

## プライバシーポリシー

### 1. General

1.1. By accessing and using the Simmons & Simmons elexica site (the “Site”) you agree to be bound by this Privacy Policy, the [Terms of Use](#) and any additional terms which are set out on the Site from time to time, which together govern such access and use (collectively the “Terms”), and you consent to the collection and use of your personal data by us in accordance with this Privacy Policy. The Terms may be translated into languages other than English. The English language version of the Terms shall prevail to the extent that there is any conflict or inconsistency with any such translated version.

1.2. Please read the Terms carefully before you start to use the Site. If you do not agree to the Terms, do not use the Site.

1.3. We may revise this Privacy Policy at any time by amending this page. You are expected to check this page from time to time to take notice of any changes we make, as they are binding on you.

1.4. This Privacy Policy describes how we fulfil our obligations under applicable data protection laws, including the Data Protection Directive 95/46/EC (and related national implementing legislation) and the Personal Data (Privacy) Ordinance (Cap. 486) of Hong Kong.

### 2. Information about us

The Site is owned by Simmons & Simmons LLP, CityPoint, One Ropemaker Street, London EC2Y 9SS, and its affiliated practices, successors and assigns, including (without limitation) elexica Limited (“we”, “us” or “our”). We are authorised and regulated by the Solicitors Regulation Authority, whose rules can be found on their website at [www.sra.org.uk](http://www.sra.org.uk).

### 3. Information we may collect from you

We may collect and process data about you:

3.1. In order to grant you access to the Site. Access to the Site is restricted to authorised users only, and we will need to collect certain data about you in order to register you as an authorised user and grant you access to the Site. We may also use your personal data to enable us to deal with any queries you have about the Site and to notify you of any changes to the Site.

3.2. By the use of cookies on the Site, in accordance with our Cookies policy set out in paragraph 4 below.

3.3. For the purposes set out in paragraph 6 below.

### 4. Cookies Policy

#### 4.1. What is a cookie?

Cookies are small data files that many internet sites automatically download to a user's computer, phone or tablet's hard disk. They are primarily used in helping web sites recognise a user that has visited the web site previously such as simplifying the logging on process for registered users. They can store account and password information. Most web browsers automatically accept cookies. The Site uses cookies so that we can better service your return to the Site (further details on the exact cookies and their purposes are set out below).

You do not have to accept cookies, but without accepting them you may experience reduced Site functionality. If you should wish to reject the cookies then please read the information that came with your browser software to see how you can turn off the automatic download feature, should you so wish. For more information about cookies, including how to set your internet browser to reject cookies, please go to [www.allaboutcookies.org](http://www.allaboutcookies.org).

#### 4.2. What cookies will the Site use and for what purposes?

The Site uses four different cookies:

**Single session cookie.** This enables the Site to keep track of your movement from page to page in order to ensure that you will not be asked for the same information you have previously given during your visit to the Site. Cookies allow you to proceed through the Site quickly and easily without having to authenticate or reprocess each new area you visit. We may use the cookie to analyse user behaviour, such as which pages have been visited during the session, in order to improve your overall experience, for example enabling us to determine and display more relevant content.

**Remember me cookie.** This cookie enables the Site to remember your personal preferences such as log in details in order to improve the user experience for example by avoiding you having to re-enter these details on each visit to the Site.

**Remember my language cookie.** This cookie enables the Site to retain your language preference for future visits in order to improve the user experience. In addition, the cookie will set the language in which the non-content aspects of emails received from the Site will be displayed in.

**Global session cookie.** This cookie enables us to collect information such as number of visitors to the site and pages visited in order to analyse user behaviour. This information is collected in an anonymous form and will be collated with similar information received from other users to enable us to compile reports in order to develop and improve user experience by displaying more tailored and relevant content for example.

#### 4.3. How long will the cookie remain on my computer?

The single session cookie is a temporary cookie which remains in the cookie file of your browser until you close the browser.

The other cookies will remain in the cookie file of your browser after the closing of the browser, and will become active again when the Site is reopened, until automatic expiry ninety days (for the remember me cookie) or one year (for the remember global session and my language cookies) after your most recent visit to the Site. Following expiry of a cookie, a new version of that cookie will be downloaded when you next visit the Site.

The cookie(s) can be deleted at any time by you. The cookie(s) will not collect any information when you are not

accessing the Site.

#### 4.4. Third party cookies

The single session and global session cookies are provided on our behalf by a trusted third party service provider to aid in the reporting of user behaviour on the Site. This behaviour is analysed to provide an improved user experience. The information collected is not linked to personally identifiable information.

#### 4.5. Data sharing

Unless we are under a duty to disclose or share your personal data in order to comply with a court order or other legal or regulatory requirement, we will keep your information stored in cookies confidential and only use it within our group (which means our affiliated practices, successors and assigns), and not with any third party.

## 5. How will we use the information we collect about you?

We may process your personal information in order to:

5.1. Record and monitor your use of this website for internal purposes which may include analysis of usage, measurement of site performance and generation of marketing reports.

5.2. Use it to provide our services and products to you and disclose it to third parties (including, but not limited to, other lawyers who may or may not be part of the Simmons & Simmons organisation) where such disclosure is connected with the provision of such services and products.

5.3. Use it to market our products and services to you in the future and this may involve contacting you using the contact details you give us.

5.4. Transfer it to Simmons & Simmons' international offices and/or allow the information to be accessed by Simmons & Simmons personnel outside the EEA as well as within it. It may also be processed by personnel operating outside the EEA who work for us or for one of our suppliers. You should be aware that in territories outside the EEA laws and practices relating to the protection of personal data are likely to be different and in some cases may be weaker than those within the EEA). By submitting your personal data or by accessing and using the Site, you agree to this transfer or processing. We will take all steps reasonably necessary to ensure that your personal data is treated securely and in accordance with this Privacy Policy.

## 6. Disclosure of your information

6.1. We may disclose your personal data to any member of our group, which means our affiliated practices, successors and assigns.

6.2. We may disclose your personal data to third parties:

6.2.1. that are specifically engaged by us to provide services to us, in which case we will require those parties to keep that information confidential and secure and to use it solely for the purpose of providing the specified services to us;

6.2.2. if we or substantially all of our assets are acquired by a third party, in which case personal data held on the Site

will be one of the transferred assets; and/or

6.2.3. if we are under a duty to disclose or share your personal data in order to comply with a court order or other legal or regulatory requirement.

## 7. Updating and accessing your information

7.1. If you wish to update or amend the information which we hold about you or wish us to cease using your data please contact [elexica@simmons-simmons.com](mailto:elexica@simmons-simmons.com).

7.2. You have a right under the data protection laws to access the information we hold about you, subject to certain conditions. If you wish to make an application to access this information please contact [elexica@simmons-simmons.com](mailto:elexica@simmons-simmons.com).

7.3. If you do not want to receive any elexica email alerts or newsletters, you can amend your profile accordingly on the Site.

## 8. Links from the Site

Where the Site contains links to other websites and resources provided by third parties, please note that these websites have their own privacy policies and that we do not accept any responsibility or liability for these policies. Please check these policies before you submit any personal data to these websites.

## 9. Contacting us

If you have any queries about this Privacy Policy please contact [elexica@simmons-simmons.com](mailto:elexica@simmons-simmons.com).

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elexica Limited, CityPoint, One Ropemaker Street, London EC2Y 9SS