Shareforce
The business contracts standard.

Privacy Policy

Version 1.4

DOCUMENT OWNER	EFFECTIVE DATE	DOCUMENT CLASSIFICATION
Jasper Boersma (CHRO)	2026-11-09	Public

Introduction

Shareforce (founded 2021) is a software company which develops and maintains an AI/ML powered software platform for legal content management and collaboration. It's a SaaS-based, modular solution. Shareforce is driven by a comprehensive clause-based repository (contract building-block library) that's fully controlled by legal staff. We enable firms to improve the compliance and uniformity of legal documents, while reducing costs and increasing efficiencies.

Shareforce software operates cloud-provider independent and can be hosted as SaaS, on-premise, or hybrid solution. The services are dockerised and run internally on Kubernetes.

Shareforce's main customers are Banks, Insurance companies, Law firms and large corporates which are operating globally.

We understand that you are aware of and care about your own personal privacy interests, and we take that seriously. This Privacy Statement describes the Shareforce's policies and practices regarding its collection and use of your personal data and sets forth your privacy rights. We recognize that information privacy is an ongoing responsibility, and so we will from time to time update this Privacy Statement as we undertake new personal data practices or adopt new privacy policies.

Data Protection Officer

Shareforce is registered in The Hague, The Netherlands. Shareforce has appointed an internal Data Protection Officer (DPO) for you to contact if you have any questions or concerns about Shareforce's personal data policies or practices. If you would like to exercise your privacy rights, please direct your query to Shareforce's data protection officer via: privacy@shareforcelegal.com .

How we collect and use (process) your personal information

Shareforce collects personal information about its customers and website visitors. With a few exceptions, this information is generally limited to:

- Name

- Job Title
- Employer Name
- Work Address
- Work Email
- Work Phone Number

We use this information to provide prospects and customers with services.

We do not sell personal information to anyone, and only share it with third parties who are facilitating the delivery of our services.

From time to time, Shareforce receives personal information about individuals from third parties. Typically, information collected from third parties will include further details on your employer or industry. We may also collect your personal data from a third party website (e.g., LinkedIn).

Use of the Shareforce Website

As is true of most other websites, Shareforce's website collects certain information automatically and stores it in log files. The information may include internet protocol (IP) addresses, the region or general location where your computer or device is accessing the internet, browser type, operating system and other usage information about the use of Shareforce's website, including a history of the pages you view. We use this information to help us design our site to better suit our users' needs. We may also use your IP address to help diagnose problems with our server and to administer our website, analyze trends, track visitor movements, and gather broad demographic information that assists us in identifying visitor preferences.

Shareforce has a legitimate interest in understanding how members, customers and potential customers use its website. This assists Shareforce with providing more relevant products and services, with communicating value to our sponsors and corporate members, and with providing appropriate staffing to meet member and customer needs.

Cookies and tracking technologies

Shareforce makes available a comprehensive Cookie Policy that describes the cookies and tracking technologies used on Shareforce website and provides information on how users can accept or reject them. More information about cookies are available in *Appendix A*.

Sharing information with third parties

The personal information Shareforce collects from you is stored in one or more databases hosted by third parties located in the European Union. These third parties do not use or have access to your personal information for any purpose other than cloud storage and retrieval. On occasion, Shareforce engages third parties to send information to you, including

information about our products, services, and events. A list of our third party sub processors can be found in *Appendix B*.

We do not otherwise reveal your personal data to non-Shareforce persons or businesses for their independent use unless: (1) you request or authorize it; (2) it's in connection with Shareforce-hosted and Shareforce co-sponsored conferences as described above; (3) the information is provided to comply with the law (for example, compelled by law enforcement to comply with a search warrant, subpoena, or court order), enforce an agreement we have with you, or to protect our rights, property or safety, or the rights, property or safety of our employees or others; (4) the information is provided to our agents, vendors or service providers who perform functions on our behalf; (5) to address emergencies or acts of God; or (6) to address disputes, claims, or to persons demonstrating legal authority to act on your behalf. We may also gather aggregated data about our services and website visitors and disclose the results of such aggregated (but not personally identifiable) information to our partners, service providers, advertisers, and/or other third parties for marketing or promotional purposes.

The Shareforce website may connect with third party services such as Facebook, LinkedIn, Twitter and others. If you choose to share information from the Shareforce website through these services, you should review the privacy policy of that service. If you are a member of a third party service, the aforementioned connections may allow that service to connect your visit to our site to your personal data.

Data Subject rights

The European Union's General Data Protection Regulation (GDPR) and other countries' privacy laws provide certain rights for data subjects. Data Subject rights under GDPR include the following:

- Right to be informed
- Right of access
- Right to rectification
- Right to erasure
- Right to restrict processing
- Right of data portability
- Right to object
- Rights related to automated decision making including profiling

This Privacy Notice is intended to provide you with information about what personal data Shareforce collects about you and how it is used.

If you wish to confirm that Shareforce is processing your personal data, or to have access to the personal data Shareforce may have about you, please contact us.

