

Privacy Policy

NEW PRIVACY POLICY

Effective Date: May 29, 2018

Privacy Policy Scope

Welcome! An overview of this Baker & Hostetler LLP Privacy Policy is provided below. To see the full text, click on the links. This Privacy Policy applies to your use of any online services (e.g., website, software, or mobile app) that posts a link to this Privacy Policy, regardless of how you access or use it.

■ Your European Union (EU) Privacy Rights

If you are visiting this site from the EU, you have certain privacy rights detailed [here](#).

■ Your Choices and Your CA Privacy Rights

You have certain choices regarding information collection and communications options explained [here](#), including:

- California residents have certain privacy rights detailed [here](#);
- Although BakerHostetler does not look for or respond to “do not track” signals, you can find information on tracking technologies [here](#) and certain choice options regarding Tracking Technologies [here](#);
- Your options regarding accessing and changing certain of your Personal Information are available [here](#);
- Your options regarding marketing communications are explained [here](#); and
- Children’s and minor’s privacy rights, and notice to parents of these rights, are explained [here](#).

■ Collection of Information

- BakerHostetler may ask you to provide Personal Information (e.g., name, address, e-mail, phone number, etc.), as well as other information, which may be required to access certain content, features, and functionality. [More](#).
- BakerHostetler and third parties may collect information from you automatically as you access the Service (e.g., information about the devices you use to access the Service and your usage activities). [More](#).
- This may include use of cookies and other technologies to keep track of your interactions with the Service, and to serve you with ads on third-party services, to offer you a more personalized and relevant experience. [More](#).
- The information BakerHostetler receives via the Service may be combined with information BakerHostetler receives from third parties and sources outside of the Service. [More](#).

■ Use of Information

The information BakerHostetler collects is used for a variety of purposes as detailed in this Privacy Policy. For example, your information helps BakerHostetler provide and improve the Service, communicate with you, serve advertising and offers to you, and operate BakerHostetler’s business. [More](#).

■ Sharing of Information

BakerHostetler may share the information BakerHostetler receives from or about you via the Service (or give others access to it), including your Personal Information, for a variety of purposes, as detailed in this Privacy Policy. [More](#). These include, without limitation:

- to deliver and improve BakerHostetler’s services;
- in connection with corporate transactions (e.g., merger or sale);
- to display your posts or send your messages ([More](#));
- in connection with your use of third-party services ([More](#)); and
 - BakerHostetler obtains your consent before knowingly sharing Personal Information with third parties for their own direct marketing purposes.
 - BakerHostetler may share your non-Personal Information, aggregate and/or de-identified information about you except as prohibited by applicable law.

■ Attorney-client Communications

Communications between us and our clients via the access controlled client portal are attorney-client communications. Any content or communications otherwise submitted to us, such as through contact us tools, posting comments on blogs, creating an alumni profile, etc., are not intended to create an attorney-client relationship and should not be used for attorney-client communications.

- **Our Protected Health Information Policy**

Additional terms apply to our treatment of certain protected health information

- **Questions and How to Contact BakerHostetler**

For more information about BakerHostetler's privacy practices regarding the Service, read the full Privacy Policy. You can also contact BakerHostetler [here](#) if you have questions or concerns.

- **Table of Contents**

For a clickable table of contents that will help you find and navigate to all the sections of the full Privacy Policy click [here](#).

FULL BAKER & HOSTETLER LLP PRIVACY POLICY

Thank you for visiting an online service (e.g., website, software, or mobile app) that posts a link to this Privacy Policy (“**Service**”) owned or operated by Baker & Hostetler LLP (“**BakerHostetler**”). This Privacy Policy will provide you with information as to how BakerHostetler collects, uses, and shares information about you, including the choices BakerHostetler offers with respect to that information, and applies to your use of any Service, regardless of how you access or use it. It does not apply to BakerHostetler's data collection activities offline or otherwise outside of the Service (unless otherwise stated below or at the time of collection). For certain Services, there may be additional notices about information practices and choices. Please read those additional privacy disclosures to understand how they apply to you.

