Notice of Employment Privacy Practices

Effective Date: January 1, 2020
Last Updated: May 22, 2020

This Notice of Employment Privacy Practices (the “Notice”) applies solely to California “residents” as defined in Section 17014 of Title 18 of the California Code of Regulations, as that section read on September 1, 2017, whose personal information is collected by Winston & Strawn LLP (“Winston,” “we,” “us,” or “our”) in the following situations:

- In connection with a job application;
- In connection with being an employee of, owner of, director of, officer of, or contractor of Winston (collectively referred to as “Workforce Member”), to the extent that the personal information is collected and used by Winston solely within the context of such role or former role as a Workforce Member of Winston;
- In connection with emergency contact information of the Workforce Member, to the extent that the personal information is collected and used solely within the context of having an emergency contact on file;
- Personal information that is necessary for the business to retain or to administer benefits for another natural person relating to the Workforce Member to the extent that the personal information is collected and used solely within the context of administering those benefits.

We refer to such California residents as “you” or “your” throughout this Notice.

We adopt this Notice to comply with the California Consumer Privacy Act of 2018 (“CCPA”) and any terms defined in the CCPA have the same meaning when used in this Notice.

This notice does not address our treatment of certain of your personal information that is excluded from CCPA’s scope, including any protected health information that is regulated by the Health Insurance Portability and Accountability Act ("HIPAA").

PERSONAL INFORMATION WE MAY COLLECT

For the purposes of this Notice, Winston generally collects the following categories of your personal information:

<table>
<thead>
<tr>
<th>Category:</th>
<th>Examples Include:</th>
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<tbody>
<tr>
<td>A. Identifiers.</td>
<td>A real name, alias, postal address, unique personal identifier, online identifier,</td>
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<td></td>
<td>internet protocol address, email address, account name, Social Security number,</td>
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<td>driver's license or other government ID number, passport number, employee ID number,</td>
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<td>or other similar identifiers.</td>
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<td>B. Personal</td>
<td>A name, signature, Social Security number, physical characteristics or</td>
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<tr>
<td>Information categories listed in the California Customer Records statute (Cal. Civ. Code § 1798.80(e)).</td>
<td>Description, address, telephone number, passport number, driver's license or state identification card, insurance policy number, education, employment, employment history, bank account number, credit card number, debit card number, or any other financial information, medical information, or health insurance information. Some personal information included in this category may overlap with other categories.</td>
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<td>C. Characteristics of protected classifications under California or federal law.</td>
<td>Age, race, color, ancestry, national origin, immigration status, citizenship, marital status, medical condition, physical or mental disability, sex, gender, pregnancy or childbirth and related medical conditions, or veteran or military status. In certain limited circumstances, we may collect gender identity, gender expression, sexual orientation, genetic information (including familial genetic information), religion or creed. Please note that we strive to minimize our collection of this type of personal information.</td>
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<tr>
<td>D. Audio, electronic, visual, or similar information.</td>
<td>Pictures (e.g., photographs on government identification cards or passwords or photographs from Winston social or business events or photographs taken for employee ID purposes), video conferences, video recordings (e.g., videos captured for security purposes), telephone calls (e.g., if your tasks as a Workforce Member require you to participate in telephone calls that may be recorded).</td>
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<td>E. Biometric information.</td>
<td>Genetic, physiological, behavioral, and biological characteristics, or activity patterns used to extract a template or other identifier or identifying information, such as, fingerprints, faceprints, and voiceprints, iris or retina scans, keystroke, gait, or other physical patterns, and sleep, health, or exercise data.</td>
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<tr>
<td>F. Professional or employment-related information.</td>
<td>Current or past job history or performance evaluations, professional license information and bar standings; corporate expense information, salary information, drug screen results, fitness-for-duty or pre-employment physical exam results, tax rates, retirement fund information, compensation information, bonus information, benefits information, or stock option information.</td>
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<td>G. Education Information.</td>
<td>Schools attended, degrees and certificates awarded or in process, grades achieved in education courses, vocational trainings and certifications and transcript information.</td>
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<tr>
<td>H. Internet or other electronic network activity information.</td>
<td>Browsing history, search history, and information regarding a Workforce Member’s interaction with an internet web site, application, or advertisement.</td>
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<tr>
<td>I. Geolocation data.</td>
<td>Information collected through GPS technology.</td>
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<tr>
<td>J. Inferences.</td>
<td>We may include inferences drawn from any of the personal information</td>
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</tbody>
</table>
identified in categories (A) through (I) in the records we keep about our Workforce Members. This personal information may include your preferences, characteristics, psychological trends, predispositions, behavior, attitudes, intelligence, abilities, and aptitudes.