You may also request information about: the purpose of the processing; the categories of personal data concerned; who else outside Shareforce might have received the data from

Shareforce; what the source of the information was (if you didn't provide it directly to Shareforce); and how long it will be stored. You have a right to correct (rectify) the record of your personal data maintained by Shareforce if it is inaccurate. You may request that Shareforce erase that data or cease processing it, subject to certain exceptions. You may also request that Shareforce cease using your data for direct marketing purposes. In many countries, you have a right to lodge a complaint with the appropriate data protection authority if you have concerns about how Shareforce processes your personal data. When technically feasible, Shareforce will—at your request—provide your personal data to you.

Reasonable access to your personal data will be provided at no cost. If access cannot be provided within a reasonable time frame, Shareforce will provide you with a date when the information will be provided. If for some reason access is denied, Shareforce will provide an explanation as to why access has been denied.

For questions or complaints concerning the processing of your personal data, you can email us at privacy@shareforcelegal.com . Alternatively, if you are located in the European Union, you can also have recourse to the European Data Protection Supervisor or with your nation's data protection authority.

Data storage and retention

Your personal data is stored by Shareforce on its servers, and on the servers of the cloud-based database management services Shareforce engages, located in the European Union. Shareforce retains service data for the duration of the customer's business relationship with Shareforce and for a period of time thereafter, to analyze the data for Shareforce's own operations, and for historical and archiving purposes associated with Shareforce's services. Shareforce retains prospect data until such time as it no longer has business value and is purged from Shareforce systems. All personal data that Shareforce controls may be deleted upon verified request from Data Subjects or their authorized agents. For more information on where and how long your personal data is stored, and for more information on your rights of erasure and portability, please contact us at: privacy@shareforcelegal.com .

Children's data

We do not knowingly attempt to solicit or receive information from children.

Questions, concerns or complaints

If you have questions, concerns, complaints, or would like to exercise your rights, please contact us at: privacy@shareforcelegal.com .

Disclaimer

The information contained in this website is for general information purposes only. The information is provided by Shareforce BV (together "Shareforce" or "we" or "us" or "our") and while we endeavour to keep the information up to date and correct, we make no

representations or warranties of any kind, express or implied, about the completeness, accuracy, reliability, suitability or availability with respect to the website or the information, products, services, or related graphics contained on the website for any purpose. Any reliance you place on such information is therefore strictly at your own risk.

In no event will we be liable for any loss or damage including without limitation, indirect or consequential loss or damage, or any loss or damage whatsoever arising from loss of data or profits arising out of, or in connection with, the use of this website.

Through this website you may be able to link to other websites which are not under our control. We have no control over the nature, content and availability of those sites. The inclusion of any links does not necessarily imply a recommendation or endorse the views expressed within them.

Every effort is made to keep the website up and running smoothly. However, we take no responsibility for, and will not be liable for, the website being temporarily unavailable due to technical issues beyond our control.

Version History

VERSION	DATE	DESCRIPTION	AUTHOR	APPROVED BY
1.0	2023-10-16	Initial policy	Jasper Boersma (CHRO)	Wouter Ofner (CEO)
1.1	2024-10-05	Annual Policy Review Update	Jasper Boersma (CHRO)	Mark Willemen (CISO)
1.2	2026-03-03	Design updates and spelling checks	Glenn de Haan (DevOps Engineer)	Mark Willemen (CISO)
1.3	2026-06-25	Add Privacy Policy, Appendix C (Data Processing Jurisdiction and Protection Measures)	Glenn de Haan (DevOps Engineer)	Mark Willemen (CISO)

VERSION	DATE	DESCRIPTION	AUTHOR	APPROVED BY
1.4	2026-11-09	Minor wording changes, address Shareforce location status, align objectives, address GitLab document control and update relevant laws	Glenn de Haan (DevOps Engineer)	Mark Willemen (CISO)

Appendix A - Cookies

This Cookie Policy supplements the information contained in our Privacy Statement and explains how we use cookies and related technologies to manage and provide our Shareforce websites, products and services; collectively referred to as the “Services”.

Cookies are small text files placed on your computer. Pixels are small amounts of code on a web page or in an email that provide a method to deliver content, such as a graphic image on a webpage.

Why do we use Cookies?

Shareforce uses cookies to:

- Help you to access and use the Services;
- Understand how visitors use and engage with our Services;
- Set your preferences;
- Deliver relevant interest-based advertising;
- Understand if you have opened an email and acted upon it; and
- Analyze and improve our Services.

Who sets Cookies on Shareforce?

Cookies are sometimes placed by Shareforce, known as first-party cookies, and sometimes third-party cookies are set by our service providers, such as Google Analytics who provides analytics and interest-based advertising. When third-party cookies are set by service providers, they are providing a service or function to Shareforce, as well as achieving the service provider’s own purposes. Shareforce cannot control how third-party cookies are used. You can review how Google Analytics collects and processes data by visiting: https://policies.google.com/technologies/partner-sites . If you don’t want Google Analytics to be used in your browser, you can install the Google Analytics Opt-out Browser Ad-On by visiting: https://tools.google.com/dlpage/gaoptout/ .

How do I manage my Cookies?