By visiting or otherwise using the Service, you consent to BakerHostetler's data collection, use, and disclosure practices, and other activities as described in this Privacy Policy, and any additional privacy statements that may be posted on an applicable part of the Service. If you do not agree and consent, please discontinue use of the Service, and uninstall Service downloads and applications.

1. INFORMATION WE COLLECT.

A. Information about You that You Provide. BakerHostetler, and/or its Service Providers (defined below), may collect information you provide directly to BakerHostetler and/or its Service Providers via the Service. For example, BakerHostetler collects information when you use or register for the Service, subscribe to notifications, post on the Service, participate in marketing activities, or communicate or transact through the Service. In addition, when you interact with Third-Party Services (defined below), you may be able to provide information to those third parties. For more information on Third-Party Services' data collection and practices click [here](#). For more information on Service Provider data collection and practices click [here](#).

Information BakerHostetler, its Service Providers and/or Third-Party Services may collect may include: (1) personally identifiable information, which is information that identifies you personally, such as your first and last name, e-mail address, phone number, and address, social media account and image (“**Personal Information**”); and (2) demographic information, such as your age, gender, interests, education and employment information (“**Demographic Information**”). Except to the extent required by applicable law, Demographic Information is “**non-Personal Information**” (i.e., data that is not Personal Information under this Privacy Policy). In addition, Personal Information, including, without limitation, BakerHostetler-Collected PI (defined below), once “**De-identified**” (i.e., the removal or modification of the personally identifiable elements, or the extraction non-personally identifiable elements including through anonymization, pseudonymization, and/or hashing) is also non-Personal Information and may be used and shared without obligation to you, except as prohibited by applicable law. However, we do not make assurances that De-identified data is not capable of re-identification. To the extent any non-Personal Information is combined by or on behalf of BakerHostetler with Personal Information BakerHostetler itself collects directly from you on the Service (“**BakerHostetler-Collected PI**”), BakerHostetler will treat the combined data as BakerHostetler-Collected PI under this Privacy Policy.

B. Information Collected Automatically. BakerHostetler, its Service Providers, and/or Third-Party Services may also automatically collect certain information about you when you access or use the Service (“**Usage Information**”) including IP address, device identifier, browser type, operating system, information about your use of the Service, and data regarding network connected hardware (e.g., computer or mobile device).

BakerHostetler does not consider Usage Information (including, without limitation, unique device identifiers) to be Personal Information or BakerHostetler-Collected PI.

The methods that may be used on the Service to collect Usage Information include:

- **Log Information:** Log information is data about your use of the Service, such as IP address, browser type, internet service provider, referring/exit pages, operating system, date/time

stamps, and related data, and may be stored in log files.

- **Information Collected by Cookies and Other Tracking Technologies:** [Cookies](#), [web beacons](#) (also known as “tracking pixels”), [embedded scripts](#), and [location-identifying technologies](#) and other tracking technologies now and hereafter developed (“Tracking Technologies”) may be used to collect information about interactions with the Service or e-mails, including information about your browsing behavior.

Cookies

A cookie is a small text file that is stored on a user’s device, which may be session ID cookies or tracking cookies. Session cookies make it easier for you to navigate the Service and expire when you close your browser. Tracking cookies remain longer and help in understanding how you use the Service, and enhance your user experience. Cookies may remain on your hard drive for an extended period of time. If you use your browser’s method of blocking or removing cookies, some but not all types of cookies may be deleted and/or blocked and as a result some features and functionalities of the Service may not work. A Flash cookie (or locally shared object) is a data file which may be placed on a device via the Adobe Flash plug-in that may be built-in to or downloaded by you to your device. HTML5 cookies can be programmed through HTML5 local storage. Flash cookies and HTML5 cookies are locally stored on your device other than in the browser and browser settings won’t control them. To identify certain types of local shared objects on your device and adjust your settings, please visit:

www.macromedia.com/support/documentation/en/flashplayer/help/settings_manager.html. The Service may associate some or all of these types of cookies with your devices.

Web Beacons (“Tracking Pixels”)

Web beacons are small graphic images, also known as “internet tags” or “clear gifs,” embedded in web pages and e-mail messages. Web beacons may be used, without limitation, to count the number of visitors to the Service, to monitor how users navigate the Service, and to count content views.

