

# LEGALICITY PRIVACY POLICY

## 1. SCOPE

**Legality, Ltd.** (“**Legality**”, “**we**”, “**us**” or “**our**”) understands the importance of protection of personal information and is committed to protecting that privacy. As such, Legality takes steps intended to meet privacy principles and requirements with respect to personal information under applicable Canadian privacy legislation.

Legality is a Canadian federal corporation and is the provider of this online patent analysis tool (“**NLPatent**” or the “**Product**”). The purpose of this Privacy Policy is to inform any person or entity that accesses the Product (the “**User**” “**you**” or “**your**”) how we collect, use, disclose and protect your personal information. Personal information is information about an identifiable individual, as more particularly described under applicable privacy legislation. This Privacy Policy applies to our collection, use and disclosure of personal information in Canada. This Privacy Policy does not apply to information about our employees or to information that is not personal information.

Use of the Product indicates your consent for Legality to handle your personal information in the manner outlined in this Privacy Policy.

## 2. COLLECTION AND USE OF PERSONAL INFORMATION

Legality and its agents and representatives collect personal information in a number of circumstances in the course of providing access to the Product. We may also require you to provide billing information to process payment (such as billing name and address, and credit card number).

Specifically, Legality collects three (3) categories of information about the User: personal information; web activity; and cookies (explained in greater detail below), in addition to such other information we may collect with your consent or as permitted or required by law.

- Personal Information: You may be asked to provide some personal information, for example when registering to gain access to the Product. This information may include the User’s name, mailing address, country/province of residence, phone number, email address, password, educational and employment background, comments and feedback, etc. This information is stored in a secure external database operated by a reputable third-party service provider that has rigorous database and network security protocols.
- Web Activity: When the User accesses the Product, Legality may automatically collect certain information about the User’s visit, such as: The User’s Internet Protocol (“IP”) address; the User’s computer, device, and connection information; the pages visited by the User; and the date and time of patent searches made by the User. Legality may use and disclose this web activity information for any purpose, such as analyzing usage of the Product, except when restricted by applicable law. Any combination of web activity with personal information will be treated as personal information.
- Cookies: Legality uses standard cookies to store and help track information about the User. You can manage your cookies and refuse to store cookies. However, doing so may

result in your inability to register, log in, or make full use of the Product. Legality's cookies allow the Product to recognize your identity when assessing the Product.

This information is not shared with anyone else, except as outlined in this Privacy Policy and when required by law. Legality uses this information primarily to improve the functioning of the Product and to communicate with the User.

### **3. PROTECTION OF INFORMATION**

Legality has implemented a variety of security measures and protocols intended to protect your personal information from accidental loss and from unauthorized disclosure.

NLPatent is a web-based system, accessed via a browser, which connects to VPN protected cloud services located within the United States. All data stores are encrypted and routinely backed up. Password and other sensitive information is further hashed.

Communication with NLPatent is restricted to secure HTTPS (SSL) and users are authenticated using JSON Web Tokens, which are an industry standard RFC 7519 method for exchanging information securely between two parties with HMAC SHA-256 encryption.

Despite these measures, Legality cannot fully guarantee the security of the User's data from unauthorized persons, such as hackers.

### **4. USE OF PERSONAL INFORMATION**

Only Legality officers and employees have access to the User's personal information. If the User has an active NLPatent account, including temporary accounts, such as pilot or trial accounts, the User may access the Product at any time while the account is active, subject to limitations set out in this Privacy Policy and [Terms of Use](#). However, personal information may be disclosed in the following limited circumstances:

*Internal Purposes.* Legality may disclose your personal information to our affiliates for internal audit, management, billing, or administrative purposes, including defending and bringing legal actions.

*Service Providers.* Legality may transfer personal information to outside agents or service providers that perform services on our behalf, for example mailing, billing, marketing, information technology or data hosting and processing services or similar services, or otherwise to collect, use, disclose, store or process personal information on our behalf for the purposes described in this Privacy Policy. Some of these service providers or affiliates may be located outside of Canada, including in the United States, and your personal information may be collected, used, disclosed, stored and processed in the United States or elsewhere outside of Canada for the purposes described in this Privacy Policy. Reasonable contractual other measures we may take to protect your personal information while processed or handled by these service providers are subject to legal requirements in Canada, the United States and other foreign countries applicable to our affiliates, agents and service providers, for example lawful requirements to disclose personal information to government authorities in those countries.

