

ArentFox Schiff Privacy Policy

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ArentFox Schiff LLP (“ArentFox Schiff,” “we,” “us,” or “our”) operates the **www.afslaw.com** website and other websites and services where this Privacy Policy is referenced (collectively, the “Service(s)"). We are committed to protecting your Personal Data and your right to privacy. If you have any questions or concerns about this Privacy Policy or our practices regarding your Personal Data, please contact us at consumerprivacy@afslaw.com or 888.414.8658.

In this Privacy Policy, we aim to explain the information we collect, how we use it, and your rights. Please read through our Privacy Policy carefully. If there is anything in this Privacy Policy that you do not agree with, please discontinue use of our websites and other Services immediately and do not provide us with Personal Data.

By using our Services, or otherwise providing Personal Data to us, you signify your agreement to the collection and use of information in accordance with this Privacy Policy.

Table of Contents

- **Scope**
- **Information Collection and Use**
- **Tracking and Cookies Data**
- **Sources of Data**
- **Use of Data**
- **Disclosure of Data**
- **International Transfer of Data**
- **Security of Data**
- **Choice and Marketing**
- **Links to Third Party Websites and External Pages**
- **Bulletin Boards, Chat Rooms, and Blogs**

- **Special Policy Regarding Information from Children**
- **Your Individual Rights in The European Economic Area, The United Kingdom, and Switzerland**
- **Your California Privacy Rights**
- **How We Respond to Do Not Track Signals**
- **Record Retention Policy**
- **Material Changes to this Privacy Policy**
- **Special Cases**
- **Contact Us**

Scope

This Privacy Policy describes the way that ArentFox Schiff collects and uses your Personal Data.

This Privacy Policy applies to the Personal Data we collect related to our:

- Websites, including www.afslaw.com, and any other websites that display this Privacy Policy, and the services available through our Services
- Events, marketing, and business development activities
- Business communications and business interactions

Additional or different privacy notices may apply to certain of our Services. If a different or supplemental privacy notice applies, it will be disclosed and in the event of a conflict between such provisions and this Privacy Policy, such different or supplemental terms shall control.

This Privacy Policy does not describe ArentFox Schiff's use of information when a client relationship is in place because, as a law firm, client information is used in accordance with strict attorney ethical rules. Thus, this Privacy Policy does not apply to information that is exchanged as part of an attorney-client relationship.

Information Collection and Use

“Personal Data” means data that identifies or is linked to a particular identified or identifiable natural person or is otherwise considered personal data or personal information under applicable privacy and/or data protection laws or regulations. ArentFox Schiff may collect the following categories of Personal Data.

- **Identifying contact information**, such as your name, address, online identifier, email address, Internet Protocol address, telephone number, and other contact information. Identifiers are sourced

directly from you. These are sourced directly from you or indirectly from you (e.g., from observing your actions on the Service). They are used to provide and improve the features and services you request; to communicate with you and provide you with information; to provide you with personalized content and information; to respond to an inquiry; to screen for potential risk or fraud; to process your request; and to send you other information related to your request. They are disclosed for administrative purposes to service providers. We disclose identifiers for business purposes to internet service providers and administrative service providers.

- **Commercial information**, such as records of services provided. We source this information directly from you. We use this information to fulfill or meet the reason you provided the information, marketing, or to provide relevant services. For example, we may use this information to provide billing information. We disclose this to third party service providers for administrative purposes.
- **Characteristics of protected classifications**, such as age or gender. We may also collect health information, such as accessibility requirements and dietary restrictions for events. We source this information directly from you. We use this information to fulfill or meet the reason you provided the information, marketing, or to provide relevant services. We disclose this to third party service providers for administrative purposes.
- **Internet or other similar network activity, including geolocation data** and information about your visit to our websites or use of our Services, including access times, websites you visit before and after you visit ours, and information about your computer hardware and software, such as your IP address, browser type, and domain names and your interaction with our websites and Services. This information is sourced indirectly from you (e.g., from observing your actions on our Services). They are used to provide you with personalized content, information, and/or to send you information on our services. They are disclosed for administrative, business purposes. Please see the [**TRACKING AND COOKIES DATA**](#) section below for more information.
- **Audio, visual, or similar information such as voicemail recordings of calls to our attorneys or personnel and CCTV video recorded at our facilities.** We source this information directly from you. We use this information for business purposes, such as detecting security incidents or providing customer service. For example, we may use this information for security purposes at our facilities. We disclose this to third party service providers for administrative purposes.
- **Professional or employment-related information such as employment history and professional licenses and memberships.** We also may collect professional or employment-related Personal Data from you if you apply for a job via our Sites. This information is sourced directly from you. They are used to communicate with you, provide you with information in response to your employment inquiry, and/or to process your request. This Personal Data may be disclosed to service providers for administrative purposes, such as background check providers.
- **Inferences drawn from Personal Data**, which may include a profile reflecting a person's preferences, interests, characteristics, psychological trends, predispositions, behavior, attitudes, intelligence, abilities, and aptitudes. We source this information directly or indirectly from you, (e.g.,

