

# **Privacy Policy**

Updated January 2025

This Privacy Policy describes how the ASLE collects, uses, and discloses information associated with an identified or identifiable individual (referred to in this Privacy Policy as "Personal Data") and what choices you have around this activity. If you have any questions, please don't hesitate to contact us.

When we refer to "ASLE", we mean the American Society of Legal Engineers, as explained in more detail in the "Identifying the Data Controller and Processor" section below.

# APPLICABILITY OF THIS PRIVACY POLICY

This Privacy Policy applies to ASLE's online workplace productivity tools and platform, including any associated ASLE mobile and desktop applications (collectively, the "Services"), americanlegalengineers.org and other ASLE websites (collectively, the "Websites") and other interactions (e.g., member service inquiries, user conferences, etc.) you may have with ASLE. If you do not agree with this Privacy Policy, then do not access or use the Services, Websites or any other aspect of ASLE's operations. For the avoidance of doubt, this is the only privacy policy that applies to ASLE.

This Privacy Policy does not apply to any third-party applications or software that integrate with the Services through the ASLE platform ("Third-Party Services"), or any other third-party products, services or operations who will provide their services under their own terms of service and privacy policy.

California Notice of Collection of Personal Information: We collect the information described below under "Information We Collect and Receive" for the operations and commercial purposes described below under "Information Use." To learn more about exercising your California Privacy Rights please review the "California Privacy Rights" section below.

## INFORMATION WE COLLECT AND RECEIVE



ASLE will collect and receive information through operating the Services and Websites, and through other interactions with ASLE. Such information will include Member Data and other information and data ("Other Information") in a variety of ways:

Member Data. Members or individuals granted access to a Website or Service by a Member ("Authorized Users") routinely submit Member Data (such as messages, files or other content submitted through Services accounts) to ASLE when using the Services.

Other Information. ASLE also collects, generates and/or receives the following categories of Other Information:

Website and account information: To create or update an ASLE account, you or our Member (e.g. your employer) supply ASLE with an email address, phone number, password, domain, and/or other account set up details. In addition, Members that register for a paid membership and/or version of the Services provide ASLE (or its payment processors) with billing details such as credit card information, banking information, and/or a billing address.

#### Usage information:

Services metadata. When an Authorized User interacts with the Services, metadata is generated that provides additional context about the way that an Authorized User uses the Services. For example, ASLE logs the Services, channels, people, features, content, and links you view or interact with, the types of files shared and what Third-Party Services are used (if any)

Log data. As with most websites and technology services delivered over the Internet, our servers automatically collect information when you access or use our Websites or Services and record it in log files. This log data may include your Internet Protocol (IP) address, the address of the web page you visited before using the Website or Services, browser type and settings, the date and time the Services were used, information about browser configuration and plugins, and your language preferences.

Device information. ASLE collects information about devices accessing the Services, including type of device, what operating system is used, device settings, application IDs, unique device identifiers and crash data. Whether we collect some or all of this Other Information often depends on the type of device used and its settings.



Location information. We receive information from you, our Members and other thirdparties that helps us approximate your location. We may, for example, use a operations address submitted or an IP address received from your browser or device to determine approximate location to assist with localization or for security purposes.

Cookie information: ASLE uses a variety of cookies and similar technologies in our Websites and Services to help us collect Other Information. For more details about how we use these technologies, and your opt-out controls and other options, please visit our Cookie Policy.

Third-Party Services information: A Member can choose to permit or restrict Third-Party Services for its Service and ASLE can receive personal data from such Third-Party Services. Typically, Third-Party Services are software that integrate with our Services, and a Member can permit its Authorized Users to enable and disable these integrations for its Service. ASLE may also develop and offer ASLE applications that connect the Services with a Third-Party Service. Once enabled, the provider of a Third-Party Service may share certain information with ASLE. For example, if a cloud storage application you are using is enabled to permit files to be imported to a Service, we may receive the user name and email address of Authorized Users, along with additional information that the application makes available to ASLE to facilitate the integration. Authorized Users should check the privacy settings and notices in these Third-Party Services to understand what data may be disclosed to ASLE. When a Third-Party Service is enabled, ASLE is authorized to connect and access Other Information made available to ASLE in accordance with our agreement with the provider of the Third-Party Service and any permission(s) granted by our Member (including, by its Authorized User(s)). Examples of information which ASLE may receive in this manner include whether you successfully created a new account or interacted with a third-party application in a way that is attributable to ASLE usage activity. We do not, however, receive or store passwords for any of these Third-Party Services when connecting them to the Services.

