

California Consumer Privacy Notice

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. In addition to our general Privacy Policy <https://www.nortonrosefulbright.com/en-us/global-statements/privacy-notice>, if you are a California resident and the California Consumer Privacy Act applies to you, this California Consumer Privacy Notice will apply. In the event of any conflict with our general Privacy Policy, this California Consumer Privacy Notice will take precedence.

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; purposes for collection; categories of third parties for disclosure or sharing; retention
2. How we obtain the personal data about you
3. Retention
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; purposes for collection; categories of third parties for disclosure or sharing; retention

California Residents

Below are the categories of personal information that we collected and disclosed for a business purpose or shared with third parties in the past twelve (12) months.

Categories of Personal Information We May Collect, Disclose, or Share	Purposes for Collection / Use	Applicable California Residents	Categories of Third Parties To Whom PI may be Disclosed or Shared	Period of Time We Retain Information
<p>Name, contact details, and other demographic information (e.g., name, email address, mailing address, phone number, driver’s license number, and emergency contact information.</p>	<p>To fulfill or meet the reason for which the information is provided; to provide you with information or services that you request from us or to remove you from our direct or indirect marketing, based on your preferences; to provide you with email or direct mail alerts and other notices concerning our services, or events or news, that may be of interest to you; to contact you by telephone, if you have provided a contact number, in order to provide you with information or services that you have requested; to carry out our obligations and enforce our rights arising from any contracts entered into between you and us, including performing client due diligence/“know your client”, anti-money laundering, anti-bribery, sanctions or reputational risk screening, identifying conflicts of interests; for fraud prevention, billing and collections; as necessary or appropriate to protect the rights of our clients or others; to respond to law enforcement requests and as required by applicable law, court order, or governmental regulations.</p>	<p>Clients, Site visitors, Employees, Applicants</p>	<p>Our verein members, service providers, collaborators, government/law enforcement where necessary</p>	<p>We will retain your personal information only as long as necessary to fulfill the purposes for which it was collected, including for the purpose of satisfying legal, accounting or auditing requirements.</p>

Categories of Personal Information We May Collect, Disclose, or Share	Purposes for Collection / Use	Applicable California Residents	Categories of Third Parties To Whom PI may be Disclosed or Shared	Period of Time We Retain Information
<p>Personal information categories listed in the California Customer Records statute (e.g., A name, signature, address, telephone number, insurance policy number, bank account number, credit card number, debit card number, or any other financial information. Some personal information included in this category may overlap with other categories.).</p>	<p>To fulfill or meet the reason for which the information is provided; to provide you with information or services that you request from us or to remove you from our direct or indirect marketing, based on your preferences; to provide you with direct mail alerts and other notices concerning our services, or events or news, that may be of interest to you; to contact you by telephone, if you have provided a contact number, in order to provide you with information or services that you have requested; to carry out our obligations and enforce our rights arising from any contracts entered into between you and us, including performing client due diligence/"know your client", anti-money laundering, anti-bribery, sanctions or reputational risk screening, identifying conflicts of interests; for fraud prevention, billing and collections; as necessary or appropriate to protect the rights of our clients or others ; to respond to law enforcement requests and as required by applicable law, court order, or governmental regulations.</p>	<p>Clients, Site visitors, Employees, Applicants</p>	<p>Our verein members, service providers, collaborators, government/law enforcement where necessary</p>	<p>We will retain your personal information only as long as necessary to fulfill the purposes for which it was collected, including for the purpose of satisfying legal, accounting or auditing requirements.</p>

Categories of Personal Information We May Collect, Disclose, or Share	Purposes for Collection / Use	Applicable California Residents	Categories of Third Parties To Whom PI may be Disclosed or Shared	Period of Time We Retain Information
<p>Protected classification characteristics under California or federal law. (e.g., Age (40 years or older), race, color, ancestry, national origin, citizenship, religion or creed, marital status, medical condition, physical or mental disability, sex (including gender, gender identity, gender expression, pregnancy or childbirth and related medical conditions), sexual orientation, veteran or military status, genetic information (including familial genetic information).</p>	<p>Normal business operations, including administering your benefits, and communicating with you, diversity initiatives, compliance with legal obligations, and identity verification</p>	<p>Employees, Applicants</p>	<p>Our verein members, service providers, collaborators, government/law enforcement where necessary</p>	<p>We will retain your personal information only as long as necessary to fulfill the purposes for which it was collected, including for the purpose of satisfying legal, accounting or auditing requirements.</p>
<p>Commercial information (e.g., Records services purchased, obtained, or considered, or other purchasing or consuming histories.</p>	<p>To carry out our obligations and enforce our rights arising from any contracts entered into between you and us, including for fraud prevention; as necessary or appropriate to protect the rights of our clients or others ; to respond to law enforcement requests and as required by applicable law, court order, or governmental regulations; 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)</p>	<p>Clients</p>	<p>Our verein members, service providers, collaborators, government/law enforcement where necessary</p>	<p>We will retain your personal information only as long as necessary to fulfill the purposes for which it was collected, including for the purpose of satisfying legal, accounting or auditing requirements.</p>

