

# Privacy Policy

Jenner & Block LLP (together with our affiliate Jenner & Block London LLP, “Jenner & Block,” “we” or the “firm”) is committed to ensuring that it acts in accordance with applicable data protection and privacy laws when it collects and uses information provided to it or information about visitors to its website. This Privacy Policy applies to your use of any of Jenner & Block’s services, its website, or as a result of your relationship with the firm or to one or more of its clients, or to any information collected from third parties including but not limited to all websites or apps that post a link to this Privacy Policy (collectively the “Sites”). The Privacy Policy also applies to the firm’s marketing and communications activities and any information we collect from you, or use, in conjunction with such activities.

This Privacy Policy explains the types of information we collect, the purposes of processing that information, the legal basis for processing that information, how we use that information, and with whom we share it. Our Privacy Policy describes the measures we take to protect the security of the information and the rights that you have as a data subject with regard to this information. We also tell you how you can reach us to update your contact information, remove your name from our mailing lists, or get answers to questions you may have about our privacy practices. Please read this Privacy Policy carefully. By continuing to interact with the firm or our Sites, you are acknowledging the practices described in this Privacy Policy.

## **UPDATES TO OUR PRIVACY POLICY**

This Privacy Policy may be updated periodically. We may modify this Privacy Policy at any time in our sole discretion by posting a revised version on this page. If we intend to further process your personal data for a purpose other than that for which the personal data were collected, prior to that further processing, the firm will provide you with information about that other purpose and with additional information necessary to ensure fair and transparent processing.


## **PERSONAL INFORMATION AND SPECIAL CATEGORY INFORMATION**

In this privacy notice, any information relating to an identified or identifiable natural person (a “data subject”) is personal information (“personal information”). An identifiable natural person is one who can be identified, directly or indirectly, by reference to a set of information.

Some personal information is deemed to be more sensitive (“special category information”). We do not collect or process any special category information through the Sites.

## **INFORMATION WE COLLECT DIRECTLY FROM YOU:**

Data Collected	Purpose of Collection
<p>Information about the devices associated with you used to access the Sites, such as a computer, mobile phone, or tablet</p>	<p>For permitted business purposes, such as administration, functioning and improvement of the Sites; to analyze the Sites' performance and functioning; to prevent fraud; to enforce the Sites' Legal Notices and Terms of Use; to comply with all applicable laws and corporate reporting obligations; to enforce the firm's agreements; to analyze how you use the Sites and to perform other market research.</p>
<p>Web browser type and version you use and any additional browsing information</p>	<p>For permitted business purposes, such as administration, functioning and improvement of the Sites; to analyze the Sites' performance and functioning; to prevent fraud; to enforce the Sites' Legal Notices and Terms of Use; to comply with all applicable laws and corporate reporting obligations; to enforce the firm's agreements; to analyze how you use the Sites and to perform other market research.</p>
<p>IP address, which may provide geolocation data</p>	<p>For permitted business purposes, such as administration, functioning and improvement of the Sites; to analyze the Sites' performance and functioning; to prevent fraud; to enforce the Sites' Legal Notices and Terms of Use; to comply with all applicable laws and corporate reporting obligations; to enforce the firm's agreements; to analyze how you use the Sites and to perform other market research.</p>
<p>How you use and</p>	<p>For permitted business purposes, such as</p>



**We collect personal information about you when you interact with the firm or our Sites, including the following:**

Some or all of the information above may be shared as set forth below.

We collect certain information by automated means when you visit our Sites, such as how many users visited our Sites and the pages accessed. By collecting this information, we learn how to best tailor our Sites to our visitors. We collect this information through various means such as “cookies” and “web beacons”

- **Cookies.** As described in our Cookie Policy, we use “cookies” on some of the Sites. Cookies are pieces of code placed on your devices when you visit certain websites. We use cookies to tell us, for example, whether you have visited us before or if you are a new visitor and to help us identify features of the Sites in which you may have the greatest interest. Cookies may enhance your online experience by saving your preferences while you are visiting a particular website. Most web browsers will tell you how to stop accepting new cookies, how to be notified when you receive a new cookie, and how to disable existing cookies. Please note, however, that without cookies you may not be able to take full advantage of the features and functionality of the Sites.
- **Web Beacons.** As described in our Cookie Policy, certain pages on our website contain “web beacons” (also known as Internet tags, pixel tags, and clear GIFs). These web beacons allow third party service providers to obtain information, such as the IP address of the computer that downloaded the page on which the beacon appears; the URL of the page on which the beacon

appears; the time the page containing the beacon was viewed; the type of browser used to view the page; and the information in cookies set by the third party.

