

Privacy Notice

Effective as of July 7, 2023.

Please click [here](#) to view the previous version of our California Privacy Notice.

Please click [here](#) to view the previous version of our UK and EU Privacy Notice.

This Privacy Notice describes how Cooley LLP and our affiliates (“**Cooley**,” “**firm**,” “**we**,” “**us**” or “**our**”) process personal information that we collect through our digital or online properties or services that link to this Privacy Notice (including as applicable, our website at cooley.com and other websites and resources made available to our clients and third parties, social media pages, and online data rooms that we operate), as well as through our marketing activities, services we provide to our corporate, institutional and nonprofit clients, live events, any offline business interactions you may have with us, and other activities described in this Privacy Notice (collectively, the “**Service**”).

[California Notice at Collection/State Privacy Rights Notice](#): See the State Privacy Rights Notice section below for important information about your rights under applicable state privacy laws.

Notice to European users: If you are located in the European Economic Area (“**EEA**”) or the United Kingdom (“**UK**”) (which we refer to as “**Europe**,” and “**European**” should be understood accordingly), see the Notice to European users below.

Notice to users from China: If you are located in China, see the Notice to Chinese users below.

Notice to users from Singapore: If you are located in Singapore, see the Notice to Singapore users below.

Cooley may provide additional or supplemental privacy policies to individuals for specific products or services that we offer at the time we collect personal information. For example, this Privacy Notice does not apply to personal information that we collect from Cooley employees, partners, contractors or job candidates. Such information is subject to separate privacy policies.

You can download a printable copy of this Privacy Notice [here](#).

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Personal information we collect

Information you provide to us. Personal information you may provide to us through the Service or otherwise includes:

- **Contact data**, such as your first and last name, salutation, billing and mailing addresses, phone number, email address, professional title, and company name.
- **Demographic data**, such as your city, state, country of residence, and postal code.
- **Communications data** based on our exchanges with you, including when you contact us through the Service, social media, or otherwise.
- **Online identifiers and account information**, such as your username or passwords for any of our websites.
- **Payment and transactional data**, including payment card information or bank account numbers used to bill for our services and your billing and payment history.
- **Dietary information**, such as information about dietary preferences that we may collect in connection with events and you may disclose to us in connection with your attendance at catered events.
- **Marketing data**, such as your preferences for receiving our marketing communications and details about your engagement with them.
- **Audio, electronic, and visual information**, such as photographs, video and voice recordings of conversations with you as permitted by law, and security camera recordings of your activity in our offices.
- **Professional or employment-related information**, such as your job title, employer information, work history and education information, such as the schools you attended.
- **Other data** not specifically listed here, which we will use as described in this Privacy Notice or as otherwise disclosed at the time of collection.

Third-party sources. We may combine personal information we receive from you with personal information we obtain from other sources, such as:

- **Public sources**, such as government agencies, public records, social media platforms, and other publicly available sources.
- **Private sources**, such as data providers, social media platforms, data licensors, account intelligence providers (who help us identify the types of visitors to our Service), and entities to which we provide services (which may include your employer).
- **Partner organizations**, such as pro bono groups and nonprofits.
- **Marketing partners**, such as joint marketing partners and event co-sponsors.

Automatic data collection. We, our service providers, and our business partners may automatically log information about you, your computer or mobile device, and your interaction over time with the Service,

our communications and other online services, such as:

- **Device data**, such as your computer or mobile device's operating system type and version, manufacturer and model, browser type, screen resolution, RAM and disk size, CPU usage, device type (e.g., phone, tablet), IP address, unique identifiers (including identifiers used for advertising purposes), language settings, mobile device carrier, radio/network information (e.g., Wi-Fi, LTE, 3G), and general location information such as city, state or geographic area.
- **Internet activity or electronic network activity information** that we collect about your interaction with our websites, emails, and other online content, such as the pages you viewed, emails you opened, links you clicked, how long you spent on a page, navigation paths between pages or screens, information about your activity, your preferences, access times, and duration of access. In addition, if you are given a key card, a key fob, or remote entry access to our offices, we log information about when and where you use the key card, key fob, or other access method.
- **General location data** when you authorize the Service to access your device's location.
- **Communication interaction data** such as your interactions with our email, chat messages, voicemail, text or other communications (e.g., whether you open and/or forward emails) – we may do this through use of pixel tags (which are also known as clear GIFs), which may be embedded invisibly in our emails.

Cookies. Some of our automatic data collection is facilitated by cookies and similar technologies. For more information, see our [Cookie Notice](#).

