# akerman

# **Privacy Policy**

Last updated: August 2024

This is the Privacy Policy of Akerman LLP ("Akerman"). Akerman is committed to protecting the privacy and security of your personal information. This Policy applies to activities Akerman engages in on its websites and offline. We are providing this notice to explain our information practices and the choices you can make about the way your information is collected and used.

Nothing stated in this Policy is intended to, nor will it, establish a client-attorney relationship with the persons reading it. Information provided to us in the course of any attorney-client relationship enjoys a unique status and may be protected by confidentiality, the attorney-client privilege, the attorney work product doctrine and other similar protections (whether in the United States or elsewhere). Nothing in this Policy will detract from any of the protections that attach to such information.

This policy covers:

- Personal Information We Collect and Use
- De-Identified Information
- Cookie Policy
- <u>Marketing Communication Options</u>
- How We Share Your Personal Information

- <u>How We Protect Your Personal</u> <u>Information</u>
- <u>"Legal Categories" of Personal</u> <u>Information</u>
- International Data Transfers
- Your Privacy Rights
- <u>Children's Privacy</u>
- <u>How Long We Keep Your Personal</u> <u>Information</u>
- <u>Third-Party Services</u>
- Changes to This Policy
- Personal Information Privacy Chart

Note: Different jurisdictions may use different terms to describe key concepts. To the extent terms used here differ from those in applicable law(s), the terms used in this Privacy Policy should be interpreted the same as similar terms used in applicable data protection laws.

# Personal Information We Collect and Use

#### Personal Information You Provide

Akerman collects personal information directly from you through your use of our website and through your interactions with us.

• Visiting Our Sites. When you visit our Sites, such as when you use our online forms, register for events, sign up for our blogs, or complete our surveys, we may collect and process different types of personal information. The type of personal information we collect from you will depend on how you interact with our Sites. The information we collect may include your name, job title or position, company, email address, phone number, physical address, other contact details, contact preferences, topics of interest, and any other information you voluntarily provide. The processing of your personal data for this purpose is based on our legitimate interest.

- **My Binder.** You may sign up on our Sites for a free service called My Binder. My Binder is an online shopping cart for Akerman We ask for your name, email, and password in order to provide this service to you. The processing of your personal data for this purpose is based on our legitimate interest or to fulfill contract obligations to you.
- Akerman Connect. Akerman Connect is our collaborative extranet site which provides a shared document repository along with other collaborative features by which an existing client can collaborate with their Akerman We ask for your name and password and use a series of cookies for the purpose of site functionality such as reporting and logging. The processing of your personal data for this purpose is based on our legitimate interest or to fulfill contract obligations to you.
- Event Registration. You may register on our Sites for Akerman sponsored We will ask for information such as your name, telephone number, email address, and company when registering for an event. We use this information to register you for the event and contact you about changes and updates regarding the event. We also may use the information to communicate with you about other events and topics that we believe may be of interest to you, subject to obtaining your consent in accordance with applicable law. The processing of your personal data

for this purpose is based on our legitimate interest or with your consent.

- Blogs and Subscribed Content. You may subscribe and comment to one of our Site blogs. In order to provide you with the content you've subscribed to, we may collect your name, email address, company name, job title, phone number, physical address, and any comments or other information you choose to provide. The processing of your personal data for this purpose is based on our legitimate interest or with your consent.
- Alumni Contact. When you update your alumni contact information, we may collect your name, email address, and other contact information you wish to provide to us. The processing of your personal data for this purpose is based on our legitimate interest or with your consent.
- Job Applications. When you apply for a job through our Sites, we may collect your name, email address, employment information and history, education history, resume, and any other information you choose to provide in submitting your application. The processing of your personal data for this purpose is based on our legitimate interest or the processing is necessary to comply with legal and regulatory obligations.
- To Process Invoices. If you are a vendor, we collect your company name, tax ID or Social Security number, address, phone number, email address, and banking information. The processing of your personal data for this purpose is based on our legitimate interest and pursuant to any contract we may have with you.

