

# Clyde & Co US LLP

## U.S. State Law Privacy Notice

Effective Date: January 1, 2023

Clyde & Co US LLP, its subsidiaries, and its affiliates (collectively “**Clyde & Co**,” “**us**,” “**we**,” or “**our**”), provide this U.S. State Law Privacy Notice (“**Notice**”) to describe how we collect, use, and disclose Personal Information, as defined below. This Notice also provides information regarding additional privacy rights you may have, depending on your State of residency, including rights afforded by the California Consumer Privacy Act, as amended (“**CCPA**”), and the Virginia Consumer Data Protection Act (“**VCDPA**”). This Notice may be amended from time to time to incorporate disclosures required by other States, and we encourage you to review this Notice each time you interact with us in the future.

This Notice supplements Clyde & Co’s other privacy policies and notices, including our main Privacy Policy (<https://www.clydeco.com/en/legal-and-privacy/privacy>). This Notice applies to Personal Information collected in relation to providing and running our services, as well as Personal Information collected from you if you visit our website or apply for a job with Clyde & Co. This Notice does not apply to our workforce personnel. If you fall within this group and have questions about how we use your Personal Information, please contact us as provided below.

“**Personal Information**” means information that identifies, relates to, describes, is reasonably capable of being associated with, or could reasonably be linked (directly or indirectly) with you. Personal Information does not include information that is publicly available, de-identified, or aggregated, or as may be otherwise exempted, such as information subject to other laws and regulations.

Unless otherwise noted, the disclosures contained within this Notice cover our activities in the prior twelve (12) months from the Effective Date as well as our current practices.

### I. How and Why We Collect, Use, and Disclose Your Personal Information

Clyde & Co may collect, use, and disclose Personal Information for business purposes consistent with applicable laws as identified below. Where Clyde & Co transfers applicable Personal Information to recipients, such as our service providers, we do so for the same business purposes described below. The Personal Information we collect about you may vary depending on the nature of your interactions with us and may not include all of the examples listed below.

Category of Personal Information	Business Purposes for Collection, Use, or Disclosure	Categories of Recipients to whom Personal Information is Disclosed for a Business Purpose
<b>Identifiers</b> , including name, postal address, online identifier, IP address, email address, or other similar identifiers	<ul style="list-style-type: none"><li>• Providing legal services, including maintaining or servicing accounts, providing client service, verifying client information, and processing payments</li><li>• Communicating with you, including responding to your</li></ul>	<ul style="list-style-type: none"><li>• Data analytics providers</li><li>• Vendors who provide services on our behalf</li><li>• Background check vendors</li></ul>

Category of Personal Information	Business Purposes for Collection, Use, or Disclosure	Categories of Recipients to whom Personal Information is Disclosed for a Business Purpose
	<p>requests or inquiries, or regarding your application if you are a job applicant</p> <ul style="list-style-type: none"> <li>• Marketing and advertising our services and expertise</li> <li>• Monitoring and analyzing trends, usage, and activities of website visitors</li> <li>• Improving our website and our visitors' online experience, including tailoring our content</li> <li>• Opening and maintaining your application records</li> <li>• Assessing your eligibility for employment if you are a job applicant</li> </ul>	
<p><b>Personal information described in Cal. Civ. Code § 1798.80(e)</b>, including name, postal address, telephone number, and financial information</p> <p><i>(Some of these examples may overlap with other categories of Personal Information.)</i></p>	<ul style="list-style-type: none"> <li>• Providing legal services, including maintaining or servicing accounts, providing client service, verifying client information, and processing payments</li> <li>• Communicating with you, including responding to your requests or inquiries, or regarding your application if you are a job applicant</li> <li>• Opening and maintaining your application records</li> <li>• Assessing your eligibility for employment if you are a job applicant</li> <li>• Marketing and advertising our services and expertise</li> </ul>	<ul style="list-style-type: none"> <li>• Data analytics providers</li> <li>• Vendors who provide services on our behalf</li> <li>• Background check vendors</li> </ul>
<p><b>Commercial information</b>, including records of services purchased, obtained, or considered, credit history, credit score, or other purchasing or consuming histories or tendencies</p>	<ul style="list-style-type: none"> <li>• Providing legal services, including maintaining or servicing accounts, providing client service, verifying client information, and processing payments</li> </ul>	<ul style="list-style-type: none"> <li>• Data analytics providers</li> <li>• Vendors who provide services on our behalf</li> </ul>
<p><b>Internet or other electronic network activity information</b>, including Internet or other similar activity, browsing history, search history, information on a consumer's interaction with a website, application logs, and device data</p>	<ul style="list-style-type: none"> <li>• Providing legal services, including maintaining or servicing accounts, providing client service, verifying client information, and processing payments</li> <li>• Marketing and advertising our services and expertise</li> <li>• Monitoring and analyzing trends, usage, and activities of website visitors</li> </ul>	<ul style="list-style-type: none"> <li>• Data analytics providers</li> <li>• Vendors who provide services on our behalf</li> </ul>

