

## **Holland & Knight LLP COVID-19 Privacy Notice**

Holland & Knight (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 throughout the coronavirus pandemic. This Privacy Notice provides you with the necessary information regarding your rights and the Firm’s obligations in accordance with applicable data privacy regulations and laws.

This Privacy Notice applies to all Firm Personnel and Visitors, as defined below, requesting access and admission to any Firm office location or workplace (“Firm Location”).

### **1. Definitions**

- 1.1. **“Personnel”** refers to all Firm partners, attorneys, staff members, employees, contractors and contract workers.
- 1.2. **“Visitors”** refers to any individual or third party, including current or potential clients and vendors, who wish to visit any Firm Location.
- 1.3. **“Personal Information”** is defined as information about an individual which, if combined, would enable others to identify the individual.
- 1.4. **“Sensitive Personal Information”** is a category of Personal Information requiring greater security and care in handling, which includes health information.

### **2. Purpose of Collection**

The Firm may collect, store and use information related to COVID-19 symptoms 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 information collected will be used to determine access to Firm Locations, track Visitors, and limit the number of individuals in a Firm Location throughout the pandemic. The Firm will collect and use information related to COVID-19 exposure and health status to authorize or prohibit individuals from entering a Firm Location to protect the health and safety of Firm Personnel and Visitors and the safety of Firm operations.

### **3. 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, and exposure to others who have recent out-of-country travel. We may also collect additional information from Visitors, such as your company name and the Firm Location and Firm Personnel you are intending to visit.

Any health data 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. The Sensitive Personal Information collected may include body temperature, having certain symptoms related to the COVID virus, and whether you have been in close contact with anyone exhibiting symptoms or who has tested positive for COVID-19.

#### 4. **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.

#### 5. **Data Protection and Storage**

Firm Personnel and Visitors will enter and submit their COVID-19 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.

#### 6. **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.

#### 7. **Individual 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@hkllaw.com](mailto:gdpr.compliance@hkllaw.com) or visit the Firm’s [GDPR Compliance Portal](#) to exercise your rights.

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

## 8. **Contact Us**

If you have any questions about this Privacy Notice, please use the contact information below.

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