from observing your actions on our Service). We use this information to fulfill or meet the reason you provided the information or for marketing. We do not disclose this information to third parties.

Please note that, if you do not provide certain Personal Data we collect, we may not be able to accomplish some purposes outlined in this Privacy Policy and you may not be able to use or access certain Services.

Tracking and Cookies Data

We use, and allow certain third parties to use, cookies, tags/beacons and other similar technologies to provide our Services and to help collect data regarding your interaction with our Services (“Usage Information”). Usage Information can include: the name of the domain and host from which you access the Internet; the Internet Protocol (IP) address of the device you are using; the browser software and operating system you are using; mobile device type, device operating system, device identifiers, device settings, the date and time of access (including the length of time spent, the pages accessed while visiting, links clicked, and number of visits, and country of origin); and the address of the website from which you have arrived at our Services. Usage Information helps us better manage Services content and communications by informing us what content is effective and how it is used. These beacons (or other tracking technology) may also be included in or associated with emails or other communications that you receive from us (or our service providers) in order to help us track your response and interests and to deliver you relevant content and services.

Cookies are files with a small amount of data which may include an anonymous unique identifier. Cookies are sent to your browser from a website and stored on your device. We, or third parties, may use session cookies or persistent cookies. Session cookies only last for the specific duration of your visit and are deleted when you close your browser. Persistent cookies remain on your device’s hard drive until you delete them or they expire. Different cookies are used to perform different functions, which we explain below:

- Essential. Some cookies are essential in order to enable you to move around our Services and use their features, such as accessing secure areas of the Services. Without these cookies, we cannot enable appropriate content based on the type of device you are using.
- Browsing and functionality. These cookies allow us to remember choices you make on the Services, such as your preferred language, and provide enhanced, more personalized features.
- Performance and analytics. We use our own cookies and third-party cookies to see how you use our Services in order to enhance their performance and develop them according to your preferences. We use Google Analytics, for example, to track website usage and activity. You can opt-out of the Google Analytics Advertising Features we use by indicating your preference using the interest-based opt-out link [here](#). Google also provides a complete privacy policy and instructions on opting-out of Google Analytics [here](#).
- Targeting or Advertising Cookies. We use cookies to create a profile of your interests and show you relevant advertising. If you do not allow these cookies, you may receive less targeted advertising. To

the extent these cookies are considered a “sale” of Personal Data under California law, you have the ability to opt-out of that “sale” at any time through our cookie tools. To exercise this right, click the “Do Not Sell My Personal Information” link in the footer of the Services.

There are several ways to manage cookies. You can instruct your browser to refuse all cookies or to indicate when a cookie is being sent. The Help feature on most browsers provides information on how to accept cookies, disable cookies, or to notify you when receiving a new cookie. The Network Advertising Initiative also offers a means to opt-out of a number of advertising cookies. Please visit www.networkadvertising.org to learn more. The Digital Advertising Alliance also has an opt-out tool available here. Please note, however, that by blocking or deleting cookies which are “strictly necessary,” you will not be able to access certain features of our Services. Note that opting-out from cookies does not mean you will no longer receive online advertising. It does mean that the company or companies from which you opted-out will no longer deliver ads tailored to your preferences and usage patterns.

Sources of Data

We collect Personal Data in the following ways:

Directly from you when you enter information on our Service. For example, when you contact us, you provide your first name, last name, email, and phone number.