#### *Personal Information Collected Automatically From Your Devices*

- Operating our Website. When you interact with our website, such as through our blog posts, logging into your account, information that you type into online forms, or otherwise engage with our website, we collect information about the pages you visit, the length of time you spend on pages, and other log information which helps us operate, maintain and improve our websites. This information includes browser type, operating system, Internet service provider, Internet Protocol (IP) address (a number that is automatically assigned to a computer when the Internet is used), domain name, click activity, referring website, and/or a date/time stamp. The processing of your personal data for this purpose is based on our legitimate interest.
- We may use cookies or other tracking technologies as follows:
- To facilitate, manage, personalize, and improve your online experience, including using analytics in order to provide more personalized experiences, and to improve our websites and services;
- When you receive marketing or informational emails from us, we use certain tools to capture data related to your interactions with our messages.
- To provide and improve our websites
- To create and manage your account with us; and
- To fix any technical issues that arise in the course of providing the websites.

The processing of your personal data for this purpose is based on our legitimate interest

#### Information Collected from Third Parties

Akerman may also obtain information about you from other sources, including Service Providers and Third-Party Services, and combine that with personal information. We may use information collected from Service Providers and Third Parties for the following purposes:

- When you engage with us online, or via social media, we may collect personal information, including your social media contact(s) and profile, chat logs, and email address to respond to your comments, questions and requests. The processing of your personal data for this purpose is based on our legitimate interest or your consent.
- **Transactions**. When we transact with you, provide services, serve you content and/or advertising, we may collect your email address. The processing of your personal data for this purpose is based on our legitimate interest or your consent.
- For Akerman's marketing and other purposes, we may collect your name, email address, social media contact, social media contact, and username. The processing of your personal data for this purpose is based on our legitimate interest or your consent.
- Account / Profile Creation and Management. To manage your account, we may collect your device information, email address, and social media contact(s). The processing of your personal data for this purpose is based on our legitimate interest or your consent.

• To fix any technical issues that arise in the course of providing the websites. The processing of your personal data for this purpose is based on our legitimate interest.

**Analytics.** Akerman may use Google Analytics, Adobe Analytics or other Service Providers for analytics services. These analytics services may use cookies and other Tracking Technologies to help Akerman analyze website users and how they use the websites. Information generated by these services (e.g., your IP address and other Usage Information) may be transmitted to and stored by these Service Providers on servers in the U.S. (or elsewhere) and these Service Providers may use this information for purposes such as evaluating your use of the websites, compiling statistic reports on the websites' activity, and providing other services relating to website activity and other Internet usage. The processing of your personal data for this purpose is based on our legitimate interest.

#### *Other Ways We May Use the Personal Information We Collect*

We may use any personal data we collect as described above for the following business purposes, and in all cases, this processing is based on our legitimate interest:

- To provide services to our clients.
- To administer and improve our services, including solving technical problems and monitoring overall usage statistics;
- To contact you and provide you with the information or services you have requested;
- To operate, evaluate, and improve our business, including improving and

personalizing the experience for you and others;

- To maintain and improve our services, including to audit, research, and conduct analysis to protect people who use our websites;
- For safety and security, by making sure third parties protect your information, and monitoring the technical functioning and security of our network;
- For legal and compliance, including complying with applicable laws, regulations, and legal obligations; and
- To protect the rights or property of Akerman, its employees, its customers, and people who use its websites.

# De-Identified Information

Sometimes we will de-identify personal information by removing or modifying the personally identifiable elements or extracting non-personally identifiable elements so they can't be associated with a person ("de-identified information"). Deidentified information is non-personal information and may be used and shared without obligation to you, except as prohibited by applicable law. To the extent any non-personal information is combined by or on behalf of Akerman with personal information Akerman itself collects directly from you on the websites, Akerman will treat the combined data as described in this Notice.

We have a legitimate interest in using your personal data for these purposes if you are our client, otherwise we will obtain your consent. You also have the right to withdraw your consent at any time, without affecting the lawfulness of the processing based on consent prior to such withdrawal.

# Cookie Policy

This section describes how Akerman uses cookies and similar technologies to collect and store information when you visit our websites. Like many companies, we use certain technologies – cookies, web beacons, clear GIFs, tracking pixels, and similar technologies (collectively, "cookies") – to collect information when you interact with our website and email communications.

