Privacy Policy

CourtCorrect Ltd.

Document Name	Privacy Policy
Effective Date	08/04/2026
Policy Owner	CEO
Classification	Internal Use
Next Review Date	08/04/2027
ISMS Reference	Supporting Policy

1. Purpose

This Privacy Policy explains how CourtCorrect Ltd. collects, uses, stores and protects personal data in connection with our business operations, services and digital platforms.

This Privacy Policy applies to all personal data processed by CourtCorrect in connection with our platform, website, products, professional services, and all other business operations. It is intended to provide transparency as required under the UK GDPR and does not create any contractual rights beyond those required by law.

This website is not intended for children, and we do not knowingly collect or process children's personal data.

You should read this Privacy Policy together with any other privacy notice or fair processing notice we may supply in specific contexts, as those documents will apply in addition to, but not instead of, this Privacy Policy.

If you have any questions about our processing activities, including requests to exercise your legal rights, please contact us using the details in Section 3.

2. Who We Are and Our Role Under Data Protection Law

CourtCorrect Ltd. is a company registered in England and Wales (company number 12117945) with its registered address at 33 Percy Street, London, W1T 2DF, United Kingdom.

Depending on the nature of the relevant processing activity, CourtCorrect may act as a Controller or a Processor. CourtCorrect will determine its role for each processing activity in accordance with the UK GDPR based on whether CourtCorrect determines the purposes and essential means of processing.

2.1 CourtCorrect as Controller

CourtCorrect acts as an independent Controller when processing personal data for purposes that CourtCorrect determines, including (without limitation):

(a) operating, maintaining and securing the CourtCorrect Platform;

(b) logging, monitoring and auditing system usage;

(c) analysing usage data for service improvement, diagnostics and performance optimisation;

(d) billing, account management and customer administration;

(e) marketing, communications and product development; and

(f) complying with our legal and regulatory obligations.

When acting as Controller, CourtCorrect processes personal data for its own legitimate interests or other lawful bases, as outlined in this Privacy Policy.

2.2 CourtCorrect as Processor

CourtCorrect acts as a Processor only when processing Case Data or end-user data strictly on the documented instructions of a Customer, including:

(g) case files, documents and evidence uploaded by Customers;

(h) structured or unstructured case information;

(i) data relating to claimants, complainants or other end-users submitted through Customer workflows; and

(j) any data processed solely to provide the Services purchased by the Customer.

Where CourtCorrect acts as a Processor, the Data Processing Agreement (DPA) governs the processing, and the Customer is responsible for determining the lawful basis, issuing any notices required to its own end-users, and fulfilling its controller obligations.

2.3 Joint Controller

Unless expressly agreed in writing, CourtCorrect does not act as a joint controller with any Customer and does not jointly determine the purposes of any Customer's processing activities. This ensures that CourtCorrect does not assume shared responsibility or liability for Customer decision-making.

3. Contact Details

Questions about this Privacy Policy or data protection matters may be directed to the Data Protection Officer: Our Data Protection Officer is George Harris of Data Privacy Services (Data Privacy and Data Security Services Limited), who can be contacted directly at george@dataprivacyservices.co.uk.

CourtCorrect Ltd.

33 Percy Street, London W1T 2DF

Data Protection Registration (ICO): ZB564422

Email: hello@courtcorrect.com

Telephone: +44 330 1332 411

You have the right to make a complaint at any time to the Information Commissioner's Office ("ICO"), the UK supervisory authority for data protection matters (www.ico.org.uk). CourtCorrect is registered with the ICO under registration number ZB564422.

We would, however, appreciate the opportunity to address your concerns before you contact the ICO, and we encourage you to reach out to us in the first instance.

4. The Data We Collect About You

Personal data means any information relating to an identified or identifiable individual. It does not include anonymous or aggregated data.

