California Privacy Policy

Last Updated: November 2020

Irell & Manella LLP (“I&M”) respects your privacy and is committed to protecting it. This Privacy Policy explains how I&M treats the Personal Information of California Consumers.

1. What Personal Information Do We Collect and How

What Is Personal Information?

“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 particular California Consumer or household.

Personal Information You Provide to Us.

Below is information regarding (a) the categories of Personal Information we have collected about you, (b) the sources of that Personal Information, (c) the business and commercial purposes for use, and (d) the categories of third-party recipients of your Personal Information for the 12 months preceding the date last updated above. Unless we inform you otherwise, this section also serves as our “Notice at Collection” by informing you of your Personal Information to be collected in the future and the purposes for its use.

You do not have to provide I&M with any Personal Information (e.g., name, address, telephone number, e-mail address, financial information, the name of your organization) unless you choose to provide it to us, including through direct interaction with us (such as by interacting with our personnel), by mail, e-mail, telephone, fax, or electronically.

With respect to this website, we collect certain non-personally identifiable information such as the type of browser you are using, the type of operating system you are using, and the domain name of your Internet service provider.

In the course of our business, we may also collect and process:

- Information you provide us relating to event invitations such as access limitations and dietary restrictions;
- Background information you provide, such as your name, mailing address, phone number, email, as part of our new business intake process;
- Information provided to us, or generated by us, such as your employment history and education, as part of our client representation.
- I&M may also collect from its website users, potential clients, or existing clients the following categories of Personal Information:
  
  (1) commercial information (examples: personal property, purchasing habits, etc.);
  (2) protected information (examples: race, ethnicity, gender, date of birth, sexual orientation);
California Privacy Policy

(3) Personal Information as identified by Cal. Civ. Code Sec. 1798.80 (examples: social security numbers, date of birth, medical information, photos, bank account number and other financial information);

(4) professional or employment information (examples: employment history and professional certifications);

(5) background checks

2. How Personal Information Is Used

I&M collects and processes Personal Information that you choose to submit to us in order to:

- Respond to your inquiry or process an application form that you choose to submit;
- Manage and administer our relationship with you and our clients;
- Provide professional services to you and our clients;
- Conduct administrative or operational processes within our firm;
- Promote our services, including sending legal updates, publications and information about events;
- Conduct recruiting;
- Analyze the use of this website, in order to improve its design and content;
- Comply with our legal obligations or to exercise or defend legal rights.

3. To Whom We Disclose Personal Information

No Sale of Personal Information

I&M does not and will not sell California Consumers’ Personal Information.

In the last 12 months, I&M disclosed the following categories of Personal Information about California Consumers to the following categories of third-party service providers for a business or commercial purposes only. **Category of Personal Information**

**Categories of Service Providers with Whom We Disclose Categories of Personal Information for a Business Purpose in the Last 12 Months**

- **Identifiers**
  - Email marketing provider
  - Government agencies, law enforcement, and other parties as required by law, including in litigation

- **Characteristics of protected classifications under California or federal law**
  - n/a

- **Commercial Information**
  - n/a
  - Biometric Information n/a
4. How We Protect Personal Information

We use an array of security management tools to protect your Personal Information and hold the ISO27001 international security standard certification. Although I&M makes every effort to protect your Personal Information, we cannot guarantee it.

5. Use of Cookies

This website uses cookies, which are small text files that are placed on a computer when visiting a website. Cookies permit us to distinguish you from other visitors to this website, and have a variety of purposes, including enhancing performance and functionality of a website, as well as compiling statistics. This website uses cookies for statistical purposes, and all data are anonymized so as not to identify you as an individual. Using cookies helps us to improve the functionality and performance of our website. By using this website you agree to our use of these cookies.

Web browsers typically accept cookies by default, while also providing users the means to modify their settings and reject cookies. If you wish to disable cookies from this website, you must do so in each browser, and on every device from which you may access this site. Note, however, that disabling cookies may affect your ability to use this or other web sites.

We use Google Analytics (GA) for aggregated, anonymized website traffic analysis. In order to track your session usage, Google drops a cookie with a randomly-generated ClientID in your browser. This ID is anonymized and contains no identifiable information like email, phone number, name, etc. We use GA to track aggregated website behavior, such as what pages you looked at, for how long, and so on. This information is important to us for improving the user experience and determining site effectiveness. If you would like to access what browsing information we have – or ask us to delete any GA data – please delete your GA cookies, reach out to us at privacy@irell.com or (888) 905-0460, and/or install the Google Analytics Opt-Out Browser Add-On.