Data about others. We may collect contact details about individuals whom you refer to us for services. Please do not refer someone to us or share their contact details with us unless you have their permission to do so.

How we use your personal information

We may use your personal information for the following purposes or as otherwise described at the time of collection:

Service delivery and operations, including:

- **Service delivery.** We may use personal information to provide and operate the Service.
- **Firm operations.** We may use personal information for the day-to-day operations of the firm, including security, facilities access, firm systems, compliance, and database use.
- **Client services.** We may use personal information to perform legal services to our clients, administer their files and bill for and collect payments for those client services.
- **Hosting and events.** If you register for our events, we may use your personal information to fulfill your registration requests, communicate with you about the events, and to host you at the events.
- **Facility access and security.** If you visit our offices, we may use your use personal information to register and host you, as well as to ensure the security of our physical offices.
- **Communication.** We may use personal information to communicate with you, including to provide support for the Service and to respond to your requests, questions and feedback.

Research and development. We may use your personal information for research and development purposes, including to analyze and improve the Service and our business and to develop new products and

services. As part of these activities, we may create aggregated, de-identified and/or anonymized data from personal information we collect. We make personal information into de-identified or anonymized data by removing information that makes the data personally identifiable to you. We may use this aggregated, de-identified or otherwise anonymized data and share it with third parties for our lawful business purposes, including to analyze and improve the Service and promote our business and will not attempt to reidentify any such data.

Marketing. We, our service providers and third parties with whom we co-sponsor events may collect and use your personal information to send you direct marketing communications and may personalize these messages based on your needs and interests. You may opt-out of our marketing communications as described in the [Opt-out of communications](#) section below.

Service improvement and analytics. We may use your personal information to analyze your usage of the Service, improve the Service, improve the rest of our business, help us understand user activity on the Service, including which pages are most and least visited and how visitors move around the Service, as well as user interactions with our emails, and to develop new products and services.

Compliance and protection. We may use your personal information to:

- comply with applicable laws, lawful requests, and legal process, such as to respond to subpoenas, investigations or requests from, or cooperate with government authorities;
- protect our, your or others' rights, privacy, safety or property (including by making and defending legal claims);
- audit our internal processes for compliance with legal and contractual requirements or our internal policies;
- enforce the terms and conditions that govern the Service; and
- prevent, identify, investigate and deter fraudulent, harmful, unauthorized, unethical or illegal activity, including cyberattacks and identity theft.

Use for new purposes. We may use your personal information for reasons not described in this Privacy Notice where permitted by law and when the reason is compatible with the purpose for which we collected it. In some cases, we may specifically ask you for your consent to collect, use or share your personal information, such as where required by law.

Retention

We generally retain personal information to fulfill the purposes for which we collected it, including for the purposes of satisfying any legal, accounting, or reporting requirements, to establish or defend legal claims, or for fraud prevention purposes. To determine the appropriate retention period for personal information, we may consider factors such as the amount, nature, and sensitivity of the personal information, the potential risk of harm from unauthorized use or disclosure of your personal information, the purposes for which we process your personal information and whether we can achieve those purposes through other means, and the applicable legal requirements.

When we no longer require the personal information we have collected about you, we may either delete it or de-identify, aggregate or anonymize it. If we de-identify, aggregate or anonymize your personal information (so that it can no longer be associated with you), we may use this information indefinitely without further notice to you.

How we share your personal information

We may share your personal information with the following parties and as otherwise described in this Privacy Notice, in other applicable notices, or at the time of collection:

Affiliates. Our affiliates.

Service providers. Third parties that provide services on our behalf or help us operate the Service or our business (such as information technology and software services, mailing services, marketing services, event management services, and cyber and physical security services). This also includes our legal support vendors, including e-discovery and deposition services and litigation support, as well as other experts, consultants, and other professionals that assist in connection with our representation of our clients.

Third parties designated by you. We may share your personal information with third parties where you have instructed us or provided your consent to do so. We will share personal information that is needed for these other companies to provide the services that you have requested.

Clients and other parties. Clients, prospective clients, and parties that may be involved in our client engagements or interactions with prospective clients, and their representatives, vendors and advisors.

Business and marketing co-sponsors. Third parties with whom we co-sponsor events.

Professional advisors. Professional advisors, such as lawyers, auditors, bankers and insurers, in the course of the professional services that they render to us.

Authorities and others. Law enforcement, government authorities, and private parties, as we believe in good faith to be necessary or appropriate for the [Compliance and protection](#) purposes described above.