## **PROCESSING**

Processing means any operation or set of operations which is performed on personal data or on sets of personal information. This is a broad definition, and ranges from the collection of personal information, to the organization or storage of personal information.

## **LEGAL BASES FOR PROCESSING INFORMATION**

The firm processes this information where we have a legal basis to do so. The legal basis that we rely on will be one of the following:

- The majority of the personal information we collect is provided by you voluntarily, for example when you sign up to join a mailing list or register for an event, and is therefore collected with your consent and permission;
- The processing is necessary to perform a contract with you or to fulfill a request you have made;
- The processing is necessary to comply with a legal obligation that applies to the firm under EU or Member State law, or UK law, as applicable; or
- The processing is necessary for purposes that are in the firm's legitimate interests in order to, for example, protect our business and better understand our clients.

Our Sites do not collect personal information about your online activities over time and across third-party websites or online services. Therefore, "do not track" signals transmitted from web browsers do not apply to our Sites, and we do not alter any of our data collection and use practices upon receipt of such a signal.

## **INFORMATION WE SHARE**

The firm will not share your information with third parties outside of the international affiliation of Jenner & Block without your consent, except as follows:

- Where we are required to by virtue of a legal, regulatory, or professional obligation;
- With third party service providers who perform services on the firm's behalf. For example, we share information with vendors, such as those that provide systems, web hosting (including microsites), IT services, marketing support, and other internal / external advisors. We may authorize them to collect information on our behalf. Some vendors may be located outside of the United States.

- In accordance with our engagement terms, where you are a client of Jenner & Block.
- Where disclosed in the firm's Cookie Policy.
- To law enforcement authorities or other government officials.
- When we believe disclosure is necessary or appropriate to prevent physical harm or financial loss or in connection with an investigation of suspected or actual illegal activity,
- If necessary to protect the vital interests of a person.
- To enforce our Legal Notices and Terms of Use.
- To protect our property, services, and legal rights.
- To prevent fraud against the firm, our affiliates, business partners, or authorized dealers.
- To support auditing, compliance, and corporate governance functions.

Any such third parties are not authorized by us to use or disclose the information, except as necessary to perform services on our behalf or comply with legal requirements. These third parties have no independent rights to the data.

## **LINKS TO OTHER WEBSITES**

The Sites may provide links to other websites for your convenience and information. These websites may operate independently from our Sites. Linked websites may have their own privacy notices or policies, which we strongly suggest you review if you visit any linked websites. To the extent any linked websites you visit are not part of the Sites, we are not responsible for their content, any use of the websites, or the privacy practices of any of those websites.

## **INFORMATION WE TRANSFER**

The Sites are generally operated in the United States. If you are located outside of the United States, please be aware that any information you provide to us may be transferred to the United States. You acknowledge that by using the Sites and giving us your information, such information may be transferred to the US and that the US may not provide the same level of protections at the laws of your country. You accept that the transmission of personal information and other data via the internet is not completely secure. Jenner & Block cannot guarantee the security of your information when it is in the process of being transmitted to and from the Sites.

## **EUROPEAN UNION AND UNITED KINGDOM RESIDENTS' RIGHTS**

With respect to certain individuals in the European Union or the United Kingdom, the firm may be considered a data controller under applicable data protection laws as they may vary from time to

time, including the General Data Protection Regulation (Regulation (EU) 2016/679) (as also incorporated into the laws of the UK) and the Data Protection Act 2018 (“EU/UK Data Protection Laws”). This means that we are responsible for deciding how we hold and use personal information about you. We are providing this information pursuant to the EU/UK Data Protection Laws.

If you are a resident of the European Union, United Kingdom, or a jurisdiction with similar data protection laws, you have a number of rights under the EU/UK Data Protection Laws, including the right to:

- Access a copy of the Personal Data that the Firm holds about you;
- Rectify inaccuracies in Personal Data that the Firm holds about you;
- Have the Personal Data that the Firm holds about you erased in certain circumstances;
- Restrict the Processing of your Personal Data in certain circumstances;
- Object to the Processing of your Personal Data in certain circumstances;
- Transfer the Personal Data that the Firm holds about you to another entity in certain circumstances; and
- Withdraw any consent you have provided, however when we process your data on a basis other than consent (e.g., our legitimate interests), your withdrawal of consent may not affect our processing.

If you notify us that you do not wish to be contacted for marketing purposes, by clicking an “unsubscribe” link or otherwise notifying us, we will not send you marketing information.

If you would like to exercise any of these rights, please contact us at [dataprotection@jenner.com](mailto:dataprotection@jenner.com). To help protect your privacy and security, we will take reasonable steps to verify your identity before granting access to your information. EU and UK residents will be notified of any actions taken on your personal information in response to a request submitted for modification, deletion, or restrictions on the processing of your personal information. EU and UK residents have the right to lodge a complaint with the appropriate privacy or data protection regulator in your jurisdiction.