6. Anonymizing Data

All recorded user IP addresses are anonymized to ensure that all personally identifiable user information is not tracked or accessed.

7. Your Rights

We are committed to respecting your rights, including where applicable under the California Consumer Privacy Act.

YOUR CALIFORNIA PRIVACY RIGHTS
a) Right to Know

California Consumers have the right to submit a verifiable request to know:

- The categories and specific pieces of Personal Information that I&M has collected about them;
- The categories of sources from which I&M collected the Personal Information;
- The categories of Personal Information that I&M sold or disclosed to a third party (other than a service provider) for a business purpose and the categories of recipients of that information; and
- The business or commercial purposes for I&M’s collection, disclosure, or sale of the Personal Information.

b) Right To Delete

- California Consumers have the right to submit a verifiable request for deletion of their Personal Information that I&M has collected from the Consumer.

c) Right to Opt Out of Sale of Personal Information

- California Consumers have a right to opt-out of the sale of the Personal Information. However, as stated above, I&M does not and will not sell Personal Information.

HOW TO EXERCISE YOUR RIGHTS

a) Making Requests

I&M will respond to requests in accordance with applicable law if it can verify the identity of the individual submitting the request. California Consumers can exercise their rights in the following ways:

1. Complete the online request form available here: https://www.irell.com/consumer-request
2. Contact by telephone: (888) 905-0460

b) Requests By Authorized Agents

You can have an authorized agent submit a CCPA request to us on your behalf by (a) providing us with a written authorization signed by you that designates the agent as your authorized agent for purposes of a CCPA request; (b) verifying your identity directly with us; and (c) directly confirming with us that the agent is authorized to submit the request.

c) How We Will Verify Your Requests

To prevent anyone other than you, or your authorized agent, from exercising the right to know or the right to delete with respect to your Personal Information, we follow procedures to verify your, or your agent’s, identity. This process seeks to confirm that the person making a request is the person about whom we have collected Personal Information or that person’s authorized agent. The verification process involves matching data points that you
provide with your request against information about you we already have in our records and that we have
determined to be reliable for purposes of verifying your identity. We will use information you provide in your
completed request form to verify your identity, and we may request additional information if necessary to complete
the verification process.

ADDITIONAL RIGHTS UNDER CALIFORNIA LAW

a) I&M’s Non-Discrimination Policy

California Consumers have the right not to be subject to discriminatory treatment by I&M for exercising their privacy
rights under the California Consumer Privacy Act, and I&M will not discriminate on that basis. However, I&M may
charge a California Consumer a different price or rate or provide a different level or quality of goods or services if the
difference is reasonably related to the value provided to the California Consumer by the Consumer’s Personal
Information. If I&M does so, it will provide Consumers with any legally required notice.

b) Your ‘Do Not Track’ Browser Setting

This website does not collect personally identifiable information about your online activities over time and across
third-party websites or online services. We support the Do Not Track (DNT) browser setting. DNT is a preference you
can set in your browser’s settings to let the websites you visit, including this website, know that you do not want the
sites collecting your personally identifiable information.

8. Third-Party Links And Services

We provide links to third-party websites operated by organizations not affiliated with I&M. We do not disclose your
Personal Information to organizations operating such linked third-party websites. We do not review or endorse, and
are not responsible for, the privacy practices of these organizations. We encourage you to read the privacy policy of
each and every website that you visit. This Privacy Policy applies solely to information collected by I&M through the
services.

9. Minors Under 16 Years of Age

We respect the privacy of children. Our services are not designed to attract an audience younger than sixteen (16),
and we do not knowingly collect Personal Information from children under sixteen (16). If you are under the age of
sixteen (16), you are not permitted to use our services and should not send any information about yourself to us
through the services. Please contact us using the contact details below if you believe we may have collected
information from your child under the age of sixteen (16), and we will work to delete it.

10. Revisions to this Policy

We reserve the right to revise this policy or any part of it from time to time. Please review the policy periodically for
changes.
11. Contacting Us

If you have any questions regarding this policy, please contact us by emailing us at privacy@irell.com, calling us at (888) 905-0460, or by sending a signed letter addressed to:

Privacy Officer
Irell & Manella LLP
1800 Avenue of the Stars, Suite 900
Los Angeles, CA 90067
United States of America