

Mayer Brown Privacy Policy For California Residents

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This privacy policy is for our clients, potential clients, and users of our websites, collaboration sites, blogs, apps and other digital media mobile applications, and online services who are California consumers, as defined below (this “**California Privacy Policy**”) and supplements the information contained in Mayer Brown’s Privacy Notice located at www.mayerbrown.com (the “**Mayer Brown Privacy Policy**”).

This notice does not cover how we manage your personal information if you are a partner of or work for Mayer Brown or are applying for a position at Mayer Brown. If you are applying for a position at Mayer Brown you can find relevant information about how we handle your personal information on the recruitment pages of our website.

1. OVERVIEW OF THIS CALIFORNIA PRIVACY POLICY

The California Consumer Privacy Rights Act (“**CPRA**”) gives California consumers certain privacy rights related to their personal information. This document describes the rights that California consumers may have under the CPRA.

What is “personal information”? For the purposes of this California Privacy Policy, “**personal information**” is defined as information that identifies, relates to, describes, is reasonably capable of being associated with, or could reasonably be linked, directly or indirectly, with a particular California consumer or California household. Personal information does not include:

- Publicly available information from government records.
- De-identified or aggregated information.
- Other regulated information that is excluded from the CPRA’s scope, such as:
 - medical information governed by the California Confidentiality of Medical Information Act (CMIA);
 - protected health information collected by a covered entity or business associated governed by the Health Insurance Portability and Accountability Act of 1996 (HIPAA);
 - personal information covered by certain sector-specific privacy laws, including the Fair Credit Reporting Act (FRCA), the Gramm-Leach-Bliley Act (GLBA) or California Financial Information Privacy Act (FIPA), and the Driver’s Privacy Protection Act of 1994.

What is “sensitive personal information”? For purposes of this California Privacy Policy, “**sensitive personal information**” is defined as (1) personal information that reveals (A) a consumer’s social security number, driver’s license number, state identification number, or passport number; (B) a consumer’s account access code, password, or credentials allowing access to an account; (C) a consumer’s precise geolocation; (D) a consumer’s racial or ethnic origin, religious or philosophical beliefs, or union membership; (E) the contents of a consumer’s mail, email and text message, unless Mayer Brown is the intended recipient of the communications; (F) a consumer’s genetic data; and (2)(A) the processing of biometric information for the purpose of uniquely identifying a consumer; (B) personal information collected and analyzed concerning a consumer’s health; or (C) personal information collected and analyzed concerning a consumer’s sex life or sexual orientation.

Who are “California consumers”? A “California consumer” is a natural person who resides in California.

2. SUMMARY OF PERSONAL INFORMATION HANDLING PRACTICES

Mayer Brown may collect personal information from you in different ways and for different purposes, as described further below. The table below describes the categories of personal information we may have collected about California consumers in the twelve (12) months prior to the date of this California Privacy Policy, the sources from which we may have collected that personal information, the purposes for which we may have used that personal information, and the third parties to whom we may have disclosed that personal information. It is important to note that the types of personal information we collect will depend on your interaction with us, including the type of representation for which we are hired and your relationship with the firm. Please note that our prior 12-month practices are the same as our current personal information handling practices.

CATEGORY OF PERSONAL INFORMATION COLLECTED	SOURCE(S) FROM WHICH PERSONAL INFORMATION WAS COLLECTED	BUSINESS OR COMMERCIAL PURPOSE(S) FOR WHICH PERSONAL INFORMATION WAS COLLECTED, USED AND DISCLOSED	CATEGORIES OF RECIPIENTS OF PERSONAL INFORMATION
Personal Identifiers, including name, address, telephone number, email address, social security number, driver’s license number, and passport number or other government identifier	Consumers	<ul style="list-style-type: none"> Business intake/conflicts checking Maintaining our Alumni Network Client collaboration on particular matters Business continuity Facilitating client communications Enabling access for and security for our offices Billing and expense reimbursement Facilitating the provision of legal advice and services Facilitating marketing/business development communications 	<ul style="list-style-type: none"> Commercial research services Translation services Collaboration platform providers Extranet services Email backup services provider Mobile application provider Cloud based file sharing utility IT service provider Off-site records storage/management Government agencies Government database research service Local counsel for clients of the Global Mobility & Migration practice area Cloud-based software provider Consumers’ other professional advisers
Personal information described in the California Customer Records Act (Cal. Civ. Code § 1798.80(e)), such as education and employment history, bank account information, tax returns, insurance policy information	Consumers	<ul style="list-style-type: none"> Maintaining our Alumni Network Client intake/conflicts checking Facilitating the provision of legal advice and services Facilitating fee and retainer payments 	<ul style="list-style-type: none"> Database provider Commercial research services Local counsel for clients of the Global Mobility & Migration practice area Government agencies Cloud-based software provider Accounting application provider Consumers’ other professional advisers