Contact information: In accordance with the consent process provided by your device or other third-party API, any contact information that an Authorized User chooses to import (such as importing an address book to find coworkers and ASLE Connect contacts or calendar from a device or API), forward or upload to the Services (for example, when sending emails to the Services) is collected when using the Services.



Third-Party data: ASLE may receive data about organizations, industries, lists of companies that are members, Website visitors, marketing campaigns and other matters related to our operations from parent corporation(s), affiliates and subsidiaries, our partners, or others that we use to make our own information better or more useful. This data may be combined with Other Information we collect and might include aggregate-level data, such as which IP addresses correspond to zip codes or countries. Or it might be more specific: for example, how well an online marketing or email campaign performed.

Audio and video metadata: ASLE may receive, capture, and store metadata derived from your use of features and Services, and additional related data such as data regarding the date and time of your usage.

Additional information provided to ASLE: We also receive Other Information when submitted to our Websites or in other ways, such as responses or opinions you provide if you participate in a focus group, contest, activity or event, feedback you provide about our products or services, enroll in a certification program or other educational program hosted by ASLE or a vendor, request support, interact with our social media accounts or otherwise communicate with ASLE.

Generally, no one is under a statutory or contractual obligation to provide any Member Data or Other Information (collectively, "Information"). However, certain Information is collected automatically and, if some Information, such as Service setup details, is not provided, we may be unable to provide the Services.

# How We Process Your Information and our Legal Bases for Doing So

Member Data will be used by ASLE in accordance with a Member's instructions, including to provide the Services, any applicable terms in the Member Agreement, a Member's use of Services functionality, and as required by applicable law. ASLE is a processor of Member Data and the Member is the controller. Member may, for example, use the Services to grant and remove access to a Service, assign roles and configure settings, access, modify, export, share, and remove Member Data, and otherwise apply its policies to the Services.

ASLE uses Other Information to operate our Services, Websites, and operations. More specifically, ASLE uses Other Information for the following purposes:

Compliance With A Legal Obligation:



ASLE processes Other Information when we comply with a legal obligation including, for example, to access, preserve or disclose certain information if there is a valid legal request from a regulator, law enforcement or others. For example, a search warrant or production order from law enforcement to provide information in relation to an investigation, such as your profile picture or IP address.

We use Service and account information, Usage information, Cookie information, Third-Party Services Information, Contact information, Third-Party data, Audio and video metadata, and Additional information provided to ASLE for compliance with a legal obligation.

## **Legitimate Interests:**

We rely on our legitimate interests or the legitimate interests of a third-party where they are not outweighed by your interests or fundamental rights and freedoms ("legitimate interests").

We use Service and account information, Usage information, Cookie information, Third-Party Services Information, Contact information, Third-Party data, Audio and video metadata, and Additional information provided to ASLE for the following legitimate interests:

- To provide, update, maintain and protect our Services, Websites and operations.
- This includes the use of Other Information to support delivery of the Services under a Member Agreement, prevent or address service errors, security or technical issues, analyze and monitor usage, trends and other activities, or at an Authorized User's request.
- It is in our and your interests to provide, update, maintain and protect our Services, Websites, and operations.
- To develop and provide search, learning, and productivity tools and additional features.

ASLE tries to make the Services as useful as possible for specific Services and Authorized Users. For example, we may:

• improve search functionality by using Other Information to help determine and rank the relevance of content or expertise to an Authorized User;



- make Services or Third-Party Service suggestions based on historical use and predictive models;
- identify organizational trends and insights;
- customize a Services experience; or
- create new productivity features and products.