Directly or indirectly from you when you register for or attend an event or interact with us via social media sites or our attorneys or personnel.

- Indirectly from you when you visit our websites or Services. For example, our Service collects Usage Information through cookies and tags when you visit our websites. Please see our [**TRACKING AND COOKIES DATA**](#) section above for more information.

From publicly available sources.

From service providers. For example, we may use service providers who retrieve publicly available information about you and we may combine it with Personal Data we have about you.

Use of Data

1. Use of Your Personal Data

ArentFox Schiff uses the Personal Data and Usage Information that it collects primarily for the following purposes:

- To deliver requested information to you, such as sending you newsletters or legal alerts or information regarding educational seminars or other events that we believe may be of interest to you.

- To advertise, provide, and assess the effectiveness of our events, promotional campaigns, publications, and services.
- To process your request for employment.
- To perform services for which we have been engaged.
- To maintain our business relationship with you.
- To respond to your comments or requests for information.
- To enforce any contracts that we enter into with you or the business you represent, or defending claims arising from such contracts.
- To operate, maintain, improve, administer and provide our Services, including customizing and optimizing user experience.
- For safety and security purposes, including where necessary to protect the rights, property or safety of us or others.
- For business purposes, including internal administration, data analysis, billing, and detecting, preventing, and responding to actual or potential fraud, illegal activities, or intellectual property infringement.
- Where we are obligated, or permitted, to do so by applicable law, regulation or legal process, including disclosure to governmental authorities.
- To complete any other transaction or service requested by you.
- As described to you when collecting Personal Data.
- Monitoring our processes for compliance with regulatory requirements.
- To notify you about a material change to this Privacy Policy or the Terms of Use for our Services, if necessary.

If ArentFox Schiff collects your Personal Data for one of the purposes described above, it may store such information on its servers or in one (or more) of its databases. If you do not want ArentFox Schiff to use and store your Personal Data in accordance with this Privacy Policy, please do not submit any Personal Data to ArentFox Schiff or its attorneys or personnel. We may anonymize, pseudonymize, aggregate or de-personalize Personal Data and/or Usage Information to create non-personally identifiable information and use such anonymized data for our own statistical, marketing, and other business purposes.

2. Legal Bases for Processing

We base the above-mentioned processing activities of your Personal Data on the following legal bases:

- **Consent.** Processing for the purpose of delivering requested information to you is based on your consent.
- **Performance of a Contract.** Processing for the purposes of performance of a contract, such as handling requests for employment, completing a transaction requested by you, and notifying you about changes to our policies as necessary to establish and fulfill a contract with you and also based upon our legitimate interests.
- **Legitimate Interests.** We may use your Personal Data for our legitimate interests to improve our services, as well as the content on our Services. Consistent with our legitimate interests and any choices that we offer or consents that may be required under applicable laws, we may use Usage Information and Personal Data for marketing purposes.
- **Legal Obligation.** We may process Personal Data as necessary to comply with our legal obligations.

Disclosure of Data

ArentFox Schiff may transfer, share, or disclose your Personal Data in the following instances:

- **With your consent.** We may share or disclose Personal Data if you ask, direct, or authorize us to do so.
- **To fulfill a service to you.** For example, if you choose to attend a webinar or other educational seminar advertised or promoted by ArentFox Schiff, we may share your Personal Data with a third party service provider in order to provide that service to you.
- **To process a request made by you.** For example, if you apply for a job via our Services, we may share your information with third parties in order to analyze and fulfill your request for employment.
- **To affiliates, strategic partners, and agents.** We may share or disclose Personal Data to our affiliates, strategic partners, and agents.
- **To unaffiliated third-party service providers, agents, or independent contractors** who help us maintain our Services and provide other administrative services to us (including, but not limited to, maintaining and analyzing data and sending customer communications on ArentFox Schiff's behalf). By agreement, we seek to ensure that these unaffiliated third parties will not use the Personal Data for any purpose other than to provide the services for which they are responsible. Because such third-party service providers that help us administer our Services will have access to users' Personal Data, if you do not wish for our third-party service providers to have access to your information, please do not submit any Personal Data to us.
- **Reorganization.** In the event of a direct or indirect reorganization process including, but not limited to, assignments, mergers, acquisitions, divestitures, bankruptcies, insolvencies, and sales of all or a part of our assets, we may disclose your Personal Data following completion of such transaction and/or during the assessment process pending transfer. If transferred in such a case, the purchaser will abide by the terms and conditions of this Privacy Policy.

