



PRIVACY POLICY

AT BARTKO PAVIA LLP ("B&P," "US," "WE," OR "OUR"), WE ARE COMMITTED TO SAFEGUARDING YOUR PRIVACY AND PROTECTING YOUR PERSONAL INFORMATION. THIS PRIVACY POLICY EXPLAINS HOW WE COLLECT, USE, DISCLOSE, AND PROCESS YOUR PERSONAL INFORMATION IN ACCORDANCE WITH APPLICABLE LAWS, INCLUDING REGULATIONS. IT COVERS OUR INTERACTIONS THROUGH THE WEBSITE (THE "WEBSITE"), SOCIAL MEDIA PAGES, CLIENT SERVICES ("CLIENT SERVICES"), AND OTHER ONLINE OR OFFLINE INTERACTIONS ("SERVICES").

By accessing or using our Services, you expressly consent to the collection, usage, and disclosure of your personal information as outlined in this Privacy Policy. Please read this Privacy Policy carefully and ensure your understanding. It is an integral part of our Terms and Conditions.

1. Minors

We do not intentionally target or direct our Services to minors, and we do not knowingly collect or solicit personal information from individuals under the age of 18. By using our Website or providing us with your personal information, you confirm that you are not under 18 years of age.

2. Information We Collect About You and How We Collect It

- **Personal Information.** This Privacy Policy pertains to the collection and usage of personal information, which includes any data that identifies or is related to an identifiable individual. Personal information encompasses details like name, mailing address, email address, and telephone number. It does not include aggregated or anonymized data.
- **Direct Information Provision.** When you engage with our Website or utilize our Services, you may directly provide personal information to B&P. This includes contact information such as name, email, mailing address, and phone number. Examples include completing a contact form, newsletter subscriptions, and interactions with our attorneys for Client Services.

- **Automated Information Collection.** During your use of the Website or interaction with our emails, B&P may automatically collect usage information through analytics tools, pixels, java scripts and cookies. This includes details like IP address, web browser information, mobile device unique number, visited pages within the Website, timestamps, and opened email links.
- **Client Information.** Clients may provide personal information to B&P at various stages of their relationship with us. This includes contact details and necessary tax and financial information required for regulatory compliance or reporting purposes. Payment information may also be necessary for processing Client Services.
- **Recruiting Information.** Individuals applying for jobs or discussing potential opportunities with B&P may provide personal information such as names, phone numbers, email addresses, educational backgrounds, and job histories.
- **Social Media.** When engaging with our social media pages, we may collect information, including anonymous data from tracking pixels. These pixels provide insights into user interactions. You may have the option to adjust your privacy settings on social media platforms. For information on LinkedIn's privacy settings, please visit: <https://www.linkedin.com/psettings/>.
- **Information from Public and Private Sources.** We may collect personal information from publicly available sources, such as public governmental databases or company registries. Additionally, we may obtain personal information from private sources, including transaction parties, financial institutions, regulators, and other law firms. Such information may be combined with other personal information we receive or collect.

3. How We Use Your Information

We and our service providers utilize your personal information for various purposes, all in compliance with applicable laws. These purposes include:

- Providing you with Services and responding to your inquiries and requests.
- Performing Client Services and fulfilling contractual obligations between you and B&P.
- Improving and modifying our Services.
- Meeting legal and regulatory requirements and responding to legal orders.
- Keeping records of our interactions with you.
- Monitoring for fraud and security events, including cybersecurity issues.
- Analytics.

- Any other purpose with your consent.

We ensure that your personal information is used only to the extent necessary to fulfill the purposes described in this Privacy Policy.

4. To Whom We Disclose Your Information

We do not sell or rent your personal information to third parties for monetary or other valuable consideration. However, we may disclose your personal information in the following circumstances:

- Within B&P. We may share your personal information among B&P to provide Services and for internal administrative purposes.
- Service Providers. We engage trusted third-party service providers to assist in delivering our Services.
- Legal and Regulatory Requirements. We may disclose your personal information to comply with applicable laws, regulations, legal processes, or enforceable government requests. This includes responding to subpoenas, court orders, or lawful requests from regulatory authorities.
- Business Transactions. In the event of a merger, acquisition, sale, reorganization, bankruptcy, or insolvency proceeding involving B&P, your personal information may be disclosed or transferred to the acquiring entity, advisors, or other parties involved.

