

**HOLLAND & KNIGHT LLP**  
**California Consumer Privacy Policy**

**FOR CALIFORNIA RESIDENTS ONLY**

This California Consumer Privacy Policy supplements the information provided in Holland & Knight LLP's [Client Data Protection Policy](#) and [Website Privacy Policy](#) and applies solely to California residents ("Consumers"), as defined by the California Consumer Privacy Act of 2018 (CCPA). This policy applies only to natural persons resident in California. It does not apply to persons living elsewhere, and it does not apply to businesses or other corporate entities.

## **1 CONSUMER RIGHTS**

### **1.1 Right to Know**

You have the right to request that we disclose the following about your "personal information," as defined by CCPA: (1) the specific pieces of personal information we may collect; (2) the categories of personal information we may collect; (3) the categories of sources from which we may collect your personal information; (4) the categories of personal information we may disclose for a business purpose; and (5) the categories of third parties to whom we may have shared your information. You also have the right to request that we disclose the business purpose for collecting or sharing such data.

Please see our [Client Data Protection Policy](#) and [Website Privacy Policy](#) for further disclosures.

### **1.2 Right to Access**

You have the right to access personal information which we hold about you. If you so request, we shall provide you with a copy of your personal information which we collect as permitted by CCPA.

You also have the right to receive your personal information in a structured and commonly used format so that it can be transferred to another entity ("data portability").

### **1.3 Right to Opt-Out of the Sale of Personal Information**

Holland & Knight does not sell personal information within the meaning of the CCPA.

### **1.4 Right to Deletion**

In certain circumstances, you have the right to request the erasure of your personal information. Upon verifying the validity of a deletion request, we will delete your personal information from our records, and instruct any service providers to delete your information, as directed by CCPA.

1.5 Please note that the above rights are not absolute, and we may be entitled to refuse requests, wholly or partly, where exceptions under applicable law apply.

## **2 EXERCISING YOUR RIGHTS**

You can exercise any of your rights as described in this policy and under data privacy laws by contacting Holland & Knight's Privacy and Compliance Team as provided in the Contact Us section below. We will not discriminate against you for exercising such rights.

Except as described in this policy or provided for under applicable data privacy 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.

### **3 VERIFYING CONSUMER REQUESTS**

When you make a request to us, if you are a client, indicate the name of the attorney with whom you worked. If possible, include a client matter number which would be located on invoices. We will verify by consultation with the attorneys responsible.

If you are not a client, we will not provide information from client files, because that information is covered by attorney-client privilege.

If you are not a client, we will require name, e-mail, phone number, and address. We will attempt to match based on that information.

Where we have reasonable doubts concerning the identity of the person making the request, we may request additional information necessary to confirm their identity.

## **CLIENTS**

### **4 CLIENT INFORMATION WE COLLECT**

4.1 We collect personal information as necessary to enable us to carry out your instructions and to manage and operate our business, and to comply with our legal and regulatory obligations.

4.2 The personal information that we collect in the course of our representation of you may include, but is not limited to, the following:

- your name;
- business address;
- contact details (such as telephone numbers and email address);
- information relating to the matter in which you are seeking our advice or representation;
- other personal information contained in correspondence and documents which you may provide to us; and
- information we obtain from our IT and communications monitoring.

4.3 This personal information is required to enable us to provide our service to you. If you do not provide personal information we ask for, it may delay or prevent us from providing services to you.

4.4 You confirm that you are authorized to provide to us the personal information which we shall process on your behalf.

4.5 Where the personal information relates to your directors, shareholders, beneficial owners, employees, agents, associates or family members it is not reasonably practicable for us to provide to them the information set out in this Policy. Accordingly, where appropriate you are responsible for providing this information to any such person.

### **5 SPECIAL CATEGORIES OF (“SENSITIVE”) CLIENT PERSONAL INFORMATION**

You may also supply us with, or we may receive, special categories of “sensitive” personal information. We process these special categories of personal information on the basis of one or more of the following:

- 5.1 where you have given explicit consent to the processing of the personal information for one or more specified purposes;
- 5.2 where the processing relates to personal information which is manifestly made public by you;
- 5.3 where the processing is necessary for the establishment, exercise or defence of legal claims; or
- 5.4 where the processing is necessary for reasons of substantial public interest, in accordance with applicable law. Such reasons include where the processing is necessary:
  - for the purposes of the prevention or detection of an unlawful act or for preventing fraud; and
  - for the provision of confidential advice.

