

CALIFORNIA PRIVACY RIGHTS ACT OF 2020 PRIVACY POLICY

Table of Contents

I. Overview	2
II. Categories of Personal Information Collected from Consumers during the Preceding 12 Months	2
III. Categories of Sources from which Personal Information is Collected from Consumers	3
IV. Business or Commercial Use of the Personal Information Collected from Consumers	3
V. Categories of Personal Information, if any, Sold to or Shared with Third Parties in the Preceding 12 Months	4
VI. Actual knowledge of Selling or Sharing the Personal Information of Consumers under 16 Years of Age	4
VII. Categories of Third Parties to whom the Information was Sold or Shared in the Preceding 12 Months	4
VIII. Your Rights under the CPRA	5
IX. Exercising Your Rights to Access, Correct, and/or Delete Personal Information About You ...	7
X. Data Retention	7
XI. Charging You a Fee	7
XII. Exercising Your Right to Limit the Use of Your Sensitive Personal Information	7
XIII. Denying Rights and Appeals	7
XIV. Private Right of Action and Complaints	8
XV. Notice of Financial Incentive	8
XVI. Changes to this Privacy Policy	8

CALIFORNIA PRIVACY RIGHTS ACT OF 2020 PRIVACY POLICY

Effective Date of Privacy Policy: January XX, 2023

I. Overview

This Privacy Policy describes the ways in which King & Spalding LLP (“we”) collects, manages, stores and disposes of information that identifies, relates to, describes, is capable of being associated with, or could reasonably be linked, directly or indirectly, with a particular consumer (“Personal information”) relating to residents of California. We may amend or update it from time to time.

II. Categories of Personal Information Collected from Consumers during the Preceding 12 Months

We have collected the below categories of Personal Information and sensitive Personal Information from consumers within the last 12 months:

Personal Information and Sensitive Personal Information	
Identifiers	Real name, postal address, unique personal identifier, online identifier, Internet Protocol address, email address, account name, or similar identifiers
Personal Information Categories as listed in Cal. Civ. Code 1798.140(v)(1)	Real name Postal address IP address Professional or employment-related information Education information, defined as information that is not publicly available personally identifiable information as defined in the Family Educational Rights and Privacy Act (<u>20 U.S.C. section 1232g</u> , 34 C.F.R. Part 99).
Sensitive Personal Information Categories as listed in Cal. Civ. Code 1798.140(ae)(1-3)	Social security number, driver’s license number, state identification number, or similar government-issued identifiers. Personal information concerning a consumer's health, or sexual orientation.

CALIFORNIA PRIVACY RIGHTS ACT OF 2020 PRIVACY POLICY

III. Categories of Sources from which Personal Information is Collected from Consumers

King & Spalding obtains all the categories of Personal Information and sensitive Personal Information listed above from at least one of the following categories of sources:

- Directly from you. For example, from forms you complete, services you purchase, emails you send;
- Indirectly from you. For example, from observing your actions on our website; or
- From clients, third parties, service providers and contractors, and publicly available sources.

IV. Business or Commercial Use of the Personal Information Collected from Consumers

We may use or disclose Personal Information for one or more of the purposes listed below.

- Providing legal services and responding to requests for legal services;
- Managing our business relationships, including billing, accounting, collection and support services;
- Providing information relating to our services either in response to specific requests or generally to develop our business;
- Processing employment applications;
- Invoicing for our services and obtaining payment;
- Responding to complaints;
- Meeting our legal and regulatory obligations;
- Making appropriate business development plans to better support our clients' needs for legal services;

CALIFORNIA PRIVACY RIGHTS ACT OF 2020 PRIVACY POLICY

- Preventing, detecting and responding to fraud or potential fraud or other illegal activities;
- Improving the functionality of our website and other IT services;
- Leveraging communications data from our Exchange server, including Outlook, to maintain a repository of business contacts and run analytics on metadata which advance our business development initiatives; and
- Processing employee data.

V. Categories of Personal Information, if any, Sold to or Shared with Third Parties in the Preceding 12 Months

In the preceding twelve (12) months, the Firm has not sold any Personal Information to third parties. In the preceding twelve (12) months, we may have disclosed the following categories of Personal Information to the parties identified in the “ “Categories of Third Parties to whom the Information was Shared in the Preceding 12 Months” section.

VI. Actual knowledge of Selling or Sharing the Personal Information of Consumers under 16 Years of Age

We do not knowingly collect Personal Information from individuals under the age of 16 on our website(s). We will delete any Personal Information collected from consumers under 16 years of age if we learn that we have shared the Personal Information from individuals under the age of 16 without verification of their legal guardian, or on the basis of parental consent, as appropriate.