Embedded Scripts

An embedded script is programming code designed to collect information about your interactions with the Service. It is temporarily downloaded onto your computer from BakerHostetler’s web server, or from a third-party with which BakerHostetler works, and is active only while you are connected to the Service, and deleted or deactivated thereafter.

Location-identifying Technologies

GPS (global positioning systems) software, geo-filtering and other location-aware technologies locate (sometimes precisely) you, or make assumptions about your location, for purposes such as verifying your location and delivering or restricting content based on your location. If you have enabled GPS or use other location-based features on the Service, your device location may be tracked.

Some information about your use of the Service and certain third-party services may be collected using Tracking Technologies across time and services, and used by BakerHostetler and third parties for purposes such as to associate different devices you use, and deliver relevant ads and/or other content to you on the Service and certain third-party services. See [Section 10](#) regarding certain choices regarding these activities.

BakerHostetler is giving you notice of the Tracking Technologies and your choices regarding them explained in [Section 10](#) so that your consent to encountering them is meaningfully informed.

C. Information BakerHostetler Collects From Other Sources. BakerHostetler may also obtain information about you from other sources, including Service Providers and Third-Party Services, and combine that with BakerHostetler-Collected PI. Notwithstanding anything to the contrary, except to the extent such data combined by or on behalf of BakerHostetler with BakerHostetler-Collected PI, this Privacy Policy is not intended to limit BakerHostetler’s activities regarding such third-party-sourced, or non-Service-sourced, information (including Personal Information), and such data will only be treated as BakerHostetler-Collected PI to the extent it is combined with BakerHostetler-Collected PI. BakerHostetler is not responsible or liable for the accuracy of the information provided by third parties or for third-party policies or practices.

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2. HOW WE USE THE INFORMATION WE OBTAIN.

BakerHostetler may use information about you, including BakerHostetler-Collected PI and other Personal Information, for any purposes not inconsistent with BakerHostetler’s statements under this Privacy Policy, or otherwise made by us in

writing at the point of collection, and not prohibited by applicable law, including, without limitation, the following:

- Allow you to participate in the features we offer on the Service;
- Facilitate, manage, personalize, and improve your online experience;
- Process your registration, manage your account and/or upload your User Generated Content (“UGC”). For more on the public nature of UGC, see [Section 4](#);
- Transact with you, provide services or information you request, respond to your comments, questions and requests, serve you content and send you notices;
- Improve the Service and for any other internal business purposes;
- Tailor our content, advertisements, and offers;
- Fulfill other purposes disclosed at the time you provide Personal Information or otherwise where we are legally permitted or are required to do so;
- Determine your location and manage digital content rights (e.g., territory restrictions); and
- Prevent and address fraud, breach of policies or terms, and threats or harm.

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3. INFORMATION WE SHARE WITH THIRD PARTIES.

BakerHostetler may share non-Personal Information, and Personal Information that is not deemed BakerHostetler-Collected PI hereunder (provided that BakerHostetler is aware of no restrictions of BakerHostetler’s use, if any), with third parties or for any purpose. Without limiting the generality of the foregoing, we and third parties may convert your Personal Information to non-Personal Information, including without limitation through hashing it or substituting a unique identifier for the Personal Information and we and third parties may use and share that data as permitted by applicable law, including to match data attributes to and from other sources. Any such third-party activities are subject to their privacy policies and practices. BakerHostetler’s sharing of BakerHostetler-Collected PI is, however, subject to the following:

- **Marketing:** Subject to your communications choices explained in [Section 10\(c\)](#), and the rights of California residents explained [here](#), we may use your Personal Information to send you marketing communications. BakerHostetler will not share your BakerHostetler-Collected PI with third parties, for their own direct marketing purposes, except in connection with Corporate Transactions (defined below) absent your consent (which may be by means of third-party interaction described in the next bullet point).
- **Your Disclosure or Consent:** As more fully described in [Section 4](#) (Information You Disclose Publicly or to Others) and [Section 5](#) (Third-Party Content, Third-Party Services, Social Features, Advertising and Analytics), your activities on the Service may, by their nature, result in the sharing of your BakerHostetler-Collected Personal Information (as well as your other Personal Information and your non-Personal Information) with third parties and by engaging in these activities you consent 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 BakerHostetler.