CourtCorrect collects and processes two distinct categories of personal data:

- **Customer Data** — personal data relating to our direct clients, users, and prospective users.
- **End-User / Case Data** — personal data uploaded by our customers relating to their own clients, claimants, or case participants. CourtCorrect processes this data strictly on behalf of the Customer, in its role as Processor, unless otherwise expressly stated.

4.1 Customer Data (CourtCorrect as Controller)

- **Identity Data** — first name, last name, username, job title.
- **Contact Data** — email address, business address, billing address, telephone numbers.
- **Organisation Data** — organisation name, address, members, logos, and other details supplied for account creation or configuration.
- **Financial Data** — payment card details and billing information.
- **Transaction Data** — details of payments and services purchased.
- **Technical Data** — IP address, login data, browser type, device identifiers, time zone settings, and other technical information.
- **Profile Data** — login credentials, your profile picture, purchases or orders made by you, your interests, preferences, feedback and survey responses, including the content you interact with on CourtCorrect.
- **Marketing and Communications Data** — marketing preferences and communication choices.
- **Usage Data** — information about how you interact with the Platform, including feature usage, system logs, workflow interactions, timestamps, and actions taken within the Platform.

4.2 End-User / Case Data (CourtCorrect as Processor)

Case Data means any information uploaded, submitted or generated on the Platform by the Customer or its users in connection with case handling. CourtCorrect does not determine the nature, accuracy, or lawfulness of Case Data, and processes it solely in accordance with the Customer's documented instructions and the DPA.

4.3 Aggregated and Statistical Data

We also collect, use and share Aggregated Data, such as usage statistics or performance metrics. This data does not identify any individual and is not considered personal data. Where Aggregated Data is derived from personal data and could indirectly identify an individual, we will treat it as personal data.

4.4 Special Category Data

CourtCorrect does not intentionally collect or process special category data under data protection legislation (this includes details about your race or ethnicity, religious or philosophical beliefs, sex life, sexual orientation, political opinions, trade union membership, information about your health, and genetic and biometric data). Nor do we collect any information about criminal convictions and offences. If Customers upload such data as part of Case Data, they do so at their own discretion and responsibility, and CourtCorrect processes it only as a Processor in accordance with the DPA.

4.5 Failure to Provide Personal Data

If required data is not provided where it is necessary for us to perform our contract or comply with a legal obligation, we may be unable to provide the relevant services, and we will inform you if this is the case.

5. How We Collect Your Personal Data

We use different methods to collect data depending on the type of data and the nature of your interaction with CourtCorrect.

5.1 Direct Interactions (Customer Data)

CourtCorrect may collect Identity, Contact, Organisation, and Financial Data directly from you when you:

(k) create an Account;

(l) complete forms on the Platform;

(m) communicate with us by email, telephone, live chat or post;

(n) request support or submit feedback; or

(o) enter into contracts or make enquiries regarding our Services.

This includes instances where your organisation registers you as a User.

5.2 Customer Uploads (Case Data)

(p) Customers and their authorised Users may upload, input, or generate Case Data on the Platform.

(q) CourtCorrect does not independently collect Case Data.

(r) All Case Data is provided exclusively by the Customer or its authorised Users.

(s) CourtCorrect processes Case Data solely on behalf of the Customer and only in accordance with the Customer's documented instructions and the Data Processing Agreement (DPA).

5.3 Automated Data Collection

CourtCorrect may automatically collect Technical Data and Usage Data when you access or use the Platform. Such data may include:

(t) device information, log files, and IP address;

(u) browser type, operating system, plug-ins, and device identifiers;

(v) interaction data, usage statistics, and diagnostic logs.

This information is collected through cookies, analytics tools, and other technologies necessary for security, performance, fraud prevention and service optimisation.

5.4 Data Received from Third Parties and Public Sources

CourtCorrect may receive personal data from third parties, including:

(w) Identity and Contact Data from publicly accessible sources such as Companies House, data brokers or aggregators;

(x) Technical Data from analytics or hosting providers;

(y) Organisation Data supplied by the Customer during onboarding.

