

CALIFORNIA PRIVACY RIGHTS ACT NOTICE

Irell & Manella LLP (“I&M”) is providing you with this Notice for Employees and Applicants Residing in California (“**Notice**”) to inform you:

1. about the categories of Personal Information that I&M collects about employees who reside in California;
2. about the purposes for which I&M uses that Personal Information;
3. that I&M does not sell Personal Information or share Personal Information for cross-context behavioral advertising; and
4. that I&M does not infer characteristics based on Sensitive Personal Information.

For purposes of this Notice,

“**Personal Information**” means information that identifies, relates to, describes, is capable of being associated with, or could reasonably be linked, directly or indirectly, with a natural person that I&M collects about its employees who reside in California, in their capacity as I&M’s employees.

“**Sensitive Personal Information**” means Personal Information that reveals (a) consumer’s Social Security or other state identification number; (b) a consumer’s account log-in, financial account, debit card, or credit card number in combination with any required security or access code, password, or credentials allowing access to an account; (c) consumer’s geolocation; (d) a consumer’s race or ethnicity, religious or philosophical beliefs, or union membership; (e) the contents of a consumer’s mail, email, or text messages unless the business is the intended recipient of the communication; and (f) a consumer’s genetic data.

In addition, Sensitive Personal Information includes processing of biometric information for purposes of identifying a consumer; Personal Information collected and analyzed concerning a consumer’s health, and Personal Information collected and analyzed concerning a consumer’s sex life or sexual orientation.

Assistance for Disabled Employees

Alternative formats of this Notice are available to individuals with a disability. Please contact hr@irell.com for assistance.

Notice at Collection

The following are the categories of Personal Information I&M collects from job applicants and employees and the purposes of the collection.

1. Identifiers and Professional or Employment-Related Information

1.1 Personal Information and Sensitive Personal Information Collected: I&M collects identifiers and professional or employment-related information, which may include the following:

Identifiers: real name, nickname or alias, postal address, telephone number, e-mail address, Social Security number, signature, online identifier, Internet Protocol address, bank account name and number for direct deposits, driver’s license number or state identification card number, and passport number.

Professional or Employment-Related Information: compensation, bonuses, equity grants, pensions, benefits, attendance, evaluations, performance reviews, discipline, personnel files, expenses, education, corporate credit card details, memberships in professional organizations, professional certifications, work eligibility in order to comply with legal requirements, and current and past employment history.

1.2 Purposes of Use¹:

Managing Job Applications:	
<ul style="list-style-type: none"> • To manage job applicant information for positions to be filled • To facilitate communication and interactions between job applicants and I&M interviewers and administrators 	<ul style="list-style-type: none"> • To assist applicants with information required by I&M’s background check provider • To set up applicant files
Managing Personnel:	
<ul style="list-style-type: none"> • To manage personnel and employment matters • To set up a personnel file • To administer compensation, bonuses, equity grants, other forms of compensation, and benefits, as permitted by law • To manage vacation, sick leave, and other leaves of absence • To provide training • To evaluate job performance and consider employees for other internal positions • To develop a talent pool and plan for succession • Career development activities • For diversity and inclusion programs • To conduct employee surveys • To engage in crisis management 	<ul style="list-style-type: none"> • To maintain an internal employee directory and for purposes of identification • To facilitate communication, interaction and collaboration among employees • To arrange team-building and other morale-related activities • To manage employee-related emergencies, including health emergencies • To promote I&M as a place to work • To arrange and manage I&M-sponsored events and public service activities • Workforce reporting and data analytics/trend analysis • To design employee retention programs • To fulfill recordkeeping and reporting responsibilities
Monitoring, Security and Compliance	
<ul style="list-style-type: none"> • To monitor use of I&M information • To conduct internal audits • To conduct internal investigations 	<ul style="list-style-type: none"> • To protect the safety and security of I&M’s facilities • To report suspected criminal conduct to law enforcement and cooperate in investigations

¹ All purposes of use identified herein are intended to be representative rather than exhaustive, and are intended to be construed broadly.