*Business Transactions.* Personal information may be used by Legality and disclosed to parties connected with the proposed or actual financing, securitization, insuring, sale, assignment or other disposal of all or part of Legality or our business or assets, for the purposes of evaluating and/or performing the proposed transaction. These purposes may include, as examples:

- permitting those parties to determine whether to proceed or continue with the transaction; and
- fulfilling reporting, inspection or audit requirements or obligations to those parties.

Assignees or successors of Legality or our business or assets may use and disclose your personal information for similar purposes as those described in this Privacy Policy.

*Legal, Regulatory, etc.* Legality may disclose your personal information as necessary to meet legal, regulatory, insurance, audit, and security requirements, and as otherwise with your consent or as permitted or required by law (including as required by applicable Canadian and foreign laws applicable to Legality or our agents and service providers and including lawful requirements to disclose personal information to government authorities in those countries).

## **5. AMENDMENT AND DELETION OF INFORMATION**

If the User cancels their subscription to the Product, Legality may retain the User's personal information for a period of **up to six (6) months**, during which time the User can renew their subscription in order to regain access to their NLPatent account. After this time, or upon request by the User, all of the User's personal information will be deleted from NLPatent. In some cases, e.g. if the User has a paid NLPatent account, they may be able to update their personal information (e.g., change their password) or cancel their subscription online through NLPatent's web interface. In other cases, e.g. if the User has a pilot account, they may need to contact Legality staff to make changes to their personal information or to delete their account. If you wish to amend or delete your information stored by Legality, you may contact james@nlpatent.com.

## **6. YOUR CONSENT**

Consent to the collection, use and disclosure of personal information may be given in various ways. Consent can be express (for example, orally, electronically or on a form you may sign describing the intended uses and disclosures of personal information) or implied (for example, when you provide information necessary for a service you have requested).

You may provide your consent in some circumstances where notice has been provided to you about our intentions with respect to your personal information and you have not withdrawn your consent for an identified purpose, such as by using an "opt out" option provided, if any. Consent may be given by your authorized representative (such as a legal guardian or a person having a power of attorney). **Generally, by providing us with personal information, we will assume that you consent to our collection, use and disclosure of such information for the purposes identified or described in this Privacy Policy, if applicable, or otherwise at the time of collection.**

You may withdraw your consent to our collection, use and disclosure of personal information at any time, subject to contractual and legal restrictions and reasonable notice. Note that if you withdraw your consent to certain uses of your personal information, we may no longer be able to provide certain of our products or services.

Legality collects, uses and discloses your personal information with your consent, except as permitted or required by law. We may be required or permitted under statute or regulation to collect, use or disclose personal information without your consent, for example to comply with a court order, to comply with local or federal regulations or a legally permitted inquiry by a government agency, or to collect a debt owed to us.

## **7. SECURITY**

We take reasonable steps to protect your personal information using physical, electronic or procedural security measures appropriate to the sensitivity of the information in our custody or control, which may include safeguards to protect against loss or theft, as well as unauthorized access, disclosure, copying, use or modification. Authorized employees, agents and mandataries of Legality who require access to your personal information in order to fulfil their job requirements will have access to your personal information.

## **8. ACCESS, CORRECTION AND CONTACTING US**

Legality may establish and maintain a file of your personal information for the purposes described above, which will be accessible by contacting [james@nlpatent.com](mailto:james@nlpatent.com).

If you wish to request access or correction of your personal information in our custody or control, you may write to [james@nlpatent.com](mailto:james@nlpatent.com). Your right to access or correct your personal information is subject to applicable legal restrictions. We may take reasonable steps to verify your identity before granting access or making corrections. If you wish to make inquiries or complaints or have other concerns about our personal information practices, you may write to us as described above or e-mail us at [support@nlpatent.com](mailto:support@nlpatent.com).

## **9. CHANGES TO PRIVACY POLICY**

This Privacy Policy may be revised from time to time. If we intend to use or disclose Personal Information for purposes materially different than those described in this Privacy Policy, we will make reasonable efforts to notify affected individuals, if necessary, including by revising this Privacy Policy. If you are concerned about how your personal information is used, you should contact us as described above. We urge you to request and review this Privacy Policy frequently to obtain the current version. Your continued provision of personal information or use of our services following any changes to this Privacy Policy constitutes your acceptance of any such changes. This Privacy Policy is effective as of **November 21, 2022**.