[Where we transfer personal information that is subject to EU/UK Data Protection Laws outside of the European Economic Area or the UK, we will take reasonable steps to ensure the security and confidentiality of your personal information, which may include entering into standard contractual clauses. Please contact us at [dataprotection@jenner.com](mailto:dataprotection@jenner.com) if you would like of copy of the relevant transfer mechanisms we have in place.]

## **HOW WE PROTECT PERSONAL INFORMATION**

We maintain administrative, technical, and physical safeguards to protect against loss, misuse, unauthorized access, disclosure, alteration, or destruction of the information you provide when visiting or using the Sites.

## **CALIFORNIA PRIVACY RIGHTS**

If you are a California resident, California law provides you with certain rights. California Civil Code Section 1798.83 permits you to opt out of the disclosure of your personal information by us to third parties for those third parties' direct marketing purposes. To make such a request, please send a detailed description of the specific content or information to [dataprotection@jenner.com](mailto:dataprotection@jenner.com) or send written request to Data Protection Officer, Jenner & Block LLP, 353 N. Clark, Chicago IL 60654. Please be aware that such a request does not ensure complete or comprehensive removal of the content or information you have posted and that there may be circumstances in which the law does not require or allow removal, even when requested.

Pursuant to California Civil Code 1798.100 *et seq.*, the California Consumer Privacy Act of 2018, as amended by the California Privacy Rights Act of 2020 ("CCPA"), California residents have the following, additional rights:

- 1. Your Right to Access to Specific Information and Data Portability.** You may request that we disclose certain information to you about our collection and use of your personal information in the past 12 months. Once we receive and confirm your personal information request, you can request that we disclose some or all of:
  - The categories of personal information we collected about you;
  - Subject to certain limitations, the specific pieces of personal information we collected about you;
  - The categories of sources for the personal information we collected about you;
  - Our business or commercial purpose for collecting that personal information;
  - The categories of third parties with whom we share that personal information; and
  - If we sold or disclosed your personal information for a business purpose, two separate lists identifying: (a) the categories of your personal information collected and sold, and the categories of the third parties to whom the data was sold; and (b) the categories of your personal information that was disclosed for business purposes.

To make such a request, please use one of the methods identified in the Exercising Your CCPA Rights section of this policy. You may only submit two personal information requests of these kinds within a 12-month period.

1. **Your Right to Request Correction.** You may request that we correct inaccurate personal information that we maintain about you, subject to certain exceptions. Once we receive and confirm your personal information request, we will correct the personal information that is the subject of your request if we are able to do so, unless an exception applies. We may require documentation from you to verify that the personal information is inaccurate. We will only use such information for the purpose of processing your request and to comply with our record-keeping obligations. We may delete the personal information instead of correcting it if the deletion would not negatively impact you or if you consent to delete it.
2. **Your Right to Request Deletion.** You may request that we delete any or all of the personal information that we collected from you and retained, subject to certain exceptions. Once we receive and confirm your personal information request, we will delete from our records the personal information that is the subject of your request, unless an exception applies.

We may deny your deletion request if retaining the information is necessary for us or our service providers to:

- Complete the transaction for which we collected the personal information, provide a good or service that you requested, take actions reasonably anticipated within the context of our ongoing business relationship with you, or otherwise perform our contract with you;
- Detect security incidents, protect against malicious, deceptive, fraudulent, or illegal activity, or prosecute those responsible for such activities;
- Debug products to identify and repair errors that impair existing intended functionality;
- Exercise free speech, ensure the right of another consumer to exercise their free speech rights, or exercise another right provided for by law;
- Comply with California Penal Code Section 1546 *et seq.* (the California Electronic Communications Privacy Act);
- Engage in public or peer-reviewed scientific, historical, or statistical research in the public interest that adheres to all other applicable ethics and privacy laws, when the information's deletion may likely render impossible or seriously impair the research's achievement, if you previously provided informed consent;
- Enable solely internal uses that are reasonably aligned with consumer expectations based on your relationship with us;
- Comply with a legal obligation; or

- Make other internal and lawful uses of that information that are compatible with the context in which you provided it.

1. **Your Right to Opt-Out of Sale or Sharing.** We do not sell personal information to third parties or share personal information for cross-context behavioral advertising. If that should change, we will make available to you a method to opt-out of such sale or sharing.

**Exercising Your CCPA Rights.** To exercise any of the CCPA rights described above, please submit a verifiable personal information request to us by either:

- Calling us at 855-366-3779;
- Visiting this form;
- Emailing us at [dataprotection@jenner.com](mailto:dataprotection@jenner.com); or
- Writing to us at the mailing address provided below.