Business transferees. We may disclose personal information in the context of actual or prospective business transactions (*e.g.*, the transfer or merger of all or part of our business). For example, we may need to share certain personal information with prospective counterparties and their advisors. We may also disclose your personal information to a successor of Cooley as part of any merger, reorganization or similar transaction, and/or in the event of a bankruptcy or dissolution, in which personal information is transferred to one or more third parties as one of our business assets.

Your choices

In this section, we describe the rights and choices available to all users. If you are a resident of a state that provides additional rights (*e.g.*, California and Virginia), you may find additional information about your rights in the [State Privacy Rights Notice](#) section below. If you are located in the EEA or the UK, see the [Notice to European users](#) below.

Opt-out of communications. You may opt-out of marketing-related emails by following the opt-out or unsubscribe instructions at the bottom of the email, or emailing us at privacy@cooley.com, or calling us at: +1 866 714 5537 (toll-free in the U.S. only). Please note that if you choose to opt-out of marketing-related emails, you may continue to receive service-related and other non-marketing emails.

Cookies. For information about cookies employed by the Service and how to control them, see our [Cookie Notice](#).

Do Not Track. Some Internet browsers may be configured to send “Do Not Track” signals to the online services that you visit. We currently do not respond to “Do Not Track” signals. To find out more about “Do Not Track,” please visit <http://www.allaboutdnt.com>.

Declining to provide information. We need to collect personal information to provide certain services. If

you do not provide the information we identify as required or mandatory, we may not be able to provide those services.

Other sites and services

The Service may contain links to websites, mobile applications, and other online services operated by third parties. In addition, our content may be integrated into web pages or other online services that are not associated with us. These links and integrations are not an endorsement of, or representation that we are affiliated with, any third party. We do not control websites, mobile applications or online services operated by third parties, and we are not responsible for their actions. We encourage you to read the privacy policies of the other websites, mobile applications and online services you use.

Security

We employ technical, organizational and physical safeguards designed to protect the personal information we collect. However, security risk is inherent in all internet and information technologies and we cannot guarantee the security of your personal information.

International data transfer

We are headquartered in the United States and may use service providers that operate in other countries. Your personal information may be transferred to the United States or other locations where privacy laws may not be as protective as those in your state, province, or country.

If you are located in the EEA or the UK, see the [Notice to European users](#) below.

Children

The website is not intended for use by anyone under 18 years of age. If you are a parent or guardian of a child from whom you believe we have collected personal information in a manner prohibited by law, please [contact us](#). If we learn that we have collected personal information through the website from a child without the consent of the child's parent or guardian as required by law, we will comply with applicable legal requirements to delete the information.

Changes to this Privacy Notice

We reserve the right to modify this Privacy Notice at any time. If we make material changes to this Privacy Notice, we will notify you by updating the date of this Privacy Notice and posting it on the Service or other appropriate means. Any modifications to this Privacy Notice will be effective upon our posting the modified version (or as otherwise indicated at the time of posting). In all cases, your use of the Service after the effective date of any modified Privacy Notice indicates your acknowledging that the modified content of the Privacy Notice applies to your interactions with the Service and our business.

How to contact us

If you have questions or concerns regarding our Privacy Notice or our processing of Personal Information, you may contact us as follows:

- **Email:** privacy@cooley.com
- **Phone:** +1 866 714 5537 (toll-free in the U.S. only)

State privacy rights notice

This section provides additional information to individuals in states with privacy laws that provide additional rights to their residents, including the California Consumer Privacy Act (“CCPA”), the Virginia Consumer Data Protection Act (“CDPA”), the Colorado Privacy Act (“CPA”), and the Connecticut Personal Data Privacy and Online Monitoring Act (collectively the “State Privacy Laws”).

This section describes how we collect, use, and share Personal Information (as defined below) of residents of these states and the rights these users may have with respect to their Personal Information. Please note that not all rights listed below may be afforded to all users and that if you are not a resident of one of these states with State Privacy Laws, you may not be able to exercise these rights. In addition, **we may not be able to process your request if you do not provide us with sufficient detail to allow us to confirm your identity or understand and respond to it.**

For purposes of this section, the term “Personal Information” has the meaning given to “personal data,” “personal information” or other similar terms in applicable State Privacy Laws and does not include information exempted from the scope of the State Privacy Laws, such as publicly available information. In some cases, we may provide a different privacy notice to certain categories of residents of these states, such as job applicants, in which case that notice will apply instead of this section. “Sensitive Personal Information” has the meaning given to such term or similar terms in applicable State Privacy Laws.