CourtCorrect does not purchase personal data from third-party marketers.

5.5 Support and Issue Resolution

(z) When you contact CourtCorrect for support, we may collect information necessary to diagnose and resolve your issue.

(aa) Support communications may be logged for security, training, and quality assurance.

(bb) CourtCorrect does not access Case Data for support purposes unless explicitly authorised by the Customer. Any such access is strictly limited, logged, and controlled.

6. How We Use Your Personal Data

6.1 General Principles

CourtCorrect shall process personal data only where permitted under Article 6 of the UK GDPR and only for the purposes set out in this Privacy Policy. Processing shall be:

(cc) lawful, fair, and transparent;

(dd) limited to what is necessary;

(ee) subject to appropriate security measures; and

(ff) consistent with CourtCorrect's commercial and compliance obligations.

6.2 Legal Bases for Processing

CourtCorrect relies on the following legal bases when processing personal data:

Performance of a Contract — where processing is necessary to provide the Services, operate the Platform, manage accounts, deliver support, or fulfil obligations under the Terms of Service or Order Form.

Compliance with Legal Obligations — including obligations under tax law, accounting rules, data protection laws, security requirements, and regulatory reporting.

Legitimate Interests — where processing is necessary for CourtCorrect's legitimate business purposes, provided such interests are not overridden by the rights and freedoms of the data subject. These interests include: service optimisation, troubleshooting, analytics and performance monitoring; fraud detection and network security; training, quality assurance and improving our Services; and responding to legal claims or preventing misuse of the Platform.

CourtCorrect will only rely on consent where required by law (for example, for marketing communications or optional features). You may withdraw your consent at any time by contacting us; withdrawal will not affect the lawfulness of processing already carried out but may affect your ability to use optional, non-essential features of the Services.

6.3 Purposes For Which We Will Use Your Personal Data

We have set out below a description of all the ways we plan to use your personal data, and which of the legal bases we rely on to do so. We have also identified what our legitimate interests are where appropriate.

Note that we may process your personal data on more than one lawful ground depending on the specific purpose for which we are using your data. Please contact us via email at hello@courtcorrect.com if you need details about the specific legal ground we are relying on to process your personal data where more than one ground has been set out in the table below.

Purpose/Activity	Type of data	Lawful basis for processing including basis of legitimate interest
To register you as a new customer	Identity, Contact	Performance of a contract with you
To process and deliver your order, manage payments, fees and charges, and collect and recover money owed to us	Identity, Contact, Financial, Transaction, Marketing and Communications	(a) Performance of a contract with you(b) Necessary for our legitimate interests (to recover debts due to us)
To manage our relationship with you, including notifying you about changes to our terms or privacy policy and asking you to leave a review	Identity, Contact, Marketing and Communications	(a) Performance of a contract with you(b) Necessary to comply with a legal obligation(c) Necessary for our legitimate interests (to keep our records updated and to study how customers use our products/services)
To administer and protect our business and this website, including troubleshooting, data analysis, testing, system maintenance, support, reporting and hosting of data	Identity, Contact, Technical, Usage	(a) Necessary for our legitimate interests (for running our business, provision of administration and IT services, network security, to prevent fraud and in the context of a business reorganisation or group restructuring exercise)(b) Necessary to comply with a legal obligation
To use data analytics to improve our website, products/services, marketing, customer relationships and experiences	Identity, Contact, Technical, Usage, Marketing and Communications	Necessary for our legitimate interests (to define types of customers for our products and services, to keep our website updated and relevant, to develop our business and to inform our marketing strategy)
To make suggestions and recommendations to you about goods or services that may be of interest to you	Identity, Contact, Technical, Usage, Marketing and Communications	Necessary for our legitimate interests (to develop our products/services and grow our business)
To operate, monitor, and improve AI-assisted features of the Platform, including model performance evaluation, diagnostics, and quality assurance	Technical, Usage, Aggregated Data	Necessary for our legitimate interests (to maintain and improve the reliability, accuracy, and performance of the Services)

6.4 AI-Assisted Processing

CourtCorrect uses artificial intelligence and machine learning technologies as part of its Platform to assist Customers with case management, document analysis, and dispute resolution. When CourtCorrect acts as a Controller, AI-assisted features may process Technical Data and Usage Data for service improvement, diagnostics, and quality assurance. When CourtCorrect acts as a Processor, AI-assisted features process Case Data solely on the Customer's documented instructions and in accordance with the DPA.

