

**Holland & Knight LLP
Website Privacy Policy**

Updated and effective as of May 21, 2018

This website (and any mobile site or mobile application that link to this Privacy Policy) (collectively, the “**Sites**”) is owned and operated by Holland & Knight LLP, a Florida limited liability partnership (“**Holland & Knight**”, “**we**”, “**our**”, and “**us**”). This Privacy Policy applies to Holland & Knight and its affiliates, including Holland & Knight (UK) LLP (a limited liability partnership registered in England and Wales under number OC327443 with its registered office at Leaf 27c Tower 42, 25 Old Broad Street, London, United Kingdom, EC2N 1HQ), and covers our processing activities as a data controller.

This Privacy Policy explains how we collect, use and disclose personal information that we collect when you visit the Sites or communicate with us both on the Sites and offline as a prospective client or general contact. This Privacy Policy does not apply to information you might provide in the context of an attorney-client or solicitor-client relationship, and information stored on an extranet site or online credit card e-payment system.

Holland & Knight (UK) LLP is registered with the United Kingdom Information Commissioner’s Office under registration number Z7232766, and is authorized and regulated by The Solicitors Regulation Authority.

We are not required to appoint a formal data protection officer under data protection laws. However, we have appointed a Data Protection Contact who you can reach out to about any queries you may have in relation to this Privacy Policy.

CONTACTING US

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

Crystal J. Adkins (Partner and Associate General Counsel)
Holland & Knight LLP
50 North Laura Street, Suite 3900
Jacksonville, Florida 32202
By email: crystal.adkins@hklaw.com
By telephone: 904.353.2000

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BROWSING OR USING OUR SITES DOES NOT MAKE YOU A CLIENT

Please be advised that browsing the Sites or using its services or functionality does not make you a client. The Sites are provided for general informational purposes and convenience. The Sites do not provide, do not constitute, and should not be construed as, legal advice. If you need legal advice, you should personally contact a lawyer or your local bar association.

DATA PROTECTION PRINCIPLES

Holland & Knight adheres to the following principles when processing your personal data:

- 1. Lawfulness, fairness and transparency** – data must be processed lawfully, fairly and in a transparent manner.
- 2. Purpose limitation** - data must be collected for specified, explicit and legitimate purposes, and not further processed in a manner that is incompatible with those purposes.
- 3. Data minimization** - data must be adequate, relevant and limited to what is necessary in relation to the purposes for which they are processed.
- 4. Accuracy** - data must be accurate and, where necessary, kept up to date.
- 5. Storage limitation** - data must be kept in a form which permits identification of data subjects for no longer than is necessary for the purposes for which the personal data are processed.
- 6. Integrity and confidentiality** - data must be processed in a manner that ensures appropriate security of the personal information, including protection against unauthorized or unlawful processing and against accidental loss, destruction or damage by using appropriate technical or organizational measures.

INFORMATION WE COLLECT

Information you provide us

For purposes of this Privacy Policy, personal information is information that that could be used to identify you either directly or indirectly. You 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.

The categories of personal information you may provide include:

- 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.

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.

Information we collect from you

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 behaviorally targeted advertising generally, please refer below to the “Cookies” section of this Privacy Policy.

Information we collect from third parties

We collect most of the information from you directly. However, we also collect the following information about you:

- 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.

WHEN WE COLLECT PERSONAL INFORMATION

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

HOW WE USE YOUR INFORMATION

We use your information collected via the Sites as provided in this Policy. The purpose for which we use and process your information and the legal basis on which we carry out each type of processing is explained below.

Purposes for which we will process the information	Legal Basis for the processing
To enable you to register on our Sites and access information, products and services on password-protected areas of the Sites.	It is in our legitimate interests to provide our services to you and to register you at your request. We consider this use to be necessary for our legitimate interests and proportionate.
To provide you with information and services that you request from us.	It is in our legitimate interests to respond to your queries and provide any information requested in order to generate and develop business. To ensure we offer a good and responsive service, we consider this use to be proportionate and will not be prejudicial or detrimental to you.
To send you alerts, newsletters, bulletins, e-announcements, and other communications concerning Holland & Knight, legal developments or notifications.	<p>It is in our legitimate interests to directly market our services to existing users. We consider this use to be proportionate and will not be prejudicial or detrimental to you.</p> <p>For direct marketing sent by email to new contacts (i.e., individuals with whom we have not previously engaged), we will obtain your consent to send you such direct marketing.</p>
To invite you to seminars, events, or other functions we believe may be of interest to you.	<p>It is in our legitimate interests to market our services. We consider this use to be proportionate and will not be prejudicial or detrimental to you.</p> <p>You can always opt-out of receiving direct marketing-related email communications by following the unsubscribe link.</p>
To enforce the terms and conditions and any contracts entered into with you.	It is in our legitimate interests to enforce our terms and conditions of service. We consider this use to be necessary for our legitimate interests and proportionate.
To send you information regarding changes to our policies, other terms and conditions, and other administrative information.	It is in our legitimate interests to ensure that any changes to our policies and other terms are communicated to you. We consider this use to be necessary for our legitimate interests and will not be prejudicial or detrimental to you.

