

Privacy Policy For Website Visitors

Last Updated: October 2023

Irell & Manella LLP ("**I&M**") respects your privacy and is committed to protecting it.

Scope

This Privacy Policy applies to the Personal Information of individuals ("**you**", "**your**", or "**yours**") collected by I&M, including the Personal Information collected when you visit any of our websites, including <https://www.irell.com/>, as they may be modified, relocated and/or redirected from time to time (the "**Site**"). This Privacy Policy does not apply to the Personal Information of individuals in their capacity as current or former partners, employees, or contractors of I&M, or their emergency contacts, dependents, or beneficiaries, or to client data or other information provided by our clients.

Notice at Collection for California Residents:

I&M collects the Personal Information identified in Section 1 for the purposes identified in Section 3 and retains it for the period described in Section 6. We do not sell your Personal Information or disclose it for cross-context behavioral advertising ("**sharing**"). We also do not collect or process sensitive Personal Information for the purpose of inferring characteristics about you. To the extent you provide I&M with Personal Information about other California residents, you are responsible for providing this notice to them.

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1. What Personal Information We Collect

What Is Personal Information?

"**Personal Information**" means information that identifies, relates to, describes, is reasonably capable of being associated with, or could reasonably be linked, directly or indirectly, with a particular individual or household.

Personal Information We Collect

Below is information regarding (a) the categories of Personal Information we have collected about you, (b) the sources of that Personal Information, (c) the purposes for use, and (d) the categories of third-party recipients of your Personal Information.

You do not have to provide I&M with any Personal Information (e.g., name, address, telephone number, e-mail address, financial information, the name of your organization) unless you choose to provide it to us, including through direct interaction with us (such as by interacting with our personnel), by mail, e-mail, telephone, fax, or electronically.

With respect to the Site, we collect certain non-personally identifiable information such as the type of browser you are using, the type of operating system you are using, and the domain name of your Internet service provider.

In certain circumstances, we may also collect and process the following categories of Personal Information:

- Identifiers, such as your name, alias, mailing address, Internet Protocol address, email address, or other similar identifiers;
- Preference Information you provide us relating to event invitations, such as access limitations and dietary restrictions;
- Non-Public Educational Information provided to us, such as academic transcripts;
- Information protected under state or federal law (examples: race, ethnicity, gender, date of birth, sexual orientation);
- Personal Information as identified by Cal. Civ. Code Sec. 1798.80 (examples: social security numbers, date of birth, medical information, photos, bank account number and other financial information);
- Professional or employment information (examples: employment history and professional certifications); and
- Background checks.

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2. How We Collect Personal Information

I&M collects and processes Personal Information from the following sources:

- You, for example, when you submit an inquiry or application, respond to an event invitation, seek representation, or otherwise provide information directly to us;
- Automated technologies, for example, browsing activity collected by automated technologies on our Site;
- Third parties, for example, recruiting agencies, lawyers, bankers, auditors, and insurers who provide recruiting, consultancy, banking, legal, insurance, and accounting services;
- Marketing/advertising companies, for example, from social media platforms, consumer research companies, and analytics or marketing/advertising companies; and
- Public sources, for example, public databases.

3. How Personal Information Is Used

I&M collects and processes Personal Information in order to:

- Respond to your inquiry and to communicate with you;
- Manage and administer our relationship with you and our clients;
- Provide professional services to you and our clients;
- Conduct administrative and operational processes within our firm;
- Auditing internal processes for proper functioning;
- Promote our services, including sending legal updates, publications and information about events;
- For potential and current job applicants, to conduct recruiting and to evaluate your application for employment;
- Conduct analysis, to improve the efficiency of our services and identify trends;
- Protect the rights, property, or safety of I&M, you, or others; and
- Comply with our ethical and legal obligations or to exercise or defend legal rights.

4. Anonymizing Data

All recorded user IP addresses are anonymized to ensure that all personally identifiable user information is not tracked or accessed.

Additionally, we may aggregate and/or deidentify other information, use it internally, and disclose to third parties. Neither Aggregated Information nor Deidentified Information (defined below) is Personal Information.

