

# Winston & Strawn LLP Website Privacy Policy (for mainland China)

At Winston & Strawn (referred to as “**we**,” “**us**,” “**our**”), we take privacy seriously and we are committed to protecting it.

Please read carefully and understand this Privacy Policy prior to using our website (Winston.com, “**Website**”) and relevant services. You agree to the terms in this Privacy Policy when you use this Website and relevant services. To the extent required by law, we will seek your further consent on certain activities that are to be carried out by us in relation to your personal information.

This Privacy Policy does not apply to our handling of employee information. It also does not apply to information we collect from you offline.

If you have any questions, comments or suggestions, please contact us in accordance with the information set out at the end of this Privacy Policy.

## Definition

**Personal information:** various types of information recorded in electronic or other ways that can be used, alone or in combination with other information, to identify the identity of a specific natural person or reflect his/her activities, including but not limited to name, address, telephone number, and ID number, etc.

**Marketing communication:** the communication sent to you via channels including but not limited to e-mail, instant messaging, and social networking by us.

**Handling of personal information:** in accordance with applicable laws and regulations, “handling” shall include the collection, storage, use, processing, transmission, provision, disclosure, deletion and other relevant activities of personal information.

## Purposes of our handling activities and involved personal information

When you use our Website or relevant services that we may provide to you, we will handle your personal information for the following purposes:

**1. *To respond to your questions and requests or to communicate with you about our relationship***

We will need you to provide your name, email address, job title, company, city, country and county/state information to enable us implementing such purpose. You may also choose to further provide us with your phone, mobile, address and postal code information, whilst the lack of such information would not affect our implementation of such purpose.

**2. *To improve our website and update our email lists***

We might use cookies to track new or past website visitors. We may also use tracking tools to see what areas of our Website are the most interesting to our visitors.

**3. *To circulate our marketing communication***

We will need you to provide your name, email address, job title, company, city, country, county/state information and preference to enable us implementing such purpose. You may also choose to further provide us with your phone, mobile, address and postal code information, whilst the lack of such information would not affect our implementation of such purpose. From time to time, we may also ask you to refresh your preferences by asking you to confirm that you consent to continue receiving marketing communication from us.

**4. *Organizing our marketing events***

We may conduct online or offline marketing events at irregular intervals. You may be asked to provide your name, job title, company, address, city state, postal code, country, and email address to register or participate in such events. In certain circumstances, we may also ask you to provide other information such as guest names, dietary preferences.

## Rules for using your personal information

Except in rare cases, we will rely on your consent to this Privacy Policy for handling your personal information.

If we intend to handle your information for other purposes not covered by this Privacy Policy, or handle your information collected for a specific purpose for other purposes, we will ask for your further consent in advance to the extent required by law.

You shall be fully aware that we do not need your consent to handle your personal information in the following circumstances:

1. where it is necessary for the conclusion or performance of a contract between you and us (where applicable);
2. where it is necessary for the performance of our statutory duties or statutory obligations;
3. where it is necessary for the response to a public health emergency or for the protection of your life, health and property safety;
4. where activities such as news reporting and supervision by public opinions are carried out for the public interest, and the handling of personal information is within a reasonable scope;
5. where activities such as handling the personal information disclosed by you (or other personal information that has been legally disclosed) are carried out within a reasonable scope;
6. other circumstances stipulated by laws and regulations.

## Who may receive or have access to your personal information

As we are a global law firm, based on the demands of operations and management, your personal information may be shared within our global structure, thus enabling us to provide you with better services. For more information about our global structure, please click [here](#).

We may share your information with our third party service providers, agents, subcontractors, and other organizations for the purposes of providing services to us or directly to you on our behalf.

When we use third party service providers, we only disclose to them any personal information that is necessary for them to provide their service and we have an agreement in place that requires them to keep your information secure and not to use it other than in accordance with our specific instructions.

## How will your personal information be protected?

The transmission of information via the Internet is not completely secure. Although we will do our best to protect your personal information, we cannot guarantee the security of your information transmitted to us and any transmission is at your own risk. Once we have received your personal information, we put in place reasonable and appropriate controls to safeguard against accidental or unlawful destruction, loss, alteration, or unauthorized access.