- **To comply with the law** or in the good faith belief that such action is necessary in order to conform to the requirements of law or comply with legal process served on us, protect and defend our rights or property, including the rights and property of ArentFox Schiff or act in urgent circumstances to protect the personal safety of our clients or end users.

Except as described in this Privacy Policy or at the time we request the information, we do not otherwise transfer, share, or otherwise disclose your Personal Data to any third parties.

International Transfer of Data

If you choose to provide us with Personal Data, it may be transferred to, and stored on, computers located outside of your state, province, country, or other governmental jurisdiction where applicable data protection laws may differ than those from your jurisdiction. If you are visiting our Services from the European Economic Area or other regions with laws governing data collection and use, please note that your Personal Data may be transferred to the United States, and to other jurisdictions, which may not have the same data protection laws as the European Economic Area and may not afford many of the rights conferred upon data subjects in the European Economic Area. *By agreeing to this Privacy Policy, you acknowledge that you understand: (i) your Personal Data may be used for the uses identified above in accordance with this Privacy Policy; and (ii) your Personal Data may be transferred to the United States, or other jurisdictions as indicated above; and you consent to such use and transfer.*

Security of Data

The security of your data is important to us, but remember that no method of data transmission over the Internet can be guaranteed to be 100% secure. You play a role in protecting your Personal Data as well. While we strive to use commercially acceptable means to protect your Personal Data, we cannot ensure or warrant the security of any information you transmit to us. Any information that you transfer to ArentFox Schiff is done at your own risk. If we learn of a security systems breach we may attempt to notify you electronically so that you can take appropriate protective steps. We will comply with all privacy laws and make any legally required disclosures regarding breaches of the security, confidentiality, or integrity of Personal Data consistent with our ability to determine the scope of a breach and our obligations to law enforcement. By using the Services or providing Personal Data to us, you agree that we can communicate with you electronically regarding security, privacy and administrative issues relating to your use of the Services. We may post a notice via our websites or the Services if a security breach occurs. We may also send an email to you at the email address you have provided to us in these circumstances. Depending on where you live, you may have a legal right to receive notice of a security breach in writing.

Choice and Marketing

You have the right to ask us not to process your Personal Data for marketing purposes. When we collect contact information from you (for example, when you provide us with your business card, when you engage us for legal services, or when you subscribe to mailing lists via our Services), we may add your details to our contacts database and our mailing lists. If you register for an event we may send you follow-up information or newsletters regarding topics related to the event.

If you receive an email communication from ArentFox Schiff and you would prefer not to receive such an email communication, please either notify the sender of that email or follow the unsubscribe instructions in the email. ArentFox Schiff will take reasonable efforts to honor any such request. You may also indicate your desire to be removed from marketing communications by contacting us at consumerprivacy@afslaw.com.

Links to Third Party Websites and External Pages

This online Privacy Policy does not apply to the websites, services or platforms of other companies, individuals, or organizations to which we may provide links. These sites may have different policies relating to your privacy and the information they collect about you. Visitors should consult the privacy policies of linked sites, as we have no control over information that is submitted to, or controlled by, third parties. We strongly advise you to review the privacy policy of every site you visit.

We have no control over and assume no responsibility for the content, privacy policies, or practices of any third party sites, platforms or services.

Bulletin Boards, Chat Rooms, and Blogs

From time to time, we may operate bulletin boards, chat rooms, and/or blogs in connection with the Services. *Please exercise caution when disclosing any information in chat rooms, forums and other public posting areas. We are not responsible for the use by others of the information that you disclose in public posting areas.*

Special Policy Regarding Information from Children

ArentFox Schiff and its Services are not targeted to children under the age of 16 and ArentFox Schiff does not knowingly collect Personal Data from any child under the age 16 without parental consent. If we become aware that such data has been collected, we will delete it.