Only you or a person that you have authorized in writing to act on your behalf may submit a personal information request. You may also make a personal information request on behalf of your minor child.

The verifiable personal information request must:

- Describe your request with sufficient detail that allows us to properly understand, evaluate, and respond to it; and
- Provide sufficient information that allows us to reasonably verify you are the person about whom we collected personal information, or an authorized representative.
- For a request by the actual person, we will typically require a copy of a valid state-issued identification card, together with any email or physical address you have submitted to us and a valid phone number belonging to the individual making the request.
- For an authorized representative, the firm will typically require a copy of the signed authorization from the individual on whose behalf the agent is acting demonstrating the agent's ability to act on that person's behalf, a valid power of attorney, court appointment document or the agent's registration with the California Secretary of State. Once we receive a personal information request from an authorized agent, unless that agent has a power of attorney issued pursuant to California Probate Code Sections 4121 to 4130, we may contact the person to whom the request relates in order to, among other things, verify their identity, confirm the agent's capacity to act on that person's behalf, and if applicable, respond to or deliver information requested pursuant to the personal information request.

- For a request related to a household, all members of the household must submit the request, and each must provide information sufficient for us to verify their identity. Typically, that will include, a copy of each household member’s valid state-issued identification card (or for minors under the age of 13, a signed consent of the minors’ parent or guardian), together with any email or physical address that may have been submitted to us and a valid phone number belonging to the individuals making the request. We may deny a request from a household if we cannot verify that the individual(s) making the request are part of the same household.

**Response Timing and Format.** We will confirm receipt of any properly submitted personal information requests and provide information about how we will process the request within ten (10) business days. We endeavor to respond to a personal information request within 45 calendar days of our receipt. If we require more time (up to 90 calendar days), we will inform you of the reason and extension period in writing. We will deliver our written response by mail or electronically, at your option. If provided electronically, we will select a format to provide your personal information that is in a portable and readily useable format. The response we provide will also explain the reasons we cannot comply with a request, if applicable, and any next steps you may take. We do not charge a fee to process or respond to your personal information request unless it is 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.

**Your Right to Non-Discrimination.** If you exercise any of your rights under the CCPA, we will not discriminate against you. For example, we will not deny you our services, charge you different prices or rates, or provide or suggest a different level or quality of services.

## **RETENTION OF INFORMATION**

The firm retains all personal information for the duration of the relevant business relationship or, where required, in accordance with its information management policies and data retention policies and schedules. When deleting personal information based on a legally valid request by the data subject, the firm will make reasonable attempts to ensure that all instances of the information are deleted. For requests for access, corrections, or deletion, please refer to the “European Union and United Kingdom Residents’ Rights” or “California Privacy Rights” sections of this policy.

## **HOW TO CONTACT US AND MAKE REQUESTS OR A COMPLAINT**

If you have any requests, questions, or comments about or under this Privacy Policy, please contact the firm’s data protection officers at [dataprotection@jenner.com](mailto:dataprotection@jenner.com). If you would like to update your contact information or preferences, have your information removed from our mailing lists, or no longer wish to receive marketing e-mails that we may send based on information collected via product registration cards or other sources, you may do so by (a) unsubscribing via the links contained in emails from us; (b) contacting us at [dataprotection@jenner.com](mailto:dataprotection@jenner.com); or (c) writing to us at Jenner & Block LLP, ATTN: Chief Information Security Officer, 353 N. Clark, Chicago Illinois, 60654.

If you have a complaint about the way that we are using your personal information please contact [dataprotection@jenner.com](mailto:dataprotection@jenner.com). If we are unable to resolve your complaint you can contact the data protection authority in your country.

## **FURTHER LEGAL NOTICES**

Additional information about the firm and the Sites can be found in our Legal Notices.

## **BUSINESS STRUCTURE CHANGES**

We reserve the right to disclose and transfer all information related to our Sites, including personal data:

- To a subsequent owner, co-owner, or operator of one or more of the Sites; or
- In connection with a merger, consolidation, restructuring or other transaction involving the firm, including, without limitation, during the course of any due diligence process.

## **CHILDREN'S PRIVACY**

Our Sites are general audience sites not directed at children under the age of 16. If we obtain actual knowledge that any information we collect has been provided by a child under the age of 16, we will promptly delete the information.

## **NOTICE TO RESIDENTS OF NEVADA**

We do not presently sell any of the Personal Information we collect to any third parties. If we were to do so in the future, we will update this Policy, and provide Nevada residents with the opportunity to opt-out of the sale of their Personal Information.

Effective Date: December 8, 2022

**Jenner & Block London LLP**  
**Privacy Policy**  
**Cookie Policy**