Our Website may contain links to other websites run by other organizations. This Privacy Policy does not apply to those other websites, so we encourage you to read their privacy statements. We cannot be responsible for the privacy policies and practices of other websites even if you access them using links that we provide. In addition, if you linked to our Website from a third party website, we cannot be responsible for the privacy policies and practices of the owners and operators of that third party website and recommend that you check the policy of that third party website.

## Preservation and retention of your personal information

We only retain your personal information within the period which is necessary for the fulfillment of the purposes stated in this Privacy Policy. Meanwhile, we will also preserve your personal information with adherence to the mandatory provisions about retention period that rising from applicable laws and regulations.

## Your rights and how we respond

You have a number of rights in relation to your personal information under applicable laws and regulations, these include:

### **1. Accessing or obtaining a copy of your information**

You have the right to access and ask for a copy of the information that we hold about you by contacting us in accordance with the information set out at the end of this Privacy Policy.

### **2. Correcting and updating your information**

The accuracy of your information is important to us. If you change your name or address/email address, or you discover that any of the other information we hold is inaccurate, incomplete or out of date, you may contact us in accordance with the information set out at the end of this Privacy Policy.

### **3. Withdrawing your consent**

Where we rely on your consent for handling your personal information, you may withdraw your consent at any time by contacting us in accordance with the information set out at the end of this Privacy Policy.

If you would like to withdraw your consent to receive any direct marketing communication to which you previously opted-in, you can do so using the unsubscribe tool provided in each of our marketing communications.

If you withdraw your consent, our handling of your personal information before you withdraw is still lawful. Once we have received the request that you are withdrawing your consent, we will no longer handle your information for the purpose(s) you originally agreed to unless we have sufficient reasons for not doing so.

#### **4. *Deleting your information***

In case you have withdrawn your consent, or we breach any law or regulation or our agreement with you when handling your personal information, or under other applicable circumstances provided by applicable laws and regulations, you shall have the right to request us to delete the information by contacting us in accordance with the information set out at the end of this Privacy Policy.

In order to guarantee security, you may be required to provide a written request or to prove your identity in other ways. We may require you to verify your identity first before processing your request. Except in rare cases, we will respond within fifteen (15) working days.

We may reject your requests that are adverse to any of our statutory rights and obligations, repeated for no reason, require excessive technical means (for example, it needs to develop a new system or change the existing practice fundamentally), present risks to the legal interests of others or are very unrealistic. Under such circumstances, we will explain to you in details.

## **Where we store your personal information**

Our Website is hosted in the United States. If you are located outside of the United States, please be aware that any information you provide to us may be transferred to the United States. Please also be aware that by using our Website and giving us your information, you consent to such transfer. You also understand that the U.S. may not provide the same level of protections as the laws of your country.

## **How do we use Cookies?**

Like many other websites, our Website uses cookies (including Google Analytics cookies) to obtain an overall view of visitor habits and visitor volumes to our Website. "Cookies" are small pieces of information sent to your computer or device and stored on its hard drive to allow our websites to recognize you when you visit.

It is possible to switch off cookies by setting your browser preferences. For more information on how we use cookies and how to switch them off on your device, please visit our [\*\*Cookies Policy\*\*](#).

## **How do we update this policy?**

We may modify this Privacy Policy occasionally, so as to timely reflect the changes in applicable laws and regulations. We will notify you and obtain your consent to the extent required by law.

If you do not agree with any aspect of the updated policy you must immediately notify us and cease using our Website or relevant services.

## **Language**

This Privacy Policy is drafted in English and Chinese. Should there exist any conflict between the two languages, the Chinese version shall prevail.

# Contact us

If you have additional questions you can call us at (312) 558-5600, fax us at (312) 558-5700, or reach us by [email](#). You can write to us at

Attn: Webmaster  
Winston & Strawn  
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.

