

## Website Privacy Policy

Last Updated: November 27, 2023

### Introduction and About Us

Vedder Price P.C. together with the other Vedder Price entities referred to below (collectively, “**Vedder Price**”, “**we**”, “**us**”, or “**our**”) is a global law firm with offices located in nine cities around the world. This Privacy Policy (the “**Policy**”) reflects our commitment to safeguarding the privacy of our clients, business contacts, website visitors, and subscribers (collectively, “**you**”) and to protecting the personal information you share with us.

This Policy explains the types of personal information collected by Vedder Price, and how such information may be collected, used, processed, utilized, maintained, or shared. It applies to the processing of personal information by Vedder Price, acting as a controller, in connection with:

- your use of our website <https://www.vedderprice.com> and any online services offered through the website, or any other website or online tool operated by Vedder Price (collectively, the “Site”);
- informing you about the services offered by Vedder Price to its clients and business partners;
- communications with you, including to respond to your inquiries, inform you about our services and events, and send you our informational materials.

This Policy also applies where we are in contact with you in other ways whether in your capacity as an individual or as director, shareholder, partner, employee or other representative of a company or other organization.

This Policy, however, does not apply to information you provide to us or that we collect in the context of recruitment and hiring. We have a separate privacy notice in connection with job applications.

This Policy applies to the following entities:

- Vedder Price P.C. - having its headquarters at 222 N. LaSalle Street, Chicago, IL.
- Vedder Price LLP – a limited liability partnership incorporated under the laws of England and Wales and registered under number OC366572 and having its registered office address at 4 Coleman Street, 6th Floor, London EC2R 5AR. Vedder Price LLP is registered with the UK Information Commissioner's Office under registration number Z2854671 and is authorized and regulated by the Solicitor’s Regulation Authority. However, where Vedder Price LLP (UK) is engaged to provide legal services, its separate [Client Data Protection and Privacy Statement](#) will apply to the information you provide to it for that purpose.
- Vedder Price (CA) LLP – having principal addresses at 1925 Century Park East Suite 1900, Los Angeles, CA 90067, USA and 1 Post St Suite 2400, San Francisco, CA 94104, USA.
- Vedder Price (FL) LLP - having a principal address at 600 Brickell Avenue Suite 1500, Miami, FL 33131, USA.
- Vedder Price Pte Ltd. - having its registered address at 10 Collyer Quay #37 06/10, Ocean Financial Centre, Singapore, 049315.

Depending on where you are located and the location from which our legal or other services are provided, the controller of your personal information, as processed by us under this Privacy Policy, will be different.

For purposes of the UK GDPR, Vedder Price has appointed an information compliance officer. The firm's information compliance officer and the firm's Office of the General Counsel are jointly responsible for overseeing questions in relation to this Policy. If you have any questions about this Policy, including any requests to exercise your legal rights, please contact us at [dataprivacy@vedderprice.com](mailto:dataprivacy@vedderprice.com).

### **Collection of Personal Information**

Vedder Price processes "**Personal Information**" regarding (i) its professional contacts, including its clients' representatives when using our legal services (ii) users of the Site, and (iii) anyone who sends us an inquiry, registers for one of our events, or subscribes to our publications. Personal Information is information that identifies, relates to, describes, is capable of being associated with, or could reasonably be linked, directly or indirectly, with a particular individual.

For purposes of certain data privacy laws outside of the UK and EEA, some of the Personal Information we receive may also fall under the sub-category of "Sensitive Personal Information," or a similar term, as defined by certain laws. This information may include information such as your Social Security number, driver's license number, state identification card number, passport number, financial account and credit card information in combination with any required security or access code, geolocation data, and racial and/or ethnic information. We only collect and use Sensitive Personal Information in accordance with privacy laws, upon your consent where required and as necessary to fulfill business purposes. We do not use such information to infer characteristics about you, and **we do not sell or share Sensitive Personal Information**.

For the purposes of UK GDPR, some of the Personal Information which you provide to us, or which we may receive, will be "special categories" of personal data. Please see the section below on special categories of personal data for further information in relation to this.

We will only process your Personal Information when we have a legal basis to do so (as set forth in further detail below).