Your privacy rights. The State Privacy Laws may provide residents with some or all of the rights listed below. However, these rights are not absolute and some State Privacy Laws do not provide these rights to their residents. Therefore, we may decline your request in certain cases as permitted by law. We do not “sell” or “share” Personal Information as those terms are defined in applicable State Privacy Laws (and have not done so during the prior 12 months) and have no actual knowledge that we have sold or shared the Personal Information of children under 16 years of age. We do not engage in any “Profiling” (as such term is defined under applicable State Privacy Laws) in furtherance of decisions that produce legal or similarly significant effects about you, where regulated by applicable State Privacy Laws. We also do not use or disclose Sensitive Personal Information for purposes that California residents have a right to limit under the CCPA, and where required by applicable State Privacy Laws, we obtain your consent before we collect Sensitive Personal Information from you.

- **Information/Know.** You may request that we confirm whether or not we are processing your Personal Information and request the following information about how we have collected and used your Personal Information during the past 12 months:
 - The categories of Personal Information that we have collected.
 - The categories of sources from which we collected Personal Information.
 - The business or commercial purpose for collecting Personal Information.
 - The categories of third parties with which we share Personal Information.
 - The categories of Personal Information that we disclosed for a business purpose.
 - The categories of third parties to whom the Personal Information was disclosed for a business purpose.
- **Access.** You may request a copy of the Personal Information that we have collected about you.
- **Appeal.** You may have the right to appeal our denial of any request validly submitted.
- **Correction.** You may ask us to correct inaccurate Personal Information that we have collected about

you.

- **Deletion.** You may ask us to delete certain Personal Information that we have collected from you.
- **Nondiscrimination.** You are entitled to exercise the rights described above free from discrimination as prohibited by the State Privacy Laws.

Exercising your right to know, access, appeal, correct, and delete Personal Information. You may submit requests to exercise your right to information/know, access, appeal, correction, or deletion by calling us at +1 866 714 5537 (toll-free in the U.S. only) or by completing our [online privacy request form](https://www.cooley.com/legal-notices/privacy-request) available at <https://www.cooley.com/legal-notices/privacy-request>.

Verification of Identity; Authorized agents. We may need to verify your identity in order to process your information/know, access, appeal, correction, or deletion requests and reserve the right to confirm your residency. To verify your identity, we may require government identification, a declaration under penalty of perjury, or other information, where permitted by law.

Under some State Privacy Laws, you may enable an authorized agent to make a request on your behalf. However, we may need to verify your authorized agent's identity and authority to act on your behalf. We may require a copy of a valid power of attorney given to your authorized agent pursuant to applicable law. If you have not provided your agent with such a power of attorney, we may ask you to take additional steps permitted by law to verify that your request is authorized, such as by providing your agent with written and signed permission to exercise your State Privacy Laws rights on your behalf, the information we request to verify your identity, and confirmation that you have given the authorized agent permission to submit the request.

Personal Information that we collect, use and disclose. We have summarized the Personal Information we collect and may disclose to third parties by reference below to both (i) the categories defined in the [Personal Information We Collect](#) section of this Privacy Notice above and (ii) the categories of Personal Information specified in the CCPA (Cal. Civ. Code §1798.140). We may use each of the categories of Personal Information below for the purposes identified in the [How We Use Your Personal Information](#) section of this Privacy Notice above (except for any Sensitive Personal Information, which will only be processed for the purposes for which it was collected and as otherwise specifically permitted by applicable law, including applicable State Privacy Laws). This section also describes our practices currently and during the 12 months preceding the effective date of this Privacy Notice. Information you voluntarily provide to us, such as in free-form webforms, may contain other categories of Personal Information not described below. More information about the categories of sources from which we collect Personal Information and the purposes for collecting or disclosing Personal Information are described above in this Privacy Notice.

Personal Information ("PI") we collect	CCPA statutory category	Categories of third parties to whom we "disclose" PI for a business purpose
<ul style="list-style-type: none">• <i>Contact data</i>	<ul style="list-style-type: none">• <i>Identifiers</i>• <i>Commercial information</i>• <i>California customer records</i>	<ul style="list-style-type: none">• <i>Affiliates</i>• <i>Service providers</i>• <i>Third parties designated by you</i>• <i>Clients and other parties</i>

