

## Privacy Policy

As professionals engaged in the provision of legal services to clients worldwide, Greenspoon Marder LLP, including its affiliated partnerships, (collectively, “Greenspoon Marder”, the “Firm”, “our”, “we”, or “us”) is committed to protecting the privacy of confidential and personal information, including personal data relating to individuals who may be clients, staff, agents, lawyers, law students, job applicants or others inside or outside the Firm. It has always been and remains the policy of the Firm to comply with the rules of professional conduct which impose a duty to preserve and protect confidential client information upon lawyers and their associated personnel.

This Privacy Statement is based on the privacy and data protection principles common to the countries in which we operate. We apply it in light of our overarching obligations to comply with the law, to preserve client confidentiality and to represent our clients as effectively as possible within the bounds of the law. This Statement is intended to summarize the Firm’s data protection practices generally, and to advise our clients, interested law students, job applicants, Website visitors, and other third parties about the Firm’s privacy policies that may be applicable to them.

This Privacy Statement is also addressed to parties outside the Firm who provide personal information to the Firm or who visit or use the Firm’s Websites. It applies to all individuals who access our Website (gmlaw.com), mobile apps, and in connection with our blogs, alerts, newsletters, webinars, social media sites or programs and other communication services (the “Services”).

Gmlaw.com (the “Website”) owned and operated by Greenspoon Marder LLP, 200 E. Broward Boulevard, Suite 1800, Fort Lauderdale, Florida 33301. Please take a moment to review the terms of our Privacy Statement. By using our Website, you agree to and accept the terms of our Privacy Statement. If you do not agree to the terms of this Privacy Policy, please do not use the Website.

We may update this Privacy Statement from time to time. The effective date of the current Privacy Statement is noted at the top of this page. If we make material changes to the way we collect, use, share or process the personal information that you have provided that adversely impact you, we will notify you by posting a notice of the changes in a clear and conspicuous manner on the our Website or via the most recent email address we have on file for you. We encourage you to check this page periodically for any changes. Your continued use of the Website following the posting of changes to these terms will mean you accept those changes.

If you have any concerns or questions about your privacy or use of our Services, please contact us via email at [privacy@gmlaw.com](mailto:privacy@gmlaw.com) or via postal mail at the relevant location listed in the “How to Contact Us” section below.

### Personal Information

#### Information We May Collect

When you use our Services, we collect personal information about your use of our Services and information that you send us. Throughout this Privacy Statement, we use the term “personal information,” which generally mean information that identifies you or makes you identifiable, and will have the meaning throughout as defined under the applicable law. Information that has been anonymized so that it does not identify a specific individual is not “personal information.”

We may collect and store the following information when running the Service:

- *Information You Provide Voluntarily.* We collect information that you voluntarily provide to us,

including: when you communicate via email or other channels; when you sign up for news, publications and marketing communications and events; when you seek career information; when you register for alumni communications newsletters, alerts, or other materials; when you submit an application for a position with us; when you sign up for a webinar or event; when you respond to our communications or requests for information. The information you provide may include your name, contact information, title, and information about the organization with which you are affiliated. In relation to career information, the information you provide may also include employment history and qualifications. We only collect and process the personal information we need to allow us to respond to your request and/or provide the particular service you have sought

- *Information We Collect Automatically.* We may automatically collect information about you when you use our Services such as, but not limited to:
  - *Device Information.* We may collect information about devices you use to access the Services and how you use the Services, such as your Internet Protocol (“IP”) address and which website you visited before accessing our Services.
  - *Performance and Log Data.* Our servers may automatically record information created by your use of our Services, which may include information such as, but not limited to, your IP address, browser type, operating system, command line information, diagnostic information related to the Services (e.g., crash activity reports), the referring web page, pages visited, location, your mobile carrier, device and application IDs, and search terms. For instance, when we send you an email, we may collect certain information including the nature of the email, whether you opened or deleted our email, action you took upon receipt of our email, or your name and contact information.
  - *Cookies.* We use cookies to display information more effectively, store, on a user’s computer or device information about the user’s preferences and settings, gather statistical information about the use of our Services to improve our design and functionality, and for security purposes. For more information, please review the Cookies and Other Technologies section below.
  - *DNT.* Please note that we do not currently respond to web browser “do not track” signals or other mechanisms that may allow you to opt out of the collection of information across networks of websites and online services as there is no standard for how online services should respond to such signals. As standards develop, we may develop policies for responding to do-not-track signals that we will describe in this Privacy Statement.
- *Information We Receive From Third Parties.* We may receive personal information about you from third parties and use such information. this can include: your name, email address, contact information, the company you work for, your position, business and home address, identification and background information, professional experience and qualifications, previous positions, financial information, such as payment related information and shareholdings, and other personal information. If you connect to us from a social network, such as LinkedIn or Facebook, we will collect personal information from the social network in accordance with your privacy settings on that social network. The connected social network may provide us with information such as your name, profile picture, network, gender, username, user ID, age or age range, language, country, friends list, follower list, and any other information you have agreed it can share or that the social network provides to us. We will assume that such social network or other third parties are entitled to collect and share such personal information with us.
- *Sensitive Information.* We may collect sensitive information about you when you use our Services. Any use of such information is limited to such purposes described to you at the time of collection.