Shareforce has unified our cookie management tool across all Shareforce domains providing users with a central location to manage your cookie preferences. With the exception of “strictly necessary” cookies that are essential for the Services to operate, you will be able to opt-in, opt-out, or adjust your cookie preferences for all other cookie categories. Please note that disabling some cookies may cause certain features of the Services to not function properly. This tool can be accessed by clicking on the Cookie Preferences link (titled Do Not Sell or Share My Personal Information for California and Connecticut residents) located in the footer or header of each webpage.

Most web browsers also allow you to delete cookies already placed, which may delete the settings and preferences controlled by those cookies, including advertising preferences. You can find instructions to remove any cookies that have been created in the cookie folder of your browser at https://allaboutcookies.org/manage-cookies/ .

Do Not Track Signals

“Do Not Track” (DNT) is a privacy preference you can set in your web browser to indicate that you do not want to be tracked. Shareforce responds to DNT signals and respects a user’s track preference expression for client-side events.

Global Privacy Control

Similar to DNT signals, “Global Privacy Control” (GPC) is a privacy preference you can set in your web browser to notify websites that you do not want your Personal Data shared with or sold to independent third-parties without your consent. Shareforce honors GPC in those jurisdictions where its recognition is required by applicable law, such as California and Colorado.

Self-Regulatory programs

Service providers may participate in self-regulatory programs that provide ways to opt out of analytics and interest-based advertising, which you can access at:

- United States: NAI (http://optout.networkadvertising.org) and DAA (http://optout.aboutads.info/)
- Canada: Digital Advertising Alliance of Canada (https://youradchoices.ca/)
- Europe: European Digital Advertising Alliance (http://www.youronlinechoices.com)

Web beacons

Most email clients have settings which allow you to prevent the automatic downloading of images, which will disable web beacons in the email messages you read.

Mobile Advertising IDs

On mobile devices, advertising IDs provided by the platform may be collected and used similar to cookie IDs. You may use the controls on iOS and Android operating systems that allow you to limit tracking and/or reset the advertising IDs.

What types of Cookies do we use?

Shareforce utilizes four categories of cookies: strictly necessary cookies, functional cookies, performance and analytics cookies, as well as targeting and advertising cookies. You can read more about each of these types of cookies and view the cookies within each category that can be found in the Services by clicking on the Cookies Preferences link (titled Do Not Sell or Share My Personal Information for California and Connecticut residents) located in the footer or header of each webpage.

Appendix B - Sub-processors of Shareforce

When acting as a processor for Customer, Shareforce may engage the following entities to carry out specific processing activities, including those processing activities necessary to deliver the Services under the Shareforce subscription.

Shareforce Affiliates

AFFILIATE ENTITY	LOCATION	SERVICE PROVIDED
Shareforce BV	Netherlands	Support Services
Shareforce Platform	United Kingdom	Support Services

Third Party Sub-processors

THIRD PARTY ENTITY	LOCATION	SERVICE PROVIDED	SHAREFORCE PRODUCT
Google LLC	United States	Cloud Hosting	SaaS and Self-Managed
Hubspot Inc	United States	CRM Platform	SaaS
Microsoft	United States	Software Provider	SaaS

Appendix C - Data Processing Jurisdiction and Protection Measures

Jurisdiction of ICT Infrastructure

Shareforce's ICT infrastructure for data processing is hosted within the European Union. This ensures compliance with EU data sovereignty requirements. All data processing activities for individual services are subject to the laws and jurisdictions of the Netherlands and the

European Union. For clients with specific regional requirements, Shareforce can configure data storage and processing to align with local jurisdiction mandates. Please contact us to discuss tailored solutions.

Measures to Prevent Unauthorized International Access or Transfers

Shareforce implements technical, organizational, and contractual safeguards to protect non-personal data processed in the EU from unauthorized access or transfers that could conflict with EU law or Member State regulations. These measures include:

Technical Measures

- Data Localization: Non-personal data is stored and processed exclusively within EU-based data centers, unless explicitly agreed otherwise with the client.
- Encryption: All data in transit and at rest is encrypted to prevent interception or unauthorized access.
- Access Controls: Zero Trust architecture and Just-In-Time (JIT) access ensure that only authorized personnel can access data, with all activities logged and audited.

Organizational Measures

- Data Classification: Non-personal data is classified and labeled to enforce jurisdiction-specific handling rules.
- Employee Training: Staff with access to EU data undergo regular training on EU data protection laws in line with ISO 27001 and SOC2 Type 2.

Contractual Measures

- Supplier Agreements: All subcontractors (e.g., cloud providers, support vendors) are bound by contractual clauses prohibiting the processing or transfer of EU data outside the EU/EEA without explicit client consent and legal compliance.
- Data Processing Addendums (DPAs): Standard DPAs include explicit prohibitions on transferring non-personal data to jurisdictions with conflicting laws (e.g., US CLOUD Act, FISA 702) unless adequate safeguards (e.g., EU Standard Contractual Clauses (SCCs)) are in place.
- Audit Rights: Clients retain the right to audit Shareforce's compliance with these measures, including on-site inspections or third-party assessments.

For further details, please refer to our Privacy Policy or contact privacy@shareforcelegal.com