

# CPRA PRIVACY POLICY

## Lewis Roca Rothgerber Christie, LLP California Privacy Notice

### Information for California Residents

We collect Personal Information from Consumers and comply with the California Privacy Rights Act (“CPRA”). In addition to our general Privacy Notice available at <https://www.lewisroca.com/privacy>, this California Privacy Notice applies to California residents (“Consumers,” “you,” or “your”).

For the purposes of this California Privacy Notice, “Personal Information” means information that is linked or reasonably linkable to a particular individual or household. However, the following categories of information are not Personal Information:

- Publicly available information;
- Deidentified or aggregated data; or
- Information otherwise excluded from the scope of the CPRA

This Privacy Notice provides the following information to California Consumers:

- Categories of Personal Information we collect;
- Purposes for which we use Personal Information;
- Categories of Personal Information we disclose to third parties;
- Categories of third parties to which we disclose Personal Information; and
- How Consumers can exercise their rights under the CPRA:
  - The rights to access, correct, or delete Personal Information;
  - The right to obtain a portable copy of Personal Information;
  - The right to limit the use of Sensitive Personal Information in certain circumstances; and

- The rights to opt out of the sharing of Personal Information for behavioral advertising, sales of Personal Information, or certain profiling.

### Categories of Non-Sensitive Personal Information

The table below outlines the non-sensitive categories of Personal Information Lewis Roca Rothgerber Christie, LLP collects about Consumers and whether and how they are disclosed to third parties.

We collect Non-Sensitive Personal Information from the following sources:

- Directly from our users
- Inferences from your activity
- From our service providers

### **Category of Personal Information: Identifiers**

#### **Examples**

Identifiers may contain the following: name, address, date of birth, gender, internet browsing history, device ID, employment history, and non-union professional affiliations

#### **Purpose(s)**

Complying with statutory obligations and for other employment and benefits-related purposes

#### **Targeted Advertising**

We do not engage in targeted advertising or share Personal Information for targeted advertising purposes

#### **Sale**

We do not sell Personal Information to anyone

#### **Sharing**

This data may be shared with Service Providers

#### **Retention Period**

We retain this data for the duration of employment, after which it is retained only to the extent required by applicable law

## **Category of Personal Information: Personal Characteristics**

### **Examples**

Personal Characteristics may contain the following: age, gender, and sexual orientation

### **Purpose(s)**

Complying with statutory obligations, responding to diversity-related requests from clients and service providers, and for other employment and benefits-related purposes

### **Targeted Advertising**

We do not engage in targeted advertising or share Personal Information for targeted advertising purposes

### **Sale**

We do not sell Personal Information to anyone

### **Sharing**

This data may be shared with Service Providers

### **Retention Period**

We retain this data for the duration of employment, after which it is retained only to the extent required by applicable law

## **Category of Personal Information: Internet/Electronic Activity**

### **Examples**

Internet/Electronic Activity may contain the following: internet browsing history, device IDs, and email addresses

### **Purpose(s)**

Complying with statutory obligations and for other employment purposes

### **Targeted Advertising**

We do not engage in targeted advertising or share Personal Information for targeted advertising purposes

### **Sale**

We do not sell Personal Information to anyone

**Sharing**

This data may be shared with Service Providers

**Retention Period**

We retain this data for the duration of employment, after which it is retained only to the extent required by applicable law

**Category of Personal Information: Professional Information****Examples**

Professional Information may contain the following: bar licenses, bar affiliations, and other professional certifications or affiliations

**Purpose(s)**

Complying with statutory obligations, promoting our services to consumers, or for other employment purposes

**Targeted Advertising**

We do not engage in targeted advertising or share Personal Information for targeted advertising purposes

**Sale**

We do not sell Personal Information to anyone

**Sharing**

This data may be shared with Service Providers

**Retention Period**

We retain this data for the duration of employment, after which it is retained only to the extent required by applicable law

**Category of Personal Information: Educational Information****Examples**

Educational Information may contain the following: university name and location, degree, and transcript

**Purpose(s)**

Complying with statutory obligations, promoting our services to consumers, or for other employment purposes

**Targeted Advertising**

We do not engage in targeted advertising or share Personal Information for targeted advertising purposes

**Sale**

We do not sell Personal Information to anyone

**Sharing**

This data may be shared with Service Providers

**Retention Period**

We retain this data for the duration of employment, after which it is retained only to the extent required by applicable law

**Category of Personal Information: Inferences****Examples**

Inferences may contain the following: marriage status

**Purpose(s)**

Complying with statutory obligations and for other employment and benefits-related purposes

**Targeted Advertising**

We do not engage in targeted advertising or share Personal Information for targeted advertising purposes

**Sale**

We do not sell Personal Information to anyone

**Sharing**

This data may be shared with Service Providers

**Retention Period**

We retain this data for the duration of employment, after which it is retained only to the extent required by applicable law

### Categories of Sensitive Personal Information

The table below outlines the categories of Sensitive Personal Information Lewis Roca Rothgerber Christie, LLP collects about Consumers and whether they are shared with third parties.