## **How We May Use Your Information**

If you provide us with Personal Information, we will retain and use that information for certain limited purposes. For

example, we will use your Personal Information to fulfill or respond to any requests that you make, such as contacting you to answer your questions, sending you related materials, sending any postal mail that you may request or sending email alerts to you if you sign up to receive them.

We process your personal information when you contact us, such as with questions, concerns, feedback, disputes or issues. Without your personal information, we cannot respond to you or ensure your continued use and enjoyment of the Services. We also process your personal information to actively monitor, investigate, prevent and mitigate any alleged or actual prohibited, illicit or illegal activities in connection with our Services; investigate, prevent, or mitigate violations of our terms, agreements or policies; and enforce our agreements with third parties and partners. We cannot perform our Services in accordance with our terms, agreements or policies without processing your personal information for such purposes.

We are committed to ensuring your safety and continued enjoyment of our Services. To do so, we process your personal information to: combat spam, malware, malicious activities or security risks; improve and enforce our security measures; and to monitor and verify your identity so that unauthorized users do not access your account with us or your information we otherwise hold. We cannot ensure the security of our Services if we do not process your personal information for security purposes.

We may provide you with third-party services, plugins, and many other options to personalize your experience of our Services. In addition, we also use cookies and similar tracking technology for such purposes. By personalizing the Services, you get to enjoy our Services even more because we keep track of your preferences (e.g. your language selection, your time zone, etc.). Without processing your personal information for such purposes, you may not be able to access or personalize part or all of our Services.

To continue to provide you with our innovative Services, we collect information about the way you use and interact with our Services for research and development purposes. Research and development help us improve our Services and build new Services and customized features or Services. With respect to potential employment, we process your personal information when you seek employment with us to evaluate you as a candidate for the position.

Lastly, we use personal information to engage in routine marketing activities. We process your personal information to inform you about our Services, new legal and policy developments, relevant information in the industries we serve and our marketing events (including by electronic means, such as email). To do so we may process your contact information or information about your interactions on our Services to send you marketing communications; provide you with information about events, webinars, or other materials; deliver targeted marketing to you; and keep you updated about our Services. If you wish to opt out of receiving our email alerts or other emails from us at any time, simply follow the instructions for doing so included in the emails. We reserve the right to send you certain communications relating to the Website, such as service announcements or similar administrative or transactional messages, without offering you the opportunity to opt out of receiving them.

### **With Whom We May Share Your Information**

Greenspoon Marder does not sell consumer personal information. Moreover, we will only share or disclose your information as outlined herein.

We may sometimes use other businesses to perform certain services for us, such as maintaining the Website and our mailing lists, sending postal mail (if necessary) and providing marketing assistance and data analysis. We may provide Personal Information to those businesses when that information is necessary for them to complete a requested transaction or otherwise perform their duties. Greenspoon Marder will take reasonable steps to help ensure that these third-party service providers are obligated to protect Personal Information on Greenspoon Marder's behalf. Moreover, we restrict our service provider's use of information beyond what is strictly necessary to complete the requested service.

As Greenspoon Marder develops, we may acquire other law firms or their assets or be acquired by or merge with another law firm. Customer information is generally one of the business assets involved in such transactions. We may transfer information to a third party in case of the reorganization, sale, merger, joint venture, assignment, transfer or other disposition of all or any portion of our business, asset or stocks, including in the event of corporate

restructuring. We reserve the right, as part of this transaction, to transfer or assign personal information we have collected from you to these third parties. Except as otherwise provided by a bankruptcy or other court, the use and disclosure of all personal information will be subject to policies that are consistent with the policies described in this Privacy Statement. However, any personal information that is submitted or collected after that transfer may be subject to a new privacy policy adopted by the successor entity.

We reserve the right to disclose visitor information in special cases when we have reason to believe that disclosing this information is necessary to identify, contact or bring legal action against someone who may be causing injury to or interference with (either intentionally or unintentionally) our rights or property, other visitors, or anyone else that could be harmed by such activities. We also reserve the right to disclose visitor information when we believe that the law requires it.

Lastly, we will disclose your information to a person you have given us your consent to disclose to or as required to complete the Services.