In such situations, B&P will make reasonable efforts to ensure that the acquiring entity (or potential acquiring entity) handles your personal information in accordance with this Privacy Policy at the time of the Transaction. However, B&P cannot guarantee or assume liability for how such entity treats your information in compliance with the Terms (including the Privacy Policy).

5. How We Store and Retain Your Information

We retain personal information for as long as necessary to fulfill the purposes for which it was collected, taking into account factors such as the duration of our relationship with you (including if you are a client), legal requirements, ethical rules, attorney-client privilege, and the need to retain information in connection with potential legal claims or positions.

6. How We Protect Your Information

B&P implements reasonable measures to protect the personal information you provide by employing appropriate physical, technical, and administrative security safeguards. However, please be aware that transmitting your personal information via the Internet carries inherent risks, and while we implement security procedures, we cannot guarantee the absolute security of transmitted information. Therefore, you assume the risk associated with transmitting your personal information to us via the Website.

7. Third-party Websites

This Website and other Services may contain links to websites maintained or controlled by third parties, which are independent of B&P. B&P assumes no responsibility for the privacy practices (if any) of these third-party websites, and we encourage you to review their respective privacy policies (if any). The presence of a link to a third-party website on the Website or other Services does not imply that the third-party site adheres to the same or similar privacy practices outlined in this Privacy Policy. The policies and procedures described in this Privacy Policy apply solely to B&P and do not extend to third-party websites. Accessing a third-party website through a link provided on our Website is done at your own risk. You acknowledge that your access to social media features linked on the Website and other Services (e.g., links to LinkedIn, etc.) is governed by the terms of use and privacy policies of the respective companies providing those social media features.

8. International Transfers and EU Rights

Please note that B&P is a United States-based law firm with its headquarters and operations solely within the United States. As of the effective date of this Privacy Policy, B&P does not maintain offices outside of the United States, including the European Union (EU). If you are a visitor to this Website residing outside of the United States (including the EU), please be aware that providing any personal information to us via the Website or other Services may result in your personal information being transferred to a jurisdiction (the United States) that may not have the same level of data protection laws as your home country. By providing your personal information to us, you consent to the transfer of your information to the United States and acknowledge that B&P cannot guarantee the same level of protection for your personal information as provided by the laws in your home country. If you do not wish to have your personal information made available to B&P personnel outside your home jurisdiction, please refrain from providing it to us via the Website or any other means.

9. California Legal Rights; California Job Applicants

If you are a resident of California, you may have certain rights under various California privacy laws. For further information, please refer to the [California Addendum](#) located at the end of this Privacy Policy. If you are a California job applicant, please review the [Notice to California Job Applicants and Employees](#) at the end of the California Privacy Addendum.

10. How We Notify You of Privacy Policy Changes

B&P reserves the right to revise this Privacy Policy at any time. Regularly reviewing these Privacy Policy webpages are the most effective means of staying informed about the information collected by B&P, its usage, and the circumstances under which it is disclosed.

11. How You Can Opt-Out; How You Can Contact Us

If you wish to stop receiving email messages and promotional communications from us, you can opt out by contacting us via email at info@bartkopavia.com or through regular mail at 1100 Sansome Street, San Francisco, CA 94111.

You can also use these contact details to request changes to your previously provided information or seek further information or clarification about this Privacy Policy, the Terms, or any other notices posted on our Website.

CALIFORNIA PRIVACY ADDENDUM

This document provides additional information for California residents and households regarding their rights under the California Consumer Privacy Act of 2018 ("CCPA"), as amended by the California Privacy Rights Act of 2020 ("CPRA") (collectively referred to as the "California Privacy Laws").

1. What Categories of Personal Information We Collect

Outlined below are the categories of personal information collected from California residents by B&P, both in the past twelve months and going forward:

- 1. Identifiers.** This category includes information such as name, address, email address, and Social Security number.
- 2. Personal Information Classifications.** This category includes details like name, signature, address, phone number, education, and employment history.
- 3. Characteristics of Protected Classifications.** This category encompasses information related to minority, veteran and disability status, which is collected with voluntary self-disclosure. Please note that such information will only be gathered in accordance with applicable laws and will not be utilized for hiring decisions.
- 4. Commercial information.** This category involves records of Client Services, financial data, and payment information.
- 5. Internet or Electronic Network Activity Information.** This category covers data such as IP addresses, log-in information, browsing history, and interactions with websites, applications, or advertisements.
- 6. Geolocation Data.** This category includes information regarding IP addresses and device locations used to determine general geographic location.

