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Scope and application

This Privacy Policy applies to the Arnold & Porter Kaye Scholer LLP Alumni Network site (<https://alumni.arnoldporter.com>) (“Alumni Site” or “Site”), communications, surveys and other Alumni Program services (“Alumni Services”). The Alumni Site is hosted by our service provider IntraWorlds, Inc. (“IntraWorlds”) who is acting as a data processor on behalf of Arnold & Porter Kaye Scholer LLP (“Firm”). The Alumni Site is a private website available only to current and former lawyers of the Firm and is designed to help maintain a long-term relationship between you, as a current or former Firm attorney, and the Firm.

There are many reasons we have an interest in a long-term relationship with you. For example, we may want to rehire you or receive candidate referrals from you, or to do business with you and/or your future employer(s). And we hope the Arnold & Porter Kaye Scholer LLP Alumni Program and this Site will be beneficial to you, regardless of your professional activities, by making it easy for you to stay connected with the Firm and your former Firm colleagues.

If you use the Services, you are consenting to your personally identifiable information (“personal data”) being collected, used and disclosed as described in this Policy.

We may modify this Privacy Policy from time to time, so please check back periodically to be sure you are comfortable with the Policy. If we make a material change to the Policy, we will notify you that we have done that. Your continued use of our Services after we publish or send a notice about our changes to this Privacy Policy means that you are consenting to the updated Policy’s terms. If you are a resident of California, our Employee Privacy Notice for California Residents also is applicable for you as a former employee. You may find that notice [here](#).

As noted, the Alumni Site is a private Site available only to current and former (“alumni”) lawyers, policy specialists and summer associates of the Firm. If you register on the site, please do not share your username or password to anyone. Please encourage other alumni to register on the Site. In addition, please respect the privacy of other members and do not give out personal data obtained from the Site to anyone.

What personal data do we collect?

Personal data you voluntarily provide us

The Alumni Site collects personal data when you directly give it to us, such as, when you register. During registration and profile setup, we require that you provide your name and email address, which will be the basic information in your Alumni Site profile.

You have the option to expand your user profile to include a wide range of additional information, including photo, postal address, current occupation, industry, education, skills, and personal and business interests. By providing complete and accurate information in your profile, you enable us to customize your experience and help you get the most from our Services. However, please supply only information that is relevant for the stated purposes of this Site.

We also may collect personal data about you in the following situations:

- If you correspond with the Alumni Site, whether by email, postal mail, or otherwise;
- If you post information about yourself on the Alumni Site, such as resumes, job applications, event RSVPs, comments on news articles including the tracking of clicks, open rates and bounces; and
- If you respond to online surveys or forms that we use for feedback, research and improvement of the Site and the Alumni Services.

Please keep in mind that when you post your personal data on the Site, that information could be accessible to the rest of the members of the Firm Alumni Network and may be made public.

Please do not post or add personal data to your profile or elsewhere on the Site that you would not want to be publicly available.

Information we collect automatically

When you use the Alumni Site, we collect information about your visit and usage of the Alumni Services. We may use various technologies to collect and store information when you use our Site, including cookies and similar tracking technologies, such as pixels and web beacons, to analyze trends, administer the website, and track users' movements around the website. The information collected may include your device's IP address, your operating system, your browser ID, and other information about how you interacted with the Site. We use this information to improve our services and the user experience as well as for purposes of network management and security.

For more information about our use of cookies and other tracking technologies, as well as how to opt out of the use of cookies, please refer to our Cookie Statement [here](#). Turning off cookies may result in a loss of functionality when using the Site or the ability to use the Site at all.

How do we use your personal data?

The Alumni Program and related Services will use your personal data for the following purposes:

- Primarily, to provide our users with a customized experience on our Site, including personalization services, such as suggested contacts, news, events and interactive communications.
- To enable other users to search for and locate you via the directory.
- To research and analyze our users' demographics, interests and behavior to better understand and serve our users and improve our Site and its offerings.
- To contact you periodically with communications about Firm announcements, seminars, events, legal memoranda, publications or employment opportunities with the Firm, affiliates or partners, which we feel might interest you, unless you ask not to be contacted. You will have an opportunity to opt out of receiving further messages.
- To get your feedback and viewpoints through polls and surveys conducted by us and others. You are not obligated to respond to polls and surveys.
- To fulfill our legal obligations, including contractual, regulatory, and reporting obligations, and obligations in connection with potential or actual legal or regulatory proceedings or investigations.
- To provide you and other members of the Site with resources for professional/career development and related support.
- To maintain and improve the Site, including auditing and monitoring its use so as to understand Site users' demographics, interests, and content preferences.
- To provide information requested by you, including in connection with opting in for our blogs.
- In connection with the administration of events.
- To analyze whether event invitations and other emails sent by the Firm have been successfully sent or have been opened.
- Other uses in the ordinary course of our business that are permissible under applicable law.