Purposes for which we will process the information	Legal Basis for the processing
<ul style="list-style-type: none"> • 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. 	<p>For all these categories, it is in our legitimate interests to continually monitor and improve our services and your experience of the Sites and to ensure network security. We consider this use to be necessary for our legitimate interests and will not be prejudicial or detrimental to you.</p>
<p>To ask you to participate voluntarily in surveys on the Sites for the purpose of monitoring and improving the Sites and our services.</p>	<p>It is in our legitimate interests to continually improve our offering and to develop our business. We consider this use to be necessary in order to effectively generate business and will not be prejudicial or detrimental to you.</p> <p>You can always opt-out of receiving survey-related email communications by following the unsubscribe link.</p>
<p>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.</p>	<p>It is in our legitimate interests to assist in the investigation of illegal or wrongful activity and protect our legal and property rights and the safety of others. We consider this use to be necessary for our legitimate interests and proportionate.</p>

Where you provide consent, you can withdraw your consent at any time and free of charge, but without affecting the lawfulness of processing based on consent before its withdrawal. You can update your details or change your privacy preferences by contacting us as provided in the “**Contacting Us**” section above.

Holland & Knight will only use your personal information for the purposes for which we collected it, unless we reasonably consider that we need to use it for another reason and that reason is compatible with the original purpose, or as otherwise required by law. If we need to use your personal information for an unrelated purpose, where we are legally permitted to do so, we will notify you in a timely manner and we will explain the legal basis which allows us to do so.

MARKETING

You may receive marketing communications from us if you have requested information from us or registered to use the Sites and, in each case, where you have not opted out of receiving that marketing (please see above “**HOW WE USE YOUR INFORMATION**”).

You have the right to opt out of receiving marketing communications at any time by:

- contacting us as provided in “**Contacting Us**” above; or
- using the “unsubscribe” link with each marketing communication.

WITH WHOM WE SHARE YOUR PERSONAL INFORMATION

We do not share your personal information with third parties except as provided in this Privacy Policy.

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).

In addition, Holland & Knight may disclose information about you in the following circumstances:

- in the event that we sell or buy any business or assets, in which case we may disclose your personal information to the prospective seller or buyer of such business or assets, including for the purpose of permitting the due diligence required to decide whether to proceed with a transaction;
- if all or substantially all of Holland & Knight’s assets are acquired by a third party, in which case personal information held by it about its customers will be one of the transferred assets;
- 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.

INTERNATIONAL TRANSFERS

If you are located in the European Economic Area (“**EEA**”):

To deliver services and products to you, it is necessary for us to transfer your personal information outside of the EEA to our affiliated firms and our third-party service providers located outside the EEA. This includes the USA.

Where personal information is transferred to and stored in a country not determined by the European Commission as providing adequate levels of protection for personal information, we take steps to provide

appropriate safeguards to protect your personal information by implementing standard contractual clauses approved by the European Commission.

If you want further information on the specific mechanism used by us when transferring your personal information out of the EEA, please contact us using the details set out above.

SECURITY OF YOUR PERSONAL INFORMATION

Holland & Knight uses appropriate physical, technical and organizational security measures to protect personal information both online and offline from unauthorized use, loss, alteration, destruction or modification. We use physical and procedural security measures to protect information.

Where data processing is carried out on our behalf by a third party, we take steps to ensure that appropriate security measures are in place to prevent unauthorized disclosure of personal information.

Despite these safeguards, however, Holland & Knight cannot guarantee the security of information.

HOW LONG WE KEEP YOUR PERSONAL DATA

Your personal information will not be kept for longer than is necessary for the purposes for which it was collected and processed. We will retain your personal information for as long as your registration on the Sites is active or as needed to provide you with services or information you have requested.