It is in our interest and in the interest of Members and Authorized Users to continuously improve and develop the member support we provide.

To investigate and help prevent security issues and abuse.

We may use a variety of tools such as device fingerprinting to prevent issues and abuse. We may process, including in an automated fashion, Other Information to better understand how ASLE is used or to prevent spam or abuse.

It is in our interest to keep the Services secure and to detect, prevent, and address abuse (such as spam) and to investigate and take action in respect of suspicious activity on the Services.

To aggregate or de-identify information.

In some cases, we aggregate or de-identify information we have associated with you and use the resulting information, for example, to improve the Services.

It is in our interest to research and improve the Services;

It is in the interests of Members and Authorized Users to practice data minimization and privacy by design in respect of their information.

Share information with others including law enforcement and to respond to legal requests.

It is in our interest and the interest of the general public to prevent and address fraud, unauthorized use of ASLE Services, violations of our terms or other harmful or illegal activity; to protect ourselves, our users or others, including as part of investigations or regulatory enquiries; or to prevent death or imminent bodily harm.

Transfer, store or process your information outside the European Economic Area.

As the Websites and Services operate globally, with Members around the world, we need to share information we collect globally. We carry out necessary transfers outside the European Economic Area, including to Australia, Canada, Japan, India, South Korea, and



the United States, to provide, update, maintain and protect our Services, Websites and operations.

For more information, review the "International Data Transfers" section below.

In our and your interests to provide, update, maintain and protect our Services, Websites and operations.

We use Service and account information, Third-Party Services Information, Third-Party data, and Additional information provided to ASLE for the following legitimate interests:

To communicate with you by responding to your requests, comments and questions.

If you contact us, we may use your Other Information to respond.

It is in our, our Members' and Authorized Users' interests to facilitate communication (for example to answer questions from Members).

To send service emails and other communications.

For example, we may:

send you service, technical and other administrative emails, messages, and other types of communications; or

contact you to inform you about changes in our Services, our Services offerings, and important Services-related notices, such as security and fraud notices. These communications are considered part of the Services and you may not opt out of them. It is in our Members and Authorized Users' interests to address service related issues.

We use Service and account information and Usage information for the following legitimate interests:

For billing, account management and other administrative matters.

ASLE may need to contact you for invoicing, account management, and similar reasons and we use account data to administer accounts and keep track of billing and payments.

It is in our interest to facilitate the effective provision and administration of the Websites and Services.



We use Service and account information, Usage Information, Cookie information, Third-Party Services Information, Third-Party data, and Additional information provided to ASLE for the following legitimate interests:

To send marketing emails and other communications.

We sometimes send emails about new product features, promotional communications or other news about ASLE. These are marketing messages so you can control whether you receive them. If you have additional questions about a message you have received from ASLE please get in touch through the contact mechanisms described below.

It is in our interest to promote the Websites and Services and send our direct marketing.

## HOW WE SHARE AND DISCLOSE INFORMATION

This section describes how ASLE may share and disclose Information, as described in the section entitled 'Information We Collect and Receive' above. Members determine their own policies and practices for the sharing and disclosure of Information to third parties. ASLE does not control how a Member or any third party chooses to share or disclose Information.

The Member's Instructions. ASLE may share and disclose Information in accordance with a Member's instructions and with appropriate consent, including any applicable terms in the Member Agreement and the Member's use of Services functionality and in compliance with applicable law and legal process. Some sharing at a Member's request may incur additional fees.

We also follow Member and Authorized User instructions on how an Authorized User's profile may be displayed within a Member's Service or when shared through ASLE Connect or other features.

Displaying the Services. When an Authorized User submits Information, it may be displayed or discoverable to other Authorized Users in the same or connected Services or ASLE Connect instances. For example, an Authorized User's email address may be displayed with their Service profile, or other profile and organizational information may be displayed to Authorized Users.