We collect Sensitive Personal Information from the following sources:

- Directly from our users
- Inferences from your activity

### **Category of Sensitive Personal Information: Government ID Data**

#### **Examples**

Government ID Data may contain the following: Social Security number, date of birth, driver's license number, passport number, and citizenship status

#### **Purpose(s)**

Complying with statutory obligations, responding to diversity-related requests from clients or service providers, and for other employment and benefits-related purposes

#### **Targeted Advertising**

We do not engage in targeted advertising or share Personal Information for targeted advertising purposes

#### **Sale**

We do not sell Personal Information to anyone

#### **Sharing**

This data may be shared with Service Providers

#### **Retention Period**

We retain this data for as long as an individual is employed, and it is retained only to the extent required by applicable law

## Category of Sensitive Personal Information: Sensitive Category Data

### Examples

Sensitive Category Data may contain the following: ethnicity, veteran status, date of birth, gender, sexual orientation, marital status, and disability status

### Purpose(s)

Complying with statutory obligations, responding to diversity-related requests from clients or service providers, and for other employment and benefits-related purposes

### Targeted Advertising

We do not engage in targeted advertising or share Personal Information for targeted advertising purposes

### Sale

We do not sell Personal Information to anyone

### Sharing

This data may be shared with Service Providers

### Retention Period

We retain this data for as long as an individual is employed, and it is retained only to the extent required by applicable law. Applicant data is retained indefinitely unless requested to be deleted by the applicant.

## Category of Sensitive Personal Information: Financial Data

### Examples

Financial Data may contain the following: Bank routing and account numbers

### Purpose(s)

Processing payments to employees or contractors via direct deposit or ACH payment

### Targeted Advertising

We do not engage in targeted advertising or share Personal Information for targeted advertising purposes

**Sale**

We do not sell Personal Information to anyone

**Sharing**

This data may be shared with Service Providers

**Retention Period**

We retain this data for as long as an individual is employed, and it is retained only to the extent required by applicable law.

**Use of Personal Information**

We use Personal Information for the purposes described in our general Privacy Notice (see <https://www.lewisroca.com/privacy>). Personal Information may also be used or disclosed as otherwise permitted or required by applicable law.

**Disclosing Personal Information**

We share Personal Information with the following category of third parties:

- Service Providers: We use service providers to securely handle Personal Information on our behalf and for a business purpose pursuant to our instructions. These companies may not use your Personal Information for their own purposes.

See the tables above for more details about how different categories of Personal Information are shared.

We do not sell Personal Information to anyone.

**Exercising Your Personal Information Rights**

California Consumers have the following rights under the CPRA:

- The rights to access, correct, or delete Personal Information;
- The right to obtain a portable copy of Personal Information;
- The right to limit the use of Sensitive Personal Information in certain circumstances; and
- The rights to opt out of the sharing of Personal Information for behavioral advertising, sales of Personal Information, or certain profiling.

If you are a California Consumer, you can submit a request to exercise your personal data rights under the CPRA by visiting our online request form at <https://www.requesteasy.com/63ad-7722>. To submit an opt-out request, you may visit our online request form at <https://www.requesteasy.com/63ad-7722>. To protect your privacy, we may need to authenticate your identity before we respond to your rights request. We will use commercially reasonable efforts to verify



your identity for this purpose. Any information you provide to authenticate your identity will only be used to process your rights request. Please be aware that we do not accept or process rights requests through other means (e.g., via fax or social media).

After submitting your request online, you will receive a follow-up email, which may include a link you must click on in order to verify your identity. If you do not click on that link, we may be unable to complete your request due to lack of verification. It is important that you provide a valid email address in order for us to be able to process your request.

We will respond to your rights request within 45 days, though in certain cases we may inform you that we will need up to another 45 days to act on your request. If we suspect fraudulent or malicious activity on or from your account, we will delay taking action on your request until we can appropriately verify your identity and the request as authentic. Also note that each of the rights are subject to certain exceptions.

We reserve the right to decline to process, or charge a reasonable fee for, requests from a Consumer that are manifestly unfounded, excessive, or repetitive.

### Limiting the Use of Sensitive Personal Information

The CPRA provides a right to limit some uses of Sensitive Personal Information. In particular, you may direct companies not to use Sensitive Personal Information except as necessary to provide goods or services you have requested.

You may submit a request to limit the use of your Sensitive Personal Information by submitting a rights request as described above.

### Authorized Agent Requests

The CPRA allows you to designate an authorized agent to make a rights request on your behalf. Your authorized agent may submit such a request by following the same method described above. We may require verification of your authorized agent in addition to the information for verification above for Consumers and households.

## Contact Us

If you have any questions or concerns regarding this California Privacy Notice, contact us at

HR-SupportAssistant@lewisroca.com

**Last updated: January 25, 2023**