#### How do Cookies Work

To understand how tracking technologies work, it is helpful to describe the types of technologies we use and what they are used for:

- Cookies a "cookie" is a small text file that websites send to your computer, device, or other internet-connected tool you are using that contains data used by the website for its business purposes. Cookies are set to expire, but can also be deleted by a browser through its settings.
- Pixels a "web beacon" or "pixel" is a tag used on a web browser or HTML email that records your activities when viewing the web page or email where it is placed. Pixels only last for the session and are not stored on your device.

Cookies are classified by their purpose:

- Strictly Required These cookies are required for the website to function. You cannot disable these.
- Functional Allow the website to remember choices you make (such as your username, language, or the region you are in) and provide enhanced, more personal features. For example, a website may provide you with local weather

reports or traffic news by storing data about your general location.

- Analytics and Statistics Help us understand how its website performs, how visitors interact with the site, and whether there may be technical issues.
- Marketing and Retargeting Used to deliver advertising that is more relevant to you and your interests. May also be used to limit the number of times you see an advertisement and measure the effectiveness of advertising campaigns.

Our websites use first-party cookies and third-party cookies. The difference between first-party cookies and third-party cookies relates to the control of the party who serves the tracking technology. First-party cookies are cookies that are specific to the website that created them. Their use enables us to operate an efficient service and to track the patterns of behavior of visitors to the website. Third-party cookies, on the other hand, are placed on your device or served by a third-party (i.e., not by Akerman). While we may allow third-parties access to the website, we do not retain control over the information supplied by the cookies, nor do we retain access to that data. This information is controlled wholly by that third-party in accordance with their respective privacy policies.

#### Cookies We Use

We use cookies consistent with this Privacy Policy. For example, a cookie may be used to determine your preferred language, maintain the security of our website and your account, measure website analytics, measure the effectiveness of our advertising and promotional communications, and gain information for marketing and advertising purposes, including by identifying the website from which a person was referred to Akerman's site and to track other websites visited by an individual.

If you have an account with us, we will, to the extent legally permissible, combine cookie data with your account to improve your experience with our services. Where permissible, your account will be identified either from you signing in to your account or by using your IP address collected through a cookie.

Third-Party Analytics. Our websites use third-party web analytics services that uses cookies, to help the websites analyze how users use the websites. The information that is collected about your use of the website will be de-identified or pseudonymized by the third-party analytics provider (i.e., Google) for the purpose of evaluating your use of the sites, compiling reports on website activity and providing other services relating to website activity and internet usage. The third-party analytics providers that Akerman uses will not link your IP address with any other data held by them about you. Information collected by us through use of third-party analytics includes: number of visitors, referring URLs, and pages visited.

For further information, please see Google Analytics' site:

- Google Analytics' use of cookies.
- <u>Google's Privacy Overview for Google</u> <u>Analytics</u>.

To learn more about the tracking technologies delivered on our website, please visit our Privacy Preference Center by clicking on "Cookie Settings" in the footer of any page of the Akerman website.

The content of a cookie is limited to an identification number. Name, IP-address or other information regarding your true identity is only collected to the extent necessary for the operation of the functionality cookies (i.e., in connection with the log-in function).

#### *Managing Cookies and Withdrawing Consent*

Please note, if you disable cookies, you may not be able to use the full functionality of our websites. In particular, you may have limited access to some areas or be transitioned to a different experience.

**Cookie Banner Settings**. We will obtain your opt-in consent to the use of the cookies and other tracking technologies on this website when you first access the website and if we introduce any new cookies to the website, unless they are necessary cookies, in which case your consent is not required. When you visit this website, a pop up will appear to inform you about our use of such cookies. You can then consent by clicking on "Accept", or you may refuse cookies (except necessarily cookies) by clicking on "Deny". You may alternatively click on the link to the cookie manager to visit our Consent Management Platform and decide the categories of cookies that you wish to accept, and the cookies you wish to reject.

You may withdraw your consent at any time with effect for the future by following the process outlined above, or by contacting the firm's Privacy Officer at PrivacyOfficer@Akerman.com If you deny cookies, we will not set those cookies on your device, except necessary cookies and a cookie to remember that you don't want any cookies set when you visit this website.