Conducting Our Business:	
<ul style="list-style-type: none"> • For communications with prospective, current, and former clients • To make business travel arrangements • To engage in project management • To manage business expenses and reimbursements 	<ul style="list-style-type: none"> • To promote the business • To provide a directory and contact information for prospective and current clients and business partners

2. Personal Information Categories From Cal. Civ. Code Section 1798.80(e)

I&M collects categories of Personal Information listed in Cal. Civ. Code Section 1798.80(e) (other than those already listed in “Identifiers,” above) as follows for the corresponding purposes listed below:

- Photograph and physical description: (a) for security and internal identification purposes, and (b) to identify employees to co-workers, prospective and current clients, and other third parties.
- Medical information: (a) to the extent necessary to comply with I&M’s legal obligations, such as to accommodate disabilities; (b) to conduct a direct threat analysis in accordance with the Americans with Disabilities Act and state law; (c) for workers’ compensation purposes; (d) for occupational health and safety compliance and record-keeping; (e) to administer leaves of absence and sick time; and (f) to respond to an employee’s medical emergency.
- Benefits information: to administer short- and long-term disability benefits.

3. Characteristics of Protected Classifications Under California or Federal Law

I&M collects information about race, age, national origin, disability, sex, and veteran status as necessary to comply with legal obligations, including the reporting requirements of the federal Equal Employment Opportunity Act and California’s Fair Employment and Housing Act. I&M also collects information about disability status to the extent an employee may need special assistance during emergencies from I&M or from first responders.

I&M also collects the following characteristics (in addition to those listed above) for its diversity and inclusion programs (including analytics), to respond to industry surveys and potential client requests for proposals and for the purposes of administering employee perquisites and support programs: (a) religion, (b) sex, (c) gender, (d) pregnancy, (e) childbirth, (f) breastfeeding, or related medical conditions, (g) sexual orientation, (h) disability, (i) gender identity, (j) gender expression, (k) marital status, (l) age, (m) familial status, (n) ancestry or (o) racial information.

I&M also uses this Personal Information for purposes including: with respect to disability, medical condition, familial status, marital status, and pregnancy, childbirth, breastfeeding, and related medical conditions, as necessary to comply with Federal and California law related to leaves of absence and accommodation; with respect to military and veteran status, as necessary to comply with leave requirements under applicable law and for tax purposes; with respect to age, incidentally to the use of birth date for birthday celebrations and identity verification; with respect to religion and pregnancy, childbirth, breastfeeding, and related medical conditions as necessary for accommodations under applicable law; with respect to protected classifications, such as national origin, to the extent this information is contained in documents that you provide in I-9 documentation; and with respect to marital status and familial status, for Company events and as necessary to provide benefits and for tax purposes.

I&M collects this category of Personal Information on a purely voluntary basis, except where required by law and uses the information only in compliance with applicable laws and regulations.

4. Commercial Information

4.1 Personal Information Collected: I&M collects commercial information including the following: records of products or services purchased, obtained, or considered, or other purchasing or consuming histories or tendencies.

4.2 Purposes of Use: reimbursement of business expenses, auditing, data security, preventing illicit activity, providing services, research and development, error prevention, quality assurance and improvement, product and service training, and order fulfillment.

5. Biometric Information

5.1 Personal Information Collected: I&M collects biometric information, including the following: geometric facial recognition using camera technology.

5.2 Purposes of Use: control access to secure facilities, to protect the safety and security of the Company’s facilities and to investigate improper conduct.

6. Internet or Other Similar Network Activity

6.1 Personal Information Collected: I&M collects information about employees’ use of the Internet or other similar network activity, including the following: browsing history, search history, downloads, log in/out and activity on I&M’s electronic resources, and information regarding an employee’s interaction with an Internet website, application, or advertisement, and publicly available social media activity.

6.2 Purposes of Use: to monitor use of I&M’s information systems and other electronic resources or information systems, to conduct internal audits, to conduct internal investigations, to protect the safety and security of I&M’s facilities and information systems, and to impose discipline.