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## 隐私政策 (中国大陆地区)

Winston & Strawn (以下简称“**我们**”)非常重视并竭力保护您的隐私。

在使用我们的网站 (Winston.com, 以下简称“**网站**”)和相关服务之前,请您仔细阅读并了解本隐私政策 (以下简称“**本政策**”)。如您选择使用我们的网站和相关服务,即意味着您已同意本政策的条款。当法律要求时,我们将在开展特定个人信息处理活动之前征求您的进一步同意。

本政策不适用于我们对员工信息的处理,亦不适用于我们通过线下方式向您收集的个人信息。

如您有任何疑问、意见或建议,请通过本政策结尾部分提供的方式与我们联系。

## 定义

**个人信息**:指以电子或者其他方式记录的能够单独或者与其他信息结合识别特定自然人个人身份或者反映特定自然人活动情况的各种信息,包括但不限于自然人的姓名、住址、电话号码、身份证件号码等。

**营销信息**:指我们通过包括但不限于电子邮件、即时通讯和社交平台等渠道向您发送的信息。

**个人信息的处理**:根据适用的法律法规,个人信息的“处理”包括个人信息的收集、存储、使用、加工、传输、提供、公开、删除等。

## 我们处理活动的目的和所涉及的个人信息的

当您使用我们的网站或接受我们向您提供的服务时,我们将出于如下目的处理您的个人信息:

### 1. 回应您的问题和要求,或与您沟通交流

我们将需要您提供您的姓名、电子邮件地址、工作职位、公司名称、所在地区(国家、城市和县/州)等信息,以使我们实现本目的。您亦可选择进一步向我们提供您的电话号码、手机号码、地址、邮政编码等信息,但如果您不提供该等信息,不会影响我们实现本目的。

### 2. 提升我们的网站和更新我们的邮件列表

我们可能会借助cookies来追踪最新或已有网站访问者。我们亦可能使用其他追踪工具,以了解我们网站的哪些部分是访客最感兴趣的。

### 3. 发送营销信息

我们将需要您提供您的姓名、电子邮件地址、工作职位、公司名称、所在地区(国家、城市和县/州)和个人偏好等信息,以使我们实现本目的。您亦可选择进一步向我们提供您的电话号码、手机号码、地址、邮政编码等信息,但如果您不提供该等信息,不会影响我们实现本目的。

我们可能会不定期地请求您确认同意继续接收来自我们的营销信息并更新您的个人偏好。

#### 4. 举办活动

我们会不定期地开展线上或线下活动。您可能会被要求提供您的姓名、工作职位、公司名称、地址、所在地区（国家、城市和县/州）、邮政编码以及电子邮件地址来注册或参与此类活动。在某些情形下，我们亦可能要求您提供其他信息，如来宾姓名、饮食偏好等。

## 使用您的个人信息的规则

在绝大部分情况下，我们将依据您对本政策的授权同意来处理您的个人信息。

如果我们将出于本隐私政策未涵盖的其他目的处理您的个人信息，或将为特定目的向您收集的个人信息用于其他目的，我们将在法律要求时，事先征得您的进一步同意。

您应充分知晓，在以下情形中，我们处理您的个人信息无需征得您的同意：

1. 为订立、履行您与我们之间的合同所必需；
2. 为履行我们的法定职责或者法定义务所必需；
3. 为应对突发公共卫生事件，或保护您的生命健康和财产安全所必需；
4. 为公共利益实施新闻报道、舆论监督等行为，在合理的范围内处理个人信息；
5. 在合理的范围内处理您自行公开或者其他已经合法公开的个人信息；
6. 法律、行政法规规定的其他情形。

## 谁可能接收或接触您的个人信息？

我们作为一家全球性的律师事务所，基于运营和管理的需要，您的个人信息可能将在我们的全球架构范围内进行共享，以使我们向您提供更好的服务。如您希望进一步了解我们的全球架构，请点击[此处](#)。

我们可能会与我们的第三方服务供应商、代理人、分包商和其他组织共享您的个人信息，以使该等第三方向我们提供服务或代表我们直接向您提供服务。

当我们使用第三方服务提供商时，我们只会共享其提供服务所必需的个人信息。我们会与其签署协议，要求其仅可按照我们的指示处理您的个人信息，并确保您的信息安全。

## 您的个人信息将被如何保护？

通过互联网进行的信息传输并非绝对安全。尽管我们将尽最大努力保护您的个人信息，我们无法保证您向我们传输的个人信息的安全性，任何传输都将由您自担风险。一旦我们收到您的个人信息，我们将采取合理和适当的控制措施，防止数据遭到意外或非法的破坏、丢失、篡改或未经授权的访问。