Who has access to your personal data?

When you register and set up your profile, your name and the other information you provide will be placed in the Alumni Directory. Unless you request otherwise through the opt-out mechanism provided on the Site, your name, profile picture, current and past professional data, degrees, social media links and hobbies/personal interests will be accessible to other members of the Alumni Site. The rest of the information you provide for your profile will not be shared with other members of the Alumni Site until you provide consent for such sharing by selecting on the “Profile visible to the public” button on the “Privacy” page of your profile on the Site. Once you provide such consent, all of the information in your profile will be in the Alumni Directory and will be accessible to other members of the Alumni Site.

You have control over this access through the privacy settings in your Profile. Click on the profile picture in the upper right corner of any page on the Site and select “Privacy”.

Other than with Alumni Site members, We will share your personal data in the following situations.

- With our service providers, including but not limited to IntraWorlds for corporate alumni software platform and services and its contractor, Amazon Web Services, for its data center facilities, which are in Oregon and Virginia.
- With advisors, including attorneys and accountants, to help us with legal, accounting and security requirements.
- With legally authorized recipients when we required to comply with court orders, valid discovery requests, valid subpoenas, and other appropriate legal mechanisms.
- To a third-party acquirer of the Firm or any of its service providers, including IntraWorlds, in the event of a sale, merger, or other acquisition of all or any part of the Firm or any of its service providers’ businesses or assets.

We do not rent or sell any of the personal information we collect through the Site, nor do we share such information with any unaffiliated third-party to use for such party’s own marketing purposes.

How do we safeguard your personal data?

We implement reasonable security safeguards designed to protect your data, such as data encryption in transit and at rest. We regularly monitor our systems for possible vulnerabilities and attacks. However, we cannot warrant the security of any information that you send us. There is no guarantee that data may not be accessed, disclosed, altered, or destroyed by breach of any of our physical, technical, or managerial safeguards.

Your user account information is password-protected so that only you, IntraWorlds and the Firm have access to this personal information. To help protect your personal information, do not divulge your password to anyone. Also remember to sign out of your account and close

your browser window when you have finished using the Site, particularly if you share a computer with someone else or are using a computer in a public place like a library or Internet cafe.

Our Site may, from time to time, contain links to other sites. If you follow a link to any of these sites, please note that these sites have their own privacy policies and that we do not accept any responsibility or liability for these statements or sites. Please check these privacy statements before you submit any personal data to these sites.

How can you update your personal data?

You can access, edit or correct the information in your profile at any time. Log in to the Alumni Site and click on Profile. If you have forgotten your password, click on the Forgot Password link and we will send an email to your primary email address. Finally, you can ask us to deactivate, delete or transfer your personal data, but then you may not be able to access any members-only areas of the Site.

We will retain your personal data as long as you have a user account on the Alumni Site. If you decide to delete or transfer your user account, we may retain your data in data backups or logs for up to 90 days after we receive your request to delete or transfer, or for longer if that is legally required.

For EU Residents

General Data Protection Regulation

Under the General Data Protection Regulation (GDPR), the Firm serves as the controller of the personal data you provide us. If at any point you believe your personal data is incorrect, you can request to see this information and have it corrected or deleted. If you wish to raise a complaint on how we have handled your personal data, you can contact our Privacy Office at privacy@arnoldporter.com, which will investigate the matter.

Sensitive personal data

We do not generally collect sensitive personal data through this Site. In the limited cases where we may collect such data, we will do this in accordance with applicable law. If you choose to provide us or members of the Alumni Site with unsolicited sensitive personal data, you consent to our using the data, as described in this Privacy Policy and in compliance with applicable law. The term “sensitive personal data” refers to the various categories of personal data identified as such by the EU GDPR.

Transfers outside the EU

We may transfer your personal data from the European Economic Area (EEA) to countries outside of the EEA, including the United States, in accordance with this policy and applicable laws. By submitting your personal data, you are agreeing to this transfer, storing and processing

of the information. For example, if a non-EU user does a Directory search or views your profile, your personal data will, in effect, be transferred outside the EU. We have no control over another user's usage of your personal data.

Additionally, we may transfer your information to a service provider and/or the Firm's system/server located outside of the EEA. In this case, the transfer, data protection and privacy measures in place are in accordance with the General Data Protection Regulation, as well as, other laws and regulations in the member state in which you are located.

IntraWorlds participates in and has certified its compliance with the EU-U.S. Privacy Shield Framework and the Swiss-U.S. Privacy Shield Framework. To learn more about the Privacy Shield Frameworks, and to view the IntraWorlds certification, visit the U.S. Department of Commerce's Privacy Shield website: www.privacyshield.gov/welcome. A list of Privacy Shield participants is maintained by the Department of Commerce and is available at: <https://www.privacyshield.gov/list>. Please note: IntraWorlds, Inc. is listed under Conenza, Inc. as a Covered Entity.