We may collect Personal Information:

- a. that you voluntarily submit to us, such as your contact details when you use the Site or interact with us by email, at online and physical events, in person or over the phone, or in the course of our business activities, including our provision of legal services. Such information includes your first and last name, job title, professional and employment-related information, company name, email address, phone number and postal address and other similar identifiers ("**Contact Details**"); and
- b. from third parties, such as from publicly accessible sources (for example, UK Companies House), client due diligence providers, websites which identify you, social media platforms (for example, LinkedIn), third party introducers or business contacts (for example, accountants), recruitment agents and your business associates (together "**Third Party Sourced Data**")

We may also collect and use technical information relating to your website visits, device and interaction with our online communications. This might include:

- your device's Internet protocol (IP) address, browser type, internet service provider, device identifier, your login information, time zone setting, browser plug-in types and versions, operating system and platform and geographical location;
- information about your visits and use of the Site, including the full Uniform Resource Locators (URL), clickstream to, through and from the Site, pages you viewed and searched for, page response times, length of visits to certain pages, referral source/exit pages, page interaction information (such as scrolling, clicks and mouse-overs), and website navigation and search terms used; and
- information collected by cookies on the Site and similar tracking devices in our marketing emails (for more information on our use of cookies and similar tracking devices, please see our [Cookie Policy](#),

(together “**Online and Technical Data**”)

We may also receive from you your preferences in receiving marketing from us and our third parties and your communication preferences (“**Marketing and Communications Data**”).

The table below summarises the categories of Personal Information we collect about you, how we use that information and, for purposes of UK GDPR, the appropriate legal bases which we rely on to process the Personal Information.

<b>Purpose or activity</b>	<b>Type of data</b>	<b>Lawful basis for processing including basis of legitimate interest</b>
To provide you with information and services that you request from us.	Contact Details, Third Party Sourced Data, Marketing and Communications Data.	It is in our legitimate interests to respond to your queries and provide any information requested in order to generate and develop business. To ensure we offer a good and responsive service, we consider this use to be proportionate and will not be prejudicial or detrimental to you.
To make suggestions and recommendations to you about services that may be of interest to you or to otherwise carry out marketing services (including sending you alerts, newsletters, announcements, updates, legal developments or other notifications which may be of interest to you).	Contact Details, Online and Technical Data, Third Party Sourced Data, Marketing and Communications Data.	It is in our legitimate interests to market our services in order to promote and grow our business. We consider this use to be proportionate and will not be prejudicial or detrimental to you.
Our system may collect information about your browser or mobile device automatically when you utilize the Site. We may use cookies and similar technologies to help us understand your activity on our Site, as well as for email communications. Data we collect automatically includes your IP address, other device identifiers, access dates and times, and referring and exiting URLs.	Online and Technical Data	Consent (if required by law).  Where consent is not required by law, it is in our legitimate interests to market our business and review how users use our Site.
To invite you to seminars, events, or other functions we believe may be of interest to you.	Contact Details, Third Party Sourced Data, Marketing and Communications Data.	It is in our legitimate interests to market our services in order to promote and grow our business. We consider this use to be proportionate and will not be prejudicial or detrimental to you.

<p>To enforce our terms and conditions and any contracts entered into with you.</p>	<p>Contact Details, Online and Technical Data.</p>	<p>It is in our legitimate interests to enforce our terms and conditions and any applicable contracts. We consider this use to be necessary for our legitimate interests and proportionate. Otherwise, and where necessary, as is necessary for the establishment, exercise or defence of legal claims.</p>
<p>Administrative purposes which include notifying you about changes to our terms and/or privacy notice</p>	<p>Contact Details.</p>	<p>It is in our legitimate interests to ensure that any changes to our policies and other terms are communicated to you. We consider this use to be necessary for our legitimate interests and will not be prejudicial or detrimental to you.</p>
<p>To comply with our internal business policies (including our corporate and social responsibility commitments) and for operational reasons, such as improving efficiency, training and quality control.</p>	<p>Contact Details, Online and Technical Data, Third Party Sourced Data, Marketing and Communications Data.</p>	<p>It is in our legitimate interests or those of a third party to adhere to our own internal procedures and so that we can deliver an efficient service to you. We consider this use to be necessary for our legitimate interests and proportionate.</p>
<p>To protect the security of our systems and data used to provide services and to prevent unauthorised access and modifications to our systems.</p> <p>To keep the Site safe and secure.</p>	<p>Contact Details, Online and Technical Data, Third Party Sourced Data.</p>	<p>Where applicable, to comply with our legal and regulatory obligations under applicable law.</p> <p>Otherwise, as is necessary for our legitimate interests to ensure network security and prevent and detect activity that could be damaging for Vedder Price, you and/or anyone else. We consider this use to be necessary for our legitimate interests and proportionate.</p>
<p>Vedder Price also processes Personal Information in order to comply with applicable legal obligations to which it is subject, including to comply with “know your client” / anti-money laundering laws and employment law.</p>	<p>Contact Details, Online and Technical Data, Third Party Sourced Data, Marketing and Communications Data.</p>	<p>As is necessary for compliance with a legal obligation to which Vedder Price is subject.</p>

