



Holland & Knight LLP COVID-19 Privacy Notice

Notice 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 (defined below).

Responsibilities

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

Definitions

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”) is a subset of PI that requires greater security protections and standards of care in handling. SPI, also known as “special categories of information” is defined as information that if lost, compromised, or disclosed could result in substantial harm, embarrassment, inconvenience, or unfairness to an individual.

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”.

Visitors: Any individual or third party, including current or potential clients and vendors, who wish to visit any Firm workplace or Firm Personnel.

¹ Including Holland & Knight (UK) LLP, Holland & Knight Colombia S.A.S. and Holland & Knight Mexico S.C.

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 (PI) WE MAY COLLECT

The PI we may collect from you will be the minimum data reasonably necessary to prevent exposure to and limit the spread of COVID-19. PI 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 ("SPI") and may include medical and health information specifically related to COVID-19 symptoms. The SPI 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 (PI)

The Firm will not distribute, disseminate or otherwise disclose any PI 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 PI, 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 PI 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. PI 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 PI. Such rights may include access to information, or the modification or deletion of PI.

UK/EU/EEA 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

The Firm is not required to appoint a formal Data Protection Officer. However, 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.

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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.

Version	Date Reviewed	Date Approved	Document Owner	Description
2	06/24/2020	06/24/2020	Diane Del Re	COVID-19 Privacy Notice (Original)
3	05/28/2021	05/28/2021	Diane Del Re	Updated notice includes vaccine status
4	08/25/2021	08/26/2021	Diane Del Re	Expanded Notice to include visitors
5	03/03/2022	03/03/2022	Diane Del Re	Annual Review (No Changes)