Category of Personal Information	Business Purposes for Collection, Use, or Disclosure	Categories of Recipients to whom Personal Information is Disclosed for a Business Purpose
	<ul style="list-style-type: none"> <li>Improving our website and our visitors' online experience, including tailoring our content</li> </ul>	
<p><b>Geolocation data</b>, including your geographic location based on your IP address</p>	<ul style="list-style-type: none"> <li>Marketing and advertising our services and expertise</li> <li>Monitoring and analyzing trends, usage, and activities of website visitors</li> <li>Improving our website and our visitors' online experience, including tailoring our content</li> </ul>	<ul style="list-style-type: none"> <li>Data analytics providers</li> <li>Vendors who provide services on our behalf</li> </ul>
<p><b>Sensory information</b>, including audio and video data processed in connection with providing legal services</p>	<ul style="list-style-type: none"> <li>Providing legal services, including maintaining or servicing accounts, providing client service, verifying client information, and processing payments</li> <li>Communicating with you, including responding to your requests or inquiries, or regarding your application if you are a job applicant</li> <li>Managing safety and security</li> <li>Opening and maintaining your application records if you are a job applicant</li> <li>Assessing your eligibility for employment if you are a job applicant</li> </ul>	<ul style="list-style-type: none"> <li>Vendors who provide services on our behalf</li> <li>Security providers</li> </ul>
<p><b>Professional or employment-related information</b>, including job title, employer, practice area or industry focus</p> <p><i>(If you are a Clyde &amp; Co. employee, please see our California Employee Privacy Notice for additional disclosures.)</i></p>	<ul style="list-style-type: none"> <li>Providing legal services, including maintaining or servicing accounts, providing client service, verifying client information, and processing payments</li> <li>Communicating with you, including responding to your requests or inquiries, or regarding your application if you are a job applicant</li> <li>Marketing and advertising our services and expertise</li> <li>Opening and maintaining your application records if you are a job applicant</li> <li>Assessing your eligibility for employment if you are a job applicant</li> </ul>	<ul style="list-style-type: none"> <li>Data analytics providers</li> <li>Vendors who provide services on our behalf</li> <li>Background check vendors</li> </ul>

Category of Personal Information	Business Purposes for Collection, Use, or Disclosure	Categories of Recipients to whom Personal Information is Disclosed for a Business Purpose
<p><b>Non-public education information</b>, including schools attended, degrees obtained, and grades collected in the context of your application, or education information processed in connection with providing legal services</p>	<ul style="list-style-type: none"> <li>• Providing legal services, including maintaining or servicing accounts, and providing client service</li> <li>• Assessing your eligibility for employment if you are a job applicant</li> </ul>	<ul style="list-style-type: none"> <li>• Vendors who provide services on our behalf</li> <li>• Background check vendors</li> </ul>
<p><b>Personal Information that does not fall directly within the categories listed above</b>, including the contents of communications you send to us, languages spoken, and information relating to criminal convictions and offenses</p>	<ul style="list-style-type: none"> <li>• Providing legal services, including maintaining or servicing accounts, providing client service, verifying client information, and processing payment</li> <li>• Communicating with you, including responding to your requests or inquiries, or regarding your application if you are a job applicant</li> <li>• Marketing and advertising our services and expertise</li> <li>• Assessing your eligibility for employment if you are a job applicant</li> </ul>	<ul style="list-style-type: none"> <li>• Data analytics providers</li> <li>• Vendors who provide services on our behalf</li> <li>• Background check vendors</li> </ul>

We may also receive Personal Information that you provide to us on a voluntary basis which we would not otherwise request or collect.

