Codex Edge Limited

Privacy Policy

Introduction

This Privacy Policy explains how Codex Edge ("we", "us", "our") may process Personal Data for the purpose of using our Services. This Privacy 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.

1. Codex Edge, the Data Controller and Data Protection Officer

1.1. Codex Edge is a limited company registered in England and Wales with company number 10483307 whose registered office is 3rd Floor, 85 Great Eastern St, London, EC2A 3HY

1.2. For the purposes of this Privacy Policy, Codex Edge is the Data Controller.

1.3. Ahmed Shahin
Codex Edge Limited
Generator, Town Hall Extension, St Peter's Square, Manchester, M60 2LA
ashahin@codexedge.com

2. Collection and Processing of Personal Data

2.1. We collect Personal Data on individuals from published or publicly available sources. These are sources such as individual lawyer's profiles in law firm/employer collateral and on their website, and entries in professional directories, and individual's or firm's social media profiles, press agencies, regulatory bodies etc.

2.2. We may collect, use, store and transfer different kinds of personal data which we have grouped together as follows:

2.2.1. Identity details including first name, maiden name, last name, or similar identifier and gender.

2.2.2. Contact details including postal address, email address and telephone numbers.

2.2.3. Employment details including the name, address, telephone number and email address of your employer, to the extent relevant;

2.2.4. Professional qualifications, memberships and regulatory status including your degree, professional qualifications and any other details to your professional standing, or regulated status;

2.2.5. Comments, opinions and views including any views and opinions that you have made public via social media platforms, employer websites, regulatory bodies, press agencies etc.

2.3. We also collect, use and share Aggregated Data such as statistical or demographic data for any purpose. Aggregated Data may be derived from your personal data but is not considered personal data in law as this data does not directly or indirectly reveal your identity. However, if we combine or connect Aggregated Data with your personal data so that it can directly or indirectly identify you, we treat the combined data as personal data which will be used in accordance with this privacy notice.

2.4. We do not collect any Sensitive Personal Data

3. Lawful Basis for Processing of Personal Data

3.1. In Processing such Personal Data in connection with the purposes set out in this Policy, the legal basis on which we rely is legitimate interest.

3.2. Codex Edge and its Atlas Users have the following legitimate interests:

3.2.1. The reason for retention and processing of Personal Data is the need to identify qualified lawyers of potential interest as recruits to Atlas Users in an efficient and targeted way.

3.2.2. Identification of those who benefit from the processing, and the nature of the benefit:

3.2.3. Codex Edge and Atlas Users benefit from the processing, as it enables them to fulfil its aims more effectively.

3.2.4. While there are no wider public benefits to the processing, the aims of Codex Edge and Atlas Users, which the processing of the data furthers, is not contrary to the public good.

3.2.5. The benefit of the processing is very important to Codex Edge and Atlas Users in making the ability to identify appropriate individuals. The corollary of that is the benefit conferred upon potential candidates, who will become aware of opportunities that they might not otherwise be.

3.2.6. Atlas can process Personal Data to achieve a targeted selection of potential candidates. Without the use of the Personal Data in Atlas, Codex Edge and Atlas Users would lack any targeted means of identifying such individuals. Without Personal Data, Codex Edge and its clients would have to rely upon traditional retainer searches. These would be slower, more time consuming and expensive, and less comprehensive.

3.3. There is nothing unethical or unlawful in the way the Personal Data will be processed or in the reasons for which it will be processed.

3.4. If there are any concerns about our Data Processing, individuals have the right to object to Data Processing that is based on our legitimate interests.

3.5. All data can be used for marketing and research purposes provided it's consistent with all other elements of the agreement.

4. Purposes for which we may Process Personal Data

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

4.1.1. Operating and managing our Sites, Software and Services;

4.1.2. Compliance with our legal and regulatory obligations under applicable law

5. Disclosure of Personal Data to third parties

5.1. We may disclose publicly available Personal Data to other entities within the Codex Edge group of companies and to our customers (for example, recruitment agencies, law firms and event organisers) for legitimate business purposes, including operating and providing our Sites, Software and Services in accordance with applicable law.

5.2. Where Personal Data is disclosed to Atlas users or customers through Atlas, Codex Edge Ltd does so as an independent data controller in relation to that Personal Data. Codex Edge Ltd does not process that Personal Data solely on behalf of its customers.

5.3. In addition, we may disclose that Personal Data to:

5.3.1. Legal and regulatory authorities, upon request, or for the purposes of reporting any actual or suspected breach of applicable law or regulation;

5.3.2. Accountants, auditors, lawyers and other outside professional advisors to Codex Edge, subject to binding contractual obligations of confidentiality;

5.3.3. 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

5.3.4. Any relevant third-party acquirer(s), if we sell or transfer all or any relevant portion of our business or assets (including in the event of a reorganization, dissolution or liquidation).

6. International Transfer of Personal Data

6.1. Codex Edge Ltd does not transfer personal data outside the United Kingdom in connection with Atlas.

6.2. All personal data processed in connection with Atlas is stored and processed in the United Kingdom only.

6.3. There is no offshore processing of personal data in connection with Atlas.

7. Data Accuracy

7.1. We take reasonable steps to ensure that:

7.1.1. Personal Data that we Process is accurate and kept up to date.

7.1.2. Any Personal Data that we Process that is inaccurate (having regard to the purposes for which it is Processed) is erased or rectified without delay.

8. Data Retention

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

8.1.1. We will retain copies of Personal Data in a form that permits identification only for as long as is necessary in connection with the purposes set out in this Privacy Policy, unless applicable law requires a longer retention period.

8.1.2. We may retain your Personal Data for the duration of any period necessary to establish, exercise or defend any legal rights.

9. Legal Rights

9.1. Subject to applicable law, data subjects have several rights regarding the Processing of their Relevant Personal Data, including:

9.1.1. the right not to provide Personal Data to us;

9.1.2. the right to request access to, or copies of, Relevant Personal Data, together with information regarding the nature, Processing and disclosure of those Relevant Personal Data;

9.1.3. the right to request rectification of any inaccuracies in Relevant Personal Data;

9.2. The right to request, on legitimate grounds:

9.2.1. Erasure of their Relevant Personal Data

9.2.2. Restriction of Processing of their Relevant Personal Data

9.2.3. The right to object to the Processing of your Relevant Personal Data by us or on our behalf

9.3. Data subjects have the right to lodge complaints with a Data Protection Authority regarding the Processing of their Relevant Personal Data by us or on our behalf. This does not affect their statutory rights.

9.4. We may request proof of identification from the data subject in order to exercise their legal rights.

10. Definitions

- “Atlas Users” is a person (including a company) who subscribes, trials or accesses with authorisation the Codex Edge Atlas platform
- “Data Controller” is a person (including a company) who determines the purposes for which, and the manner for which, any personal data are processed.
- “Data Protection Authority” means an independent public authority that is legally tasked with overseeing compliance with applicable data protection laws.
- “Personal Data” means any information relating to an identified or identifiable natural person.
- “Process”, “Processing” or “Processed” means anything that is done with any Personal Data, whether by automated means, such as collection, organisation, 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 Data 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.
- “Satisfactory Jurisdiction” a jurisdiction that has been formally designated by the European Commission as providing a satisfactory level of protection for Personal Data.
- “Services” means the services provided under any applicable agreement between Codex Edge and our clients 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 Codex Edge (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 Codex Edge or on our behalf.