With respect to personal data received or transferred pursuant to the Privacy Shield Frameworks, IntraWorlds is subject to the regulatory enforcement powers of the U.S. Federal Trade Commission. IntraWorlds additionally has executed Standard Contractual Clauses for purposes of receiving personal data from the EU.

If you have an unresolved privacy or data use concern that we have not addressed satisfactorily, please contact the appropriate EU Data Protection Authority (DPA) free of charge. A list of DPAs can be found [here](#). Under certain conditions, more fully described on the Privacy Shield website, www.privacyshield.gov/article?id=How-to-Submit-a-Complaint, you may be entitled to invoke binding arbitration when other dispute resolution procedures have been exhausted.

Cookies Statement

What are cookies and clear GIFs?

As part of offering and providing customizable and personalized services, this Site uses cookies and clear GIFs to store and sometimes track information about you. Cookies are text files containing small amounts of information which are downloaded to your computer or mobile device when you visit a site. Cookies are then sent back to the originating site on each subsequent visit, or to another site that recognizes that cookie. Clear GIFs, also called "web beacons" or "web bugs", are tiny graphics with a unique identifier, similar in function to cookies, and are used to track the online movements of users. In contrast to cookies, which are stored on your hard drive, clear GIFs are embedded invisibly on-site pages and are about the size of the period at the end of this sentence. For the purposes of this Privacy Statement, both cookies and clear GIFs are referred to as "cookies". Cookies are useful because they allow a site to recognize a user's device. You can find more information about cookies at: www.allaboutcookies.org and www.youronlinechoices.eu. For a video about cookies visit: <https://policies.google.com/technologies/cookies>.

Cookies do a lot of different jobs, like letting you navigate between pages efficiently, remembering your preferences, and generally improve the user experience.

The cookies used on this Site have been categorized on the basis of the categories found in the ICC UK Cookie guide issued in April 2012. A list of all the cookies used on this Site by category is set out below.

What if I don't want cookies? By using our Site, you agree that we can place cookies on your device as explained below. If you want to remove existing cookies from your device, you can do this using your browser options. If you want to block future cookies being placed on your device, you can change your browser settings to do this. For more information on managing cookies see www.allaboutcookies.org/manage-cookies/. Please note that current "Do Not Track" initiatives are not recognized by our Site.

Please bear in mind that deleting and blocking cookies will have an impact on your user experience as parts of the Site may no longer work. Unless you have adjusted your browser settings to block cookies, our system will issue cookies as soon you visit our Site, even if you have previously deleted our cookies.

Turning off cookies will also prevent any web beacons from tracking your user activity on our Site. The web beacon will still account for an anonymous visit, but your unique information will not be recorded.

What cookies do we use on the Alumni Site?

- **Strictly necessary cookies** – These cookies are essential in order to enable you to move around the Site and use its features, such as accessing secure areas of the Site. Without these cookies, services you have asked for cannot be provided. Examples of strictly necessary cookies include session-based cookies which are deleted when you leave the site that maintain the state of your current activities and persistent cookies (cookies that remain on your machine between visits) for functionality such as "keep me logged in" or remembering your preferred language.
- **Performance cookies** – These cookies collect information about how visitors use a site; for instance, which pages visitors go to most often, and if they get error messages from web pages. All information these cookies collect is only used to improve how a site works in general for all users as well as specifically for you. Performance cookies are used to track patterns of Site use, including pages viewed and whether the individual is a new or repeat visitor.
- **Functionality cookies** – These cookies allow a site to remember choices you make (such as your username, language or the region you are in) and provide enhanced, more personal features. For instance, a site may be able to provide you with local information or news by storing in a cookie the region in which you are currently located. These cookies can also be used to remember changes you have made to text size, font and other parts of the Site's pages that you can customize. They may also be

used to provide services you have asked for such as watching a video or commenting on a blog. We may use information collected from our cookies to identify user behavior and to serve content and offers based on your profile. In some cases, we pass this information on to others within The Firm for marketing or analysis purposes. In most cases, we will not be able to track individuals by name. Only if a user is a registered user, will we associate the cookie information with a named individual. These cookies cannot track your browsing activity on other websites. They don't gather any information about you that could be used for advertising or remembering where you've been on the internet outside our Site. Functionality cookies used by the Site include **IntraWorlds tracking cookies** to authenticate the user by log-in details and remember language selection, and **Social login cookies** to remember when someone has previously used social log-in.

How to contact us

If you have any questions regarding this Notice, please email us at privacy@arnoldporter.com or write to us at:

Arnold & Porter
601 Massachusetts Avenue
Washington, DC 20001
Attention: Privacy Office