

Table of Contents

I. Overview 2

II. Categories of Personal Data Collected from Consumers during the Preceding 12 Months.. 2

III. Categories of Sources from which Personal Data is Collected from Consumers 3

IV. Business or Commercial Use of the Personal Data Collected from Consumers 3

V. Categories of Personal Data Sold to Third Parties 4

VI. Actual knowledge of Selling the Personal Data of Consumers Who are Minors 4

**VII. Categories of Third Parties to whom the Personal Data was Sold in the Preceding 12 Months
4**

VIII. Your Rights under the CPRA..... 5

IX. Exercising Your Rights to Access, Correct, and/or Delete Personal Data About You 6

X. Data Retention 6

XI. Charging You a Fee..... 6

XII. Exercising Your Right to Limit the Use of Sensitive Personal Data About You 6

XIII. Denying Rights and Appeals 6

XIV. Private Right of Action and Complaints..... 7

XV. Notice of Financial Incentive 7

Changes to this Privacy Policy 7

KING & SPALDING TEXAS DATA PRIVACY AND SECURITY ACT OF 2023 PRIVACY NOTICE

Effective Date: April 1, 2024

I. Overview

This Privacy Policy describes the ways in which King & Spalding LLP (“King & Spalding” or “we”) collects, manages, 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 Data”) relating to residents of Texas. We may amend or update it from time to time. You can tell when the Privacy Policy was last updated by reviewing the “Effective Date of Privacy Policy” legend at the top of this page.

II. Categories of Personal Data Collected from Consumers

We have collected the below categories of Personal Data and Sensitive Data from consumers:

Personal Data and Sensitive Personal Data	
Identifiers	Real name, postal address, unique personal identifier, online identifier, Internet Protocol address, email address, account name, or similar identifiers
Personal Data Categories	Real name Postal address IP address Professional or employment-related information
Sensitive Data Categories	Citizenship, Immigration Status, Social security number, driver’s license number, state identification number, or similar government-issued identifiers. Personal Data concerning a consumer’s ethnic or racial origins. Personal Data concerning a consumer's health, or sexual orientation.

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

King & Spalding obtains all the categories of Personal Data and Sensitive Data 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 Data Collected from Consumers

We may use or disclose Personal Data 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;
- Preventing, detecting, and responding to fraud or potential fraud or other illegal activities;
- Improving the functionality of our website and other IT services;

KING & SPALDING TEXAS DATA PRIVACY AND SECURITY ACT OF 2023 PRIVACY NOTICE

- 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
- Human resources management.

V. Categories of Personal Data Sold to Third Parties

The Firm does not sell Personal Data to Third for any purpose. We may have disclosed the following categories of Personal Data to the parties identified in the “Categories of Third Parties to whom the Personal Data was Shared” section. “Categories of Third Parties” includes providers of data services, financial institutions, professional services providers, event partners and sponsors, etc.

VI. Actual knowledge of Selling the Personal Data of Known Children under 13 Years of Age

We do not collect Personal Data directly from known children under 13 years of age. Parents and legal guardians may provide the Personal Data of known children under the age of 13 when enrolling in benefits or when participating in firm-sponsored events. We will delete any Personal Data collected from known children under 13 years of age if we learn that we have shared the Personal Data from known children under the age of 13 without verification of their legal guardian, or on the basis of parental consent, as appropriate.

VII. Categories of Third Parties to whom the Personal Data is Sold

We do not sell Personal Data to the entities listed within the “Categories of Third Parties” section. We may disclose Personal Data or sensitive Personal Data to a third party for the purposes identified in the “Identification of the Specific Business or Commercial Purposes for Collecting Personal Data from Consumers” section. When we disclose Personal Data for these purposes, we enter into a contract with such third parties that requires the recipient to protect the Personal Data. We may share Personal Data and Sensitive Data 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;

KING & SPALDING TEXAS DATA PRIVACY AND SECURITY ACT OF 2023 PRIVACY NOTICE

- 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 TDPSA

You enjoy the following rights under the TDPSA:

- **Right to Access:** You have the right to confirm what Personal Data we are processing on you and to access the Personal Data, including:
 - The categories of Personal Data;
 - The categories of sources from which the Personal Data is collected;
 - The business or commercial purpose for collecting or selling Personal Data and/or sensitive Personal Data;
 - The categories of third parties to whom we disclose Personal Data; and
 - The specific pieces of Personal Data we have collected about you.
- **Right to Correct:** You have the right correct inaccuracies in your Personal Data, considering the nature of the Personal Data, and the purposes for processing your Personal Data.
- **Right to Delete:** You have the right to request the deletion of your Personal Data that we have collected about you, subject to certain exceptions.
- **Right to Data Portability:** You have the right to request a copy personal data, if it exists in a digital format that you previously provided to us. We will provide the copy to use in a portable, and to the extent technically feasible, readily usable format that allows you to transfer the data to another Controller without hindrance.
- **Right to Opt-Out of the Selling Personal Data:** You have the right to opt-out of the selling of your Personal Data for the purposes of targeted advertising, the sale of your

KING & SPALDING TEXAS DATA PRIVACY AND SECURITY ACT OF 2023 PRIVACY NOTICE

Personal Data, or profiling in furtherance of a decision that produces a legal or similarly significant effect concerning you.

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

Texas residents and their authorized agents can submit requests for access, correction, deletion, data portability, and opting out of the selling of your Personal Data for our review. We may request additional information to verify the authenticity of your request, including confirming Personal Data that you have already provided to us, or potentially requesting additional Personal 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 without undue delay, but no later than 45 calendar day. We may request up to an additional 45 calendar days to honor your request, depending on its complexity. Texas 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 Data 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. We shall provide you with a copy of the information at least twice annually free of charge. We can charge you a reasonable fee to cover the administrative costs of complying with excessive, repetitive, or manifestly unfounded requests.

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

We do not use sensitive Personal Data about you for purposes other than those specified in the TDPSA and this privacy notice.

XIII. Denying Rights and Appeals Process

If we deny any of your rights granted by the TDPSA, 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. We will notify you in writing of any action taken or not taken in response to your appeal not later than the 60th day

KING & SPALDING TEXAS DATA PRIVACY AND SECURITY ACT OF 2023 PRIVACY NOTICE

after receiving your appeal. We will include a written explanation of the reason or reasons for our decision. You can send your appeal to us following the instructions located below, in the “Contacting Us” section. Additionally, you may contact the Texas Attorney General if you have concerns about the results of the appeal.

XIV. Private Right of Action and Complaints

The TDPSA does not have a “privacy right of action” provision. You may submit complaints regarding our compliance with the TDPSA via the Texas Attorney General’s Internet website.

XV. 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.