BakerHostetler may also share any information about you (including, without limitation, BakerHostetler-Collected PI) for any purposes not inconsistent with this Privacy Policy, or our written statements at the point of collection, and otherwise not prohibited by applicable law, including, without limitation:

- BakerHostetler’s agents, vendors, consultants, and other service providers (collectively “Service Providers”) may receive, or be given access, to your information, including, without limitation, Personal Information, Demographic Information, and Usage Information, in connection with their work on BakerHostetler’s behalf, provided however, BakerHostetler does not authorize its Service Providers to use BakerHostetler-Collected PI provided by BakerHostetler to the Service Providers to send you direct marketing messages other than related to BakerHostetler absent your consent. For more information on choices Service Providers may offer you click [here](#).
- To comply with the law, law enforcement or other legal process, and where permitted, in response to a government request; and
- If BakerHostetler believes your actions are inconsistent with BakerHostetler’s user agreements, applicable terms or policies, or to protect the rights, property, life, health, security and safety of BakerHostetler, the Service or its users, or any third-party.

In addition, BakerHostetler may share your BakerHostetler-Collected Personal Information (as well as your other Personal Information and your non-Personal Information), in connection with or during negotiations of any proposed or actual financing of our business, or merger, purchase, sale, joint venture, or any other type of acquisition or business combination of all or any portion of BakerHostetler assets, or transfer of all or a portion of BakerHostetler’s business to

another company, whether as a going concern or as part of bankruptcy, liquidation, or similar proceeding (“Corporate Transactions”).

the forgoing or anything to the contrary, information and materials that are subject to attorney-client privilege (e.g., client documents uploaded by clients to us via the client portal), will be treated subject to our obligations to clients under applicable state bar rules and client engagement agreements.

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4. INFORMATION YOU DISCLOSE PUBLICLY OR TO OTHERS

A. User Generated Content and Public Information. The Service may permit you to post or submit UGC including, without limitation, written content, user profiles, audio or visual recordings, computer graphics, pictures, data, comments, or other content, including Personal Information. If you choose to submit UGC to any public area of the Service, your UGC will be considered “public” and non-confidential, and will be accessible by anyone, including BakerHostetler. Notwithstanding anything to the contrary, unless otherwise explicitly agreed by us, Personal Information included in UGC is not subject to BakerHostetler’s usage or sharing limitations, or other obligations, regarding BakerHostetler-Collected PI or other Personal Information under this Privacy Policy or otherwise, and may be used and shared by BakerHostetler and third parties to the fullest extent not prohibited by applicable law. BakerHostetler encourages you to exercise caution when making decisions about what you disclose in such public areas. California minors should see [Section 8](#) regarding potential removal of certain UGC they have posted on the Service.

Additionally, the Service may offer you the option to send a communication to a friend or other contact. If so, BakerHostetler relies on you to only send to people that have given you permission to do so. The recipient’s Personal Information you provide (e.g., name, e-mail address) will be used to facilitate the communication, but not used by BakerHostetler for any other marketing purpose unless BakerHostetler obtains consent from that person. Your contact information and message may be included in the communication.

B. Profiles. Some parts of the Service may allow you to create a profile. A user’s profile page may be, by default, set up to display information such as the user’s display name, images, location (city/state/country), groups that the user has joined and optional information added by the user including, for example, the user’s name, photographs, employment, education, and biographic information, etc. Profile information is used by us primarily to be presented back to and edited by you when you access the Service and to be presented to others permitted to view that information on the Service. We may offer users the ability to manage their profile and use profile preference settings as explained at the [Manage My Profile form](#), the functionality and features of which are subject to change from time-to-time so visit it frequently to confirm the settings reflect your then current preferences and we recommend that you do not post information or content as part of your profile that you are not prepared to make public. Changing setting options may not result in immediate changes to the settings, which are subject to our operations and maintenance schedules. Users should carefully consider the use of such settings to improve information display options and to ensure the settings are properly set and functioning in the manner desired. Notwithstanding the availability of profile preference settings, you should be aware that these settings are for convenience only and may not be error free. Further, other users that have access may repost or otherwise make public your information or content. Accordingly, discretion and good judgment should be exercised when posting information or content as part of your profile.