## *Provision of our legal services*

Further, with respect to our provision of legal services in the United States and Singapore, we may collect the following Personal Information to provide such services:

- Contact information, including first name, last name, email address, physical address, work and personal telephone numbers, and other similar identifiers.
- Payment and transactional data needed to provide you with legal services, including billing information.
- Professional or employment-related information, including title, company, and business phone number.
- Other information as reasonably necessary for Vedder Price to provide legal services.

Vedder Price processes this Personal Information to perform a contract with you or to take precontractual steps at your request in order to provide you with our legal services, manage our relationship with you and carry out any related administration, and send you communications related to our legal services.

As above, where Vedder Price LLP (UK) is engaged to provide legal services, its separate Client Data Protection and Privacy Statement will apply to the information you provide to it for that purpose.

## *Marketing*

We will only send you marketing messages if you have given us your consent to do so, unless consent is not required under applicable law (for example, where you are a corporate subscriber or we have a pre-existing relationship where your consent is not required). Where you provide consent, you can withdraw your consent at any time, but without affecting the lawfulness of processing based on consent before its withdrawal. In any case, you have the right to opt out of receiving email marketing communications from us at any time by:

- contacting us at [dataprivacy@vedderprice.com](mailto:dataprivacy@vedderprice.com); or
- using the “unsubscribe” link in emails.

## *Special categories of Personal Information*

For the purposes of UK GDPR, some of the Personal Information which you provide to us, or which we may receive, may be “special categories” of personal data. This is defined by UK GDPR to include personal data revealing a person’s racial or ethnic origin, religious or philosophical beliefs, or data concerning health. We process special categories of Personal Information on the basis of one or more of the following:

- where you have given explicit consent to the processing for one or more specified purposes;
- where the processing is necessary for the establishment, exercise or defence of legal claims; and/or
- where the processing is necessary for reasons of substantial public interest, in accordance with applicable law.

Unless needed for a particular client matter that we are working with you on, we do not generally seek to collect special categories of Personal Information or criminal offence or convictions data about you.

## ***Disclosure of Personal Information***

**We do not sell or share for cross-context behavioral or targeted advertising purposes your Personal Information to any third party.** We may disclose your Personal Information in the following circumstances:

Other entities in the Vedder Price group: see the Introduction section above for further information regarding the Vedder Price group of entities.

- Authorized third parties and service providers: We may disclose your Personal Information to third party vendors or processors that provide us with the services necessary for the achievement of the purposes described above. These may include marketing, providing communications, IT support, fraud prevention, data storage, web hosting or analytic services. These third parties are only permitted to use your Personal Information to the extent necessary to enable them to provide their services to us. They are required to follow our instructions and to comply with appropriate security measures to protect your Personal Information.

- Other parties when required by law or as necessary: We may disclose your Personal Information to our affiliates and other entities acting as independent controllers, which may be tax, legal or government authorities, law enforcement agencies, regulators and professional bodies (including the Solicitors Regulation Authority (SRA) and the Law Society in England and Wales) or third parties in connection with claims, disputes, litigation or investigations where we reasonably believe that disclosure is required by law or pursuant to legal process, or is necessary to establish, exercise or defend legal claims, including to protect or defend your rights, property or security or ours. In certain circumstances, we may be prohibited from telling you that a disclosure has been made.
- Other parties with your consent: There may be instances where we disclose your Personal Information to other authorized third parties when you expressly consent to such sharing.
- Other parties in connection with a transfer of assets: If we make a sale or transfer of assets, or are otherwise involved in a merger, transfer, reorganization, financing, change of control or acquisition in relation to Vedder Price we may transfer your information to one or more third parties as part of that transaction in a manner consistent with this Policy.

### ***International Transfers***

Vedder Price is an international law firm, with clients, affiliates and offices located throughout the world. As our headquarters are based in the United States, your Personal Information will be transferred to the United States for the purposes referred to under this Policy.

In addition, when we disclose your Personal Information with the recipients mentioned above, it may involve transfers of your Personal Information overseas, which may include transfers to countries outside of the UK/EEA whose laws provide levels of protection for Personal Information that are not always equivalent to the level of protection that may be provided in your own country.