7. Geolocation Data

7.1 Personal Information Collected: I&M collects geolocation data, including information that can be used to determine a mobile device’s physical location.

7.2 Purposes of Use: to ensure security of I&M and client data in the event a device is lost or stolen and potentially other emergency uses.

8. Sensory or Surveillance Data

8.1 Personal Information Collected: I&M collects sensory or surveillance data, including the following: voicemails and footage from video surveillance cameras.

8.2 Purposes of Use: for purposes of communication, to protect the safety and security of I&M’s facilities, company and client property, and personnel through video surveillance, to monitor compliance with I&M policies, and to investigate improper conduct.

9. Non-Public Education Information

9.1 Personal Information Collected: I&M collects education information, including academic transcripts, employment and professional information.

9.2 Purposes of Use: to determine suitability for internal roles and promotions, to verify resumes, to determine eligibility for training courses, and to assist with professional licensing.

10. Preferences

10.1 Personal Information Collected: I&M collects employee preferences information, including preferred meals, seating and other travel preferences, desired working hours, work space preferences, and preferred work supplies.

10.2 Purposes of Use: for travel and event planning, for employee satisfaction, and to plan and arrange work supplies and workspaces.

Purposes Potentially Applicable to any of the Categories of Personal Information Listed Above

In addition to the foregoing, I&M also may use and disclose employees' Personal Information to third parties to facilitate administrative functions and information technology operations and for legal reasons and corporate transactions. These acceptable uses by I&M include, but are not limited to the following:

- to manage and operate information technology and communications systems, risk management and insurance functions, budgeting, financial management and reporting, strategic planning;
- to manage litigation involving I&M or its clients, and other legal disputes and inquiries and to meet legal and regulatory requirements;
- in connection with a potential transaction, sale, or assignment of assets, merger, divestiture, or other changes of control or financial status of I&M or any of its affiliates;
- to comply with legal process or requests from law enforcement or regulatory agencies; and
- to manage licenses, permits and authorizations applicable to I&M's business operations.

I&M does not share Personal Information with a third-party for cross-context behavioral advertising, whether or not for monetary or other valuable consideration.

I&M does not sell employee Personal Information.

For these reasons, I&M is not required to provide an opt-out of the sale or sharing of your Personal Information.

I&M is not required to provide an opt-out of the use or disclosure of Sensitive Personal Information, including because it does not infer characteristics based on such information.

11. Notice of Categories of Personal Information Collected and Disclosed

I&M has collected the foregoing categories of Personal Information listed in Sections 1-10 above from California employees for the purposes described above. The sources of the categories of Personal Information in Sections 1 through 5, 9 and 10 are employees themselves; we also collect the categories of Personal Information in Sections 1, 2 and 9 from recruiters, employment agencies and online job services. We use service providers to collect the categories of Personal Information in Sections 6 through 8.

12. Retention of Personal Information

We generally retain your Personal Information for the period necessary to fulfill the purposes of the collection, including for the period of your employment, and for such additional periods as may be required to comply with applicable laws and legal obligations.

13. Consumer Rights

13.1 You have the following rights and you may exercise your rights by notifying hr@irell.com. Please identify which of the following rights you seek to exercise and I&M will respond to your request within fourteen days from receipt of your request.

- The right to know (request disclosure of) Personal Information collected by I&M, why it was collected and if it was sold and to whom.
- The right to delete Personal Information collected from you, subject to certain exceptions under the CCPA and other laws.
- The right to non-discriminatory treatment for exercising any rights.
- The right to correct inaccurate Personal Information.

13.2 We may ask for certain information to verify the identity of the person making the request. This may include two or more pieces of Personal Information depending on the nature of the request. You also have the right to designate an agent to exercise these rights on your behalf. In such cases, we may require you to do either of the following: (1) verify your own identity directly with us or (2) directly confirm with us that you have provided the authorized agent permission to submit the request. Alternatively, you or your authorized agent can provide us a power of attorney pursuant to Probate Code sections 4121 to 4130.

13.3 You may contact I&M for more information about this Notice and its privacy practices by contacting hr@irell.com.

This notice is effective as of August 7, 2023.