VII. Categories of Third Parties to whom the Information was Sold or Shared in the Preceding 12 Months

We may disclose Personal Information or sensitive Personal Information to a third party for the purposes identified in the “ Identification of the Specific Business or Commercial Purposes for Collecting Personal Information from Consumers” section. When we disclose Personal Information for these purposes, we enter into a contract with such third parties that requires

CALIFORNIA PRIVACY RIGHTS ACT OF 2020 PRIVACY POLICY

the recipient to protect the Personal Information. We may share Personal Information and sensitive Personal Information with the following categories of third parties:

- Providers of data services such as website hosting, data hosting, and SaaS tools;
- Outsourced IT and data quality service providers;
- Financial institutions;
- Benefits and Human Resources service providers;
- Professional services providers;
- Building and facilities services;
- Shipping or direct mail organizations;
- Event partners and sponsors; and
- Paper-based service provider

VIII. Your Rights under the CPRA

You enjoy the following rights under the CPRA:

Right to Access: You have the right to know what Personal Information we have collected about you in the preceding 12 months, including:

- The categories of Personal Information;
- The categories of sources from which the Personal Information is collected;
- The business or commercial purpose for collecting, selling, or sharing Personal Information and/or sensitive Personal Information;
- The categories of third parties to whom we disclose Personal Information; and

CALIFORNIA PRIVACY RIGHTS ACT OF 2020 PRIVACY POLICY

- The specific pieces of Personal Information we have collected about you.

Right to Delete: You have the right to request the deletion of Personal Information that we have collected about you, subject to certain exceptions.

Right to Correct: You have the right to request the correction of inaccurate Personal Information that we maintain about you.

Right to Opt-Out of the Selling or Sharing of Personal Information: When applicable, you have the right to opt-out of the selling or sharing of Personal Information about you.

Right to Limit the Use of Sensitive Personal Information about you: When applicable, you have right to limit the use of sensitive Personal Information about you, under certain circumstances, if we use or disclose sensitive Personal Information for reasons other than those set forth in California Civ. Code 1798.7027, subsection (m).

Right to Non-Discrimination: You have the right not to receive discriminatory treatment by us for the exercise of privacy rights conferred by the CPRA, including an employee's, a job applicant's, or an independent contractor's right not to be retaliated against for the exercise of their CPRA rights.

We will not discriminate against you for exercising any of your CPRA rights. If you exercise any of your CPRA rights, we will not take any of the following actions unless permitted by the CPRA:

- Deny you services;
- Charge you different prices or rates for services, including through granting discounts or other benefits, or imposing penalties;
- Provide you a different level or quality of services; or
- Suggest that you may receive a different price or rate for services or a different level or quality of services.

CALIFORNIA PRIVACY RIGHTS ACT OF 2020 PRIVACY POLICY

IX. Exercising Your Rights to Access, Correct, and/or Delete Personal Information About You

California residents and their authorized agents can submit requests for access, correction, and deletion for our review. We may request additional information to verify the authenticity of your request, including confirming data or other Personal Information that you have already provided to us, or potentially requesting additional data. We will provide you with confirmation of our receipt of your request within 10 business days. We will work diligently to satisfy your request within 45 calendar days, and we may request up to an additional 45 calendar days to honor your request, depending on its complexity. California residents intending to exercise their rights described above should submit a verifiable request to us by either: Calling us toll-free at 1-833-795-0354; or by Clicking [here](#):

X. Data Retention

Personal Information will be retained by King & Spalding for as long as the information is required to fulfill our legitimate business needs or the purposes for which the information was collected, or for as long as is required by law.

XI. Charging You a Fee

We do not charge a fee to process or respond to your verifiable request unless such requests are excessive, repetitive, or manifestly unfounded. If we determine that the request warrants a fee, we will tell you why we made that decision and provide you with a cost estimate before completing your request.

XII. Exercising Your Right to Limit the Use of Sensitive Personal Information About You

We do not use sensitive Personal Information about you for purposes other than those specified in California Civ. Code 1798.7027(m).

XIII. Denying Rights and Appeals

If we deny any of your rights granted by the CPRA, you may have the right to appeal the decision with us. If you would like to appeal a prior decision, please include 'Appeal' in the subject line, along with the prior request and related communications. Please send this to us

CALIFORNIA PRIVACY RIGHTS ACT OF 2020 PRIVACY POLICY

following the instructions located below, in Contacting Us. Additionally, you may contact the California Privacy Protection Agency and you have the ability to contact your state's attorney general (see information listed below) if you have concerns about the results of the appeal.

XIV. Private Right of Action and Complaints

In limited circumstances, you can sue a business under the CPRA if there is a data breach. More information about the types of data breaches for which you currently can sue a business under the CPRA can be found [here](#).

For all other violations of the CPRA, you may file a consumer complaint with the California Privacy Protection Agency. If you choose to file a complaint with the California Privacy Protection Agency, explain exactly how the business violated the CPRA, and describe when and how the violation occurred.

Please note that the California Privacy Protection Agency cannot represent you or give you legal advice on how to resolve your individual complaint. In addition, starting in 2023, you also will be able to file via the electronic complaint system available on the Agency's website at <https://cppa.ca.gov/>.

XV. Notice of Financial Incentive

We do not offer a financial incentive or price service difference for the use of Personal Information about you or Sensitive Personal Information about you.

XVI. Changes to this Privacy Policy

We reserve the right to amend this privacy notice at our discretion and at any time. When we make changes to this privacy notice, we will post the updated notice on the Website and update the notice's effective date. Your continued use of our website following the posting of changes constitutes your acceptance of such changes.