If you have accepted cookies but want to deny them (withdraw your consent) for the future, you can delete the cookies in your website browser and the cookies window including the link to the cookie manager appears again.

Cookies and Browser Settings. You can disable cookies by changing your website browser settings to reject cookies. How to do this will depend on the browser you use. Rejecting cookies will prevent your browser from accepting new cookies, as well as (depending on the sophistication of your browser software) allow you to decide on acceptance of each new cookie in a variety of ways. You can also delete all cookies that are already on your device. If you do this, however, you may have to manually adjust some preferences every time you visit this website. All modern browsers allow you to change your cookie settings, typically by going to the 'options' or 'preferences' menu of your browser. Use the 'Help' option in your browser for more details.

- Cookie settings in Internet Explorer
- Cookie settings in Microsoft Edge
- Cookie settings in Firefox
- Cookie settings in Chrome
- Cookie settings in Safari weband iOS.

**Opt-Out Preference Signal.** You may use an Opt-Out Preference Signal, such as the Global Privacy Control (GPC), to opt-out of the sale/sharing of your personal

information or the use of cookies for targeted marketing. You may send a GPC signal to our website by selecting the appropriate settings on your browser or device. Your signal will be processed in our system as though you de-selected the "Share or Sale of Personal Information" in our cookie preference center. If you do not have an account or if you are not logged into your account, your request to opt-out of sale/sharing will be linked to your browser identifier only and not linked to any account information because the connection between your browser and the account is not known to us.

Blocking all cookies (including necessary cookies) will have a negative impact upon the usability of many websites, including ours. If you block necessary cookies, you may not be able to use all the features on this website. You can also delete cookies already stored on your computer. However, deleting cookies might have a negative impact on the usability of many websites, including ours.

To find out more about cookies, visit <u>www.aboutcookies.org</u> or <u>www.allaboutcookies.org</u>.

### Marketing Communications Options

#### Email Marketing Communications

You can opt out of receiving certain promotional communications from Akerman at any time by following the instructions provided in e-mails to click on the unsubscribe link, or if available by changing your communication preferences by logging onto your account. Please note that your opt-out is limited to the e-mail address used and will not affect subsequent subscriptions. If you opt-out of only certain communications, other subscription communications may continue. Even if you opt out of receiving promotional communications, Akerman may, subject to applicable law, continue to send you nonpromotional communications, such as those about your account, transactions, servicing, or Akerman's ongoing business relations.

#### Additional Information for California Residents

California residents also have the additional rights regarding disclosure of your personal information to third-parties for their own direct marketing purposes. We do not share "personal information" as defined by California's "Shine the Light" law with non-Affiliate third-parties for their direct marketing purposes absent your consent. If you are a California resident, you may request information about our compliance with the Shine the Light law and/or withdraw previously given consent to sharing with non-Affiliate third-parties for their direct marketing purposes by contacting using the methods in the Contact Us section below.

As these rights and your privacy rights are not the same and exist under different laws, you must exercise your rights under this law and the other privacy laws separately.

### How We Share Your Personal Information

We disclose personal information with certain third parties (as described below), provided the purpose for disclosure and use is consistent with those purposes the personal information was originally collected, as described in this privacy policy. We may share your information within Akerman or with:

- Service Providers, Agents, Suppliers, Business Partners: We use others to help us provide some of our products and services (such as maintenance, IT support, analysis, audit, marketing, and security). Unless we tell you differently or as described elsewhere in this Privacy Policy, our agents are not allowed to use your information beyond what is needed to assist
- Akerman Locations: We may share your personal information with our different locations. If we share your information, we will share only the information that is necessary and we will take reasonable steps to make sure that prudent steps are taken to protect your information.
- Your Disclosure or Agreement: Your activities on the website may, by their nature, result in the sharing of your personal information (as well as your non-personal information) with third parties and by engaging in these activities you agree to that and further sharing and disclosure to third parties. Such third-party data receipt and collection is subject to the privacy and business practices of that third-party, not Akerman.
- Changes in Business Structure/Ownership: We may disclose or transfer your personal information to a third party in the event of a business transition, merger, sale or change of control involving Akerman LLP or one of our third-party service providers
- Compliance with Legal Obligations and Legal Requests: We may be required to respond to legal requests for your information, including from law

enforcement or other government or regulatory agencies in accordance with applicable laws or regulations. We also may have to disclose certain information to auditors, government authorities, or other authorized individuals in order to comply with laws that apply to us or other legal obligations such as contractual requirements.