Collaborating with Others. The Services provide different ways for Authorized User's working in independent Services to collaborate. Information, such as an Authorized User's profile and organizational information, may be shared, subject to the policies and practices of the Service(s) you use. For example, depending on the settings of your Service, to enable connections with other Authorized Users, your profile may be shared or searchable or discoverable by Authorized Users or other users outside of Service(s) you belong to, or shared via email when you invite an Authorized User or other user to collaborate via ASLE Connect. In many instances, ASLE includes either administrator controls or user controls, depending on the use case, with respect to external collaboration. Authorized Users may also decide to expand the visibility of certain content and Member Data, such as files.

Member access. Owners, administrators, Authorized Users, and other Member representatives and personnel may be able to access, modify, or restrict access to Information.

Third-Party service providers and partners. We may engage third-party companies or individuals as service providers or operations partners to process Information and support our operations. These third parties may, for example, provide virtual computing and storage services, assist ASLE with verifying Owners and Members, or we may share operations information to develop strategic partnerships with Third-Party service providers to support our common members. In this respect, depending on the Third-Party service provided, ASLE may share your Information.

Third-Party Services. A Member may enable, or permit Authorized Users to enable, Third-Party Services. We require each Third-Party Service provider to disclose all permissions for information accessible through the Services, but we do not guarantee that they do so. When Third-Party Services are enabled by a Member or an Authorized User, ASLE may share Information with Third-Party Services. Third-Party Services are not owned or controlled by ASLE and third parties that have been granted access to Information may have their own policies and practices for its collection, use, and sharing. Please check the permissions, privacy settings, and notices for these Third-Party Services or contact the provider for any questions.

Forums. The Information you choose to provide in a community forum including personal data will be publicly available.



Organizers and sponsors of Events/Webinars. If you attend an event or webinar organized by ASLE, we may share your profile and organizational information with the event or webinar sponsors when you register, have your badge scanned, or join a breakout room. If required by applicable law, you may consent to such sharing via the registration form or by allowing your attendee badge to be scanned at a sponsor booth. In these circumstances, your information will be subject to the sponsors' privacy statements. For more information, please refer to the terms provided when you register for such an event or webinar.

Professional advisers. We may share your Information with professional advisers acting as service providers, processors, controllers, or joint controllers - including lawyers, bankers, auditors, and insurers who provide consultancy, banking, legal, insurance and accounting services, and to the extent we are legally obliged to share or have a legitimate interest in sharing your Information containing personal data.

Corporate Affiliates. ASLE may share Information with our corporate affiliates, parents and/or subsidiaries.

Aggregated or De-identified Data. We may disclose or use aggregated or de-identified Information for any purpose. For example, we may share aggregated or de-identified Information with prospects or partners for operations or research.

Law Enforcement and Regulators. If we receive a request for information, we may disclose Other Information if we reasonably believe disclosure is in accordance with or required by any applicable law, regulation or legal process. Please review the Data Request Policy, Data Request Overview, and Transparency Report to understand how ASLE responds to requests to disclose data from government agencies, law enforcement entities, and other sources. This may at times include information that any subprocessors processes on behalf of ASLE in its role as a subprocessor, including as pursuant to the terms of any data protection agreement between ASLE and its Members.

To enforce our rights, prevent fraud, and for safety. To protect and defend the rights, property, or safety of ASLE, its users, or third parties, including enforcing its contracts or policies, or in connection with investigating and preventing illegal activity, fraud, or security issues, including to prevent death or imminent bodily harm.

With Consent. ASLE may share Information with third parties when we have consent to do so or as otherwise permitted in this Privacy Policy. For Services registered to corporate



entities, ASLE may share Information with consent of the Service primary owner or authorized corporate officer, or their designee. For memberships or accounts created without a formal affiliation, ASLE may require user consent.

#### **DATA RETENTION**

ASLE will retain Member Data in accordance with a Member's instructions (including to perform any applicable terms in the Member Agreement and through Member's use of Services functionality) and as required by applicable law. Member may customize their retention settings and, depending on the Services plan, apply those customized settings at the Service level, channel level or other level. The Member may also apply different settings to messages, files or other types of Member Data. The deletion of Member Data and other use of the Services by the Member may result in the deletion and/or deidentification of certain associated Other Information.