Categories of Personal Information We May Collect, Disclose, or Share	Purposes for Collection / Use	Applicable California Residents	Categories of Third Parties To Whom PI may be Disclosed or Shared	Period of Time We Retain Information
<p>Biometric information (e.g., Genetic, physiological, behavioral, and biological characteristics, or activity patterns used to extract a template or other identifier or identifying information, such as fingerprints, and health or exercise data.</p>	<p>Normal business operations, including identity verification for network access, and health or exercise data if volunteered by you.</p>	<p>Employees</p>	<p>Our verein members, service providers, collaborators, government/law enforcement where necessary</p>	<p>We will retain your personal information only as long as necessary to fulfill the purposes for which it was collected, including for the purpose of satisfying legal, accounting or auditing requirements, or as required by law.</p>
<p>Internet or other similar network activity (e.g., Browsing history, search history, information on a consumer’s interaction with a website, application, or advertisement, (including our HighQ portals, Dealrooms and the Institute))</p>	<p>To improve our website and present its contents to you; for testing, research, analysis and product development; as necessary or appropriate to protect the rights of our clients or others ; to respond to law enforcement requests and as required by applicable law, court order, or governmental regulations.</p>	<p>Clients, Site visitors, Employees</p>	<p>Our verein members, service providers, collaborators, government/law enforcement where necessary</p>	<p>We will retain your personal information only as long as necessary to fulfill the purposes for which it was collected, including for the purpose of satisfying legal, accounting or auditing requirements.</p>

Categories of Personal Information We May Collect, Disclose, or Share	Purposes for Collection / Use	Applicable California Residents	Categories of Third Parties To Whom PI may be Disclosed or Shared	Period of Time We Retain Information
<p>Geolocation Data (e.g., Physical location or movements)</p>	<p>To as necessary or appropriate to protect the rights of our clients or others; to respond to law enforcement requests and as required by applicable law, court order, or governmental regulations.</p>	<p>Employees</p>	<p>Our verein members, service providers, collaborators, government/law enforcement where necessary</p>	<p>We will retain your personal information only as long as necessary to fulfill the purposes for which it was collected, including for the purpose of satisfying legal, accounting or auditing requirements.</p>
<p>Sensory data. (e.g., thermal)</p>	<p>Health and safety purposes</p>	<p>Clients, Employees, Applicants</p>	<p>Our verein members, service providers, collaborators, government/law enforcement where necessary</p>	<p>We will retain your personal information only as long as necessary to fulfill the purposes for which it was collected, including for the purpose of satisfying legal, accounting or auditing requirements.</p>

Categories of Personal Information We May Collect, Disclose, or Share	Purposes for Collection / Use	Applicable California Residents	Categories of Third Parties To Whom PI may be Disclosed or Shared	Period of Time We Retain Information
<p>Professional or employment-related information (e.g., Current or past job history or performance evaluations)</p>	<p>Normal business operations including related to HR, training and performance, salary review, talent and skills management, HR knowledge management, HR case management, and maintenance of employment records.</p>	<p>Employees, Applicants</p>	<p>Our verein members, service providers, collaborators, government/law enforcement where necessary</p>	<p>We will retain your personal information only as long as necessary to fulfill the purposes for which it was collected, including for the purpose of satisfying legal, accounting or auditing requirements.</p>
<p>Non-public education information (per the Family Educational Rights and Privacy Act) (e.g., Education records directly related to a student maintained by an educational institution or party acting on its behalf, such as grades, transcripts, class lists, student schedules, student identification codes, student financial information, or student disciplinary record)</p>	<p>Normal business operations including related to HR, training and performance, talent and skills management, HR knowledge management, HR case management, and maintenance of employment records.</p>	<p>Employees, Applicants</p>	<p>Our verein members, service providers, collaborators, government/law enforcement where necessary</p>	<p>We will retain your personal information only as long as necessary to fulfill the purposes for which it was collected, including for the purpose of satisfying legal, accounting or auditing requirements.</p>

Categories of Personal Information We May Collect, Disclose, or Share	Purposes for Collection / Use	Applicable California Residents	Categories of Third Parties To Whom PI may be Disclosed or Shared	Period of Time We Retain Information
<p>Inferences (e.g., inferences drawn from any of the information identified above to make a profile of a California resident, including preferences, behavior, characteristics, and attitudes)</p>	<p>Normal business operations including related to HR, training and performance, salary review, talent and skills management, HR knowledge management, HR case management, and maintenance of employment records. We may use electronic systems to assist humans in making some of these uses, and in making inferences drawn from any of the information identified above to create a profile about an employee reflecting the employee's preferences, characteristics, psychological trends, predispositions, behavior, attitudes, intelligence, abilities, and aptitudes.</p>	<p>Employees, Applicants</p>	<p>Our verein members, service providers, collaborators, government/law enforcement where necessary</p>	<p>We will retain your personal information only as long as necessary to fulfill the purposes for which it was collected, including for the purpose of satisfying legal, accounting or auditing requirements.</p>

