akerman

# Cookie Policy

This is the Website 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 (the "Sites"). 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.

## Personal Information We Collect and Use

**General Information**

When you use the Internet, your computer may transmit certain information to servers that host the websites you visit. The transmitted information may include the type of Internet browser you are using, the type of computer operating system you are using, your Internet Protocol (IP) address, the pages you visited on our Sites, and how you arrived at our Sites. When you visit our Sites, we collect this information, and we use this information to create a better user experience, to identify areas for improvement on our Sites, and to enhance the security of our systems.

## Cookies

*What are Cookies?* Cookies are small bits of text that are placed on your personal device when you visit certain websites.

Essential Cookies (Cannot be disabled)

- These cookies allows the core functionality of the website and helps identify trusted web traffic. Without these, the website would not function properly. Therefore, essential cookies can only be disabled by changing your browser preferences.

Non-Essential Cookies (Can be disabled)

- Analytical cookies help us to improve our Sites by collecting and reporting information on its usage. These types of cookies include Google Analytics and can collect information about which pages have been read.
- A user reference cookie is used to personalize content for website visitors by saving it to a user's account for future reference.

You have many choices to manage cookies on your computer. Most browsers allow you to block or delete cookies from your system, and you can set most browsers to prevent cookies from being placed on your devices. If you do this, however, you may have to manually adjust preferences every time you visit our Sites and it may not be possible to use the full functionality of our Sites. To learn more about your ability to manage cookies, please consult the privacy features in your browser.

## Personal Information

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 are interacting 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.

- You may sign up on our Sites for a free service called My Binder. My Binder is an online shopping cart for Akerman content. We ask for your name, email, and password in order to provide this service to you.
- 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 attorneys. We ask for your name and password and use a series of cookies for the purpose of site functionality such as reporting and logging. You must accept the terms of Akerman's privacy policy in order to use the site.
- You may register on our Sites for Akerman sponsored events. 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.
- You may subscribe and comment to one of our Site blogs.
- When you update your alumni contact information, we may collect your name, email address, and other contact information you wish to provide to us.

We may collect information about you directly and automatically.

- For example, we may collect information directly from you when you provide us with your name and email address when using the "Connect With Us" feature on our Sites.

- We also may collect information automatically about you such as the pages you've accessed, your type of computer, or your type of browser when you visit our Sites.

## How We May Use Your Personal Information

**Your privacy is important to us. We collect and use information we believe is necessary to our business, and to provide you with the products and services you expect when you interact with us. When we collect and use your information, we take your privacy and security seriously.**

We collect and use personal information to deliver superior service. We will use the information you provide to us for the purpose you provided it to us (for example, to use Akerman Connect), which is stated when we collect the information. We also may use your information in other ways for our business purposes and to provide you with the products and services you request and expect from us, including but not limited to the following purposes:

- to provide services to our clients
- to administer and improve our services, including solving technical problems and monitoring overall usage statistics
- for marketing and promotional purposes, product development, and content improvement
- to contact you and provide you with the information or services you have requested
- for identification and authentication purposes where access requires pre-authorization
- to comply with applicable laws, regulations and court orders
- to assist third parties in protecting your information
- to ensure the technical functioning and security of our network

## How We Share Your Personal Information

We do not sell, rent, trade or otherwise disclose personal information collected through our Sites, except as described in this privacy policy. We may share your information within Akerman LLP or with:

- *Agents:* 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 Website Privacy Policy, our agents are not allowed to use your information beyond what is needed to assist us.
- *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.

## 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.

## Your Privacy Rights

For all personal information that we have about you, you have the following rights and choices that we will accommodate where your requests meet legal and regulatory requirements and do not risk making other information less secure or changing other information:

*Opt Out, Object, Withdraw Consent:* You can always choose not to disclose certain information to us. Where we rely on your consent to process your personal information, you have the right to withdraw or decline consent at any time. If you have provided us with your email address and you would like to stop receiving marketing emails from us, click on the unsubscribe link at the bottom of any of our email communications.

If you do not wish to receive marketing communications from us via direct mail, or if you want to request that we do not share your contact information with our marketing partners, please contact us using the methods in the Contact Us section and include your name, address, and any other specific contact information that you wish to restrict.

*Access, Correct, Update, Restrict Processing, Erase:* You may have the right to access, correct, and update your information. You also may request that we restrict processing of your information or erase it. To ensure that all of your personal information is correct and up to date, or to ask that we restrict processing or erase your information, please contact us using the methods in the Contact Us section below and include your name, address, and any other specific contact information that you wish to restrict, correct, or erase.

*Data Portability:* If you would like to request that we provide a copy of your information to you, please contact us using the methods in the Contact Us section below.

*Responding to Requests:* Each request to access, correct, restrict processing, erase, or provide a copy of information will be evaluated to determine whether the request meets legal regulatory requirements and does not risk making our other information less secure or changing our other information.

*Complaints to Supervisory Authority:* If you find yourself in the European Economic Area, European Union, or Switzerland, you have the right to lodge a complaint with a supervisory authority of the European Union or European Economic Area according to that authority's rules and procedures.

If you would like to make a request regarding your personal information, please contact us at ProtectPrivacy@Akerman.com.

## Your California Privacy Rights

Pursuant to California Civil Code Section 1798.83(c)(2), California law requires us to inform California residents who have provided us with personal information that they may request information from us about our disclosures to third parties for their direct marketing purposes. Akerman does not share individuals' personal information with third parties outside of Akerman for those parties' direct marketing use. To request information, please contact us at ProtectPrivacy@Akerman.com.