## **6 HOW CLIENT INFORMATION IS COLLECTED**

We collect most of this information from you directly, however, we also collect information:

- 6.1 from publicly accessible sources;
- 6.2 directly from a third party, e.g. client due diligence providers;
- 6.3 from a third party with your consent, e.g:
  - your bank, another financial institution, or advisor; and
  - consultants and other professional we may engage in relation to your matter;
- 6.4 via our website - we use cookies on our website;
- 6.5 via our information technology systems, e.g:
  - online case management, document management and time recording systems;
  - door entry systems and reception logs; and
  - CCTV and access control systems.

## **7 THE PURPOSE FOR WHICH CLIENT INFORMATION IS COLLECTED**

- 7.1 The below further explains the purposes for which Holland & Knight will use your personal information (excluding sensitive personal information):
  - To provide legal professional services to you in connection with your matters.
  - To carry out associated administration and accounting in connection with your matters and other processing necessary to comply with our professional, legal and regulatory obligations.
  - To comply with our internal business policies.
  - For operational reasons, such as improving efficiency, training and quality control.
  - To prevent unauthorized access and modifications to our systems.
  - For updating client records.
  - For marketing our services.

- 7.2 Where we request personal information to identify you for compliance with anti-money laundering regulations, we shall process such information only for the purposes of preventing money laundering or terrorist financing, or as otherwise set out in this Policy or permitted by law;

## **8 DISCLOSURE OF CLIENT PERSONAL INFORMATION**

- 8.1 Personal information will be retained by us and will not be shared, transferred or otherwise disclosed to any third party, except as set out in the Firm's Policies.
- 8.2 If we are working with other professional advisers on your behalf we shall assume that we may disclose your information to them, unless you instruct us otherwise.

## **SITE VISITORS**

### **9 SITE VISITOR INFORMATION WE COLLECT**

- 9.1 Visitors to the website owned and operated by Holland & Knight LLP (and any mobile site or mobile application that link to our Privacy Policies) (collectively, the "Sites") are not required to provide any personal information on any areas of the Sites. However, you may choose to provide us with personal information about yourself by corresponding with us by phone, email, via the Sites, or otherwise.
- first and last name;
  - job title and company name;
  - email address;
  - phone number
  - mailing address;
  - username (if applicable) and password to register with us and access password-protected areas of our Sites;
  - any other identifier that permits Holland & Knight to make contact with you.
- 9.2 We do not generally seek to collect sensitive personal information through our Sites. Sensitive personal information for purposes of this Privacy Policy is information relating to racial or ethnic origin, political opinions, religious or philosophical beliefs, trade-union membership, health or sex life, sexual orientation, genetic or biometric information. If we do collect sensitive personal information, we will ask for your explicit consent as required by applicable law to our proposed use of that information at the time of collection.

### **10 INFORMATION WE COLLECT ABOUT YOUR SITE VISITS**

Holland & Knight collects, stores and uses information about your visits to the Sites and about your computer, tablet, mobile or other device through which you access the Sites. This includes the following:

- anonymous information that does not identify you directly or indirectly, and includes statistical information concerning how you use our Sites or information that is linked to a cookie ID or other ID that is not paired in our records with your identifiable information, including name, phone number, or email address;
- information about you and your computer collected automatically using common tracking technologies when you visit the Sites, including your Web browser type and operating system, your IP address, and information regarding the content you view and features you access on the Sites, cookies, analytical tools, or other technologies;
- free widgets for social sharing that interact with the online advertising operations on behalf of other parties. For information about how you can elect not to receive behaviourally targeted advertising generally, please refer below to the "Cookies" section of this Privacy Policy;

## **11 HOW SITE VISITOR INFORMATION IS COLLECTED**

11.1 Holland & Knight collects personal information as follows:

- when you voluntarily provide it to us on the Sites or offline;
- when you sign up to receive emails, alerts, or other communications;
- when you communicate with us either on the Sites or offline; and
- from third-party sources

11.2 We collect most of the information from you directly. However, we also collect the following information about you from Third-Parties.