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5. THIRD-PARTY CONTENT, THIRD-PARTY SERVICES, SOCIAL FEATURES, ADVERTISING AND ANALYTICS.

The Service may include hyperlinks to, or include on or in connection with, the Service (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.

Certain functionalities on the Service permit interactions that you initiate between the Service and certain Third-Party Services, such as third-party social networks (“**Social Features**”). Examples of Social Features include: enabling you to send content such as contacts and photos between the Service and a Third-Party Service; “liking” or “sharing” BakerHostetler’s content; logging in to the Service using your Third-Party Service account (e.g., using LinkedIn or Facebook Connect to sign-in to the Service); and to otherwise connect the Service to a Third-Party Service (e.g., to pull or push information to or from the Service). If you use Social Features, and potentially other Third-Party Services, information you post or provide access to may be publicly displayed on the Service (see [Section 4](#)) or by the Third-Party

Service that you use. Similarly, if you post information on a third-party service that references the Service (e.g., by using a hashtag associated with BakerHostetler in a tweet or status update), your post may be used on or in connection with the Service or otherwise by BakerHostetler. Also, both BakerHostetler and the third-party may have access to certain information about you and your use of the Service and any Third-Party Service.

BakerHostetler may engage and work with Service Providers and other third parties to serve advertisements on the Service and/or on third-party services. Some of these ads may be tailored to your interest based on your browsing of the Service and elsewhere on the internet, sometimes referred to as “interest-based advertising” and “online behavioral advertising” (“**Interest-based Advertising**”), which may include sending you an ad on a third-party service after you have left the Service (i.e., “retargeting”).

BakerHostetler 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 BakerHostetler analyze Service users and how they use the Service. 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 Service, compiling statistic reports on the Service’s activity, and providing other services relating to Service activity and other internet usage.

Except to the extent we combine information we receive from Service Providers, Third-Party Services, or other third parties with BakerHostetler-Collected PI, in which case BakerHostetler will treat the combined information as BakerHostetler-Collected PI under this Privacy Policy (see [Section 1\(c\)](#)), data obtained by BakerHostetler from a third-party, even in association with the Service, is not subject to BakerHostetler’s limitations regarding BakerHostetler-Collected PI under this Privacy Policy, however such data remains subject to any restrictions imposed on BakerHostetler by the third-party, if any. Otherwise, the information collected, stored, and shared by third parties remains subject to their privacy policies and practices, including whether they continue to share information with BakerHostetler, the types of information shared, and your choices on what is visible to others on Third-Party Services.

As permitted by applicable law, BakerHostetler is not responsible for, and makes no representations regarding, the policies or business practices of any third parties, including, without limitation, analytics Service Providers and Third-Party Services associated with the Service, and encourages you to familiarize yourself with and consult their privacy policies and terms of use. See [Section 10](#) for more on certain choices offered by some third parties regarding their data collection and use, including regarding Interest-based Advertising and analytics.

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6. DATA SECURITY AND MONITORING.

BakerHostetler takes reasonable measures to protect BakerHostetler-Collected PI (excluding public UGC) from loss, theft, misuse and unauthorized access, disclosure, alteration, and destruction. Nevertheless, transmission via the internet and online digital storage are not completely secure and BakerHostetler does not guarantee the security of your information collected through the Service.

BakerHostetler and its Service Providers may (but make no commitment to) monitor use of the Service, and may collect and use related information including BakerHostetler-Collected PI and other Personal Information for all purposes not prohibited by applicable law or inconsistent with this Privacy Policy, including, without limitation, to identify fraudulent activities and transactions; prevent abuse of, and investigate and/or seek prosecution for, any potential threats to or misuse of the Service; ensure compliance with this Privacy Policy; investigate violations of or enforce these documents; and otherwise to protect the rights and property of BakerHostetler, third parties, and other users. Monitoring may result in the collection, recording, and analysis of online activity or communications through our Service. If you do not consent to these conditions, you must discontinue your use of the Service.

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7. INTERNATIONAL TRANSFER.