Akerman has collected the following types of information from consumers within the past twelve (12) months:

- Name;
- Contact details and preferences, including physical address, e-mail address, phone number, and other contact information that individuals have chosen to provide to us;
- Professional or employment-related information;
- Internet and electronic network activity information; and
- Topics of interest to the individual.

  Other information about individuals has been provided to us in connection with services we provide to our clients including our legal representation of clients.

Within the past twelve (12) months, Akerman has not sold information about consumers or disclosed information about consumers for a business purpose to a third party.

## Notice to Residents of the EU, EEA, and Switzerland

If you reside or otherwise find yourself in the European Economic Area, European Union, or Switzerland, Akerman is committed to respecting your rights as a data subject under the applicable laws of these countries. If you have a privacy concern or questions about how your personal information is used, please contact us at

ProtectPrivacy@Akerman.com, or by using any of the methods listed in the Contact Us section below.

Consistent with our values, we observe the following privacy principles when collecting or processing your personal information:

- Information will be processed fairly and in accordance with applicable law.
- Information will be collected for specified and legitimate purposes, and will not be processed in ways that are incompatible with those purposes.
- Information collection and use will be limited to what is relevant for the specified purposes and will not be excessive. We will limit the amount and type of information gathered to what is necessary for the uses and purposes defined in this Website Privacy Policy.
- We will only collect and process personal information about you where we have a lawful basis. Lawful bases include consent (where you have given consent), contract (where we must process your personal information based on a contract we have with you, for example, to deliver requested products or services), and legitimate interests (where processing is necessary for the purposes of compelling legitimate interests of Akerman that are not overridden by your rights).
- Data subjects in the European Union, European Economic Area, and Switzerland may be asked to provide their clear and unambiguous consent for collection, processing, and transfer of their personal information. Where we process personal information based on consent, consent can be withdrawn at any time.
- We will keep your personal information as accurate, complete, and up-to-date as necessary and practical, and we will take reasonable steps to correct or delete personal information that is inaccurate or incomplete. If you think that your information is inaccurate

or incomplete, please contact us using the methods in the Contact Us section below.

- Information will only be kept where it is necessary for the purposes for which it was collected and processed. Those purposes are defined in this Website Privacy Policy.
- We are required by law to comply with many regulations that require us to keep information, including your personal information, for different time periods. We must evaluate any request to change or delete information, including your information, prior to fulfilling such request to make sure that the requested change or deletion meets legal regulatory requirements and does not change our other information or make it less secure. We will keep information for as long as is necessary to comply with legal or regulatory obligations.
- Your information will be deleted or amended if we receive a relevant request from you, if we are permitted by law to do so, and if making the change does not risk making other information less secure or risk changing other information. Please contact us using the methods in the Contact Us section below to submit a request.
- We have taken appropriate measures to prevent unauthorized access, loss, use, or damage to your personal information.

*International Transfers of Personal Information:* If you are located outside the United States and you interact with our Sites or provide your personal information, then your personal information may be transferred to the United States. If you are located in the European Economic Area, European Union, or Switzerland, please note that the United States currently is not on the list of countries that the European Commission considers adequate regarding the protection of personal information.

## Changes to This Policy

We reserve the right to modify or change this Website 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.

## Contact Us

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 ProtectPrivacy@Akerman.com or writing to:

Akerman LLP
Attention: Chief Information Officer
495 North Keller Road
Suite 300
Maitland, FL 32751

This Website Privacy Policy was last updated on July 23, 2019.

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## Akerman Site Cookie Descriptions

1. CookieControl
Cookie name: CookieControl
Details: This cookie will be added by the cookie plugin and is used by it to remember the user's selections.
Privacy: This cookie does not store any personally identifiable information.

2. Content personalization
Cookie name: origin
Details: This temporary session cookie tracks whether specific content was viewed by the website visitor during the current website session, and is used to personalize content for website visitors during the current website visit only.
Privacy: This cookie does not store any personally identifiable information.

3. Google Analytics and Google Tag Manager
Cookie names: _ga, _gid, _gat
Details: These persistent cookies are set by

Google Analytics to distinguish users for analytics and marketing purposes.
Privacy: https://www.google.com/analytics/terms/us.html
Reference: https://developers.google.com/analytics/devguides/collection/analyticsjs/cookie-usage

4. RubyLaw Firm analytics
Cookie names: _pk_id, _pk_ses
Details: These cookies are set by the RubyLaw Firm Analytics solution, using a tool called Matomo, and are used to distinguish users and track their website visits for analytics and marketing purposes.
Privacy: This cookie does not store any personally identifiable information, as recorded IP addresses are anonymized.
Reference: https://matomo.org/faq/general/faq_18254/

5. Website security
Cookie name: __cfduid
Details: This persistent cookie is set by Cloudflare, a third-party security solution we use to keep the website secure for our website visitors.
Privacy: This cookie does not store any personally identifiable information.
Reference: https://support.cloudflare.com/hc/en-us/articles/200170156-What-does-the-CloudFlare-cfduid-cookie-do-

6. Saved content personalization
Cookie names: mybinder
Details: This cookie is used to personalize content for website visitors by saving it to a user's account for future reference.
Privacy: This cookie does not store any personally identifiable information.