		<ul style="list-style-type: none"> • Professional advisors • Authorities and others • Business transferees • Business and marketing co-sponsors
<ul style="list-style-type: none"> • Demographic data 	<ul style="list-style-type: none"> • Identifiers • California customer records 	<ul style="list-style-type: none"> • Affiliates • Service providers • Third parties designated by you • Clients and other parties • Professional advisors • Authorities and others • Business transferees • Business and marketing co-sponsors
<ul style="list-style-type: none"> • Online identifiers and account information 	<ul style="list-style-type: none"> • Identifiers 	<ul style="list-style-type: none"> • Affiliates • Service providers • Third parties designated by you • Clients and other parties • Professional advisors • Authorities and others • Business transferees • Business and marketing co-sponsors
<ul style="list-style-type: none"> • Communications data 	<ul style="list-style-type: none"> • Identifiers • Commercial information • California consumer records • Internet or Network Information 	<ul style="list-style-type: none"> • Affiliates • Service providers • Third parties designated by you • Clients and other parties • Professional advisors • Authorities and others • Business transferees • Business and marketing

		<i>co-sponsors</i>
<ul style="list-style-type: none"> • <i>Payment and transactional data</i> 	<ul style="list-style-type: none"> • <i>Commercial information</i> • <i>California consumer records</i> • <i>Financial information</i> 	<ul style="list-style-type: none"> • <i>Affiliates</i> • <i>Service providers</i> • <i>Third parties designated by you</i> • <i>Clients and other parties</i> • <i>Professional advisors</i> • <i>Authorities and others</i> • <i>Business transferees</i> • <i>Business and marketing co-sponsors</i>
<ul style="list-style-type: none"> • <i>Marketing data</i> 	<ul style="list-style-type: none"> • <i>Identifiers</i> • <i>Commercial information</i> • <i>California customer records</i> • <i>Internet or Network Information</i> 	<ul style="list-style-type: none"> • <i>Affiliates</i> • <i>Service providers</i> • <i>Third parties designated by you</i> • <i>Clients and other parties</i> • <i>Professional advisors</i> • <i>Authorities and others</i> • <i>Business transferees</i> • <i>Business and marketing co-sponsors</i>
<ul style="list-style-type: none"> • <i>Dietary information</i> 	<ul style="list-style-type: none"> • <i>Identifiers</i> • <i>Commercial information</i> • <i>California customer records</i> 	<ul style="list-style-type: none"> • <i>Affiliates</i> • <i>Service providers</i> • <i>Third parties designated by you</i> • <i>Professional advisors</i> • <i>Authorities and others</i> • <i>Business transferees</i>
<ul style="list-style-type: none"> • <i>Audio, electronic, and visual information</i> 	<ul style="list-style-type: none"> • <i>Sensory Information</i> • <i>Identifiers</i> • <i>California consumer records</i> 	<ul style="list-style-type: none"> • <i>Affiliates</i> • <i>Service providers</i> • <i>Third parties designated by you</i> • <i>Professional advisors</i> • <i>Authorities and others</i>

		<ul style="list-style-type: none"> • <i>Business transferees</i>
<ul style="list-style-type: none"> • <i>Professional or Employment-related data</i> 	<ul style="list-style-type: none"> • <i>Identifiers</i> • <i>California customer records</i> 	<ul style="list-style-type: none"> • <i>Affiliates</i> • <i>Service providers</i> • <i>Third parties designated by you</i> • <i>Clients and other parties</i> • <i>Professional advisors</i> • <i>Authorities and others</i> • <i>Business transferees</i> • <i>Business and marketing co-sponsors</i>
<ul style="list-style-type: none"> • <i>Data about others</i> 	<ul style="list-style-type: none"> • <i>Identifiers</i> • <i>California consumer records</i> 	<ul style="list-style-type: none"> • <i>Affiliates</i> • <i>Service providers</i> • <i>Third parties designated by you</i> • <i>Clients and other parties</i> • <i>Professional advisors</i> • <i>Authorities and others</i> • <i>Business transferees</i> • <i>Business and marketing co-sponsors</i>
<ul style="list-style-type: none"> • <i>Device data</i> 	<ul style="list-style-type: none"> • <i>Identifiers</i> • <i>Internet or Network Information</i> 	<ul style="list-style-type: none"> • <i>Affiliates</i> • <i>Service providers</i> • <i>Third parties designated by you</i> • <i>Clients and other parties</i> • <i>Professional advisors</i> • <i>Authorities and others</i> • <i>Business transferees</i> • <i>Business and marketing co-sponsors</i>
<ul style="list-style-type: none"> • <i>Online activity data</i> 	<ul style="list-style-type: none"> • <i>Identifiers</i> • <i>Commercial information</i> 	<ul style="list-style-type: none"> • <i>Affiliates</i> • <i>Service providers</i> • <i>Third parties designated</i>