Personal records, such as, birth certificates, marriage certificates, divorce/adoption decrees, wage statements, police clearance certificates, medical exams and other health information, employment records including compensation data, photographs, diplomas, arrest/conviction records and dependent information	Consumers	Facilitating the provision of legal services	Local counsel for clients of the Global Mobility practice area Government agencies Cloud-based software provider
Characteristics of protected classifications under California or federal law, such as race, color, gender, marital status	Consumers	Facilitating the provision of legal advice and services	Local counsel for clients of the Global Mobility & Migration practice area Government agencies Cloud-based software provider Consumers' other professional advisers
Commercial information, including asset ownership and valuation and utility bills	Consumers	Facilitating the provision of legal services Client intake	Consumers' other professional advisers Government database research service
Internet or other electronic network activity information, such as interactions with Mayer Brown emails and substantive content sent through email	Consumers, either upon registration with name and email address or through opening of email and use of links embedded in email	Facilitating website registration Facilitating our understanding of our marketing emails' effectiveness Providing users information about other events or services in their areas of interest	IT service provider
Audio, electronic, visual, thermal, olfactory, or similar information, such as video images	Closed circuit television in our New York office	Building security	IT service provider

3. ADDITIONAL PURPOSES FOR USING/DISCLOSING PERSONAL INFORMATION

In addition to the purposes identified above, we may also use and disclose the categories of Personal Information identified above to:

- Address legal or regulatory disputes or investigations involving our work, including potential and actual negligence claims and professional discipline matters; or
- Prosecute or defend lawsuits or other legal disputes in which you are involved and for which you hire us to represent you.

In such instances, we may disclose Personal Information about you to our co-counsel, opposing counsel, external electronic discovery vendors, external subject matter or expert witnesses/consultants, or our insurers.

Additionally, if you retain us to represent you in connection with a legal dispute, we may collect additional categories of Personal Information from you (or at your direction) depending on the subject matter of the representation. The use and disclosure of such Personal Information will be consistent with the uses outlined above.

4. RETENTION OF PERSONAL INFORMATION

We have document retention and destruction practices relating to data which differ according to geographical region, practice area/business support team, the nature of the information, its format and type of documentation. In determining the appropriate retention period for personal information we consider such factors as the nature of the information, the purposes for which the data is retained, appropriate security measures, relevant technical constraints and applicable legal requirements.

Please contact us if you want further information about our record retention policies.

5. NO SALE OR SHARING OF PERSONAL INFORMATION

We do not sell or share your personal information with third parties. We also do not knowingly sell, share, use for cross-context behavioral advertising or disclose the personal information of children under the age of 16. If we change our practices in the future for any new information that we collect from you, we will notify you by updating this California Privacy Policy.

6. SENSITIVE PERSONAL INFORMATION

Under the CPRA, certain types of personal information are considered “sensitive” personal information and require additional data privacy rights and obligations. Depending on your relationship to Mayer Brown, we may collect from you your social security number, driver’s license number, state identification number, passport number, racial or ethnic origin, religious or philosophical beliefs, or union membership, as described in the Summary of Personal Information Handling Practices section above, which may be considered sensitive personal information under the CPRA. We only collect this sensitive personal information where necessary to provide the legal services for which we were retained or for business intake and conflicts checking purposes (“Permitted Uses”). Because Mayer Brown uses this sensitive personal information for Permitted Uses, there is no need for it to provide a Limit Use and Disclosure of Sensitive Personal Information right under the CPRA.

7. CPRA RIGHTS FOR CALIFORNIA CONSUMERS

The CPRA provides California consumers the following rights with respect to their personal information, subject to certain exceptions. This Section explains those rights. If you are a California consumer and would like to exercise any of those rights, please see Section 8 below for more information on how to submit a request.

A. RIGHT TO KNOW ABOUT AND ACCESS YOUR PERSONAL INFORMATION

If you are a California consumer, you may have the right to request that Mayer Brown provide you with information regarding what personal information about you we have collected, used, disclosed, shared or sold in the preceding twelve (12) months. Once we receive your request and verify your identity, we will disclose to you one or more of the following as requested:

- The categories of personal information we have collected about you in the preceding twelve (12) months.
- The categories of sources from which we collected your personal information in the preceding twelve (12) months.
- The business or commercial purposes for collecting your personal information in the preceding twelve (12) months.
- The categories of third parties to whom we disclosed your personal information in the preceding twelve (12) months.
- The specific pieces of personal information we collected about you in the preceding twelve (12) months.