CourtCorrect does not use solely automated decision-making that produces legal effects or similarly significant effects on individuals within the meaning of Article 22 of the UK GDPR. AI-generated outputs are subject to human oversight before any decision that materially

affects a data subject is taken. Where a Customer uses AI-assisted features of the Platform to support its own decision-making, the Customer is responsible for ensuring that appropriate human review and oversight are applied in accordance with its own legal obligations.

6.5 Marketing and Cookies

CourtCorrect may use your Personal Data to assess what products, features or services may be relevant or of interest to you. You may receive marketing communications from us if you have requested information or purchased services from us and have not opted out of receiving such communications.

We will obtain your express opt-in consent before sharing your personal data with any third party outside CourtCorrect for their own marketing purposes.

You may opt out of receiving marketing messages from us at any time by using the unsubscribe link contained in those communications or by contacting us at hello@courtcorrect.com. Opting out of marketing will not affect service-related or operational messages necessary for the management of your account or our services.

You may configure your browser to refuse some or all cookies or to alert you when cookies are used. Please note that disabling or refusing cookies may cause parts of our website or Platform to become inaccessible or function incorrectly. Further information on the cookies we use is available in our Cookie Policy at https://www.courtcorrect.com/cookie-policy.

6.6 Change of Purposes

Where CourtCorrect intends to use personal data for a purpose materially different from that for which it was originally collected, CourtCorrect will:

(gg) assess compatibility under Article 6(4) UK GDPR;

(hh) update this Privacy Policy where required.

We may use your personal data for any compatible purpose, or for other purposes where permitted by law, including internal analytics, compliance, or risk management activities. CourtCorrect may continue processing where required or permitted by law without further notice or consent. If you wish to get an explanation as to how the processing for the new purpose is compatible with the original purpose, please contact us via email at hello@courtcorrect.com.

7. Disclosures of Personal Data

CourtCorrect may disclose personal data only where such disclosure is necessary for the purposes set out in this Privacy Policy, required by law, or otherwise permitted under the UK GDPR. CourtCorrect ensures that any third party receiving personal data processes such data strictly in accordance with CourtCorrect's instructions and applicable law.

CourtCorrect may disclose personal data to the following categories of recipients:

- **Service Providers (Processors):** CourtCorrect may disclose personal data to third-party service providers acting as processors. These include hosting, infrastructure, analytics, security, AI tooling, and communications providers. Such processors are permitted to process personal data solely for the purposes of providing services to CourtCorrect and are bound by contractual data protection obligations.
- **Professional Advisers and Authorities:** CourtCorrect may disclose personal data to professional advisers (including legal, financial, audit or insurance advisers) and to HMRC, regulatory authorities, law enforcement bodies, or other government entities

where required by law or where reasonably necessary to protect CourtCorrect's rights or comply with regulatory obligations.

- **Third parties involved in corporate transactions:** CourtCorrect may disclose personal data in connection with any business sale, merger, acquisition, financing, restructuring, or similar corporate event. Any such party will be required to use personal data in a manner consistent with this Privacy Policy.
- **Other CourtCorrect Users:** CourtCorrect may disclose personal data to other users only where required for the performance of services requested by you. Case Data submitted by you will not be shared with other users unless you expressly instruct or authorise us to do so.