- "**Aggregated Information**" refers to information about a group of individuals from which the individually identifiable information has been removed. An example of Aggregated Information would be the statistic that 20 people used our website's contact form on a given day.

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- **"Deidentified Information"** means information subjected to reasonable measures to ensure that the deidentified information cannot be associated with the individual. An example of Deidentified Information would be the data point that an unidentified visitor first entered the Site through our main web page. We maintain Deidentified Information in a deidentified form and do not attempt to reidentify it, except that we may attempt to reidentify the information to determine whether our deidentification processes function correctly or in the event of any potential security breach.

5. To Whom We Disclose Personal Information

I&M discloses Personal Information as necessary for the purposes described in Section 3 above to the following categories of external recipients:

- Service providers and contractors: I&M may disclose your Personal Information to service providers and contractors for the purposes above to assist us in meeting our business needs and contractual and legal obligations;
- Counterparties to transactions or disputes, and their counsel;
- Courts, arbitrators, mediators, and others as necessary to represent our clients;
- Government or administrative agencies: For example, I&M submits filings to courts and administrative agencies;
- Public: I&M may disclose Personal Information to the public as part of a press release with your permission, for example, to announce a trial victory;
- Required Disclosures: We may be required to disclose Personal Information in a court proceeding, in response to a court order, subpoena, civil discovery request, other legal process, or as otherwise required by law;
- Legal Compliance and Protections: We may disclose Personal Information when we believe disclosure is necessary to comply with the law or to protect the rights, property, or safety of I&M, our users, or others.

6. How Long We Keep Your Personal Information

We will ordinarily retain your Personal Information for twelve months, but may do so for as long as our ethical obligations require. We may also retain Personal Information longer as necessary to comply with legal, administrative, or procedural requirements, for example, a litigation hold.

7. How We Protect Personal Information

We use an array of security management tools to protect your Personal Information and hold the ISO27001 international security standard certification. Although I&M makes every effort to protect your Personal Information, we cannot guarantee it.

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8. Use of Cookies and Other Technologies

The Site uses cookies, which are small text files that are placed on a computer when visiting a website. Cookies permit us to distinguish you from other visitors to the Site, and have a variety of purposes, including enhancing performance and functionality of a website, as well as compiling statistics. The Site uses cookies for statistical purposes, and all data are anonymized so as not to identify you as an individual. Using cookies helps us to improve the functionality and performance of the Site. By using the Site you agree to our use of these cookies.

Web browsers typically accept cookies by default, while also providing users the means to modify their settings and reject cookies. If you wish to disable cookies from the Site, you must do so in each browser, and on every device from which you may access the Site. Note, however, that disabling cookies may affect your ability to use this or other websites.

Use of Google Analytics

We use Google Analytics ("GA") for aggregated, anonymized website traffic analysis. In order to track your session usage, Google utilizes a cookie with a randomly-generated ClientID in your browser. We use GA to track aggregated website behavior, such as what pages you looked at, for how long, and so on. This information is important to us for improving the user experience and determining Site effectiveness.

Tracking Across Time and Different Sites

The Site does not track your online activities over time and across websites or online services on an individual basis. We do not allow third parties to use our Site to track your activities over time or across other websites.

Your 'Do Not Track' Browser Setting

The Site does not collect personally identifiable information about your online activities over time and across third-party websites or online services. We do not support the Do Not Track ("DNT") browser setting. Some web browsers incorporate a DNT feature that signals to the websites you visit that you do not want to have your online activity tracked. Many websites and applications, including our Site, do not currently respond to web browser DNT signals because such signals are not yet uniform. For more information about DNT signals, please visit <http://allaboutdnt.com>.

9. Third-Party Links and Services

We may provide links to third-party websites operated by organizations not affiliated with I&M. We do not disclose your Personal Information to organizations operating such linked third-party websites. We do not review or endorse, and are not responsible for, the privacy practices of these organizations. We encourage you to read the privacy policy of each and every website that you visit. This Privacy Policy applies solely to information collected by I&M through the services we provide.