BakerHostetler is based in the U.S. and the information BakerHostetler and its Service Providers collect is governed by U.S. law. If you are accessing the Service from outside of the U.S., please be aware that information collected through the Service may be transferred to, processed, stored, and used in the U.S. Data protection laws in the U.S. may be different from those of your country of residence. Your use of the Service or provision of any information therefore constitutes your consent to the transfer to and from, processing, usage, sharing, and storage of your information, including Personal Information, in the U.S. as set forth in this Privacy Policy.

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8. CHILDREN'S PRIVACY.

The Service is intended for a general audience and not directed to children less than 13 years of age. BakerHostetler does not intend to collect personal information as defined by the U.S. Children's Privacy Protection Act ("COPPA") ("Children's Personal Information") in a manner that is not permitted by COPPA. If we obtain knowledge that we have collected Children's Personal Information in a manner not permitted by COPPA, we will remove such data to the extent required by COPPA.

Any California residents under the age of eighteen (18) who used the Service, and who posted content or information on the Service, can request removal by contacting BakerHostetler [here](#), detailing where the content or information is posted and attesting that you posted it. BakerHostetler will then make reasonable good faith efforts to remove the post from prospective public view or anonymize it so the minor cannot be individually identified to the extent required by applicable law. This removal process cannot ensure complete or comprehensive removal. For instance, third-parties may have republished or archived content by search engines and others that BakerHostetler does not control.

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9. ACCESSING AND CHANGING INFORMATION

BakerHostetler may provide web pages or other mechanisms allowing you to delete, correct, or update some of the BakerHostetler-Collected PI, and potentially certain other information about you (e.g., profile and account information through the Manage My Profile form). BakerHostetler will make good faith efforts to make requested changes in BakerHostetler's then-active databases as soon as practicable, but it is not always possible to completely change, remove or delete all of your information or public postings from BakerHostetler's databases (California minors see [Section 8](#)) and residual and/or cached data may remain archived thereafter. Further, we reserve the right to retain data (a) as required by applicable law; and (b) for so long as reasonably necessary to fulfill the purposes for which the data is retained except to the extent prohibited by applicable law.

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10. CHOICES: TRACKING AND COMMUNICATIONS OPTIONS.

A. Tracking Technologies Generally. Regular cookies may generally be disabled or removed by tools available as part of most commercial browsers, and in some instances blocked in the future by selecting certain settings. Browsers offer different functionalities and options so you may need to set them separately. Also, tools from commercial browsers may not be effective with regard to Flash cookies (also known as locally shared objects), HTML5 cookies, or other Tracking Technologies. For information on disabling Flash cookies, go to Adobe's website <http://helpx.adobe.com/flash-player/kb/disable-third-party-local-shared.html>. Please be aware that if you disable or remove these technologies, some parts of the Service may not work and that when you revisit the Service your ability to limit browser-based Tracking Technologies is subject to your browser settings and limitations.

Your browser settings may allow you to automatically transmit a "Do Not Track" signal to online services you visit. Note, however, there is no consensus among industry participants as to what "Do Not Track" means in this context. Like many online services, BakerHostetler currently does not alter BakerHostetler's practices when BakerHostetler receives a "Do Not Track" signal from a visitor's browser. To find out more about "Do Not Track," you can visit <http://www.allaboutdnt.com>, but BakerHostetler is not responsible for the completeness or accuracy of this third-party information. Some third parties, however, may offer you choices regarding their Tracking Technologies. One way to potentially identify cookies on our web site is to add the free Ghostery plug-in to your browser (www.ghostery.com), which according to Ghostery will display for you traditional, browser-based cookies associated with the web sites (but not mobile apps) you visit and privacy and opt-out policies and options of the parties operating those cookies. BakerHostetler is not responsible for the completeness or accuracy of this tool or third-party choice notices or mechanisms. For specific information on some of the choice options offered by third-party analytics and advertising providers, see the next section.

B. Analytics and Advertising Tracking Technologies. You may exercise choices regarding the use of cookies from Google Analytics by going to <https://tools.google.com/dlpage/gaoptout> or downloading the Google Analytics Opt-out Browser Add-on. You may exercise choices regarding the use of cookies from Adobe Analytics by going to <http://www.adobe.com/privacy/opt-out.html> under the section labeled "Tell our customers not to measure your use of their web sites or tailor their online ads for you."