CourtCorrect requires all third-party service providers and partners who process personal data on its behalf to maintain appropriate confidentiality, security, and data protection measures. Such third parties are strictly prohibited from using personal data for their own purposes and may process personal data solely in accordance with CourtCorrect's documented instructions and only for the specific purposes for which they have been engaged.

CourtCorrect does not sell personal data, and CourtCorrect does not share personal data with third parties for their independent commercial benefit, advertising purposes, or any form of data monetisation.

7.1 International Transfers

CourtCorrect may allow personal data to be accessed or processed by certain approved sub-processors located outside the United Kingdom or European Economic Area, but only where such transfers are permitted under the UK GDPR. Where data is transferred internationally, CourtCorrect implements appropriate safeguards, which may include Standard Contractual Clauses, the UK–US Data Bridge, or other legally recognised transfer mechanisms. Further details of our sub-processors and applicable transfer mechanisms are set out in our Data Processing Agreement (DPA).

8. Data Security

8.1 Security Measures

CourtCorrect implements appropriate technical and organisational measures designed to protect personal data against accidental, unlawful, or unauthorised destruction, loss, alteration, access, disclosure, or use. These measures include access controls, encryption where appropriate, network and infrastructure security, monitoring, and internal governance protocols. The specific measures applied depend on the nature of the data and the risks identified. Security controls are maintained in accordance with the CourtCorrect ISMS and the Data Protection and Handling Policy.

8.2 Access Restrictions

Access to personal data is strictly limited to authorised employees, contractors, agents, and sub-processors who have a legitimate business need to access such information. All such individuals are subject to confidentiality obligations and are required to process personal data strictly in accordance with CourtCorrect's instructions and applicable law.

8.3 Security Limitations

While CourtCorrect maintains security measures that meet or exceed industry standards, no method of data transmission or storage is entirely secure. CourtCorrect cannot guarantee

absolute security of personal data processed through its systems, and the Customer acknowledges that residual risks may remain inherent in all digital systems.

8.4 Breach Management

CourtCorrect has established procedures to detect, investigate, and respond to personal data breaches in accordance with the Incident Management Policy. Where required by applicable law, CourtCorrect will notify the relevant supervisory authority without undue delay and in any event within 72 hours of becoming aware of a personal data breach that is likely to result in a risk to individuals' rights and freedoms. Affected data subjects and Customers will be notified in accordance with the UK GDPR and the applicable Data Processing Agreement.

8.5 Customer Responsibilities

The Customer is responsible for maintaining the security and confidentiality of any user credentials, access tokens, or authentication mechanisms provided for use of the Services, and for ensuring that its Users comply with all security requirements communicated by CourtCorrect. CourtCorrect is not responsible for unauthorised access resulting from the Customer's failure to secure its own systems or credentials.

9. Data Retention

CourtCorrect retains personal data only for as long as necessary to fulfil the purposes for which it was collected, including meeting legal, regulatory, accounting, or reporting requirements, resolving disputes, enforcing agreements, and maintaining the integrity and security of the Service. Retention periods are defined in the Data Retention and Disposal Policy.

When determining appropriate retention periods, CourtCorrect considers:

(ii) the nature, scope, and sensitivity of the personal data;

(jj) the potential risk of harm from unauthorised use or disclosure;

(kk) the purposes for which the data is processed and whether those purposes can be achieved by other means; and

(ll) applicable legal, regulatory, and operational requirements.

9.1 Case Data Retention

Case Data processed within the CourtCorrect Platform in connection with dispute resolution or case management is retained for as long as the Customer (or any other party to the case) maintains an active account, unless the Customer requests deletion earlier and deletion is legally permissible. CourtCorrect acts solely on the Customer's documented instructions regarding the retention or deletion of Case Data and does not determine retention periods for such data. Where deletion is requested, CourtCorrect will delete the data unless it is required to retain it under applicable law.