我们的网站可能包含其他主体运营的链接。本隐私政策不适用于其他网站，因此我们建议您阅读其他网站的隐私政策。即使您通过我们提供的链接访问其他网站，我们对这些网站的隐私政策与实践不承担任何责任。此外，如果您通过第三方网站的链接访问我们网站，我们同样不对该第三方网站的所有者和运营者的隐私政策和实践负责，我们建议您充分了解第三方网站的相关政策。

# 留存您的个人信息

我们仅会在实现本政策所述目的所需的期限内保留您的个人信息。同时，我们亦会按照适用的法律法规中关于保留期限的强制性要求，留存您的个人信息。

## 您的权利和我们如何响应

根据适用的法律法规，您对您的个人信息拥有诸多权利，包括：

### 1. 查阅或复制您的个人信息

您有权查阅并要求我们提供我们所掌握的您的个人信息副本，您可通过本政策结尾部分提供的方式与我们联系。

### 2. 更正和补充您的个人信息

您的个人信息的准确性对我们而言非常重要。如果您改变了您的姓名、地址或电子邮件地址，或您发现我们持有的任何其他信息不准确、不完整或已经过时，您可通过本政策结尾部分提供的方式与我们联系。

### 3. 撤回您的同意

当我们根据您的授权同意来处理您的个人信息，您可随时通过本政策结尾部分提供的方式与我们联系，以撤回您的授权同意。

如果您希望撤回您先前授予的对接收营销信息的同意，您可通过营销信息中提供的方式进行退订。

如您撤回您的同意，我们在您撤回同意之前已进行的个人信息处理仍是合法的。一旦我们收到您撤回同意的请求，我们将不再出于您先前同意的目的处理您的个人信息，除非我们有充分的理由。

### 4. 删除您的个人信息

如果您撤回了您的同意，或我们在处理您的个人信息时违反了法律法规或与您的约定，或在法律法规规定的其他情形下，您有权通过本政策结尾部分提供的方式与我们联系，要求我们删除您的个人信息。

为保障安全，您可能被要求以书面方式提出请求，或以其他方式证明您的身份。我们可能会在处理您的请求之前，要求您验证自己的身份。通常情况下，我们将在十五（15）个工作日内做出答复。

对于那些违背我们的法定权利和义务、无端重复、需要过多技术手段（例如，需要开发新系统或从根本上改变实践）、对他人合法权益造成风险或者其他非常不切实际的请求，我们可能会予以拒绝。在该等情况下，我们将向您提供详细的解释。

## 我们在何处储存您的个人信息？

我们的网站服务器位于美国。如您在美国境外，请注意您提供给我们的任何信息可能会被传输至美国。您使用我们的网站并向我们提供您的信息，将被视为您同意该等传输，且您了解美国可能不会提供与您所在国法律同等的个人信息保护标准。

## 我们如何使用Cookies？

与许多其他网站相似，我们的网站使用Cookies（包括Google Analytics Cookies）来统计访问者的使用偏好和数量。“Cookies”是发送至您的计算机或设备并储存在其硬盘上的微小信息，以使我们的网站能够在您访问时进行识别。

您可通过设置您的浏览器偏好来关闭Cookies。如您希望进一步了解我们是如何使用Cookies以及如何如何在您的设备上关闭它们，请参阅我们的[Cookies政策](#)。

## 本政策如何更新？

我们可能会不定期修改本政策，以便及时反映适用法律法规的变化。我们会根据适用法律法规的要求向您告知并在必要时征得您的同意。

如您不同意更新后的隐私政策中的任何内容，请您立即通知我们并停止使用我们的网站或相关服务。

## 语言

本隐私政策以中英文书就。如两种语言的表述存在不一致，应以中文文本为准。

## 联系我们

如果您有任何疑问，您可以通过拨打(312) 558-5600联系我们，或传真至(312) 558-5700，或通过[电子邮件](#)联系我们。您亦可致信至：

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

当您联系我们时，请提供您的电子邮件地址、姓名、地址和电话号码。这将有助于我们正确处理您的请求。

**WINSTON & STRAWN LLP EUROPE PRIVACY NOTICE**