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10. Minors Under 16 Years of Age

We respect the privacy of children. Our services are not designed to attract an audience younger than sixteen (16), and we do not knowingly collect Personal Information from children under sixteen (16). If you are under the age of sixteen (16), you are not permitted to use our services and should not send any information about yourself to us through the Site. Please contact us using the contact details below if you believe we may have collected information from your child under the age of sixteen (16), and we will work to delete it.

11. Additional Information for California Residents

Disclosures for Business Purposes

I&M has disclosed each of the categories of Personal Information listed in Section 1, above, for the following "business purposes", as that term is defined under the California Consumer Privacy Act ("CCPA"), in the last 12 months:

- Service providers: For the business purpose of performing services on I&M's behalf and, in particular, for the specific purposes described above;
- Auditors, lawyers, consultants, and accountants engaged by I&M: For the business purpose of auditing compliance with policies and applicable laws, in addition to performing services on I&M's behalf; and
- For the business purposes of (1) auditing compliance with policies and applicable laws, (2) helping to ensure security and integrity, (3) debugging, (4) short-term transient use, (5) performing services on behalf of I&M, (6) internal research, and (7) activities to maintain or improve the quality or safety of a service or device.

No Sale or Sharing of Personal Information

I&M does not and will not sell or share California residents' Personal Information, where "share" means disclosing Personal Information to third parties for cross-context behavioral advertising.

Your California Privacy Rights

We are committed to respecting your rights, including where applicable under the CCPA. Subject to applicable law, California residents have the following rights:

a) Right to Know

California residents have the right to submit a verifiable request for specific pieces of your Personal Information and for information about I&M's collection, use, and disclosure of your Personal Information.

Please note that the CCPA's right to obtain "specific pieces" does not grant a right to the whole of any document that contains Personal Information, but only to discrete items of Personal Information. Moreover, California residents generally just have a right to know categories, for example, categories of third parties to which Personal Information is disclosed, but not the identities of individual third parties.

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b) Right To Delete

- California residents have the right to submit a verifiable request for deletion of their Personal Information that I&M has collected from the resident.

c) Right to Correct

- California residents have the right to submit a verifiable request for the correction of inaccurate Personal Information maintained by I&M, taking into account the nature of the Personal Information and the purposes of processing the Personal Information.

How To Exercise Your Rights

a) Making Requests

I&M will respond to requests in accordance with applicable law if it can verify the identity of the individual submitting the request. California residents can exercise their rights in the following ways:

1. Complete the online request form available here: <https://www.irell.com/consumer-request>
2. Contact by telephone: (888) 905-0460

b) Requests by Authorized Agents

You can have an authorized agent submit a CCPA request to us on your behalf by (a) providing us with a written authorization signed by you that designates the agent as your authorized agent for purposes of a CCPA request; and (b) verifying your identity directly with us or directly confirming with us that the agent is authorized to submit the request. In the alternative, you can provide a power of attorney compliant with the California Probate Code.

c) How We Will Verify Your Requests

To prevent anyone other than you, or your authorized agent, from exercising your rights with respect to your Personal Information, we follow procedures to verify your, or your agent's, identity. This process seeks to confirm that the person making a request is the person about whom we have collected Personal Information or that person's authorized agent. The verification process involves matching data points that you provide with your request against information about you we already have in our records and that we have determined to be reliable for purposes of verifying your identity.

We will use information you provide in your completed request form to verify your identity, and we may request additional information if necessary to complete the verification process. The more risk entailed by the request (e.g., a request for specific pieces of Personal Information), the more items of Personal Information we may request to verify your identity. If we cannot verify your identity to a sufficient level of certainty to respond securely to your request, we will let you know promptly and explain why we cannot verify your identity.

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I&M's Non-Discrimination Policy

California residents have the right not to be subject to discriminatory treatment by I&M for exercising their privacy rights under the CCPA, and I&M will not discriminate on that basis.

12. Revisions to This Policy

We reserve the right to revise this policy or any part of it from time to time. Please review the policy periodically for changes.

13. Contacting Us

If you have any questions regarding this policy, please contact us by emailing us at privacy@irell.com, calling us at (888) 905-0460, or by sending a signed letter addressed to:

Privacy Officer
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