### **Aggregate Information**

As noted above, Greenspoon Marder may collect general, non-personal, statistical information about the use of the Website, such as how many visitors visit a specific page on the Website, how long they stay on that page and which hyperlinks, if any, they “click” on. We collect this information through the use of “cookies” and other tracking technologies, which are discussed in greater detail below. We collect this information in order to determine which areas of the Website are most popular and to enhance the Website for visitors. We may group this information into aggregate visitor data in order to describe the use of the Website to our existing or potential business partners or other third parties, or in response to a government request. We may also group preferences information that we collect from visitors into aggregate data for the same purposes. However, please be assured that this aggregate data will in no way personally identify you or any other visitors to the Website.

### **Cookies and Other Tracking Technologies**

Our Website utilizes “cookies” and other tracking technologies. A cookie is a small text file that a Website transfers to a hard drive for record-keeping purposes. For example, we may use cookies to collect information about Website activity. Most browsers allow you to control cookies, including whether or not to accept them and how to remove them. You may set most browsers to notify you if you receive a cookie, or you may choose to block cookies with your browser. However, please be aware that some features of the Website may not function properly or may be slower if you refuse cookies.

Tracking technologies may record information such as Internet domain and host names; Internet protocol (IP) addresses; browser software and operating system types; clickstream patterns; and dates and times that our Website is accessed. An IP address is a number that is automatically assigned to your computer whenever you are surfing the Web. Web servers, the big computers that “serve up” Web pages, automatically identify your computer by its IP address.

It is not our practice to link the information we record using cookies or other tracking technologies to any Personal Information you submit while on the Website. However, we reserve the right to use cookies, IP addresses and other tracking technologies to identify a visitor when we believe it is necessary to enforce compliance with the Website's policies, to protect the Website, our visitors, clients or others, or when we believe that the law requires it.

### **Links to Other Websites**

Please be aware that when you are on GMLaw.com, you could be directed to other sites that are beyond our control. These other sites may send their own cookies to visitors, collect data or solicit Personal Information. The privacy policies of these other sites may be significantly different from Greenspoon Marder's Privacy Statement. We are not responsible for the privacy practices of these other sites and cannot guarantee the security of any of your Personal Information collected there.

## **Territoriality**

Our computer systems are currently based in the United States and the content of our Website is directed to United States residents. Your personal data will be processed by us in the United States, where data protection and privacy regulations may or may not be equal to the level of protection as in other parts of the world, such as in Canada and the European Union. BY VISITING THE WEBSITE, YOU UNEQUIVOCALLY AND UNAMBIGUOUSLY CONSENT TO THE COLLECTION AND PROCESSING IN THE UNITED STATES OF ANY PERSONAL AND NON-PERSONAL INFORMATION COLLECTED OR OBTAINED BY THE FIRM THROUGH VOLUNTARY SUBMISSIONS, AND THAT UNITED STATES LAW GOVERNS ANY SUCH COLLECTION AND PROCESSING. The Firm adheres to the General Data Protection Regulation (“GDPR”) for its clients and in its practice. The GDPR is not applicable to this informational Website targeted to United States clients.

## **Security**

We intend to take reasonable and appropriate steps to protect the Personal Information that you share with us from unauthorized access or disclosure. When you transmit Personal Information from your PC to our servers, your information is protected by both a “firewall” (a combination of computer hardware and software that helps keep unauthorized visitors from accessing information within our computer network) and industry standard SSL (Secure Socket Layer) encryption. Unfortunately, no data transmission over the Internet can be guaranteed to be 100% secure. As a result, while we strive to protect your Personal Information and privacy, we cannot guarantee or warrant the security of any information you disclose or transmit to us online and cannot be responsible for the theft, destruction or inadvertent disclosure of your Personal Information.

## **Children’s Privacy**

We do not knowingly collect any personal information from children under 16. If we become aware that an individual under the age of 16 is submitting information without consent from their parent or legal guardian or as permitted under applicable law, we will delete the information as soon as possible from our database. If you believe we are collecting information about an individual under 16, please notify us immediately so that we can take appropriate action.

## **Governing Law**

This Privacy Statement and the privacy practices of Greenspoon Marder are subject exclusively to the laws or rules of the State of Florida within the United States of America. Greenspoon Marder makes no representation that this Privacy Statement and such practices comply with the laws of any other country. Visitors who use the Website and reside outside the United States do so on their own initiative and are responsible for compliance with local laws, if and to the extent local laws are applicable. If you reside outside of the United States, by using the Website you consent to the transfer and use of your information outside your country.

## **You’re Information Choices**

We take reasonable steps to ensure that your personal information is accurate, complete, and up to date. You may access and update your personal information that we hold by contacting us directly at [privacy@gmlaw.com](mailto:privacy@gmlaw.com). For your protection, we may need to verify your identity before implementing your request. We will try to implement your request as soon as reasonably practicable.