YOUR RIGHTS

ACCESS TO AND UPDATING YOUR PERSONAL DATA

You have the right to access information which we hold about you ("**data subject access request**").

You may also have the right to receive personal information which you have provided to us in a structured and commonly used format so that it can be transferred to another data controller ("**data portability**"). The right to data portability only applies where your personal data is processed by us with your consent or for the performance of a contract and when processing is carried out by automated means.

We want to make sure that your personal information is accurate and up to date. You may ask us to correct, modify or remove information you think is inaccurate by contacting us as provided in the "**Contacting Us**" section above. Please keep us informed if your personal information changes during your relationship with us.

RIGHT TO OBJECT

Direct marketing

You have the right to object at any time to our processing of your personal information for direct marketing purposes.

Where we process your information based on our legitimate interests

You also have the right to object, on grounds relating to your particular situation, at any time to processing of your personal information which is based on our legitimate interests. Where you object on this ground, we shall no longer process your personal information unless we can demonstrate compelling legitimate grounds for the processing which override your interests, rights and freedoms or for the establishment, exercise or defense of legal claims.

YOUR OTHER RIGHTS

You also have the following rights under applicable data protection laws to request that we rectify your personal information which is inaccurate or incomplete.

In certain circumstances, you have the right to:

- request the erasure of your personal information erasure (“**right to be forgotten**”);
- restrict the processing of your personal information to processing in certain circumstances.

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

For example, we may refuse a request for erasure of personal information where the processing is necessary to comply with a legal obligation or necessary for the establishment, exercise or defense of legal claims. We may refuse to comply with a request for restriction if the request is manifestly unfounded or excessive.

EXERCISING YOUR RIGHTS

You can exercise any of your rights as described in this Privacy Policy and under applicable data protection laws by contacting us as provided in the “**Contacting Us**” section above.

Except as described in this Privacy Policy or provided under data protection 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.

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

COOKIES, ANALYTICAL TOOLS, AND RELATED TECHNOLOGIES

Our Site uses browser cookies for analytics, functionality, and for various other services. Browser cookies are small pieces of data that are stored on your computer so that our servers can identify your browser software when you visit the Sites. We may also use similar technologies that serve similar purposes such as HTML5 local storage, “Flash” cookies, and web beacons.

We may also use location aware browsing functionality provided by your browser for functionality or analytics.

If you don't want us to use cookies when you use the Sites, you can set your Internet browser not to accept cookies. However, if you block cookies, some of the features on the Sites may not function as a result, and you may have to re-register or take other actions to be able to use certain services.

You can find more information about how to do manage cookies for all the commonly used internet browsers by visiting www.allaboutcookies.org. This website will also explain how you can delete cookies which are already stored on your device.

Advertising Cookies

You can opt-out of the behavioral targeting component of online ads generally by using the resources provided by the Digital Advertising Alliance at <http://www.aboutads.info/choices/> or the Network Advertising

Initiative at <http://www.networkadvertising.org/choices/>. Please note, however, that if you delete your cookies, you will need to re-do any prior opt-outs through the Digital Advertising Alliance or Network Advertising Initiative.

CHILDREN

The Sites are not directed at children, and we will not knowingly accept or request personal information from individuals under the age of 16 years. If we learn that we have collected personal information from a child under 16, subject to applicable law, we will either (i) delete this information from our databases, in accordance with our deletion procedures; or (ii) obtain verifiable parental consent, in accordance with the Children's Online Privacy Protection Act.

LINKS

The Sites may, from time to time, contain links to and from the websites of our advertisers and affiliates, including social media networks. If you follow a link to any of these websites, please note that these websites have their own privacy policies, and Holland & Knight does not accept any responsibility or liability for these policies. Please check these policies before you submit any personal information to these websites.

COMPLAINTS

If you have any questions or complaints regarding our Privacy Policy or practices, please contact us as provided in "**Contacting Us**" above.

If you are located in the EEA, you also have the right to complain to the relevant supervisory authority in the EEA. In the UK, this is the Information Commissioner's Office (<https://ico.org.uk/>).

CHANGES TO OUR PRIVACY POLICY

From time to time, we may change this Privacy Policy. Any changes will be posted on this page with an updated revision date. If we make any material changes to this Privacy Policy, we will notify you by email or by means of a prominent notice on the Sites prior to the change becoming effective. If new Policy terms materially affect only registered users of the Sites, those users will be notified separately.