	<ul style="list-style-type: none"> • <i>Internet or Network Information</i> 	<ul style="list-style-type: none"> • <i>by you</i> • <i>Clients and other parties</i> • <i>Professional advisors</i> • <i>Authorities and others</i> • <i>Business transferees</i> • <i>Business and marketing co-sponsors</i>
<ul style="list-style-type: none"> • <i>General location data</i> 	<ul style="list-style-type: none"> • <i>Geolocation data</i> 	<ul style="list-style-type: none"> • <i>Affiliates</i> • <i>Service providers</i> • <i>Third parties designated by you</i> • <i>Clients and other parties</i> • <i>Professional advisors</i> • <i>Authorities and others</i> • <i>Business transferees</i> • <i>Business and marketing co-sponsors</i>
<ul style="list-style-type: none"> • <i>Communication interaction data</i> 	<ul style="list-style-type: none"> • <i>Identifiers</i> • <i>Commercial information</i> • <i>California consumer records</i> • <i>Internet or Network Information</i> 	<ul style="list-style-type: none"> • <i>Affiliates</i> • <i>Service providers</i> • <i>Third parties designated by you</i> • <i>Clients and other parties</i> • <i>Professional advisors</i> • <i>Authorities and others</i> • <i>Business transferees</i> • <i>Business and marketing co-sponsors</i>
<ul style="list-style-type: none"> • <i>Data derived from the above</i> 	<ul style="list-style-type: none"> • <i>Inferences</i> 	<ul style="list-style-type: none"> • <i>Affiliates</i> • <i>Service providers</i> • <i>Clients and other parties</i> • <i>Professional advisors</i> • <i>Authorities and others</i> • <i>Business transferees</i> • <i>Business and marketing</i>

		<i>co-sponsors</i>
<ul style="list-style-type: none"> • <i>Other Sensitive Personal Information</i> <p><i>We do not require that you provide this information, but it may be revealed in identity data or other information we collect, or as voluntarily disclosed by you</i></p>	<ul style="list-style-type: none"> • <i>Protected Classification Characteristics</i> 	<ul style="list-style-type: none"> • N/A

Notice to users in China

Except as otherwise provided, this section applies to individuals located in the People’s Republic of China (“China”) pursuant to applicable Chinese laws, including China’s Personal Information Protection Law (“PIPL”). This section supplements this Privacy Notice. In case of any inconsistencies between this section and the rest of this Privacy Notice, this section prevails.

For purposes of this section, the term “**Personal Information**” means various kinds of information related to identified or identifiable natural persons recorded by electronic or other means, excluding the anonymized information.

Processing of sensitive Personal Information. Your **payment and transactional data** and **dietary information** may be considered sensitive Personal Information. We process your sensitive Personal Information only to the extent necessary for purposes as described in the [How we use your personal information](#) section above. We employ technical, organizational and physical safeguards designed to protect the personal information we collect.

Sharing and disclosure of your Personal Information. In the event that we need to share your Personal Information with business transferees as described in the [How we share your personal information](#) section of this Privacy Notice, we will inform you of the name and contact information of the recipient of your Personal Information. The recipient shall comply with this Privacy Notice when processing your Personal Information. If the processing methods and purposes of the recipient fall beyond the scope of this Privacy Notice, such a recipient shall obtain your consent.

We will not publicly disclose your Personal Information unless we have obtained your prior consent or the public disclosure is required by applicable Chinese laws, legally binding enforcement actions or court orders.

International transfer of your Personal Information. We are headquartered in the United States and may use service providers that operate in other countries. We may transfer your Personal Information outside China for necessary purposes as described in the [How we use your personal information](#) section of this Privacy Notice. We will adopt the lawful transfer mechanism(s) required under applicable Chinese laws

and take measures to ensure the overseas recipients can provide the same level of protection as required under the PIPL.

Your rights. You have the right to access, correct, restrict or object to processing, withdrawal of consent, and obtaining a copy of your Personal Information retained by us.

If we have not deleted your Personal Information, you also have the right to request to delete your Personal Information under the following circumstances:

- the purposes of processing have been achieved or cannot be achieved, or your Personal Information is no longer necessary for achieving the purposes of processing;
- we cease to provide our services, or the retention period has expired;
- you have withdrawn your consent;
- our processing is in violation of applicable Chinese laws or the agreements with you; or
- other circumstances as provided by applicable Chinese laws.

Contact us. To request to exercise your rights or if you have any questions about this section or how we process your Personal Information, please contact us at privacy@cooley.com. We will respond to your request in a timely manner after verifying your identity.

Notice to users in Singapore

Except as otherwise provided, this section applies to individuals located in Singapore pursuant to applicable Singaporean laws, including the Personal Data Protection Act (“PDPA”). This section supplements this Privacy Notice. In case of any inconsistencies between this section and the rest of this Privacy Notice, this section prevails.