Categories of Personal Information We May Collect, Disclose, or Share	Purposes for Collection / Use	Applicable California Residents	Categories of Third Parties To Whom PI may be Disclosed or Shared	Period of Time We Retain Information
<p>Sensitive Personal Information including certain financial information (e.g., social security, driver’s license, state identification card, or passport number; account log-in, financial account, debit card, or credit card number in combination with any required security or access code, password, or credentials allowing access to an account; precise geolocation; racial or ethnic origin, religious or philosophical beliefs, or union membership; the contents of mail, email and text messages, unless the we are the intended recipient of the communication; processing of biometric information for the purpose of uniquely identifying a consumer; personal information collected and analyzed concerning your health; or personal information collected and analyzed concerning your sexual orientation.)</p>	<p>Performing client due diligence/“know your client”, anti-money laundering, anti-bribery, sanctions or reputational risk screening, identifying conflicts of interests; 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; for fraud prevention; normal business operations, including administering your benefits, and communicating with you, diversity initiatives, compliance with legal obligations, and identity verification; to respond to law enforcement requests and as required by applicable law, court order, or governmental regulations.</p>	<p>Clients, Employees, Applicants</p>	<p>Our verein members, service providers, collaborators, government/law enforcement where necessary</p>	<p>We will retain your personal information only as long as necessary to fulfill the purposes for which it was collected, including for the purpose of satisfying legal, accounting or auditing requirements.</p>

In addition to the chart above, we may use, disclose, or share your information

- As described to you when collecting your personal information or as otherwise set forth in the CCPA.
- To evaluate or conduct a merger, divestiture, restructuring, reorganization, dissolution, or other sale or transfer of some or all of our assets, whether as a going concern or as part of bankruptcy, liquidation, or similar proceeding, in which personal information held by us is among the assets transferred.

We will not collect additional categories of personal information or use the personal information we collected for materially different, unrelated, or incompatible purposes without providing you notice.

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. Retention

We retain data in accordance with its record retention program. The criteria used to determine retention periods include: (i) the length of time we have an ongoing relationship with you and provide the Sites or Services to you; (ii) whether there is a legal obligation to which we are subject; or (iii) whether retention is advisable in light of our legal position (such as in regard to the enforcement of the Site Terms of Use, applicable statutes of limitations, litigation or regulatory investigations). The time periods listed

above are based on the longest period NRFUS needs to keep a category of company records that may contain this category of personal information. When NRFUS no longer needs to retain your personal information, NRFUS promptly destroys it pursuant to the ordinary course of business under our record retention program, unless a legal obligation to continue to retain that data applies. For example, NRFUS may need to retain documents that contain personal information for a longer period to comply with preservation obligations in litigations and government investigations.

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, share, and sell. You also have the right to opt-out of sharing personal information for cross-context behavioral advertising purposes. You also have the right to opt-out of our sharing your information for cross-context behavioral advertising. In addition, you may also Limit the Use of your Sensitive Personal information. You also have the right to request that a business correct or delete any personal information about you which the business has collected about you. To submit any 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, certain requests sent to us 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 soon be able to recognize the Global Privacy Control (GPC). 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) 651 7777 or e-mail privacypolicy@nortonrosefulbright.com for assistance.

Data Protection Officer

2200 Ross Avenue – Suite 3600
Dallas, Texas 75201-7932
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: January 1, 2023.



Norton Rose Fulbright is a global law firm. We provide the world's preeminent corporations and financial institutions with a full business law service. We have more than 3700 lawyers and other legal staff based in Europe, the United States, Canada, Latin America, Asia, Australia, Africa and the Middle East.

Law around the world

nortonrosefulbright.com

Norton Rose Fulbright Verein, a Swiss verein, helps coordinate the activities of Norton Rose Fulbright members but does not itself provide legal services to clients. Norton Rose Fulbright has offices in more than 50 cities worldwide, including London, Houston, New York, Toronto, Mexico City, Hong Kong, Sydney and Johannesburg. For more information, see nortonrosefulbright.com/legal-notices. The purpose of this communication is to provide information as to developments in the law. It does not contain a full analysis of the law nor does it constitute an opinion of any Norton Rose Fulbright entity on the points of law discussed. You must take specific legal advice on any particular matter which concerns you. If you require any advice or further information, please speak to your usual contact at Norton Rose Fulbright.

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