Vedder Price has procedures and contractual obligations in place to ensure that Personal Information is transferred, processed, and stored with appropriate safeguards and in accordance with applicable laws. Such appropriate safeguards include the international data transfer agreement issued by the UK Information Commissioner. We will provide you with details on the applicable safeguards and transfers upon request, to the contact details specified at the end of this Policy.

### ***Security Procedures***

Vedder Price maintains appropriate technical and organizational security procedures in order to protect your Personal Information from loss, misuse, unauthorized access, disclosure or alteration, in accordance with applicable data protection and privacy laws.

In particular, we have put in place procedures to deal with any suspected personal data breach and will notify you and any applicable regulator of a breach where we are legally required to do so.

In addition to such measures, Vedder Price limits access to your Personal Information to those personnel, agents, contractors and other third parties who have a need to know. Vedder Price maintains confidentiality policies that govern all information that any attorney or other personnel of Vedder Price receives in the course of their employment or association with Vedder Price. All attorneys and personnel are made aware of these policies and Vedder Price has in place procedures to train all attorneys and personnel to put these policies into practice. Despite our efforts, we cannot guarantee the security of information transmitted over the Internet or that Personal Information will not be accessed by unauthorized persons. You should take adequate precautions to protect your Personal Information.

### ***Retention of Personal Information***

#### *General principles*

Vedder Price will retain your Personal Information for no longer than is necessary for the purposes identified under this Policy in accordance with our legal obligations and legitimate business interests, and as permitted by applicable law.



Please note that the data retention period actually applied by Vedder Price may vary, depending on the nature of the data, the applicable jurisdiction, and the purpose of collection. 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, regulatory, tax, accounting, reporting or other requirements we may be subject to as a law firm. Upon the expiration of the applicable data retention periods, Vedder Price will delete the relevant Personal Information.

For legal services, Vedder Price will keep your Personal Information for the whole duration of our legal services, as extended by applicable data retention periods in our records management or data retention policies, or as long as may be required by applicable statutory or professional retention obligations.

### **Your U.S. State Privacy Rights**

Depending on the jurisdiction in which you live, you may have the following rights subject to the exceptions allowed by law:

- **Transparency:** Businesses that collect Personal Information subject to the above listed laws are required to provide you with notice regarding the categories of Personal Information to be collected, the purposes for which the categories of Personal Information are collected or used, whether that information is sold or shared, and the length of time we intend to retain each category of Personal Information, or if that is not possible, the criteria used to determine that period, among other information.
- **Access:** You may have the right to inquire about the categories and specific pieces of Personal Information Vedder Price has collected about you, the categories of sources from which the Personal Information is collected, the business purpose for collecting the Personal Information, and the categories of third parties with whom Vedder Price shares Personal Information.
- **Correction:** You may have the right to correct inaccurate or obsolete Personal Information that Vedder Price may maintain.
- **Deletion:** You may have the right to request deletion of Personal Information under certain circumstances.
- **Non-discrimination:** You may have the right not to be discriminated against based on your exercising any of your rights afforded by state law.
- **Limitation:** You may have the right to limit the use and disclosure of Sensitive Personal Information. Vedder Price does not use your Sensitive Personal Information in any matter that requires the right to limit because Vedder Price only collects, uses, or discloses Sensitive Personal Information as necessary to provide you with good or services, and does not sell or share Sensitive Personal Information.

To exercise your rights, please contact us at [dataprivacy@vedderprice.com](mailto:dataprivacy@vedderprice.com), or call us at (312) 609 – 7500 ext. 7750.

We will first acknowledge receipt of your request within 10 business days and then provide a substantive response within 45 calendar days after its receipt. If we require more time (up to 90 days or the permitted timeframe), we will inform you of the reason and extension period in writing. If you are a Virginia, Colorado, or Connecticut resident and we deny your request, you may appeal our decision by emailing your request to [dataprivacy@vedderprice.com](mailto:dataprivacy@vedderprice.com) or calling us at (312) 609-7500 ext 7750. Within 45 calendar days of receipt of an appeal, we will inform you in writing of any action taken or not taken in response to the appeal, including a written explanation of the reasons for the decision.

Only you or your authorized agent may make a verifiable consumer request related to your Personal Information. To respond to your requests, we must verify your identity.

- **How to Authorize an Agent:** You may designate an authorized agent to submit your verified consumer request on your behalf, but only if the authorized agent has your written permission to do so and you have taken steps to verify your identity directly with us.
- **How We Verify Your Request:** We will only use the Personal Information provided in the context of your request to verify your identity or the authority of your authorized agent to make the request. Depending on how you interact with us, we may require that you provide at least two pieces of Personal Information, such as your name, email

address, client number, or other information that we already have in our possession. We will verify your request by comparing the information you provide to information already in our possession to minimize the risk of fraud.

