

# **Privacy Policy**

Effective Date: May 14, 2018

Last Updated: August 10, 2023

## SCOPE

This Privacy Policy ("Policy") describes how Winston & Strawn LLP ("Winston," "we," or "us") treats personal information that we collect offline and through our websites and other online platforms where this Policy is located (collectively, our "Platform"). This Policy does not apply to our collection, use and disclosure of personal information regarding Winston's workforce members.

This Platform is operated in the United States and intended for use by individuals who are located in the United States.

Winston & Strawn LLP's Europe Privacy Policy is available here.

Winston & Strawn LLP's Website Privacy Policy (for mainland China) is available here.

## NOTICE AT COLLECTION

We collect information from you and about you. Here are some examples of the personal information we may collect. Below this section, you will find more details about how we may use and disclose personal information.

Please note that we do not knowingly engage in the sharing of personal information for cross-contextual marketing purposes or the sale of personal information.

- Contact information. This may include your name, address, email address, or telephone number.
- **Commercial information**. This may include information that could identify you and relates to the services or events in which you are interested or have considered.

- Internet or other similar network activity. This may include unique personal identifier, online identifier, IP address and location based on IP address, device identifier, browsing history, and information regarding interaction with an Internet website or electronic communication. This may also include information about the browser you are using or what site you came from and what site you visit when you leave us.
- Sensory data. This may include pictures or videos from our events.
- Professional information. This may include your title, employer, or professional contact information.
- Education information. This may include information about institutions you have attended.
- Inferences drawn from personal information. This may include a profile relating to your interests in our services and events.

Our Personal Information Retention Criteria: The California Consumer Privacy Act, as amended by the California Privacy Rights Act (collectively, "CCPA") requires that we disclose the criteria we use to determine how long we will retain each category of personal information we collect. Oftentimes, our records contain several of these categories of personal information combined together and therefore we consider, on a case-by-case basis, a number of factors to assess how long personal information is retained. These factors include what personal information is reasonably necessary to (i) provide our products and services or administer our relationship with an individual; (ii) protect our business, employees, organization, and others; (iii) fulfill our legal and regulatory obligations; and (iv) investigate and address issues which may include safety concerns, potential security incidents, or policy violations.

#### HOW WE MAY COLLECT YOUR PERSONAL INFORMATION

We may collect your personal information in different ways. Below, you will find additional details and examples regarding how we may collect your personal information.

- Directly From You. For example, if you contact us or sign up for one of our events.
- For example, when you visit and navigate our Platform on any device. We may also collect information about users over time and across different websites and devices when you use the Platform. We may use tools such as analytics and cookies, including cookies run by third parties, to collect this information.
- From Third Parties. We may receive information about you from other sources. For example, this may include receiving information from our business partners, our social media pages, or contacts who provide your information to us because they think you may be interested in our services or events.

#### HOW WE MAY USE YOUR PERSONAL INFORMATION

Here are more details and examples regarding how we may use your personal information:

- To Run and Improve Our Business. This may also include using your information for business administration purposes, such as for accounting, record keeping, legal, backup, and other administrative purposes. This may also include communicating with you or understanding what services or events may be of interest to you.
- **For Commercial Purposes**. We may provide you with information about Winston, our attorneys, and our services. This also includes providing you with information about our events. For more information about your choices related to these communications, see the Cookies and Electronic Communications section below.
- For Security Purposes. This could include protecting our organization, our workforce, and our clients. It may also include protecting our Platform.
- As Otherwise Permitted By Law or As We May Notify You or As Requested or Directed By You.

## HOW WE MAY DISCLOSE YOUR PERSONAL INFORMATION

Here are more details and examples regarding how we may disclose your personal information:

- With Our Service Providers. We may disclose your information with third parties who perform services on our behalf. For example, this may include companies that send emails on our behalf or help us run our Platform.
- With Our Business Partners. For example, we may share personal information with a business partner that cohosts an event with us.
- With Any Successors to All or Part of Our Firm. For example, if we merge with, are acquired by, or sell part of our Firm to another entity. This may include an asset sale, corporate reorganization, or other change of control.
- To Comply With the Law or To Protect Ourselves. For example, this could include responding to a court order or subpoena. It could also include sharing information if a government agency or investigatory body requests. We might disclose information when we are investigating a potential fraud.
- For Other Reasons We May Describe to You or As Requested or Directed By You.

## YOUR PRIVACY RIGHTS

Based on your state of residence, you may have the rights listed below with respect to the personal information that we maintain about you. We may take steps to verify your identity, as permitted or required under applicable law, before we process your request. Verification may include asking you to provide information about yourself that we can match against information already in our possession.

