis for handling your information

- 8.1. Australia. We collect, use and disclose your information because it is reasonably necessary for our functions and activities as a provider of legal market intelligence and analytics, as required by APP 3.2 and APP 6.

- 8.2. United Kingdom and European Economic Area. We rely on:

- performance of a contract, where we are providing a product or service to you or your employer;
- your consent, for non-essential cookies and for marketing where consent is required, which you may withdraw at any time;
- our legitimate interests in running, securing, promoting and improving our business, where we have assessed that those interests are not overridden by your rights and freedoms; and
- compliance with a legal obligation, where the law requires us to handle your information in a particular way.

- 8.3. Where we rely on legitimate interests you have the right to object, as set out in section 13.

9. Marketing

- 9.1. We may send you information about our products, research, events and insights where you have asked us to, or where you are a business contact at an organisation we reasonably believe would be interested in what we do.
- 9.2. Every marketing message we send includes a simple way to unsubscribe, and we act on unsubscribe requests promptly and free of charge. You can also tell us to stop at any time by emailing support@pirical.com.
- 9.3. Australia. These rights are given to you by APP 7. You may also ask us where we obtained your information, and we will tell you unless it is impracticable or unreasonable to do so. We do not charge for acting on either request.

10. Sensitive information and government identifiers

- 10.1. We do not seek out, infer or derive sensitive information about you, meaning information about your racial or ethnic origin, your political opinions or associations, your religious or philosophical beliefs, your membership of a professional or trade association or trade union, your sexual orientation, your health, your genetic or biometric characteristics, or any criminal record. If you send us information of that kind we will only use it for the purpose for which you sent it.
- 10.2. We do not collect, use, disclose or adopt government related identifiers such as a tax file number, Medicare number, national insurance number, passport number or driver licence number.

11. Who we share it with

- 11.1. We share your information with:
- service providers who host, secure, support and operate our platform and business systems, including cloud hosting, email, customer relationship management, email delivery, support ticketing, error reporting, product analytics, survey and payment providers. They act on our instructions and are bound by contract;
 - your employer, where they are our customer and the information relates to your use of a product they have bought;
 - our professional advisers, including auditors, lawyers and accountants, under confidentiality obligations;
 - regulators, courts and law enforcement, where we are required or permitted by law;
 - an acquirer of our business, in the event of a sale, reorganisation or similar transaction.
- 11.2. A current list of the service providers we use, what they do and where they operate is available from our Privacy Officer on request.

12. Where your information is held

- 12.1. We are based in the United Kingdom. Your information is held and processed in the following locations:

Country or region	Why
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United Kingdom	Our own operations and personnel
Ireland and the European Economic Area	Cloud hosting, storage, email, customer relationship management and internal business systems
United States	Product analytics and application error reporting

12.2. Australia. Your information will be held outside Australia. Before we disclose it to an overseas recipient we take reasonable steps to ensure that the recipient handles it consistently with the APPs, as required by APP 8.

12.3. United Kingdom and European Economic Area. Transfers outside the UK or the EEA are made on the basis of an adequacy decision, or of standard contractual clauses or the UK International Data Transfer Agreement, together with any additional safeguards required.

13. Your rights

13.1. Wherever you are, you can ask us to:

- tell you what information we hold about you and give you a copy;
- correct anything that is inaccurate, out of date, incomplete, irrelevant or misleading;
- delete information we no longer need; and
- stop sending you marketing.

13.2. Australia. Your access and correction rights are those given by APP 12 and APP 13. If we refuse a request we will tell you in writing why and how to complain. If we refuse to correct information and you ask us to, we will associate a statement with that information recording that you consider it inaccurate, out of date, incomplete, irrelevant or misleading.

13.3. United Kingdom and European Economic Area. You also have the right to restrict or object to our processing, the right to data portability, the right to withdraw consent where we rely on it, and the right to complain to a supervisory authority.

13.4. We do not charge for making a request or for acting on it.

14. How to make a request

14.1. Email support@pirical.com or write to the address in section 2.4, and tell us what you would like us to do. We will ask for enough information to be satisfied that the request is yours, and no more.

14.2. 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. How long we keep it

15.1. We keep your information for as long as we need it for the purposes in section 7, and then delete it or de-identify it so that you can no longer reasonably be identified. In practice:

- Enquiries that do not lead anywhere: we keep them while we follow up and for a reasonable period afterwards, then delete them.

- Customer relationship records: we keep them for the life of the relationship and for a period afterwards, so that we can deal with questions, disputes and legal claims.
- Contracts, invoices and accounting records: we keep them for as long as tax, accounting and company law require.
- Marketing preferences and unsubscribe records: we keep a record of your unsubscribe indefinitely, so that we do not contact you again by mistake.

15.2. Aggregated and de-identified analysis is not personal information and we may keep it.

16. Keeping your information safe

- 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 in transit and at rest, annual penetration testing, staff training and confidentiality obligations.
- 16.2. No transmission over the internet is completely secure. If you send us something sensitive by email, consider protecting it with a password.
- 16.3. If we suffer a data breach that is likely to result in serious harm to you, or a high risk to your rights, we will assess it and, where the law requires, notify you and the relevant regulator, including the Office of the Australian Information Commissioner and the Information Commissioner's Office.

17. Complaints

- 17.1. If you are unhappy with how we have handled your information or your request, email 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 can 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 where you live or work.

18. Definitions

- 18.1. In this policy, "personal information" and "sensitive information" have the meanings given in section 6 of the Privacy Act, and "personal data" has the meaning given in the UK GDPR and the EU GDPR. The "APPs" are the Australian Privacy Principles in Schedule 1 to the Privacy Act. Information is "de-identified" when it is no longer about an individual who is reasonably identifiable. Your use of pirical.com and our products is also subject to our Terms of Service.

Aspirant Analytics Limited T/A Pirical, 20-22 Wenlock Road, London, N1 7GU, United Kingdom. Company number 08406864.