**II. Sources of Personal Information**

We may collect the Personal Information identified above from the following sources:

- **Directly from you.** For example, when you visit our website, complete electronic forms or paper documents, contact us by phone or email, or register for an event we sponsor.
- **Automatically when using our electronic systems.** For example, we may collect your usage history when you use our website.
- **From external sources.** For example, your employer, your business contacts, and investigators, credit bureaus, anti-fraud databases, sanctions lists, court judgments, and other databases, and data brokers, data analytics providers, and internet service providers.
- **Automatically when you visit our offices.** For example, security camera footage.
- **From service providers that help us run our business.** For example, from information technology vendors, background check agencies, and other service providers.

We may also collect publicly available information about you, including information that is lawfully made available to the general public from federal, state, or local government records.

### **III. Disclosing Your Personal Information**

We may disclose each of the categories of Personal Information identified above to the respectively identified categories of recipients for operational or business purposes consistent with the purposes for collection or use designated, as is reasonably necessary and proportionate to achieve those purposes, or for another purpose that is compatible with the context in which the Personal Information was collected including, but not limited to:

- Auditing;
- Helping to ensure security and integrity;
- Debugging, repairing, and improving functionality;
- Short-term, transient use;
- Performing services on our behalf;
- Providing advertising and marketing services, as applicable;
- Internal research for technological development; and
- Verifying quality and/or safety.

In addition to the other purposes for collection, use, and disclosure of Personal Information described in this Notice, we may collect, use, and disclose Personal Information as required by law, regulation or court order; to respond to governmental and/or law enforcement requests; to identify, contact or bring legal action against someone who may be causing injury to or interfering with our or others' rights or property; to support any actual or threatened claim, defense or declaration in a case or before any jurisdictional and/or administrative authority, arbitration or mediation panel; or in connection with disciplinary actions/investigations. Likewise, we may use and disclose Personal Information to third parties in connection with the sale, assignment, merger, reorganization, or other transfer of our company.

### **IV. How Long We Keep Your Personal Information**

We keep your Personal Information in accordance with our global data retention policy which categorizes all of the information held by us and specifies the appropriate retention period for each category of information. Those periods are based on the requirements of relevant data protection laws and the purpose for which the information is collected and used, taking into account legal and regulatory requirements to retain the information for a minimum period, limitation periods for taking legal action, good practice and our business purposes.

### **V. California Privacy Rights**

#### **Selling or Sharing of Personal Information**

We do not sell Personal Information or share it for cross-context behavioral advertising.

#### **Submitting a Privacy Rights Request**

If you are a resident of California, you have the right to submit certain requests relating to your Personal Information as described below. To exercise any of these rights, please email us at [northamericahr@clydeco.com](mailto:northamericahr@clydeco.com) or call us toll-free at 1-415-365-9840. You can also send a letter to: Data Protection Officer c/o Clyde & Co US LLP, 150 California Street, 15th Floor, San

Francisco, CA 94111. Please note that if you submit a request to know, request to delete, or request to correct, you will be asked to verify your identity in accordance with the law. You may designate an authorized agent to make a request on your behalf; however, you will still need to verify your identity directly with us before your request can be processed.

**A. Right to Know.** You have the right to know what Personal Information we have collected about you, which includes:

1. The categories of Personal Information we have collected about you, including:
  - a. The categories of sources from which the Personal Information was collected;
  - b. Our business purposes for collecting or disclosing Personal Information;
  - c. The categories of recipients to which we disclose Personal Information;
  - d. The categories of Personal Information that we disclosed for a business purpose, and for each category identified, the categories of recipients to which we disclosed that particular category of Personal Information.
2. The specific pieces of Personal Information we have collected about you.