7. **Audio, Electronic, Visual, and Similar Information.** This category includes call recordings, CCTV footage for safety and security purposes (e.g., office premises), and audio/video recordings of events, conferences, and meetings.
8. **Professional or Employment-Related Information.** This category involves job title, employer name, work history, references, skills, accomplishments, training, performance evaluations, and employment termination details.
9. **Education Information.** Subject to the Federal Educational Rights and Privacy Act. This category comprises educational history, records (e.g., grades, transcripts), and information provided in resumes or cover letters.
10. **Inferences Drawn from Other Personal Information.** This category refers to profiles reflecting preferences, characteristics, psychological trends, behaviors, attitudes, intelligence, abilities, and aptitudes.
11. **Sensitive Personal Information.** This category, as defined under the CPRA, includes Social Security or state identification numbers, account login information, financial or payment data, geolocation, racial or ethnic origin, beliefs or union membership, contents of mail/ email/text messages (unless B&P is the intended recipient), genetic and biometric data, health information, and information regarding sex life or sexual orientation.
12. **Legal or Contractual Information.** This category encompasses information necessary to respond to law enforcement or governmental agency requests, comply with legal and contractual obligations, exercise legal rights, or establish, exercise, and defend legal claims.
13. **Other Information Collected from California Job Applicants.** This category includes job interview notes, responses to screening questions, assessment results, and other information provided during the recruitment process.

For further details on the sources of this information, the purposes for which it is used, and the parties with whom it is shared, please refer to the relevant sections in our general Privacy Policy.

2. Your Rights Under California Privacy Law

Subject to exceptions and limitations, California Privacy Laws grant you the following rights:

- **Right to Know.** You have the right to request information about the personal information we have collected about you, including the categories of personal information, sources of collection, and the business purposes for collecting it. Additionally, you have the right to request specific pieces of personal information in a portable and structured format.
- **Right to Correct.** You can request the correction of inaccuracies in your personal information.

- **Right to Delete.** In certain circumstances, you have the right to request the deletion or de-identification of your personal information. However, please note that this right does not apply in specific situations, such as when the information is necessary to provide services, fulfill a contract, protect security and rights, comply with legal obligations, or engage in research or other lawful uses.
- **Right to Opt-Out.** You have the right to opt-out of the disclosure of your personal information for valuable consideration or cross-contextual behavioral advertising. Please be aware that B&P does not sell, rent, or share personal information for such purposes.
- **Right to Request a Record of Third-Party Direct Marketing Disclosures.** California residents may request a list of personal information disclosed to third parties for direct marketing purposes in the previous twelve (12) months, including the names and addresses of those parties.

3. How You Can Submit a Request

If you exercise your applicable California rights, B&P will not discriminate against you. To exercise any of these rights, please submit a verifiable consumer request to info@bartkopavia.com or through regular mail at 1100 Sansome Street, San Francisco, CA 94111. We may require additional information to verify your identity and protect against fraudulent requests. Authorized agents may also submit requests on your behalf, subject to verification procedures.

We strive to respond to verifiable consumer requests within 45 days. If an extension is necessary, we will notify you in writing.

4. Limitations on the Use and Disclosure of Sensitive Personal Information

Under the CPRA, you have the right to limit the use and disclosure of Sensitive Personal Information when used for inferring consumer characteristics. However, please note that B&P only uses Sensitive Personal Information for specific purposes, such as providing services, ensuring security, and complying with legal obligations.

5. Minors

We do not sell or share personal information of individuals under 16 years of age, as defined by California Privacy Laws.

6. Automated Decision-Making

We do not utilize personal information for automated decision-making processes.

7. Conflicts

This California Privacy Addendum is supplementary to and incorporated into our Privacy Policy. In the event of any conflict between this California Privacy Addendum and the Privacy Policy, the California Privacy Addendum shall prevail solely concerning personal information governed by California Privacy Laws.

IMPORTANT NOTICE FOR CALIFORNIA JOB APPLICANTS AND EMPLOYEES

In accordance with California privacy laws, we are obligated to provide this important notice to all California residents who apply for employment or are currently employed by B&P. This notice also applies to individuals referred to as “attorneys,” “interns,” “law clerks,” and “contractors.”

1. Purpose and Scope of the Notice

The purpose of this notice is to inform you about the collection, use, and disclosure of HR Data (as defined below) that we receive from you, whether directly or indirectly, via the Website, inperson interactions, or any other means.