You may choose whether to receive some Interest-based Advertising by submitting opt-outs. Some of the advertisers and Service Providers that perform advertising-related services for us and third parties may participate in the Digital Advertising Alliance's ("DAA") Self-Regulatory Program for Online Behavioral Advertising. To learn more about how you can exercise certain choices regarding Interest-based Advertising, visit <http://www.aboutads.info/choices/>, and <http://www.aboutads.info/appchoices> for information on the DAA's opt-out program for mobile apps. Some of these companies may also be members of the Network Advertising Initiative ("NAI"). To learn more about the NAI and your opt-out options for their members, see <http://www.networkadvertising.org/choices/>. Please be aware that, even if you are able to opt out of certain kinds of Interest-based Advertising, you may continue to receive other types of ads. Opting out only means that those selected members should no longer deliver certain Interest-based Advertising to you, but does not mean you will no longer receive any targeted content and/or ads (e.g., from other ad networks). Also, if your browsers are configured to reject cookies when you visit these opt-out webpages, or you subsequently erase your cookies, use a different device or web browser or use a non-browser-based method of access (e.g., mobile app), your NAI / DAA browser-based opt-out may not, or may no longer, be effective. BakerHostetler supports the ad industry's 2009 Self-regulatory Principles for Online Behavioral Advertising (<https://www.iab.com/wp-content/uploads/2015/05/ven-principles-07-01-09.pdf>) and expects that ad networks BakerHostetler directly engages to serve you Interest-based Advertising will do so as well, though BakerHostetler cannot guaranty their compliance. BakerHostetler is not responsible for effectiveness of, or compliance with, any third-parties' opt-out options or programs or the accuracy of their statements regarding their programs.

C. Communications. You can opt out of receiving e-mail marketing communications from BakerHostetler at any time by following the instructions provided in emails 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 marketing communications, BakerHostetler may, subject to applicable law, continue to send you non-marketing communications, such as those about your account, transactions, servicing, or BakerHostetler's ongoing business relations.

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11. YOUR CALIFORNIA PRIVACY RIGHTS.

We do not share personal information as defined by California Civil Code Section 1798.83 ("Shine the Light law") with 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 by contacting us [here](#) or by sending a letter to BakerHostetler: One Cleveland Center, 1375 East 9th Street Suite 2100, Cleveland, OH 44114-1794, (Attention: Privacy Inquiry). Any such request must include "California Privacy Rights Request" in the first line of the description and include your name, street address, city, state, and ZIP code. Please note that we are only required to respond to one request per customer each year, and we are not required to respond to requests made by means other than through this email address or mail address.

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12. YOUR EUROPEAN UNION PRIVACY RIGHTS.

If you are visiting this site from the European Union, you have certain privacy rights as described below.

Personal Information. With respect to EU data subjects, "personal information," as used in this Privacy Policy, is equivalent to "personal data" as defined in the European Union General Data Protection Regulation (GDPR) <https://gdpr-info.eu/art-4-gdpr/>.

Sensitive Data. Some of the information you provide us may constitute sensitive data as defined in the GDPR.

Legal Bases for Processing. We only use your personal information as permitted by law. We are required to inform you of the legal bases of our processing of your personal information, which are described in the table below. If you have questions about the legal bases under which we process your personal information, contact us at privacy_inquiry@bakerlaw.com.

Processing Purpose	Legal Basis
<p><u>To communicate with you</u></p> <p><u>To optimize our platform</u></p> <p><u>For compliance, fraud prevention, and safety.</u></p>	<p>These processing activities constitute our legitimate interests. We make sure we consider and balance any potential impacts on you (both positive and negative) and your rights before we process your personal information for our legitimate interests. We do not use your personal information for activities where our interests are overridden by any adverse impact on you (unless we have your consent or are otherwise required or permitted to by law).</p>
<p><u>To comply with law</u></p>	<p>We use your personal information to comply with applicable laws.</p>
<p><u>With your consent</u></p>	<p>Where our use of your personal information is based upon your consent, you have the right to withdraw it anytime in the manner indicated in the Service or by contacting us at privacy_inquiry@bakerlaw.com.</p>

Use for New Purposes. We may use your personal information for reasons not described in this Privacy Policy, where we are permitted by law to do so and where the reason is compatible with the purpose for which we collected it. If we need to use your personal information for an unrelated purpose, we will notify you and explain the applicable legal basis for that use. If we have relied upon your consent for a particular use of your personal information, we will seek your consent for any unrelated purpose.