- name, contact details and professional experience and qualifications from publicly accessible sources, such as Companies House and LinkedIn;
- credit account information, fraud activity, sanction status and PEP status from due diligence providers;
- name, contact details and professional experience and qualifications from recruitment agencies;
- which you have made public on websites associated with you or your company or on social media platforms.

## **12 THE PURPOSE FOR WHICH SITE VISITOR INFORMATION IS COLLECTED**

The below further explains the purposes for which Holland & Knight will use your personal information:

- To enable you to register on our Sites and access information, products and services on password-protected areas of the Sites.
- To provide you with information and services that you request from us.
- To send you alerts, newsletters, bulletins, e-announcements, and other communications concerning Holland & Knight, legal developments or notifications.
- To invite you to seminars, events, or other functions we believe may be of interest to you.
- To enforce the terms and conditions and any contracts entered into with you.
- To send you information regarding changes to our policies, other terms and conditions, and other administrative information.
- To administer our Sites, including troubleshooting, data analysis, testing, research, statistical and survey purposes
- To improve our Sites to ensure that consent is presented in the most effective manner for you and your computer, mobile device or other item of hardware through which you access the Sites; and
- To keep our Sites safe and secure
- To ask you to participate voluntarily in surveys on the Sites for the purpose of monitoring and improving the Sites and our services.
- For uses or disclosures related to assisting in the investigation of suspected illegal or wrongful activity, and to protect and defend our rights and property, or the rights or safety of third parties.

## **13 DISCLOSURE OF SITE VISITOR PERSONAL INFORMATION**

13.1 Holland & Knight may disclose information about you in the following circumstances:

- in the event that we sell or buy any business or assets, or if all or substantially all of Holland & Knight's assets are acquired by a third party, in which case we may disclose your personal information to the prospective seller or buyer of such business or assets, solely for the purpose of permitting the due diligence required to decide whether to proceed with a transaction;

- if we are under a duty to disclose or share your personal information in order to comply with any legal or regulatory obligation;
- if necessary to protect the vital interests of a person; and
- to enforce or apply our terms and conditions or to establish, exercise or defend the rights of Holland & Knight, our staff, customers or others.

13.2 We do not share your personal information with third parties except as provided in the Firm's Privacy Policies. We share your information with the following third parties:

- Affiliated firms and advisors: we share your information with our affiliated firms and advisors as necessary to carry out the purposes for which the information was supplied or collected.
- Service providers: we use third parties to assist with the running of the Sites and our services including hosting providers, recruitment agencies, IT providers, software providers, marketing database providers, accountants, HR system providers. In order to obtain these services, we need to share your personal information with such third parties. Our third-party service providers are subject to security and confidentiality obligations and are only permitted to process your personal information for specified purposes and in accordance with our instructions.
- Social media networks: Holland & Knight uses social sharing and other "widgets" to enable interaction with social media networks. Some of these social media networks track your visit to our Sites (or any other website that uses the widgets) because when you visit those websites, they may place personally identifiable "cookies" in your browser which are then transmitted back to the social network when you visit other sites that happen to use that network's social sharing widgets (even if you don't "click" on or interact with the widget).

## 14 CONTACT US

If you have any questions about this policy or your personal information, or to exercise any of your rights as described in this policy or under applicable data privacy laws, you can contact us as follows:

Holland & Knight LLP  
 CO: Privacy and Compliance Department  
 524 Grand Regency Blvd  
 Brandon, FL 33510  
 Email: [privacy@hklaw.com](mailto:privacy@hklaw.com)  
 Toll-free: 800-446-9813  
[Consumer Request Form \(PDF\)](#)  
[Consumer Request Form \(Microsoft Word\)](#)

## 15 REVISIONS

15.1 This policy can be revised at any time. Any new version will be posted at this url. It will be effective as of the date of posting.