9.2 General Personal Data

Identity, Contact, Billing, Technical, Usage and other account-related data are retained for as long as necessary to manage the Customer's account, operate the Platform, comply with legal and regulatory obligations, resolve disputes, maintain security records, or establish, exercise or defend legal claims. Basic customer information (including Identity, Contact, Financial and Transaction Data) will be retained for at least six (6) years after the customer relationship ends, in accordance with UK tax and financial record-keeping requirements.

9.3 Deletion and Anonymisation

The Customer may delete data directly through the Platform or request deletion from CourtCorrect. CourtCorrect will comply with such requests unless retention is required by law or otherwise permitted under the UK GDPR. Personal data may be anonymised so that it no longer identifies any individual; anonymised data may be retained and used indefinitely for analytics, system improvement and other legitimate business purposes.

10. Your Legal Rights

Subject to applicable law, individuals have the following rights in relation to their personal data processed by CourtCorrect:

- **Right of Access:** You may request a copy of the personal data we hold about you and information about how we process it.
- **Right to Rectification:** You may request correction of inaccurate personal data or completion of incomplete data. CourtCorrect may ask for evidence to verify the accuracy of any corrected information.
- **Right to Erasure:** You may request deletion of your personal data where there is no lawful basis for us to continue processing it. CourtCorrect may refuse deletion where retention is required by law or necessary to establish, exercise, or defend legal claims.
- **Right to Object:** You may object to processing carried out on the basis of our legitimate interests, where your particular circumstances justify objection, as you feel it impacts on your fundamental rights and freedoms. You may also object at any time to the use of your personal data for direct marketing.
- **Right to Restrict Processing:** You may request that we restrict the processing of your personal data in circumstances permitted under the UK GDPR, for example where you contest the accuracy of the data, where processing is unlawful and you prefer restriction to deletion, where you need the data for legal claims, or where you have objected to processing and we are considering whether our legitimate grounds override your interests.
- **Right to Data Portability:** You may request a copy of certain personal data in a structured, commonly used, machine-readable format, and may request that we transfer such data to another controller where technically feasible. This right applies only to automated processing based on consent or contract.
- **Right to Withdraw Consent:** Where we rely on consent for processing, you may withdraw that consent at any time. Withdrawal does not affect the lawfulness of processing carried out before the withdrawal. If you withdraw your consent, we may not be able to provide certain products or services to you. We will advise you if this is the case at the time you withdraw your consent.
- **Rights in Relation to Automated Processing:** You have the right not to be subject to a decision based solely on automated processing, including profiling, which produces legal effects concerning you or similarly significantly affects you, except where permitted under Article 22 of the UK GDPR. As noted in Section 6.4, CourtCorrect does not engage in solely automated decision-making of this kind.

10.1 Exercising Your Rights

Requests to exercise these rights may be submitted by contacting us at hello@courtcorrect.com. CourtCorrect may require additional information to verify your identity and ensure your right to access your personal data before responding. CourtCorrect

does not charge a fee for exercising your rights. However, we may charge a reasonable fee or refuse to act where a request is manifestly unfounded, excessive, or repetitive.

We will respond to all valid requests within the time limits set out in the UK GDPR, usually within one month. Complex or numerous requests may take longer; if so, we will notify you and provide an explanation of the reasons for the extension. The maximum permissible extension is two additional months (three months total).

11. Administrative Provisions

11.1 Changes to This Privacy Policy

CourtCorrect keeps this Privacy Policy under regular review and may update it from time to time. Any changes will be published on our website and will take effect upon publication unless stated otherwise. Continued use of our services after an update constitutes your acceptance of the revised Privacy Policy.

11.2 Your Duty to Inform Us of Changes

It is important that the personal data we hold about you is accurate and up to date. Please notify us of any changes to your personal information during your relationship with us.

11.3 Third-Party Links

Our website and Platform may contain links to third-party websites or services. Clicking on those links may allow third parties to collect or share information about you. CourtCorrect does not control these websites and is not responsible for their privacy practices. We encourage you to review the privacy policies of any third-party site you visit.