In your request, please make clear what information you would like to have changed, whether you would like to have your personal information suppressed from our database, or other limitations you would like to put on our use of your personal information. However, please note that we reserve the right to refuse to act on a request that is unfounded or excessive (for example because it is repetitive).

The Firm will make reasonable efforts to honor any request you make to forgo contact with you in the future or delete your information. Please note that if you make an opt-out request, the Firm will retain your contact information to make efforts to ensure that you are not contacted in the future.

To the extent required by the CAN-SPAM Act, or other similar domestic and international regulation, commercial email messages will also provide you with an opportunity to opt-out of receiving this information. Please note that changes to your preferences may not be effective immediately.

### **Notice to California Residents**

This section applies only to California residents. Pursuant to the California Consumer Privacy Act of 2018, as amended (“CCPA”), below is a summary for the last twelve (12) months of the “Personal Information” categories, as identified and defined by the CCPA (see California Civil Code section 1798.140(o)), that we collect. The Sections above discuss the reasons we collect the Personal Information, where we obtain the Personal Information, and the other entities with whom we may share the Personal Information. Under the CCPA, Personal Information is defined as any information that identifies, relates to, describes, is reasonably capable of being associated with, or could reasonably be linked, directly or indirectly, with a particular consumer or household (“Personal Information”).

We generally collect the following categories of Personal Information in providing our Services:

- identifiers such as a name, address, unique personal identifier, email, phone number, your device’s IP address, software, and identification numbers associated with your devices;
- characteristics of protected classifications under California or federal law, such as gender;
- commercial information such as records of products or services purchased, obtained, or considered by you;
- internet or other electronic information regarding length of visit and number of page views, click-stream data, locale preferences, your mobile carrier, date and time stamps associated with transactions, and system configuration information;
- professional or employment-related information;
- your geolocation, to the extent you have configured your device to permit us to collect such information; and
- inferences about your preferences, characteristics, behavior and attitudes.

For more information about the Personal Information we collect and how we collect it refer to the language detailing our collection and use of information above. We collect Personal Information for the business purposes described in the “**How We May Use Your Information**” section above. The CCPA defines a “business purpose” as the use of Personal Information for the business’s operational purposes, or other notified purposes, provided the use of Personal Information is reasonably necessary and proportionate to achieve the operational purpose for which the Personal Information was collected or another operational purpose that is compatible with the context in which the Personal Information was collected. The categories of other individuals or entities with whom we may share your Personal Information are listed in the **With Whom We May Share Your Information section above.**

### **California Privacy Rights.**

If you are a California consumer as defined in the CCPA, you have rights in relation to your Personal Information; however, your rights are subject to certain exceptions. For instance, we cannot disclose specific pieces of Personal Information if the disclosure would create a substantial, articulable, and unreasonable risk to the security of the Personal Information, your account with us, or the security of our network systems.

To assert your right to know, to access, or to delete your Personal Information, please contact us by email at [privacy@gmlaw.com](mailto:privacy@gmlaw.com) or contact us at 888-491-1120. To confirm your identity, we may ask you to verify Personal Information we already have on file for you. If we cannot verify your identity based on the information we have on file, we may request additional information from you, which we will only use to verify your identity, and for security or

fraud-prevention purposes.

- **Right Against Discrimination.** You have the right not to be discriminated against for exercising any of the rights described in this section. We will not discriminate against you for exercising your right to know, delete or opt-out of sales.
- **Right to Know.** You have the right to request in writing: (i) a list of the categories of Personal Information, such as name, address, email address, that a business has disclosed to third parties during the immediately preceding calendar year for the third parties' direct marketing purposes, and (ii) the names and addresses of all such third parties. In addition, you have the right to request: (i) the categories of Personal Information we have collected about you, (ii) the categories of sources from which Personal Information is collected, (iii) the business or commercial purpose for the information collection, (iv) the categories of third parties with whom we have shared Personal Information, and (v) the specific pieces of Personal Information we hold about an individual.
- **Right to Access.** You have the right to request a copy of the specific Personal Information we collected about you during the 12 months before your request.
- **Right to Delete.** You have the right to request that we delete any Personal Information we have collected from you or maintain about you, subject to certain exceptions.
- **Right to Opt-Out of Selling.** California residents have the right to opt-out of having their Personal Information sold. We do not sell your Personal Information.

Should you have questions regarding the above, please contact us at 888-491-1120 or via email at [privacy@gmlaw.com](mailto:privacy@gmlaw.com) and indicate in the subject line "California Privacy Rights."

## Contacting Us

If you have any comments or questions regarding our Legal Notices, Terms of Use or Privacy Policy, please contact:

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