We do not sell any individual's personal information, including information belonging to children under the age of 16, nor do we share that personal information with third parties for those parties' commercial use.

### How We Protect Your Personal Information

We strive to take appropriate security measures to help safeguard your personal information from unauthorized access and disclosure. For example, only authorized employees are allowed to access personal information, and they may only access it for approved reasons. We also use technology to protect your information, including encrypting sensitive personal information and using firewalls to help stop unauthorized persons from accessing information. If you have an online account with us, your account also is protected by a password for your privacy and security, and you must prevent unauthorized access to your account and personal information by selecting and protecting your password appropriately, limiting access to your devices, and by signing off after you have finished accessing your account.

While we cannot guarantee that loss, misuse, or alteration of information will never occur, we use reasonable efforts to prevent it. Please keep in mind that no method of storage or transmission over the Internet is completely secure, so when you use our products or services or provide us with information, it is at your own risk.

Please be aware that our Sites may contain links to other sites on the Internet that are not owned and operated by Akerman. Those websites are operated by third parties. The information practices of those websites linked to our Sites are not covered by this Website Privacy Policy. We are not responsible for the privacy policies of websites to which our Sites link. If you provide any information to third parties, different rules regarding the collection and use of your personal information will apply. We suggest you review the third party's privacy policies before providing any information to them.

### "Legal Categories" of Personal Information

The California Consumer Privacy Act of 2018, as amended by the California Privacy Rights Act of 2020 (the "CCPA") requires us to tell you about the personal information we collect about you in a certain way – specifically, we need to tie it back to "legal categories" of personal information that are listed in the law. To make things easier to understand, we've put this information in a chart outline:

- The legal category of personal information, including the definition of each,
- The source(s) from which your personal information is collected,
- The purpose for why we collect and use your personal information for each legal

category, and

• The business purposes for which we share your personal information and with whom.

We've included these things and a list of personal information We Disclose for a Business Purpose in the **Personal Information Privacy Chart** at the end of this Privacy Policy.

# International Data Transfers

Akerman primarily stores the personal information we collect in the United States. To facilitate Akerman's global operations. staff who work for Akerman and/or our service providers may transfer and access such personal information from locations around the world. This will involve transferring your personal information outside the country you reside in. We will take all steps reasonably necessary to ensure that your personal information is treated securely and in accordance with this Privacy Policy. Whenever we transfer your personal information out of the country you reside in, we will ensure one of the following safeguards is implemented:

- We will only transfer your personal information to countries that have been deemed to provide an adequate level of protection for personal information by the applicable Data Protection or Supervisory Authority; or
- We may use specific contracts approved by the applicable Data Protection or Supervisory Authority which give personal information the same protection it has in the country you reside in; or
- We will ensure there is some other protection in place which has been

approved by the applicable Data Protection or Supervisory Authority as giving personal information the same protection it has in the country where you reside.

## Your Privacy Rights

The rights described in this section apply to all users. Note: Some data protection laws may use other terms to describe these rights differently. If you have any questions about these rights, please contact us at PrivacyOfficer@Akerman.com

**Right to Access and to Know** — You have the right to access the personal data collected about you. You also may request to know the categories of personal data collected about you, the information or categories of information shared with third parties, or the specific third parties or categories of third parties to which the information was shared; or, some combination of similar information. However, there are certain exemptions, meaning that data subjects may not always receive all of the information we process.

**Right of Complaint** — If you believe that the processing of your personal data violates applicable laws and regulations, please contact us at PrivacyOfficer@Akerman.com We will always try to find a solution together. Should this not be possible, you have the right to complain to the applicable Data Protection or Supervisory Authority about our processing of your personal data. If you are in the EEA, please contact your local Data Protection Authority in the EU. For contact details of your local Data Protection Authority, please see **here**.