12. Review

This Privacy Policy shall be reviewed at least annually by the Data Protection Officer, or more frequently in response to:

- Changes to applicable data protection law or regulatory guidance.
- Material changes to CourtCorrect's processing activities, sub-processors, or service offerings.
- Findings from internal or external audits.
- Outputs from the ISMS Management Review (08-ISMS).
- Significant data protection incidents or complaints.

The review cycle is aligned with the ISMS annual review cadence to ensure consistency between this external-facing Privacy Policy and internal data protection policies.

13. Glossary

"Personal Data" means any information relating to an identified or identifiable natural person, as defined under the UK GDPR.

"Case Data" means any data, documents, files, evidence, or other information uploaded, submitted, or generated by Customers or their end-users through the CourtCorrect Platform in connection with a claim, case, or matter.

“Customer Data” means the personal data that CourtCorrect collects from or about its direct clients, users, or prospective users in connection with account creation, access to the Platform, customer support, communications, billing, or the general use of the Services.

“Services” means the technology platform and related services made available by CourtCorrect to the Customer for case and complaints management, including all AI-assisted functionality, as further defined in the Terms and Conditions or applicable Order Form.

“Platform” means the CourtCorrect web application and any associated interfaces, APIs, or mobile applications through which the Services are delivered.

“Controller” means the natural or legal person who determines the purposes and means of processing personal data.

“Processor” means the natural or legal person who processes personal data on behalf of a Controller.

“Sub-processor” means any third party appointed by CourtCorrect to process personal data on CourtCorrect’s behalf when CourtCorrect acts as a Processor.

“Legitimate Interest” means CourtCorrect’s interest in operating, improving and securing its services and business. We make sure we consider and balance any potential impact on you (both positive and negative) and your rights before we process your personal data for our legitimate interests. CourtCorrect will not rely on legitimate interests where such interests are overridden by your fundamental rights and freedoms.

“Performance of a Contract” means processing that is necessary for entering into, or performing, a contract to which you are a party.

“Legal or Regulatory Obligation” means processing personal data where it is necessary for compliance with a legal or regulatory obligation to which CourtCorrect is subject.

“Special Category Data” means personal data requiring additional protection under the UK GDPR (such as health, biometric, race, ethnicity, or political opinions). CourtCorrect does not intentionally collect such data.

“Aggregated Data” means data that does not identify an individual and is compiled for statistical or analytical purposes. Aggregated Data is not considered Personal Data.

“Data Subject” means an identified or identifiable natural person whose personal data is processed.

“International Transfer” means the transfer of personal data outside the UK or EEA under Chapter V of the UK GDPR.

“UK GDPR” means the UK General Data Protection Regulation, as incorporated into UK law following Brexit.

“DPA” means the Data Processing Agreement between CourtCorrect and the Customer, which governs CourtCorrect’s processing of personal data as a Processor.

14. Version History

Version	Date	Author	Description	Approved by
1.0	15/12/2023	L. Langridge	Initial policy creation.	L. Bull
2.0	12/07/2024	H. Solomonides	Minor edits and formatting	L. Bull

			improvements.	
3.0	02/04/2025	E. Marin	Sub-processors updates and legal basis for processing.	L. Bull
4.0	27/11/2025	A. Naiko	Review and addition of new subprocessors.	L. Bull
5.0	08/04/2026	A. Naiko	Aligned formatting with ISMS policy suite. Added metadata table and version control header. Added AI/automated processing transparency (Article 22 UK GDPR). Added Technical and Usage Data to purposes table. Added sub-processor summary table. Fixed Cookie Policy link. Defined Services and Platform in glossary. Aligned review cycle with ISMS annual cadence. Aligned DSAR contact channel with DSAR Procedure. Added ISMS cross-reference statement.	L. Bull
5.1	13/08/2026	A. Naiko	Outsourced DPO appointed: George Harris, Data Privacy Services (agreement dated 13/08/2026); DPO contact details updated.	L. Bull

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