ASLE may retain Other Information pertaining to you for as long as necessary for the purposes described in this Privacy Policy (such as to provide the Services, including any optional features you use, and to provide member support). This may include keeping your Other Information after you have deactivated your account for the period of time needed for ASLE to pursue legitimate operations interests, conduct audits, comply with (and demonstrate compliance with) legal obligations, resolve disputes, and enforce our agreements.

## **SECURITY**

ASLE takes security of data very seriously. ASLE works hard to protect Information you provide from loss, misuse, and unauthorized access or disclosure. These steps take into account the sensitivity of the Information we collect, process and store, and the current state of technology. Given the nature of communications and information processing technology, ASLE cannot guarantee that Information during transmission through the Internet or while stored on our systems or otherwise in our care will be absolutely safe from intrusion by others. When you click a link to a third-party site, you will be leaving our site and we don't control or endorse what is on third-party sites.

#### **AGE LIMITATIONS**



ASLE does not allow use of our Services and Websites by anyone younger than 16 years old, to the extent prohibited by applicable law. If you learn that anyone younger than 16 has unlawfully provided us with personal data, please contact us and we will take steps to delete such information.

## **CHANGES TO THIS PRIVACY POLICY**

ASLE may change this Privacy Policy from time to time. Laws, regulations, and industry standards evolve, which may make those changes necessary, or we may make changes to our services or operations. We will post the changes to this page and encourage you to review our Privacy Policy to stay informed. If we make changes that materially alter your privacy rights, ASLE will provide additional notice, such as via email or through the Services. If you disagree with the changes to this Privacy Policy, you should deactivate your Services account. Contact the Member if you wish to request the removal of Personal Data under their control.

# INTERNATIONAL DATA TRANSFERS

ASLE may transfer your Personal Data to countries other than the one in which you live, including transfers to the United States. To the extent that Personal Data is transferred abroad, ASLE will ensure compliance with the requirements of the applicable laws in the respective jurisdiction in line with ASLE's obligations.

In particular, we offer the following safeguards if ASLE transfers Personal Data from jurisdictions with differing data protection laws:

European Commission's Standard Contractual Clauses. ASLE uses Standard Contractual Clauses approved by the European Commission (and the equivalent standard contractual clauses for the UK where appropriate) for transfers to, among others, Australia, Canada, India, Japan, South Korea, and the United States. ASLE will transfer your Personal Data to facilitate the provision of the Services.

Asia-Pacific Economic Cooperation Cross-Border Privacy Rules System And Privacy Recognition For Processors. ASLE's privacy practices, described in this Privacy Policy, comply with the Asia-Pacific Economic Cooperation ("APEC") Cross Border Privacy Rules ("CBPR") system and the Privacy Recognition for Processors ("PRP"). The APEC CBPR



system provides a framework for organizations to ensure protection of personal data transferred among participating APEC economies and the PRP demonstrates an organization's ability to provide effective implementation of a personal data controller's privacy obligations related to the processing of personal information. If you have an unresolved privacy or data use concern related to our APEC CBPR or PRP certifications that we have not addressed satisfactorily, you may contact our third-party dispute resolution provider.

# **DATA PROTECTION OFFICER**

To communicate with our Data Protection Officer, please email info@americanlegalengineers.org.

# IDENTIFYING THE DATA CONTROLLER AND PROCESSOR

Data protection law in certain jurisdictions differentiates between the "controller" and "processor" of information. In general, Member is the controller of Member Data. In general, ASLE is the processor of Member Data and the controller of Other Information.

## Your Rights

Individuals in the European Economic Area, the United Kingdom, Brazil, and across the globe have certain statutory rights in relation to their personal data. Subject to any exemptions provided by law, you may have the right to request access to your personal information, as well as to seek to update, delete, or correct this information.

