

California Consumer Privacy Notice

June 2020

Norton Rose Fulbright US LLP (“NRFUS”) takes data privacy seriously. We recognize and value the trust that individuals place in us when providing us with personal data and we are committed to safeguarding the privacy and security of personal data we may collect from visitors to our websites and/or the clients to whom we provide legal and other services. Because most of our clients are corporations and other organizations, the California Consumer Privacy Act typically will not apply, but our general Privacy Policy <https://www.nortonrosefulbright.com/en-us/global-statements/privacy-notice> will apply. In those rare instances where the California Consumer Privacy Act does apply to you, this California Consumer Privacy Notice will apply.

This Privacy notice aims to help you understand our personal data collection, usage and disclosure practices by explaining:

1. What personal data we collect about you
2. How we obtain the personal data about you
3. How we use your personal data
4. Who we share your personal data with
5. How we protect your personal data
6. What rights you have in relation to your personal data
7. How we use cookies, tracking, and similar technologies
8. How you can contact us
9. How we will update this Privacy notice

By providing your personal data to us (whether via one of our websites, by email, in person or over the phone), you agree to the processing set out in this Privacy notice. Further notices highlighting certain uses we wish to make of your personal data together with the ability to opt in or out of selected uses may also be provided to you when we collect personal data from you.

Please note: This Privacy notice does not apply to, and NRFUS is not responsible for, any third party websites which may be accessible through links from this website. If you follow a link to any of these third party websites, they will have their own privacy policies and you will need to check these policies before you submit any personal data to such third party websites.

This Privacy notice aims to help you understand our personal data collection, usage and disclosure practices by explaining:

1. What personal data we collect about you

We may collect and process different categories of personal data in the course of operating our business and providing our services, such as personal identifiers, commercial information, Internet information, and professional information. These include:

- Basic personal details such as your name and job title;
- Contact data such as your telephone number and postal or email address;

- Financial data such as payment related information or bank account details;
- Demographic data such as your address, preferences or interests;
- Website usage and other technical data such as details of your visits to our websites (including our HighQ portals, Dealrooms and the Institute) or information collected through cookies and other tracking technologies;
- Personal data provided to us by or on behalf of our clients or generated by us in the course of providing our services, which may, where relevant, include special categories of personal data;
- Identification and other background verification data such as a copy of passports or utility bills or evidence of beneficial ownership or the source of funds to comply with client due diligence/"know your client"/anti-money laundering laws and collected as part of our client acceptance and ongoing monitoring procedures;
- Recruitment related data such as your curriculum vitae, your education and employment history, details of professional memberships and other information relevant to potential recruitment to NRFUS;
- Data that you may provide to us in course of registering for and attending events or meetings, including access and dietary requirements; and

Any other personal data relating to you that you may provide.

2. How we obtain the personal data about you

We may collect or receive your personal data in a number of different ways:

- Where you provide it to us directly, for example by corresponding with us by email, or via other direct interactions with us such as completing a form on our website or registering for and using one of our online tools such as the HighQ portals;
- Where we monitor use of, or interactions with, our websites, any marketing we may send to you, or other email communications sent from or received by NRFUS;
- Third party sources, for example, where we collect information about you to assist with "know your client" checks as part of our client acceptance procedures or where we receive

information about you from recruitment agencies for recruitment purposes; or

- Publicly available sources – we may, for example, use such sources to help us keep the contact details we already hold for you accurate and up to date or for professional networking purposes, e.g. LinkedIn.

3. How we use your personal data

We will only use your personal data where we are permitted to do so by applicable law. We use your data for a variety of business and commercial purposes:

- Contract performance: where your information is necessary to enter into or perform our contract with you.
- Legal obligation: where we need to use your information to comply with our legal obligations.
- Legitimate interests: where we use your information to achieve a legitimate interest and our reasons for using it outweigh any prejudice to your data protection rights.
- Legal claims: where your information is necessary for us to defend, prosecute or make a claim against you, us or a third party.
- Consent: where you have consented to our use of your information (you will have been presented with a consent form or facility in relation to any such use and may withdraw your consent through an unsubscribe or similar facility).

We may use your personal data in the following ways:

- To provide our legal and other services to you and to conduct our business – to administer and perform our services, including to carry out our obligations arising from any agreements entered into between you and us (please note that our Standard Terms of Engagement apply where we provide legal services).
- To facilitate use of our websites and to ensure content is relevant – to respond to requests for information or inquiries from visitors to our websites and to ensure that content from our websites is presented in the most effective manner for you and for your device.
- For marketing and business development purposes – to provide you with details of new services, legal updates and invites to seminars and events where you have chosen to receive these. We will provide an option to unsubscribe or opt-out of further communication on any electronic marketing

communication sent to you or you may opt out by contacting us as set out in section 8 below.