Your Individual Rights in The European Economic Area, The United Kingdom, and Switzerland

For residents of the European Economic Area, the United Kingdom, and Switzerland, you may be entitled to ask us for a copy of your information, to correct it, erase or restrict its processing, or ask us to transfer some of this information to other organizations. You may also have the right to object to some processing activities and, where we have asked for your consent to process your information, to withdraw this consent. These rights may be limited in some situations, for example, where we can demonstrate that we have a legal requirement to process your information. In some instances, this may mean that we are able to retain your information even if you withdraw your consent.

We hope we can satisfy any queries you may have about the way we process your data. If you have any concerns about how we process your data, or would like to opt-out of receiving marketing communications, please contact us at consumerprivacy@afslaw.com.

For residents of the European Economic Area, the United Kingdom, and Switzerland in the event you have unresolved concerns, you also have the right to complain to a data protection authority.

Your California Privacy Rights

California consumers may have the following rights. To the extent that these rights apply to you, the following rights are provided:

- **Right to know**
You have the right to know and request information about the categories and specific pieces of information we have collected about you, as well as the categories of sources from which such information is collected, the purpose for collecting such information, and the categories of third parties with whom we share such information. You also have the right to know if we have sold or disclosed your Personal Data. You may also request a copy of the Personal Data we have collected and, upon request, we will provide this information to you in electronic form.
- **Right to request deletion**
You have the right to request the deletion of your Personal Data, subject to certain exceptions and our record retention policy.
- **Right to opt-out of sale**
You have the right to opt-out of the “sale” of your Personal Data to third parties. Arent Fox does not sell Personal Data as the term “sell” is traditionally understood, but “sell” is broadly defined under California law. You have the right to opt-out of that “sale” on a going-forward basis at any time through our cookie tools. To exercise this right, click the “Do Not Sell My Personal Information”

link in the footer of the Services or use our cookie settings tool in the footer of our Services. We do not knowingly “sell” the Personal Data of children under 16 years old

- **Right to non-discrimination**

You have the right to not be discriminated against for exercising any of these rights.

If you would like to exercise one or more of the rights above, please contact us by calling 888.414.8658 or consumerprivacy@afslaw.com. You may designate an authorized agent to make a request on your behalf. We will deny a request from an agent that does not submit proof that they have been authorized by you to act on your behalf.

We may need to confirm your verifiable consumer request before completing your request, and, for example, may ask for you to confirm data points we already have about you. We will only use Personal Data provided in a consumer request to verify the requestor’s identity or authority to make the request.

We do not sell or provide your Personal Data to any third party for such third party’s direct marketing purposes and therefore do not respond to requests under California’s “Shine the Light” law.

How We Respond to Do Not Track Signals

Certain web browsers and other programs may be used to signal your preferences about how or whether we or third parties may collect information about your online activities. If your browser or device is using a Global Privacy Control setting, we will endeavor to detect it and honor it on that specific browser or device.

Record Retention Policy

We will keep your Personal Data for as long as necessary to perform the purposes set out in this Privacy Policy and in accordance with our record retention policy. Laws may require us to hold certain information for specific periods.

Material Changes to this Privacy Policy

ArentFox Schiff reserves the right to change this Privacy Policy from time to time. When we do, we will also revise the “Last Updated” date at the beginning of this Privacy Policy. For material updates, we will give notice and/or place a prominent notice on our Services.

You are advised to review this Privacy Policy periodically for any changes. Changes to this Privacy Policy are effective when they are posted on this page. *By continuing to use our Services or providing Personal Data to us, you are agreeing to be bound by any changes or revisions made to this Privacy Policy.*

Special Cases

ArentFox Schiff reserves the right to disclose Personal Data in special cases, when we have reason to believe that disclosing this information is necessary to identify, contact, or bring legal action against someone who may be causing injury to or interference with (either intentionally or unintentionally) our rights or property, other ArentFox Schiff clients or Services users, or anyone else that could be harmed by such activities. We may disclose Personal Data without notice to you in response to a subpoena or when we believe in good faith that the law requires or permits it or to respond to an emergency situation.

Specific areas or pages of our Services may include additional or different provisions relating to collection and disclosure of Personal Data. In the event of a conflict between such provisions and this Privacy Policy, such specific terms shall control.

Contact Us

For questions about this policy and/or to contact us with any questions, please contact us at: consumerprivacy@afslaw.com or 888.414.8658