B. RIGHT TO DATA PORTABILITY

You have the right to receive the information under right (A) in a format, to the extent technically feasible, that is portable, usable, and allows you to transmit the personal information to a person without impediment, where the processing is carried out by automated means.

C. RIGHT TO DELETE YOUR PERSONAL INFORMATION

If you are a California consumer, you may have the right to request that Mayer Brown delete certain of your personal information that we have collected from you. However, this right to deletion does not apply to any of your personal information that is subject to an exception under the CPRA (as described below). Once we receive your request and verify your identity, we will delete (and direct our contractors and service providers to delete) your personal information in our records that is not subject to any of the CPRA exceptions.

CPRA Exceptions

We may deny your deletion request where your personal information is required for any of the following reasons, which we will identify in our response to you if we deny your request:

- Complete the transaction for which we collected the personal information, provide a good or service that you requested, take actions reasonably anticipated by you within the context of our ongoing business relationship with you, or otherwise perform our contract with you.
- Help to ensure data security and integrity .
- 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 the California Electronic Communications Privacy Act (Cal. Penal Code § 1546 seq.).
- Engage in public or peer-reviewed scientific, historical, or statistical research that conforms or adheres to all other applicable ethics and privacy laws, when the information's deletion may likely render impossible or seriously impair the ability to complete such research, if you previously provided informed consent.
- Enable solely internal uses that are reasonably aligned with your expectations based on your relationship with us and compatible with the context in which you provided the information.
- Comply with a legal obligation.

D. RIGHT TO CORRECT

You have the right to request us to correct inaccurate personal information we maintain about you.

E. RIGHTS RELATED TO SHARING FOR CROSS-CONTEXT BEHAVIORAL ADVERTISING OR SALE

We do not share your personal information for cross-context behavioral advertising or sell your personal information.

F. RIGHTS RELATED TO SENSITIVE PERSONAL INFORMATION

The CPRA provides additional protection for sensitive personal information. Please see the Sensitive Personal information section above for more information.

G. RIGHT TO NON-DISCRIMINATION

Mayer Brown will not discriminate against any California consumer who exercises any of the rights described above. Specifically, except as permitted by the CPRA, we will not deny you goods or services; charge you different prices or rates, including through granting discounts or other benefits, or imposing penalties;

provide you with a different level of service or quality of goods or services; or suggest that you may receive a different price or rate for goods or services or a different level or quality of goods or services.

8. HOW TO SUBMIT A REQUEST

If you are a California consumer and would like to exercise any of the CPRA rights identified above, you may submit a request by [completing this form](#), by calling us toll-free at (844) 936-1724, or emailing us at privacy@mayerbrown.com. In some instances, we will need to verify your identity before honoring your privacy right request. To verify your identity, we will ask that you provide the following information when you submit your request: your name, address, telephone number, email address, and a description of your relationship to Mayer Brown (e.g., client, website user, or member of Mayer Brown alumni website), and the nature of your request under the CPRA (e.g., request to delete or request to know). Depending on your type of request or the information requested by you, we may require additional information in order to verify your identity and fulfill your request. If we cannot successfully verify your identity, we will inform you of that fact. We cannot fulfill your request or provide you with your personal information if we cannot verify your identity or that you have authority to make the request and confirm the personal information relates to you.

Making a verifiable consumer request does not require you to create an account with us. We will honor your privacy rights request within 45 calendar days of receipt, unless we request an extension under the CPRA.

9. SUBMITTING A REQUEST THROUGH YOUR AUTHORIZED AGENT

You may exercise your privacy rights through an authorized agent. If we receive your request from an authorized agent, we may ask for evidence that you have provided such agent with a power of attorney or that the agent otherwise has valid written authority to submit requests to exercise rights on your behalf.

CONTACT FOR MORE INFORMATION

If you have any questions or concerns about this California Privacy Policy or our privacy practices, or to request this California Privacy Policy in another format, please contact privacy@mayerbrown.com.

Mayer Brown is a distinctively global law firm, uniquely positioned to advise the world's leading companies and financial institutions on their most complex deals and disputes. With extensive reach across four continents, we are the only integrated law firm in the world with approximately 200 lawyers in each of the world's three largest financial centers—New York, London and Hong Kong—the backbone of the global economy. We have deep experience in high-stakes litigation and complex transactions across industry sectors, including our signature strength, the global financial services industry. Our diverse teams of lawyers are recognized by our clients as strategic partners with deep commercial instincts and a commitment to creatively anticipating their needs and delivering excellence in everything we do. Our "one-firm" culture—seamless and integrated across all practices and regions—ensures that our clients receive the best of our knowledge and experience.

Please visit mayerbrown.com for comprehensive contact information for all Mayer Brown offices.

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