**Right to Correct**: Without prejudice to your right to review or change the information in

your account to make sure it is accurate and up-to-date, you also have the right to request rectification of any other of your personal data, provided to us if you consider it to be inaccurate or incomplete.

**Right to Data Portability** — Under certain circumstances, you may request us to transfer your personal data, provided by you, to another controller. Also, you have the right to receive your personal data, which have been provided by you, in a structured, commonly used and machine-readable format and to transmit those data to another controller.

**Right to Delete / Erasure** – You generally have a right to request your personal data or part of it to be erased (e.g., when your personal data are no longer necessary for the stated purposes in this Policy, the personal data have been unlawfully processed); however, we may not always erase your personal data because sometimes the processing is still necessary. For example, for complying with statutory obligations or for lodging, exercising or substantiating legal claims. Therefore, we will weigh your interest in having your personal data erased against the necessity of maintaining the personal data for our legitimate interests. Please be aware that if you request us to delete your personal data, you may also not be able to continue to use the Platform.

**Right to Restriction.** Under certain circumstances, you may have the right to restrict a business's ability to process personal data about the you. For example, if the accuracy of your personal data is contested, the processing is unlawful or personal data is no longer needed for purposes of the processing. However, we can still use restricted data in certain circumstances (e.g., when your personal data is needed for legal claims or to protect another data subject's rights).

**Right to Notification of Correction, Deletion** 

**or Restriction.** Unless it is impossible or involves a disproportionate effort, we will inform the recipients of your personal data about correction, deletion or restriction of processing.

**Right Against Automated Decision Making**/ **Profiling** — You may have the right to not be subject to a decision based solely on an automated process without human input.

**Right of Objection** — Under certain circumstances, you may object to the processing of your personal data by us, or third parties engaged by us. We will consider several factors when assessing an objection to our processing in furtherance of our legitimate interests, including: our users' reasonable expectations; the benefits and risks to you, us, other users, or third parties; and other available means to achieve the same purpose that may be less invasive and do not require disproportional effort. Your objection will be upheld, and we will cease processing your information, unless the processing is based on compelling legitimate grounds or is needed for legal reasons. For example, you may object to the use of your personal data for direct marketing purposes.

**Right to Withdraw Consent** — If we have requested your explicit consent for data processing, you have the right to withdraw your consent at any time. The withdrawal of consent will not affect the lawfulness of the processing prior to the withdrawal.

#### Right to Opt In for Sensitive Data

**Processing** — Under certain circumstances, you may have the right to opt in (or consent) before a we can process your sensitive data.

**Right to Opt Out of Sale or Sharing.** Where applicable, in the U.S., you may opt out of the Sale or Sharing of personal data to third parties, as those terms are defined by U.S. federal, state and local laws. You may exercise this right by clicking on the "Your Privacy Choices" link located at the bottom of the Akerman homepage or by submitting a request as described below.

In addition, we will not discriminate against you if you exercise your privacy rights under any applicable privacy and data protection laws, including by:

- Denying you goods or services.
- Charging you different prices or rates for goods or services, including through granting discounts or other benefits, or imposing penalties.
- Providing you a different level or quality of goods or services.
- Suggesting that you may receive a different price or rate for goods or services or a different level or quality of goods or services.

*How to Make a Request*: If you would like to make a request, please use one of the methods in the "Contact Us" section of this Privacy Policy. You will need to provide your first and last name, email address, physical address, describe your relationship with us, and specify the type of request you would like to make.

*Responding to Requests*: Your request will be evaluated to determine whether the

requested change meets legal regulatory requirements and does not risk making our other data less secure or changing our other data. If we aren't able to honor any part of your request, we will tell you that in our response, as well as the reason(s) we cannot do so.

*Verifying Your Identity*: In order for us to look into your request, we first need to verify your identity, meaning that we need to make sure that you are the consumer we may have collected personal information about or a person who has been duly authorized to make the request on behalf of the consumer. For example, if you make a request, we will ask you to confirm your name and email address. For certain requests, we will use a combination of your email address, name, and/or zip code to verify your identity, so that we can help protect your information.

*Appealing a Denied Request*: If we deny all or part of your privacy request, you may have a right to appeal that decision. If you would like to make an appeal, please contact us using the methods in the "Contact Us" section below, and include your name, email address, physical address, the type of request you made, and the reason for requesting an appeal.