For purposes of this section, the term “**Personal Data**” means data, whether true or not, about an individual who can be identified from that data or from that data and other information to which the organization has or is likely to have access.

International transfer of your Personal Data. We are headquartered in the United States and may use service providers that operate in other countries. We may transfer your Personal Data outside Singapore for necessary purposes as described in the [How we use your personal information](#) section of this Privacy Notice. We will take such necessary measures to ensure that the overseas recipients of your Personal Data are bound by legally enforceable obligations to ensure that these overseas recipients provide a standard of protection to the Personal Data so transferred that is comparable to the protection under the PDPA.

Your rights. You may request that we provide access to your Personal Data that is in our possession or under our control as well as information about the ways in which your Personal Data has been used or disclosed by us within a year before the date of your request. You may also request that we correct your Personal Data that is in our possession or under our control, unless an exception to the correction request applies, or we are satisfied on reasonable grounds that a correction should not be made.

Contact us. To request to exercise your rights or if you have any questions about this section or how we process your Personal Data, please contact us at privacy@cooley.com. We will respond to your request in a timely manner after verifying your identity.

Notice to European users

The information provided in this “Notice to European users” section applies only to individuals in the United Kingdom (“UK”) and the European Economic Area (“EEA”) (hereafter collectively referred to as “Europe” as defined at the top of this Privacy Notice).

Personal information. References to “personal information” in this Privacy Notice are equivalent to “personal data” governed by European data protection legislation – *i.e.*, any information relating to an identified or identifiable natural person. It does not include “anonymous data” (*i.e.*, information where the identity of individual has been permanently removed).

Controller. Cooley is responsible for your personal data. Cooley comprises Cooley LLP, a limited liability partnership formed under the laws of the State of California, United States of America, and registered with the register of the State Bar of California under number 50505-7, with offices in the U.S., Europe and Asia, and its affiliated practice, Cooley (UK) LLP, a limited liability partnership incorporated in England and Wales with registered number OC395270. Information on our affiliated practices can be found [here](#). For the purposes of European data protection legislation, your data will be controlled by the Cooley affiliate or subsidiary undertaking that you have instructed or that is providing services to you or communicating to you and each such entity is regarded as an independent data controller of your personal data.

Data Protection Officer. Our data protection officer can be contacted at: privacy@cooley.com or at the following postal address: [DPO, 10265 Science Center Drive, San Diego, CA 92121-1117, USA](#)

Legal bases for processing. In respect of each of the purposes for which we use your personal information, the European data protection legislation requires us to ensure that we have a legal base for that use. The legal bases of our processing of your personal information as described in this Privacy Notice will depend on the type of personal information and the specific context in which we process it. However, the legal bases we typically rely on are set out in the table below. If you have questions about the legal basis of how we process your personal information, contact us at privacy@cooley.com:

Processing purpose <i>Details regarding each processing purpose listed below are provided in the section above titled “How we use your personal information.”</i>	Categories of personal information involved <i>Details regarding the categories of personal information listed below are provided in the section above titled “Personal information we collect.”</i>	Legal basis
1. Service delivery and operations: We need to process your personal information to operate the Service, including responding to your requests or inquiries, providing you with access to content or information you requested, etc.	<ul style="list-style-type: none"> • Contact data • Demographic data • Communications data • Online identifiers and account information 	Processing is necessary to perform the contract governing our provision of our Service or to take steps that you request prior to signing up for the Service.

	<ul style="list-style-type: none"> • Payment and transactional data • Dietary information • Audio, electronic, and visual information • Professional or employment-related information • Device data • Internet activity or electronic network activity information • Other data 	
<p>2. For research and development: We may use your personal information for research and development purposes, including to analyze and improve the Service and our business.</p>	<p>Any and all data types relevant in the circumstances</p>	<p>These activities constitute our legitimate interests. We do not use your personal information for these activities where our interests are overridden by the impact on you.</p>
<p>3. We may need to process your personal information for additional purposes, such as:</p> <ul style="list-style-type: none"> • To ensure access and maintenance of the Service, and to ensure their proper functioning. • For compliance, fraud prevention and safety. • For sharing your personal information with third parties as described in this Privacy Notice. • To disclose your personal information to a prospective or actual purchaser or seller in the context of a merger, acquisition or other reorganization or sale of our business or assets. • For the collection of statistical information about the use of the Service. • To protect our interests as a company, for different purposes, such as: <ul style="list-style-type: none"> ○ Enforcement of the Terms of Service. 	<ul style="list-style-type: none"> • Contact data • Demographic data • Communications data • Online identifiers and account information • Payment and transactional data • Audio, electronic, and visual information • Professional or employment-related information • Device data • Internet activity or electronic network activity information • Other data 	<p>We rely on our legitimate interests to process your personal information when performing these processing activities. We do not use your personal information for these purposes where our interests are overridden by the impact on you.</p>

