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## **ADERANT HOLDINGS, INC. SAFE HARBOR PRIVACY POLICY**

### **I. European Union Safe Harbor Policy**

Aderant Holdings, Inc. and its affiliated ADERANT entities (collectively "ADERANT" or, alternatively "the company", "we", "us" or "our") respect individual privacy and value the confidence of our clients, customers, employees, consumers, business partners, and others. ADERANT adheres to the Safe Harbor Framework concerning the transfer of personal data from the European Union to the United States. Accordingly, ADERANT follows the Safe Harbor Principles published by the U.S. Department of Commerce ("Principles") with respect to all such data, the specifics of which can be found at <http://export.gov/safeharbor> as agreed by the U.S. Department of Commerce and the European Commission. This statement ("Privacy Policy") outlines our general policy and practices for implementing the Principles, including the types of information ADERANT gathers, how we use it, and the choices affected individuals have regarding our use of, and their ability to correct, that information.

This Privacy Policy applies to all personal information that ADERANT handles, including on-line (except as noted below), off-line, and manually processed data. For purposes of this Privacy Policy, "Personal Information" means information that:

1. is transferred from the European Union to the United States;
2. is recorded in any form;
3. is about, or pertains to, a specific individual or can be linked to that individual.

### **II. Principles Protecting Individuals' Privacy**

#### **(a) Notice and Choice**

To the extent permitted by the Safe Harbor Framework, ADERANT reserved the right to process Personal Information in the course of its internal business operation without the knowledge of the individuals that may be involved.

Where ADERANT receives Personal Information from its subsidiaries, affiliates, or other entities in the European Union, ADERANT will use and disclose such Personal Information only in accordance with the purposes for which it was originally collected, or in accordance with the notices provided by such entities.

ADERANT will provide notice and provide individuals with the opportunity to "opt out" if such Personal Information is to be disclosed to a third party or used for a purpose which is not consistent with the purposes for which it was originally collected. For sensitive Personal Information, affirmative or explicit, ADERANT will provide notice and individual choice will be given to "opt in" if such sensitive Personal Information is to be disclosed to a third party or used for a purpose other than the purpose for which it was originally collected.

ADERANT collects Personal Information from individuals only as permitted by the Principles or with the consent of the individual affected. If applicable, consent for Personal Information to be collected, used, and/or disclosed in certain ways may be required in order for an individual to obtain or use ADERANT services.

#### **(b) Disclosures and Transfers**

ADERANT does not disclose an individual's Personal Information to third parties, except when one or more of the following conditions is true:

1. ADERANT has the individual's permission to make the disclosure;
2. The disclosure is required by law or mandatory professional standards;
3. The disclosure is reasonably related to the sale or other disposition of all or part of ADERANT's business;
4. The information in question is publicly available;
5. The disclosure is reasonable necessary for the establishment of legal claims; or
6. The disclosure is to another ADERANT entity or to persons or entities providing services on ADERANT's or the individual's behalf (each a "transferee"), consistent with the purpose for

which the Personal Information was obtained, if the transferee, with respect to the Personal Information in question:

- a. is subject to law providing an adequate level of privacy protection;
- b. has agreed in writing to provide an adequate level of privacy protection; or
- c. Subscribes to the Principles.

Permitted transfers of Personal Information, either to third parties, or within ADERANT, or between subsidiaries of ADERANT, include the transfer of data from one jurisdiction to another, including transfers to and from the United States of America. Because privacy laws vary from one jurisdiction to another, Personal Information may be transferred to a jurisdiction where the laws provide less or different protection than the jurisdiction in which the Personal Information originated.

**(c) Data Security, Integrity and Access**

ADERANT employs various physical, electronic and managerial measures designed to provide reasonable protection of Personal Information from accidental loss or destruction, improper use, alteration, or disclosure. However, ADERANT cannot guarantee the security of information on or transmitted via the Internet.

ADERANT processes Personal Information only in ways consistent with the purpose for which it was collected or authorized by the individual. To the extent necessary for such purposes, ADERANT takes reasonable steps to make sure that Personal Information is accurate, complete, current and otherwise reliable with regard to its intended use.

If an individual becomes aware that Personal Information we maintain about that individual is inaccurate, or if an individual would like to update or review his or her Personal Information, the individual may contact us using the contact information below. The individual will need to provide sufficient unique identifying information. We may request additional identifying information as a security precaution. In addition, we may limit or deny access to Personal Information where providing such access would be unreasonably burdensome or expensive in the circumstances, or as otherwise permitted by the Safe Harbor Framework. In some circumstances we may charge a reasonable fee, where warranted, for access to Personal Information.

**(d) Information Subject to Other Policies**

ADERANT is committed to following the Principles for the protection of all Personal Information within the scope of the Safe Harbor Framework. However, certain information as specified below may be subject to policies that may differ in some respects from the general policies set forth in this Privacy Policy:

1. Links from ADERANT's external website ([www.aderant.com](http://www.aderant.com)) and our intranet have their own privacy policies that may apply to those websites. These policies may be accessed through the linked websites; and
2. Information obtained from or relating to clients or former clients, employees, business partners and others, is further subject to the terms of any confidentiality or privacy notice to that client or former client, employee, business partner or other, any engagement letter or service agreements executed with the client or former client, employee, business partner or other, and applicable laws and professional consulting standards.

**III. Changes to this Privacy Policy**

ADERANT reserves the right to change or amend this Privacy Policy from time to time and will post any revisions on this website. When and if ADERANT does so, ADERANT will also revise the "last updated" date at the end of this Privacy Policy.

**(a) Amendments**

This Privacy Policy may be amended from time to time, consistent with the requirements of the Safe Harbor Framework. If this Privacy Policy is amended, a revised Privacy Policy will be posted on ADERANT's website.

**(b) How to Contact ADERANT**

Should you have any questions or suggestions about ADERANT's privacy practices, or wish to update or correct any personally identifiable information that you have chosen to provide us, please feel free to contact us at:

Aderant Holdings, Inc.  
c/o Aderant North America, Inc.  
Attention: Director, Global IT  
2255 Killearn Center Blvd.  
Tallahassee, FL 32309 USA  
Email: [Chris.Tankard@aderant.com](mailto:Chris.Tankard@aderant.com) or [privacy@aderant.com](mailto:privacy@aderant.com)