### **Your Rights under the UK GDPR**

If our processing of your Personal Information is subject to UK GDPR, you have various rights in relation to the processing of your Personal Information, depending on the relevant situation. These include the following rights:

- *Right of access*: right to request confirmation as to whether or not your Personal Information is being processed by Vedder Price and, if so, the right to receive a copy of it;
- *Right to rectification*: right to request the rectification of your Personal Information without undue delay if you find that it is inaccurate and the right to have incomplete personal data completed;
- *Right to erasure*: right to request the erasure or deletion of your Personal Information without undue delay depending on the circumstances. For example, this right does not apply if the processing is necessary to establish, exercise, or defend legal claims;
- *Right to restriction*: right to request, in some circumstances, to limit the purposes for which we process your Personal Information if the continued processing of the Personal Information in this way is not justified, such as where the accuracy of the Personal Information is contested by you;
- *Right to data portability*: right to request, in some circumstances, a copy of your Personal Information provided to us, in a structured, commonly used, and machine-readable format;
- *Right to object*: right to object, on grounds relating to your particular situation, to the processing of your Personal Information based on legitimate interests. In addition, you can object at any time to the processing of your Personal Information for direct marketing communications.
- *Right to withdraw consent*: if you have provided consent to any processing of your Personal Information, you have a right to withdraw that consent.

Please note that some of these rights are not absolute and there are a number of exceptions where we may not have an obligation to fulfill your request. We may refuse a request for erasure, for example, where the processing is necessary to comply with a legal obligation or necessary for the establishment, exercise or defence of legal claims.

In order to exercise any of your rights, or if you have any other questions about our use of your Personal Information, including if you wish to obtain further details regarding our legitimate interests, please send a request using the contact details specified at the end of this Policy. Please note that we may ask you to provide us with additional information in order to verify your identity.

Save as provided under applicable data protection laws, there is no charge for the exercise of your legal rights. However, if your requests are manifestly unfounded or excessive, in particular because of their repetitive character, we may either: (a) charge a reasonable fee taking into account the administrative costs of providing the information or taking the action requested; or (b) refuse to act on the request.

We ask that you please attempt to resolve any issues with us first, although in any case, you also have the right to lodge a complaint with the competent data protection authority, in particular in the country of your habitual residence, place of work, or place of an alleged infringement if you consider that the processing of your Personal Information carried out by us infringes any applicable privacy laws. In the UK, you can complain to the Information Commissioner's Office who can be contacted at <https://ico.org.uk> or by telephone on 0303 123 1113.

### **Use of Cookies**

Our Site uses "cookies" (small data files) and similar technologies to distinguish you from other users on the Site. This helps us to provide you with a good experience when you browse the Site and also allows us to improve the Site. For detailed information about "cookies" and how they are used on the Site, please refer to our Cookie Policy.



### ***Third-Party Links***

The Site may contain hyperlinks to websites of third parties. This Policy does not apply to such third-party content or websites. If individuals decide to follow such links, they must be aware that Vedder Price does not take any responsibility for the third-party content or compliance of the third-party website with data privacy laws. Individuals are encouraged to make themselves aware of applicable privacy policies before they submit Personal Information to third-party websites.

### ***Children's Privacy***

Vedder Price does not knowingly collect, use, or disclose Personal Information from children under the age of 16. If Vedder Price is made aware that it has collected Personal Information from a child in a manner that is inconsistent with applicable laws, Vedder Price will delete this information as soon as possible.

We do not sell or share the Personal Information of any individuals and, therefore, necessarily do not sell or share the information of children of any age.

### ***Revisions to this Policy***

Vedder Price reserves the right to change or update this Policy at any time. The applicable version of this Policy is available on the Site. This Policy was last updated in November 2023.

### ***Contact***

For any requests, questions or comments about this Policy or the collection, processing, or storage of your Personal Information by Vedder Price, please contact our Privacy team via e-mail at: [dataprivacy@vedderprice.com](mailto:dataprivacy@vedderprice.com).

or in writing to:

Vedder Price P.C.  
Attn.: Office of the General Counsel  
222 N. LaSalle Street  
Chicago, IL 60601  
United States of America

or

Vedder Price LLP  
Attn: Information Compliance Officer  
4 Coleman Street,  
London  
United Kingdom  
EC2R 5AR

[vedderprice.com](https://www.vedderprice.com)