<ul style="list-style-type: none"> ○ Assess claims that any content violates the rights of third-parties. ○ For the establishment or exercise our legal rights or defending against legal claims. 		
<p>4. For marketing and advertising purposes: We and our third-party advertising partners may collect and use your personal information for marketing and advertising purposes.</p>	<ul style="list-style-type: none"> ● Contact data ● Demographic data ● Communications data ● Device data ● Internet activity or electronic network activity information ● Marketing data ● Other data 	<p>Processing is based on your consent where that consent is required by applicable law. Where such consent is not required by applicable law, we process your personal information for these purposes based on our legitimate interests in promoting our business.</p>
<p>5. Compliance with legal obligations and protection purposes: We are subject to certain legal obligations that may oblige us to disclose your personal information to courts, law enforcement or regulatory authorities.</p>	<p>Any and all data types relevant in the circumstances</p>	<p>Processing is necessary to comply with our legal obligations. Where Compliance with Law is not applicable, we and any relevant third parties have a legitimate interest in participating in, supporting, and following legal process and requests, including through co-operation with authorities. We and any relevant third parties may also have a legitimate interest of ensuring the protection, maintenance, and enforcement of our and their rights, property, and/or safety.</p>
<p>6. Further uses: We may use your personal information for reasons not described in this Privacy Notice.</p>	<p>Any and all data types relevant in the circumstances</p>	<p>The original legal basis relied upon, if the relevant further use is compatible with the initial purpose for which the Personal Information was collected. Consent, if the relevant further use is not compatible with the initial purpose for which the personal information was collected.</p>

Your rights. Subject to certain exemptions, and in some cases dependent upon the processing activity we are undertaking, you may have the following rights under data protection laws:

1. **Right of access:** You have the right to ask us for copies of your personal information.
2. **Right to rectification:** You have the right to ask us to rectify personal information you think is inaccurate. You also have the right to ask us to complete information you think is incomplete.

3. **Right to erasure:** You have the right to ask us to erase your personal information in certain circumstances.
4. **Right to restriction of processing:** You have the right to ask us to restrict the processing of your personal information in certain circumstances.
5. **Right to object to processing:** You have the right to object to the processing of your personal information in certain circumstances.
6. **Right to data portability:** You have the right to ask that we transfer the personal information you gave us to another organization, or to you, in certain circumstances.
7. **Right to withdraw consent at any time:** Where we are relying on consent to process your personal data, you have the right to withdraw your consent at any time. However, this will not affect the lawfulness of any processing carried out before you withdraw your consent.

Exercising These Rights. You may submit these requests by email to privacy@cooley.com or at the following postal address: DPO, 10265 Science Center Drive, San Diego, CA 92121-1117, USA. We may request specific information from you to help us confirm your identity and process your request. Whether or not we are required to fulfill any request you make will depend on a number of factors (*e.g.*, why and how we are processing your personal information), if we reject any request you may make (whether in whole or in part) we will let you know our grounds for doing so at the time, subject to any legal restrictions.

Your Right to Lodge a Complaint with Your Supervisory Authority. In addition to your rights outlined above, if you are not satisfied with our response to a request you make, or how we process your personal information, you can make a complaint to the data protection regulator in your habitual place of residence.

- For users in the European Economic Area – the contact information for the data protection regulator in your place of residence can be found here:

https://edpb.europa.eu/about-edpb/board/members_en

- For users in the UK – the contact information for the UK data protection regulator is below:

The Information Commissioner’s Office

Water Lane, Wycliffe House

Wilmslow - Cheshire SK9 5AF

Tel. +44 303 123 1113

Website: <https://ico.org.uk/make-a-complaint/>

Cross-border data transfer. We are headquartered in the U.S. and many of our service providers, advisers, partners or other recipients of data are also based in the U.S. This means that, if you use the Service, your personal information will necessarily be accessed and processed in the U.S. It may also be provided to recipients in other countries outside Europe. In such circumstances, those parties’ processing of your personal information will involve a transfer of your personal information outside of Europe where privacy laws may not be as protective as those in your state, province, or country. Where we share your personal information with third parties who are based outside Europe, we will take steps to transfer your personal information in accordance with applicable law.

You can obtain further information or a copy of or access safeguards under which your personal information is transferred outside of the EEA and/or UK by contacting us at privacy@cooley.com.