Retention. We will only retain your personal information for as long as is necessary to fulfill the purposes for which it was collected, 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 you have provided, 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.

In some circumstances we may anonymize your personal information (so that it can be no longer associated with you), in which case we may use this information indefinitely without further notice to you.

Your Rights. Under the GDPR, you have certain rights regarding your personal information. You may ask us to take the following actions in relation to your personal information that we hold:

- **Opt-out.** Stop sending you direct marketing communications, which you have previously consented to receive. We may continue to send you Service-related and other non-marketing communications.
- **Access.** Provide you with information about our processing of your personal information and give you access to your personal information.
- **Correct.** Update or correct inaccuracies in your personal information.
- **Delete.** Delete your personal information.
- **Transfer.** Transfer a machine-readable copy of your personal information to you or a third-party of your choice.
- **Restrict.** Restrict the processing of your personal information.
- **Object.** Object to our reliance on our legitimate interests as the basis of our processing of your personal information that impacts your rights.

You can submit these requests by email to privacy_inquiry@bakerlaw.com. We may request specific information from you to help us confirm your identity and process your request. Applicable law may require or permit us to decline your request. If we decline your request, we will tell you why, subject to legal restrictions. If you would like to submit a complaint about our use of your personal information or response to your requests regarding your personal information, you may contact us at privacy_inquiry@bakerlaw.com or submit a complaint to the data protection regulator in your jurisdiction. You can find your data protection regulator [here](#).

Cross-Border Data Transfer. Please be aware that any personal data you provide to us will be transferred to, processed, and stored in the United States. Data protection laws in the U.S. may be different from those in your country of residence. You consent to the transfer of your information, including personal information, to the U.S. as set forth in this Privacy Policy by visiting our site or using our service.

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13. CHANGES TO THIS PRIVACY POLICY.

We reserve the right to change this Privacy Policy prospectively effective upon the posting of the revised Privacy Policy and your use of our Service indicates your consent to the privacy policy posted at the time of use. However, we will not treat your previously collected BakerHostetler-Collected PI, to the extent it is not collected under the new privacy policy, in a manner materially different than represented at the time it was collected without your consent. To the extent any provision of this Privacy Policy is found by a competent tribunal to be invalid or unenforceable, such provision shall be severed to the extent necessary for the remainder to be valid and enforceable.

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14. ATTORNEY-CLIENT COMMUNICATIONS.

COMMUNICATIONS BETWEEN US AND OUR CLIENTS VIA THE ACCESS CONTROLLED CLIENT PORTAL ARE ATTORNEY-CLIENT COMMUNICATIONS. ANY CONTENT OR COMMUNICATIONS OTHERWISE SUBMITTED TO US, SUCH AS THROUGH CONTACT US TOOLS, POSTING COMMENTS ON BLOGS, CREATING AN ALUMNI PROFILE, ETC., ARE NOT INTENDED TO CREATE AN ATTORNEY-CLIENT RELATIONSHIP AND SHOULD NOT BE USED FOR ATTORNEY-CLIENT COMMUNICATIONS.

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15. OUR PROTECTED HEALTH INFORMATION POLICY.

Client submissions to us that include protected health information under the federal Health Insurance Portability and Accountability Act or similar state laws (“PHI”) will be, notwithstanding anything to the contrary in our Privacy Policy or Submission Terms, subject to our business associate agreement (“BAA”) with the client. Clients should not submit PHI to us without having unless they have a BAA in place with us.

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16. CONTACT BAKERHOSTETLER.

If you have any questions about this Privacy Policy, please contact BakerHostetler [here](#) or at One Cleveland Center, 1375 East 9th Street Suite 2100, Cleveland, OH 44114-1794 (Attention: Privacy Inquiry).

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