Please note that this notice supplements our California Privacy Addendum. If you provide us with HR Data (as defined below), the rights outlined in Section 2. (“Your Rights Under California Privacy Law) below, as well as the disclaimers regarding Limitations on the Use and Disclosure of Sensitive Personal Information, Minors, and Automated Decision-Making outlined in Sections 4., 5. and 6., respectively, will also apply to such HR Data.

2. What Personal Information Do We Collect from Job Applicants and Employees?

For job applicants and employees who are California residents, B&P collects and has collected, used, and disclosed, within the twelve months preceding the effective date of this Privacy Policy, the following categories of personal information listed in Section 1. (“What Categories of Personal Information We Collect”) below: categories a., b., d., h., i., j., k., l., and m. For the purposes of this notice, all such personal information is collectively referred to as “HR Data.”

3. From What Sources Do We Collect HR Data?

- **Voluntarily Provided Information.** We collect HR Data directly from you when you voluntarily provide us with information during the job application, recruitment, or interview process. If you become an employee of B&P or are currently employed by us, you may also voluntarily provide us with HR Data necessary for the administration of payroll, benefits, insurance, and taxes.

- **Automatically Collected Information.** We automatically collect HR Data in the form of Internet or other electronic network activity information (such as IP address or other device identifiers) when you visit the Website, including any careers page or online job postings.
- **Public Sources.** We collect HR Data from publicly available sources such as your social media profiles, prior employer websites, and public pages of various state Bar Associations.
- **Private Sources.** For job applicants, we collect HR Data from recruiters, previous employers, professional references, universities, other educational institutions, and pre-employment screening providers (e.g., background check providers). For both job applicants and current employees, we collect HR Data from credentialing and licensing organizations, as well as governmental entities.
- **Other Sources.** As part of your job application process or in managing your employment, you may direct us to other sources of HR Data.

4. How Do We Use HR Data?

We use HR Data for the following business purposes:

- **Processing and Managing Job Applications.** We use HR Data to assess your qualifications and evaluate your candidacy for employment. During the application process, we may collect photographs of you for identification purposes, and with your consent, we may record video footage of your interview.
- **Conducting Screening and Background Checks.** We may perform background checks and/ or other employee screening procedures, in compliance with applicable law, which may require the use of HR Data, including certain Sensitive Personal Information, such as social security numbers.
- **Facilitating Visa or Work Permit Applications.** In some cases where a visa or work permit is required, we use HR Data to assist you in obtaining the necessary documentation.
- **Managing Employment.** If you become an employee, we use HR Data (including HR Data provided during the pre-employment stage) to manage your employment, including compensation, benefits, insurance, taxes, and any employment termination. We may also use HR Data to evaluate your ongoing performance at B&P.
- **Compliance with Legal or Regulatory Requirements.** We retain HR Data as mandated by applicable law. In certain circumstances, we may be legally obligated to retain or utilize HR Data, such as for detecting, preventing, or investigating security incidents, fraud, or other illegal activities, or to protect the rights, property, and safety of B&P or others.

- Improving Recruiting Processes and Employment Practices. We utilize HR Data to enhance our recruiting processes and evaluate our employment practices with respect to current employees.

5. How do we disclose HR Data?

We disclose HR Data for the business purposes described above in this notice, both internally within B&P and externally as follows:

- **Service Providers.** We may disclose HR Data to service providers who assist us in operating and supporting our recruiting processes, including recruiting firms, technology providers, security and fraud consultants, analytics providers, screening and background check providers, and other providers of hiring management tools used by B&P. For current employees, we disclose HR Data to service providers who assist us in the management and administration of standard human resources functions, such as payroll, benefits, insurance, and taxes. We also disclose HR Data to IT service providers as part of administering and maintaining our firm's IT infrastructure, networks, and security, including addressing IT support requests generated by B&P or by you.
- **Governmental Authorities and Law Enforcement.** We may disclose HR Data as required by applicable law, including to state or federal tax authorities when necessary. We may also disclose HR Data in response to requests from governmental authorities or law enforcement agencies. Additionally, we may disclose HR Data when legally required to detect, prevent, or investigate security incidents, fraud, or other illegal activities, or to protect the rights, property, and safety of B&P or others, including contract enforcement or dispute resolution.
- **Transactions.** In the event that B&P undergoes a merger, acquisition, sale, reorganization, bankruptcy, or insolvency proceeding, HR Data may be disclosed as outlined in our Privacy Policy.
- **Professional Advisors.** HR Data may be disclosed to our professional advisors, including accountants, legal counsel, consultants, and insurance providers.