**B. Right to Delete Your Personal Information.** You have the right to request that we delete Personal Information we collected from you, subject to certain exceptions.

**C. Right to Correct Inaccurate Information.** If you believe that Personal Information we maintain about you is inaccurate, you have the right to request that we correct that information.

**D. Right to Opt Out of Sales and Sharing of Personal Information.** We do not sell your Personal Information or share it for cross-context behavioral advertising to which the right to opt out of sales and sharing of Personal Information applies under the CCPA.

**E. Right to Limit Use and Disclosure of Sensitive Personal Information.** We do not collect, use, or disclose sensitive Personal Information for purposes to which the right to limit use and disclosure applies under the CCPA.

**F. Right to Non-Discrimination for the Exercise of Your Privacy Rights.** We will not discriminate against you for exercising any of the rights herein.

**G. California “Shine the Light”**

California Civil Code Section 1798.83(e) (the “Shine the Light Law”) permits California residents with whom we have an established business relationship to request that we provide you with a list of certain categories of Personal Information that we have disclosed to third parties for their own direct marketing purposes during the preceding calendar year. We do not disclose Personal Information to other parties for their own direct marketing purposes. Californians may request information about our compliance with this law by contacting us as provided below.

## VI. Virginia Privacy Rights

This Section supplements the other parts of our Notice, and provides additional information for Virginia consumers, including how to exercise their rights under the VCDPA. Capitalized terms defined in the VCDPA that are used Section VI shall have the same meaning as in the VCDPA.

You can learn more about the Personal Data we Process and the purpose for Processing such Personal Data in the [“How and Why We Collect, Use, and Disclose Your Personal Information”](#) section above. You can also learn more about our disclosure of Personal Data and the categories of Third Parties we disclose Personal Data to in the [“Disclosing Your Personal Information”](#) section above.

### A. Additional Information about Certain Data Uses

1. **Targeted Advertising.** We do not Process your Personal Data for Targeted Advertising.
2. **Sales of Personal Data.** We do not Sell your Personal Data.

### B. Making a Privacy Rights Request

If you are a resident of Virginia, you have the right to submit certain requests relating to your Personal Data as described below. To exercise any of these rights, please email us at [northamericahr@clydeco.com](mailto:northamericahr@clydeco.com) or call us toll-free at 1-415-365-9840. Please note that we will need to authenticate your identity before your request can be processed. For authentication, you will be asked to verify your identity in accordance with the law. Please also note that if you make a privacy rights request, we will retain the Personal Data submitted in connection with your request for recordkeeping purposes.

1. **Right to Access and Data Portability.** You have the right to confirm whether we are Processing your Personal Data, to access your Personal Data, and to obtain a copy of Personal Data you provided to us in a portable format.
2. **Right to Correct.** You have the right to request that we correct inaccuracies in your Personal Data, taking into account the nature of the Personal Data and our Purposes for Processing it.
3. **Right to Delete.** You have the right to request that we delete your Personal Data.
4. **Right to Opt Out.** We do not Process your Personal Data for any purposes to which the Right to Opt Out applies.
5. **Right to Appeal.** Sometimes we are unable to process requests relating to your Personal Data, in which case, your request will be denied. If you are a resident of Virginia whose privacy rights request has previously been denied by us and you believe we denied it in error, you may appeal for reconsideration

of your request by sending an email to [northamericahr@clydeco.com](mailto:northamericahr@clydeco.com) or by calling toll-free at 1-415-365-9840.

## **VII. How to Contact Us**

If you have any questions, please email us at [northamericahr@clydeco.com](mailto:northamericahr@clydeco.com) or call us toll-free at 1-415-365-9840. You can also send a letter to: Data Protection Officer c/o Clyde & Co US LLP, 150 California Street, 15th Floor, San Francisco, CA 94111.