- This means that you can request that we disclose what personal information we have collected about you,
  including the categories of personal information, the categories of sources from which the personal information is
  collected, the business or commercial purpose for collecting, selling, or sharing personal information, the
  categories of third parties to whom we have disclosed personal information, and the specific pieces of personal
  information we have collected about the consumer.
- This means that you can request that we delete personal information about you which we have collected from you.
- This means that you can request that we correct inaccurate personal information that we maintain about you.
- **Right to Non-Discrimination.** This means that we are prohibited from discriminating against you if you exercise your rights under applicable law.

If you wish to exercise your rights under this section, you can contact us at <a href="info@winston.com">info@winston.com</a>. Please include your name and email address. and indicate you are making a "Privacy Rights" request. If we deny your rights request and you would like to appeal, you may contact us at <a href="info@winston.com">info@winston.com</a>.

**Agents.** Agents that you have authorized to act on your behalf may also submit privacy requests as instructed above. The agents must also provide evidence that they have your written permission to submit a request on your behalf. If we are unable to verify the authenticity of a request, we may ask you for more information or may deny the request.

#### **CHILDREN UNDER 18**

The Platform where this Policy is located is meant for adults. We do not knowingly collect personally identifiable data from persons under the age of 18 and strive to comply with the provisions of The Children's Online Privacy Protection Act (COPPA). If you are a parent or legal guardian and think your child under 18 has provided us with information, please contact us at <a href="mailto:info@winston.com">info@winston.com</a>. You can also write to us at the address listed at the end of this website Policy. Please mark your inquiries "COPPA Information Request." <a href="mailto:Parents, you can learn more about how to">Parents, you can learn more about how to</a> protect children's privacy online here.

## **COOKIES AND ELECTRONIC COMMUNICATIONS**

You have certain choices about how we collect, use, and disclose your information in connection with our use of cookies and our provision of electronic communications. Certain choices you make are browser- and device-specific.

# **Cookies & Other Tracking Technologies:**

- Cookies: You can adjust your browser to control cookies to require your affirmative acceptance for new cookies, automatically reject cookies and/or delete or disable existing cookies. How you do so depends on the type of cookie and the browser that you are using. For more information on how to control browser cookies, click here. If information about your browser is not available through this page, please search your browser for instructions about how to opt out of cookie collection.
- Flash Cookies: You may need to take an additional action to manage flash cookies, which you can learn more about here. Why? Because Flash cookies cannot be controlled through your browser settings.
- **Google Analytics:** We may use Google Analytics on our Platform to help us understand how you use our Platform. You can learn about how to opt out of Google Analytics here.
- **Email Tools:** You can also change your email settings to block the automatic download of images in email messages, as such images may contain technologies that help us understand how you interact with the message.

Note that deleting or blocking cookies may impact your experience on our website, as some features may not be available. Certain options you select are browser- and device-specific and you may need to re-select your choices if you clear your browser cookies or otherwise remove your choices.

**Our Do Not Track Policy:** Some browsers have "do not track" features that allow you to tell a website not to track you. These features are not all uniform. We do not currently respond to "do not track" signals. If you block cookies, certain features on our sites may not work. If you block or reject cookies, not all of the tracking described here will stop.

## **Marketing Communications:**

You can opt out of receiving our electronic marketing communications; however, you will still receive transactional messages from us.

# **SECURITY**

The Internet is not 100% secure. We cannot promise that your use of our Platform will be completely safe. We encourage you to use caution when using the Internet. We use reasonable means to safeguard personal information under our control.

## STORAGE OF INFORMATION

Information we maintain may be stored in or outside of the United States. If you live outside of the United States, you understand and agree that we may transfer your personal information to the United States. This Platform is intended for use in the United States and is subject to the laws of the United States, which may not provide the same level of protection as those in your own country.

#### **LINKS**

Our Platform may contain links to other third-party sites that are not governed by this Policy. If you click on a link to a third-party site, you will be taken to a site we do not control. We are not responsible for these third-party sites or their privacy practices. We suggest that you read the privacy policies of those sites carefully.

If you have additional questions you can call us at (312) 558-5600, fax us at (312) 558-5700, or reach us at <a href="mailto:info@winston.com">info@winston.com</a>. You can write to us at:

Attn: Webmaster Winston & Strawn LLP 35 W. Wacker Drive Chicago, IL 60601

Please include your email address, name, address, and telephone number when you contact us. This helps us handle your request correctly.

# **CHANGES IN POLICY**

From time to time, we may change our Policy. We will notify you of any material changes to our Policy as required by law. We will also post an updated copy on our Platform. Please check our Platform periodically for updates.