

CALIFORNIA PRIVACY POLICY

JANUARY 1, 2023

Protecting your privacy is important to Morgan, Lewis & Bockius LLP (the “Firm”). This California Privacy Policy (“Policy”) describes how the Firm may collect, use, disclose and safeguard the personal information you provide when you communicate or interact with the Firm, including as a client, as well as information you provide on the Firm’s websites and through or in connection with our mobile apps (the “Apps”) or other software- and Internet-enabled programs and services sponsored by the Firm (the “Site”). This Policy reflects our compliance with applicable California law, including the California Consumer Privacy Act. Please see our general privacy policy, available at www.morganlewis.com, for more information.

The following table sets forth the categories of personal information we have collected in the preceding 12 months, the source of that personal information, and how we have used and shared such personal information for business purposes in the preceding 12 months.

Category of Personal Information Collected	Source of Information	Purpose for Collection	Categories of Recipients
Identifiers: your name, postal address, email address, telephone numbers, or other similar identifiers.	From you	To communicate with you and to administer a relationship with you.	Our service providers, if applicable and necessary to administer the engagement or relationship with you.
Payment information: name, routing and bank account number, billing address and records of payments.	From you	To accept payment for services provided to you or to provide reimbursements where appropriate.	Our bank and other service providers who process payments for us and who are contractually required to comply with laws and requirements applicable to payment processing.
Information you provide about a third party: if you send someone else a communication from the Site, we may collect information, such as that person’s name and email.	From you	To deliver to or communicate with the person at the address that you have requested.	Our service providers as necessary and appropriate, for example, in furtherance of our engagement with you.

Category of Personal Information Collected	Source of Information	Purpose for Collection	Categories of Recipients
<p>Communications: communications we have with you including any documents or other information you may provide to us in the course of an engagement.</p>	<p>From you</p>	<p>To handle your legal matters or otherwise in the course of an engagement.</p> <p>To handle website requests.</p> <p>To contact you when necessary or requested.</p>	<p>Our service providers to the extent permitted, and for firm clients, under our confidentiality obligations and/or applicable privileges.</p>
<p>Preference information: your marketing preferences, your account settings (including any default preferences), any preferences you have indicated, the types of services/information materials that interest you, the areas of our Site that you have visited or ways that you interact with our Site.</p>	<p>From you, from our website technology interaction with your browser/devices and cookies and other similar technologies tracking the pages you visit, the marketing messages you open and the links you follow.</p>	<p>To enhance your online experience, including as a way to recognize you and welcome you to the Site or App, to provide you with customized Site or App content.</p>	<p>Our third party vendors and service providers that perform website analytic services for us or enable the customization of content to you to improve your experiences on our Site, an App or elsewhere.</p>
<p>Voluntary information: any voluntary information you provide us with, such as responses to surveys and social media account details.</p>	<p>From you and your social media account provider.</p>	<p>To know you better, make our communications with you more personal, learn and improve from your survey feedback and organize events.</p>	<p>Our service providers</p>
<p>Personalization: inferences drawn from your interactions online, how you use our Site and App, and whether and when you open our marketing emails to create a profile reflecting your preferences, characteristics, and behavior.</p>	<p>From you, from our Site or App technology's interaction with your browser or devices and cookies tracking the pages you visit.</p>	<p>To improve our Site, services, online experience.</p>	<p>Our third party vendors and service providers that perform website analytic services for us or enable the customization of offers to you to improve your website experience for our Site, Apps or elsewhere.</p>
<p>Internet or other electronic network activity information IP address, geolocation data, internet provider, operating system and browser used, type of device (such as laptop or smart phone), search history, device cookie settings and other device details.</p>	<p>From you and from our website or app technology's interaction with your browser or devices.</p>	<p>To make sure our website and app technology works properly with your device and you can see and use our intended website and apps on the device, and for analytical and demographic purposes.</p> <p>To protect the security and integrity of the Site and our business, such as by protecting against and preventing fraud, unauthorized transactions, and managing risk exposure, including by identifying potential hackers and other unauthorized users.</p>	<p>Our service providers who help us with fraud protection, and third party vendors and service providers that perform website analytic services for us or enable more relevant offers to you on our Site, an App or elsewhere.</p>