To the extent that ASLE's processing of your Personal Data is subject to the General Data Protection Regulation or other applicable laws requiring a legal basis for processing Personal Data, such as the UK Data Protection Act and the Brazilian General Data Protection Act (Lei Geral de Proteção de Dados), ASLE primarily relies on its legitimate interests, described above, to process your Personal Data. Where we rely on legitimate interests to process your Personal Data, you can object to that processing by contacting us as described in the "Contacting ASLE" section below. In response to your objection, we will stop processing your information for the relevant purposes unless we have compelling grounds in the circumstances or the processing is necessary in the context of legal claims. ASLE may also process Other Information that constitutes your Personal Data for direct



marketing purposes and you have a right to object to ASLE's use of your Personal Data for this purpose at any time.

#### Your California Privacy Rights

This section provides additional details about the personal information we collect about California consumers and the rights afforded to them under the California Consumer Privacy Act or "CCPA," as amended by the California Privacy Rights Act or "CPRA".

California law requires that we detail the categories of personal information that we collect and disclose for certain "operations purposes," such as to service providers that assist us with securing our services or marketing our products, and to such other entities as described in earlier sections of Privacy Policy. In addition to the information provided above in the 'Information We Collect And Receive' section, we collect the following categories of personal information from you, your employer, data analytics providers, data brokers, and Third-Party Services for our operations purposes:

Identifiers/contact information;

Commercial information;

Internet or electronic network activity information;

Financial information;

Geolocation information;

Professional or employment-related information;

Audio and visual data;

In limited circumstances where allowed by law, information that may be protected under California or United States law; and

Inferences drawn from any of the above categories.

We collect this information for the operations and commercial purposes described in the 'How We Process your Information and our Legal Bases for Doing So' section above. We share this information as described in the 'How We Share and Disclose Information' section above. ASLE does not sell (as such term is defined in the CCPA or otherwise) the personal information we collect (and will not sell it without providing a right to opt out).



We may also share personal information (in the form of identifiers and internet activity information) with third party advertisers for purposes of targeting advertisements on non-ASLE websites, applications, and services. In addition, we may allow third parties to collect personal information from our sites or services if those third parties are authorized service providers who have agreed to our contractual limitations as to their retention, use, and disclosure of such personal information, or if you use our sites or services to interact with third parties or direct us to disclose your personal information to third parties.

Subject to certain limitations, the CCPA provides California consumers the right to request to know more details about the categories or specific pieces of personal information we collect (including how we use, disclose, or may sell this information), to delete their personal information, to opt out of any "sales", to know and opt out of sharing of personal information for delivering advertisements on non-ASLE websites, and to not be discriminated against for exercising these rights.

California consumers may make a request pursuant to their rights under the CCPA by contacting us at info@americanlegalengineers.org. We will verify your request using the information associated with your account, including email address. Government identification may be required. Consumers can also designate an authorized agent to exercise these rights on their behalf. Authorized agents must submit proof of authorization.

If you would like to opt-out of sharing activity based on your cookie identifiers, turn on a Global Privacy Control in your web browser or browser extension. Please see the California Privacy Protection Agency's website at https://oag.ca.gov/privacy/ccpa for more information on valid Global Privacy Controls. If you would like to opt-out of sharing activity based on other identifiers (like email address or phone number), contact us in accordance with the "Contacting ASLE" section, below.

## **DATA PROTECTION AUTHORITY**

Subject to applicable law, you also have the right to (i) restrict ASLE's use of Other Information that constitutes your Personal Data and (ii) lodge a complaint with your local data protection authority. If, however, you believe that we have not been able to assist with your complaint or concern, and you are located in the European Economic Area or the United Kingdom, you have the right to lodge a complaint with the competent supervisory authority. If you work or reside in a country that is a member of the European Union or



that is in the EEA, you may find the contact details for your appropriate data protection authority on the following website. If you are a resident of the United Kingdom you may contact the UK supervisory authority, the Information Commissioner's Office.

# **CONTACTING ASLE**

Please also feel free to contact ASLE if you have any questions about this Privacy Policy or ASLE's practices, or if you are seeking to exercise any of your statutory rights. ASLE will respond within a reasonable timeframe. You may contact us at info@americanlegalengineers.org.