*Requests by Authorized Agents*: You may have the right to designate an authorized agent to make a request on your behalf. Authorized agents of consumers may make a request by using the methods in the "Contact Us" section of this Privacy Policy. Privacy laws require that any request you submit to us is subject to an identification and verification process, and confirmation of the agent's authority, which may include attestation under penalty of perjury. Absent a power of attorney, we will also require the consumer to verify their own identity. We may verify identity based on matching information you provided with data we have maintained on you in our systems. This data could include, but is not limited to, email address, mailing address, or phone number.

# Children's Privacy

The Sites are not directed at nor intended for use by children under the age of 18, and we do not knowingly collect any personal information directly from children under the age of 18. We will never use or disclose any personal information of a child under the age of 18 for marketing or advertising purposes. If you are under age 18, you should not use our Websites and you should not send us personal information about yourself. If you suspect that a child is using our websites, please contact Akerman by email at PrivacyOfficer@Akerman.com.

### How Long We Keep Your Personal Information

We will only retain your personal information for as long as necessary to fulfill the purposes for which we collected it, including for the purposes of satisfying any legal, accounting, or reporting requirements. To determine the appropriate retention period for personal information, we consider the amount, nature, and sensitivity of the personal information, the potential risk of harm from unauthorized use or disclosure of your personal information, the purposes for which we process your personal information and whether we can achieve those purposes through other means, and the applicable legal requirements.

We cannot (fully) comply with a request to erase or delete if we have to retain your personal information for certain purposes and for a longer period due to a statutory retention period. After the retention period has expired, we will delete your personal information.

# Third-Party Services

The websites may include hyperlinks to, or include on or in connection with, the websites (e.g., apps and plug-ins), websites, locations, platforms, applications or services operated by third parties ("Third-Party Service(s)"). These Third-Party Services may use their own cookies, web beacons, and other Tracking Technology to independently collect information about you and may solicit personal information from you. Akerman does control or provide any representation about the privacy practices of Third-Party Services which are linked from its websites. Please review the privacy policies of all websites you visit.

# Changes to This Policy

We reserve the right to modify or change this Privacy Policy at any time. When we make a material change to this Website Privacy Policy, we will inform you by changing the date on this page noting when the Website Privacy Policy was last updated.

If you have any questions about this Website Privacy Policy or how we process your personal information, please contact us by sending an email to PrivacyOfficer@Akerman.com or writing to:

Akerman LLP Attention: Privacy Officer 71 South Wacker Drive 47th Floor Chicago, IL 60606 T: <u>+1 312 634 5700</u>

The firm is happy to assist with any special needs for accessing this policy. Contact the PrivacyOfficer@Akerman.com to make the request.

This Privacy Policy was last updated on August 29, 2024. If you wish to review previous versions of this policy, please make the request to PrivacyOfficer@Akerman.com.

### Personal Information Privacy Chart

This section summarizes how Akerman processes personal information in accordance with the California Consumer Privacy Act of 2018, as amended by the California Privacy Rights Act of 2020 (collectively, "CCPA"), The terms used in this section shall have the same meanings as given to them under the CCPA.

In the last 12 months, we have collected or received the following categories of Personal Information, where we have a legitimate interest, legal obligation or consent for processing:

Category (with examples of information collected)	Sources	Purposes for Collection and Use	Sharing with Third Parties for a Business Purpose
A Identifiers. Real name, alias, postal address, unique personal identifier, online identifier, Internet Protocol address, email address, account name, Social Security number, driver's license number, passport number, or other similar identifiers.	<ul> <li>Directly from You</li> <li>Automatically from Your Devices</li> <li>From Third Parties</li> </ul>	Visiting Our Sites     My Binder     Akerman Connect     Event Registration     Blogs and     Subscribed Content     Alumni Contact     Job Applications     Processing Invoices     Operating our     Website     Marketing     Engagement     Account / Profile     Creation and     Management     Transactions	Service Providers     Akerman Locations     Your Disclosure or     Agreement     Changes in Business     Structure / Ownership     Compliance
B. Personal information categories listed in the California Customer Records statute (Cal. Civ. Code § 1798.80(e)). Name, signature, Social Security number, physical characteristics or description, address, telephone number, nasport number, driver's license or state identification card number, insurance policy number, education, employment, employment history, bank account number, oredit card number, debit card number, oredit card number, debit card number, oredit card number, difficancial information, medical information, or health insurance information included in this category may overlap with other categories.	Directly from You     From Third Parties	Visiting Our Sites     My Binder     Akerman Connect     Event Registration     Blogs and     Subscribed Content     Alumni Contact     Job Applications     Processing Invoices     Engagement     Marketing     Account / Profile     Creation and     Management     Transactions	Service Providers     Akerman Locations     Your Disclosure or     Agreement     Changes in Business     Structure / Ownership     Compliance
C. Protected classification characteristics under California or federal law. 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).	• Directly from You	Job Applications	<ul> <li>Service Providers</li> <li>Your Disclosure or Agreement</li> <li>Changes in Business Structure / Ownership</li> <li>Compliance</li> </ul>
D. Commercial information Records of personal property, products or services purchased, obtained, or considered, or other purchasing or consuming histories or tendencies.	• Directly from You	Marketing	Service Providers     Akerman Locations     Your Disclosure or     Agreement     Changes in Business     Structure / Ownership
E. Biometric information Genetic, physiological, behavioral, and biological characteristics, or activity patterns used to extract a template or other identifier or identifying information, such as, fingerprints, faceprints, and voiceprints, iris or retina scans, keystroke, gait, or other physical patterns, and sleep, health, or exercise data.	Not collected	Not collected	Not collected
F. Internet or other similar network activity. Browsing history, search history, information on a consumer's interaction with a website, application, or advertisement.	Automatically from Your Devices	<ul> <li>Operating Our Website</li> <li>Marketing</li> <li>Debugging</li> <li>Analytics</li> </ul>	Service Providers     Changes in Business     Structure / Ownership
G. Geolocation data Physical location or movements	Not collected	Not collected	Not collected

H. Sensory data Audio, electronic, visual, thermal, olfactory, or similar information.	Not collected	Not collected	Not collected
I. Professional or employment-related information. Current or past job history or performance evaluations.	• Directly from You	Job Applications	Service Providers     Akerman Locations     Your Disclosure or     Agreement     Changes in Business     Structure / Ownership     Compliance
J. Non-public education information (per the Family Educational Rights and Privacy Act (20 U.S.C. Section <u>12322</u> , 34 C.F.R. Part 99)) 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 records	Directly from You	Job Applications	Service Providers     Akerman Locations     Your Disclosure or     Agreement     Changes in Business     Structure / Ownership     Compliance
K. Inferences drawn from other Personal Information Profile reflecting a person's preferences, characteristics, psychological trends, predispositions, behavior, attitudes, intelligence, abilities, and aptitudes	Not collected	Not collected	Not collected
L. Sensitive Personal Information as defined in § 1798.140(ae) of the California Consumer Privacy Act Personal information that reveals a consumer's: Social Security number, driver's license number, state identification card number, or passport number; a consumer's account log-in, financial account, debit card, or credit card number in combination with any 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 a consumer's mail, email, and text messages (not business related); genetic data; biometric data used to uniquely identify a consumer; health data; or data related to sex life or sexual orientation.	• Directly from You	<ul> <li>Job Applications</li> <li>Processing Invoices</li> </ul>	<ul> <li>Service Providers</li> <li>Akerman Locations</li> <li>Your Disclosure or Agreement</li> <li>Changes in Business Structure / Ownership</li> <li>Compliance</li> </ul>

We may also collect information to comply with applicable law or regulatory requirements or legal requests.

Disclosures of Personal Information for a Business Purpose

In the preceding twelve (12) months, we have disclosed the following categories of personal information for a business purpose include the sections defined in the above table.

**Category A: Identifiers** 

Category B: California Customer Records

**Category C: Protected Classifications** 

Category D: Commercial Information Records Category F: Internet and Network Activity

Category I: Professional or Employment Information

Category J: Non-Public Education Information

Category L: Sensitive Personal Information

Sale of Personal Information

In the preceding twelve (12) months, we have not sold any categories of personal information.