- For research and development purposes – analysis in order to better understand your and our clients’ services and marketing requirements and to better understand our business and develop our services and offerings.
- For recruitment purposes – to enable us to process applications for employment submitted via the Careers section of our website and to assess your suitability for any position for which you may apply at Norton Rose Fulbright.
- To fulfil our legal, regulatory, or risk management obligations – to comply with our legal obligations (performing client due diligence/“know your client”, anti-money laundering, anti-bribery, sanctions or reputational risk screening, identifying conflicts of interests); for the prevention of fraud and/or other relevant background checks as may be required by applicable law and regulation and best practice at any given time; and to enforce our legal rights, to comply.
- To ensure that we are paid – to recover any payments due to us and where necessary to enforce such recovery through the engagement of debt collection agencies or taking other legal action (including the commencement and carrying out of legal and court proceedings).
- To inform you of changes – to notify you about changes to our services or our Standard Terms of Engagement for legal services or this Privacy notice.
- To reorganize or make changes to our business – In the event that we are undergo a re-organization (for example if we merge, combine or divest a part of our business), we may need to transfer some or all of your personal data to the relevant third party (or its advisors) as part of any due diligence process or transfer to that re-organized entity or third party your personal data for the same purposes as set out in this Privacy notice or for the purpose of analyzing any proposed re-organization.

4. Who we share your personal data with

NRFUS is member firm of Norton Rose Fulbright, a Swiss verein. The members of the firm are separate legal entities, but we coordinate our practices. Any personal data that we collect or you provide to us may be shared with and processed by any Norton Rose Fulbright entity among our global network.

We may also share your personal data with a variety of the following categories of third parties:

- Our professional advisors (e.g. legal, financial, business, risk management or other advisors), bankers and auditors;
- Our insurers and insurance brokers;
- Third party service providers, including a service center based in the Philippines that is operated by Accenture UK Limited, to whom we outsource certain functions such as information and document management, office support, technology and IT services, word processing, photocopying and translation services (we have agreements in place with these service providers to protect the confidentiality and security of information (including personal data) shared with them); and
- Other third party external advisors or experts engaged in the course of the services we provide to our clients and with their prior consent, such as barristers, local counsel and technology service providers such as eDiscovery and document review platforms.

We may also process your personal data to comply with valid government subpoenas or other legal process. Before complying, where possible, we will provide you with notice so that you may object.

5. How we protect your personal data

We recognize that information security is an integral element of data privacy. While no data transmission (including over the Internet or any website) can be guaranteed to be secure from intrusion, we implement a range of commercially reasonable physical, technical and procedural measures to help protect personal data from unauthorized access, use, disclosure, alteration or destruction in accordance with data protection law requirements.

Alongside our role, please also note that where we have given you (or where you have chosen) a password which enables you to access certain parts of our websites or online services, you are responsible for keeping this password confidential and for complying with any other security procedures that we notify you of. We ask you not to share a password with anyone.

6. What rights you have in relation to your personal data

If you have any questions about our use of your personal data, you should first contact us via the details provided in section 8 below. Under certain circumstances and in accordance with applicable data protection laws:

You have the right to request that we disclose to you what information we collect, use, disclose, and sell. You also have the right to request that a business delete any personal information about you which the business has collected about you. To submit either of the above requests, you may call toll-free 1 (877) 203-2849. You may also submit via email at privacypolicy@NortonRoseFulbright.com for assistance. Please note for your protection, any request sent to us to delete your personal information will be subject to the a verification procedure that may require you to provide us with information about you that we have in our files.

We may have disclosed your information as described above during the preceding 12 months, but we do not sell your personal information. We do not have actual knowledge that we sell the personal information of minors under 16 years of age.

We shall not discriminate against you for exercising any of your above rights.

You may designate an authorized agent to make a request to exercise your rights on your behalf. For your protection, we reserve the right to deny any request from an agent who does not submit proof that they have been authorized to act on your behalf.

You can exercise your right to stop email marketing messages from us at any time by using an unsubscribe facility or contacting us at privacypolicy@nortonrosefulbright.com.

If you contact us to exercise any of these rights we will check your entitlement and respond in most cases within 45 days.

7. How we use cookies, tracking, and similar technologies

When you visit our websites we may send a cookie to your computer. This is a small data file stored by your computer to help improve functionality or tailor information to provide visitors with more relevant pages. For details of the cookies employed by us, please see our Cookie Policy, which forms part of this Privacy notice. We may also analyze website traffic to identify what visitors find most interesting so we can tailor our websites accordingly.

We will not respond to Web browser “do not track” signals. If you would like additional information about online tracking and various opt-out mechanisms, please see <https://youradchoices.com/>.

Because we link to social media sites, and from time to time may include third-party advertisements, other parties may collect your personally identifiable information about your online activities over time and across different web sites when you visit this Site.

Please note that not all tracking will stop even if you delete cookies.

8. How you can contact us

If you have a concern or a question about how we have processed your personal information, you should first raise your concern or question with Human Resources. In the event that Human Resources is unable to resolve the concern or question, you may call 1 (713) 6517777 or e-mail privacypolicy@NortonRoseFulbright.com for assistance.

Data Protection Officer
799 9th Street NW, Suite 1000
Washington DC 20001
United States

9. How we may update this Privacy notice

We may change the content of our websites and how we use cookies without notice and consequently our Privacy notice and Cookie Policy may change from time to time in the future. We therefore encourage you to review them when you visit the website to stay informed of how we are using personal data.

Effective Date: June 30, 2020.