**HOW WE COLLECT YOUR PERSONAL INFORMATION**

Winston obtains the categories of personal information listed above from the following categories of sources:

- **Directly from you.** For example, we collect the personal information you provide to us in connection with your job application or application for Winston benefits. We will also collect the personal information you provide to us throughout the duration of your employment with Winston.

- **From your beneficiaries and dependents.** For example, your beneficiaries and dependents may provide us with your personal information in the course of their receipt of benefits provided or administered by us.

- **From our service providers.** For example, we may collect your personal information from a service provider that conducts background checks for us. We may also receive your personal information from service providers who help us run our business, including payroll, software and travel management providers.

- **From Workforce Members.** For example, if a Workforce Member provides your personal information in connection with an application for Winston-provided benefits.

- **From benefits administrators.** For example, we may receive personal information about you from the companies that administer the benefits plans offered by Winston.

- **From third parties.** For example, a third-party recruiter may provide your personal information to us in connection with our search for a Workforce Member. We may also receive personal information from your medical provider in connection with an absence from work or other medical need you may have.

- **Automatically.** For example, we may automatically collect personal information from the computers and other devices that you use in the course of being a Workforce Member. We may also collect such personal information from the electronic platforms we provide to you, including Winston’s email, word processing and “chat” platforms.

**HOW WE USE YOUR PERSONAL INFORMATION**

We may use the categories of your personal information listed above for one or more of the following purposes:

- To support our organizational and operational functions.
• To provide services and benefits to you as a Winston Workforce Member.

• To properly administer our workforce and its benefits and compensation programs.

• To evaluate your candidacy or performance as a Winston Workforce Member.

• To respond to law enforcement requests and as required or permitted by applicable law, court order, subpoena, or governmental regulations.

• To safeguard our information technology infrastructure, detect security incidents, conduct investigations and take other actions as required or permitted by applicable law to protect and defend Winston, our affiliates and subsidiaries, and our Workforce Members, including in connection with legal proceedings.

• To protect the safety and health of our Workforce Members.

• As directed by you.

• As otherwise described to you when collecting your personal information or as otherwise set forth in the CCPA.

**HOW WE SHARE YOUR PERSONAL INFORMATION**

In connection with Winston’s collection and use of your personal information as described above, Winston may disclose your personal information in the following ways:

• With our parent organization, subsidiaries and affiliates.

• On our online platforms. For example, this may include sharing pictures of you on our website and our social media pages.

• With our service providers and benefits administrators.

• With our auditors, actuaries, accountants, attorneys, governments or other third parties, as required or permitted by applicable law.

• As directed by you.

• To comply with the law or to protect our organization. This includes responding to court orders or subpoenas, or defending Winston in a lawsuit. This may also include sharing your personal information if a government agency or investigatory body requests this data. We may share also your personal information when we are investigating a security incident, allegation, or a potential fraud or violation of law.

• With any successors to all or part of our organization. For example, if we merge with, acquire or are acquired, or sell part of organization to another entity. This may include an asset sale, corporate reorganization or other change of control.
• As otherwise described to you when collecting your personal information or as otherwise set forth in or permitted the CCPA.

CHANGES TO OUR NOTICE
Winston reserves the right to amend this Notice at our discretion and at any time. When we make changes to this Notice, we will update the Notice's effective date and make available the updated Notice as required by law.

CONTACT INFORMATION
If you have any questions or comments about this Notice, the ways in which Winston collects, uses and shares your personal information, please do not hesitate to contact us at:

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  Email: JMarcus@winston.com
  Phone: 312-558-3775