Holland & Knight LLP COVID-19 Privacy Notice

Policy Statement
Holland & Knight LLP (the “Firm”) is committed to protecting the privacy, health and safety of Firm personnel and visitors. This Privacy Notice provides information about how we collect and store Personal Information, and how this information may be used during the COVID-19 pandemic and reopening of Firm Office Locations. This Privacy Notice provides you with necessary information regarding your rights and the Firm’s obligations, in accordance with applicable data privacy regulations and laws.

Scope
This Privacy Notice applies to all Firm personnel and visitors, as defined below.

Responsibilities
The Firm’s Office of the General Counsel is responsible for maintaining, reviewing and updating this Privacy Notice.

Definitions
The Firm: For the purposes of this Notice, we will refer to Holland & Knight LLP and its associated affiliates1 as “the Firm”, and collectively as “we”, “our”, or “us”.

Firm personnel: All individuals who are, or were, employed by the Firm are referred to as “Firm personnel”. Firm personnel refers to all Firm partners, attorneys, staff members, employees, contractors and contract workers. When we refer directly to you as Firm personnel, we’ll refer to you as you, as well as through second-person pronouns such as your and yours.

Personal Information: Commonly referred to as Personally Identifiable Information (“PII”), Personal Information (“PI”) may be defined under various privacy laws, but, generally, is a fact about an individual which, if combined with one or more other facts about that individual, would enable others to determine the specific person to whom the facts apply.

Sensitive Personal Information: Sensitive Personal Information (“SPI”) requires greater security protections and standards of care in handling. SPI is defined as information that if lost, compromised, or disclosed could result in substantial harm, embarrassment, inconvenience, or unfairness to an individual. Generally, SPI is collected or processed only during the course of legitimate Firm activities with appropriate safeguards and protections, necessary for the purposes of fulfilling business operations of the Firm, or collected or processed with explicit consent for the intended purpose or use.

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1 Including Holland & Knight (UK) LLP, Holland & Knight Colombia S.A.S. and Holland & Knight Mexico S.C.
Visitors: Any individual or third party, including current or potential clients and vendors, who wish to visit any Firm workplace or Firm personnel.

Procedures

1. PURPOSE OF COLLECTION
   The Firm may collect, store and use information related to COVID-19 symptoms, vaccination status, and exposure risks solely for the purpose of the operational health and safety of Firm personnel and visitors as a matter of public health and safety. The Firm will collect and use information related to COVID-19 exposure, vaccination status, and health information to protect the health and safety of Firm personnel and visitors, and the safety of Firm operations.

2. PERSONAL INFORMATION WE MAY COLLECT
   The Personal Information we may collect from you will be the minimum data reasonably necessary to prevent exposure to and limit the spread of COVID-19. Personal Information may include name, phone number, email, recent out-of-country travel, vaccination status (including whether you have received the COVID-19 vaccination or intend to be vaccinated), and exposure to others who have been diagnosed with COVID-19 or have recent out-of-country travel.

   Any health information you may provide is classified as a special category of “Sensitive Personal Information” and may include medical and health information specifically related to COVID-19 symptoms. The Sensitive Personal Information collected may include body temperature, having certain symptoms related to the COVID-19 virus, and whether you have been in close contact with anyone exhibiting symptoms or who has tested positive for COVID-19.

3. DISCLOSURE OF PERSONAL INFORMATION
   The Firm will not distribute, disseminate or otherwise disclose any Personal Information to a third party unless:
   - The disclosure is required by local law, municipal ordinance, or any government or public health agency;
   - The disclosure is necessary and justified in the public’s interest; or
   - The disclosure is required pursuant to a valid warrant or subpoena.

4. DATA PROTECTION AND STORAGE
   Firm personnel and visitors will enter and submit their COVID-19 symptoms, risk of exposure, and vaccination status through survey responses via a mobile device application, intranet site or external website form. Survey responses, including Personal Information, will not be stored on the local device, mobile application or system hosting the survey form.

   The Firm will use a reasonable standard of care to securely store and protect from disclosure any Personal Information collected, in a manner that is the same or more protective than the manner in which the Firm stores and protects from disclosure other confidential and sensitive information. Personal Information will be handled with confidentiality and accessible to those Firm leaders with a “need to know” for purposes of protecting the safety of others, and identifying or preventing potential exposure and spread of COVID-19.
5. **DATA RETENTION**
   The Firm will retain Personal Information only until the initial purpose for collecting and retaining such data has been satisfied. The Firm will take into consideration retention guidance from relevant public health authorities and government agencies.

6. **INDIVIDUAL PRIVACY RIGHTS**
   Certain data privacy laws and regulations provide you with rights regarding your Personal Information. Such rights may include access to information, or the modification or deletion of Personal Information.

   **UK or European Union Data Subjects:** You may contact gdpr.compliance@hklaw.com or visit the Firm’s [GDPR Compliance Portal](#) to exercise your rights.

   **California Residents:** You may contact privacy@hklaw.com, visit the Firm’s [California Consumer Privacy Portal](#), or call toll-free 1-800-446-9813 to exercise your rights.

7. **CONTACT INFORMATION**
   We have appointed the following contact in the event you have any questions regarding this Notice or your rights with respect to your Personal Information.
   Diane Del Re  
   Privacy and Compliance Senior Manager  
   Holland & Knight LLP  
   524 Grand Regency Blvd. | Brandon, Florida 33510  
   Office 813.901.4196 | Mobile 813.997.7584  
   diane.delre@hklaw.com | [www.hklaw.com](#)

8. **MODIFICATIONS AND REVISIONS**
   We reserve the right to modify, revise, or otherwise amend this Notice at any time and in any manner. Unless we specifically obtain your consent, any changes to this Notice will only impact the information collected on or after the date of the change.

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