Category of Personal Information Collected	Source of Information	Purpose for Collection	Categories of Recipients
<p>Information automatically collected from your browser: when you use the Site, some data is automatically transferred from your browser to our server, including your browser type, operating system type or mobile device model, viewed webpages, links that are clicked, IP address, mobile device identifier or other unique identifier, sites or apps visited before coming to our Site or App, the amount of time you spend viewing or using the Site or App, the number of times you return, or other click-stream or site usage data, emails we send that you open, forward, or click through to our Site or App.</p>	<p>From you and from our website or app technology's interaction with your browser or devices.</p>	<p>In an aggregated non-specific format for analytical and demographic purposes.</p> <p>To protect the security or integrity of the Site and our business, such as by protecting against and preventing fraud, unauthorized transactions, and managing risk exposure, including by identifying potential hackers and other unauthorized users.</p>	<p>Our third party vendors and service providers that perform website analytic services for us or enable the customization of offers to you to improve your website experience.</p>

Do Not Track

Do Not Track (DNT) is a privacy preference that users can set in some web browsers, allowing users to opt out of tracking by websites and online services. At the present time, the World Wide Web Consortium (W3C) has not yet established universal standards for recognizable DNT signals and therefore, the Firm and the Site do not recognize DNT.

Opt-Out Preference Signals

As noted below, we do not “share” personal information for targeted or cross-context behavioral advertising purposes. Accordingly, opt-out preference signals sent from a browser are not required and are not processed.

Your California Privacy Rights

If you are a California resident, you may request information about our disclosure of personal information to third parties or affiliated companies for their direct marketing purposes. To make such request, please contact us as set forth below. Please allow up to 30 days for us to process your request. You may submit such a request once per year.

If you are a California resident, California law also provides you with the following rights with respect to your personal information:

- The right to know what personal information we have collected, used, disclosed and sold about you, including the categories of personal information, the categories of sources from which the personal information is collected, the business or commercial purpose for collecting, selling, or sharing personal information, the categories of third parties to whom the Firm discloses personal information, and the specific pieces of personal information the Firm has collected about you. To submit a request to know, you may call us at 844-977-1101, visit www.morganlewis.com, or email MLPrivacyOffice@morganlewis.com.
- The right to request that we correct any personal information we have collected about you. To submit a request for correction, you may call us at 844-977-1101, visit www.morganlewis.com, or email MLPrivacyOffice@morganlewis.com. You also may designate an authorized agent to make a request for correction on your behalf on our website at www.morganlewis.com.

- The right to request that we delete any personal information we have collected about you. To submit a request for deletion, you may call us at 844-977-1101, visit www.morganlewis.com, or email MLPrivacyOffice@morganlewis.com. You also may designate an authorized agent to make a request for deletion on your behalf on our website at www.morganlewis.com.
- The right not to receive discriminatory treatment for the exercise of privacy rights conferred by the CCPA.

You also may designate an authorized agent to make a request for access on your behalf on our website at visit www.morganlewis.com, or email MLPrivacyOffice@morganlewis.com.

When you exercise these rights and submit a request to us, we will verify your identity by calling your phone number on file and asking for your email address and the date of your last interaction with us. We also may use a third party verification provider to verify your identity. Your exercise of these rights will have no adverse effect on the price and quality of our services.

The Firm does not sell or share (i.e., engage in cross-context behavioral or targeted advertising) personal information about you to third parties. The Firm does not use or disclose sensitive personal information for any purposes other than those permitted by applicable law.

Record Retention

We may retain your personal information for as long as necessary to fulfill the purpose for which it was collected or to comply with legal or regulatory requirements. We strive to retain your personal information no longer than is reasonably necessary to carry out the purposes listed in this Notice or as required by law. We generally retain your personal information for up to seven (7) years.

Contact Us

If you have any questions about this Privacy Policy or to request this Privacy Policy in another form, please contact us at 844-977-1101 or MLPrivacyOffice@morganlewis.com.