

California Privacy Rights Notice

Effective Date: January 1, 2023

Your Rights and Choices

The California Consumer Privacy Act, as amended by the California Privacy Rights Act (collectively the “CCPA”) provides California residents with specific rights regarding their personal information. In addition to our Privacy Policy <https://www.rc.com/privacy-policy.cfm> this webpage further describes your CCPA rights and explains how to exercise those rights.

Access Rights

You have the right to request that Robinson & Cole LLP disclose certain information to you about our collection and use of your personal information over the past twelve (12) months. Once we receive and confirm your verifiable consumer request, we will disclose to you:

- The categories of personal information we collected about you.
- The categories of sources for the personal information we collected about you.
- Our business or commercial purpose for collecting or selling that personal information.
- The categories of third parties with whom we share that personal information.
- The specific pieces of personal information we collected about you (also called a data portability request).
- If we sold or disclosed your personal information for a business purpose, two separate lists disclosing:
 - sales, identifying the personal information categories that each category of recipient purchased; and,
 - disclosures for a business purpose, identifying the personal information categories that each category of recipient obtained.

Deletion Rights

You have the right to request that Robinson & Cole LLP delete any of your personal information that we collected from you and retained, subject to certain exceptions. Once we receive and confirm your verifiable consumer request, we will delete your personal information in our records, as applicable (and direct our service providers to do the same), unless an exception applies.

We may deny your deletion request if retaining the information is necessary for us or our service provider(s) to:

- Complete the transaction for which we collected the personal information, provide a good or service that you requested, take actions reasonably anticipated within the context of our ongoing business relationship with you, or otherwise perform our contract with you.
- Detect security incidents, protect against malicious, deceptive, fraudulent, or illegal activity, or prosecute those responsible for such activities.
- Debug products to identify and repair errors that impair existing intended functionality.

- Exercise free speech protect the right of another consumer to exercise their free speech rights, or exercise another right provided for by law.
- Comply with the California Electronic Communications Privacy Act (Cal. Penal Code § 1546 *et. seq.*).
- Engage in public or peer-reviewed scientific, historical, or statistical research in the public interest that adheres to all other applicable ethics and privacy laws, when the information's deletion may likely render impossible or seriously impair the research's achievement, if you previously provided informed consent.
- Enable solely internal uses that are reasonably aligned with consumer expectations based on your relationship with us.
- Comply with a legal obligation.
- Make other internal and lawful uses of that information that are compatible with the context in which you provided it.

Correction Rights

You have the right to request that we correct inaccurate personal information about you. We will take into account the nature of the personal information and the purposes of the processing of the personal information in responding to your request. We will process your request if we receive a verifiable request and we will use commercially reasonable efforts to correct the inaccurate personal information as directed pursuant to the CCPA.

Your Right to Limit the Use of Sensitive Personal Information

You have the right, at any time, to direct us to limit our use of your sensitive personal

Information only to that use which is necessary to perform the services or provide the goods reasonably expected or to fulfil the reason that we collected such information and/or other permissible business purposes. Sensitive personal information includes:

- Government ID — your Social Security number, driver's license number, state identification card number, passport number, or other official identifier.
- Financial Information — your financial account log-in credentials, debit card, or credit card number in combination with any required security or access code, password, or credentials allowing access to an account.
- Geolocation — your precise geolocation.
- Race, religion and union membership — your racial or ethnic origin, religious or philosophical beliefs, or union membership.
- Communications — the contents of your private communications, unless we are the intended recipient of the communication.
- Genetics — your genetic data.

- Biometrics —biometric information processed for the purpose of uniquely identifying you (such as a fingerprint or voice print).
- Health — personal information collected and analyzed concerning your physical and mental health.
- Sexual orientation — personal information collected and analyzed concerning your sex life or sexual orientation.

Please note that we do not use or disclose your sensitive personal information for purposes other than to provide you with our services. However, note that this information may be used, or disclosed to a service provider or contractor pursuant to a written agreement in order to provide such services. If you choose to limit such use, you can opt-in to such use again by contacting us via email. Note that this right does not apply to sensitive personal information that is collected or processed without the purpose of inferring characteristics about you.

Exercising Your Rights

To exercise the access, data portability, correction, limitation, and deletion rights described above, please submit a verifiable consumer request to us by either telephone or email using the following: 800-826-3579 or PrivacyContact@rc.com.

Only you, or a person registered with the California Secretary of State that you authorize to act on your behalf, may make a verifiable consumer request related to your personal information. You may also make a verifiable consumer request on behalf of your minor child.

You may only make a verifiable consumer request for access or data portability twice within a 12-month period. The verifiable consumer request must:

- Provide sufficient information that allows us to reasonably verify you are the person about whom we collected personal information or an authorized representative.
- Describe your request with sufficient detail that allows us to properly understand, evaluate, and respond to it.

We cannot respond to your request or provide you with personal information if we cannot verify your identity or authority to make the request and confirm the personal information relates to you. For all requests, it is helpful to put the statement “California Privacy Rights” in the body of your request, describe the nature of your request, and provide your name, street address, city, state, and zip code. In your request, you need to provide enough information that allows us to reasonably verify that you are the person that we collected information about.

Making a verifiable consumer request does not require you to create an account with us.

We will only use personal information provided in a verifiable consumer request to verify the requestor's identity or authority to make the request. We will not require you to incur any costs or fees in order to process or provide a verifiable request.

Response Timing and Format

We will confirm receipt of a verifiable consumer request within ten (10) business days and provide information about how we will process the request.

We will provide a response to a verifiable consumer request within forty-five (45) calendar days of its receipt. If we require more time (up to 45 calendar days), we will inform you of the reason and extension period in writing. For example, we may need more time to follow up with our service providers regarding your request.

Any disclosures we provide will only cover the 12-month period preceding the verifiable consumer request's receipt. The response we provide will also explain the reasons we cannot comply with a request, if applicable. For data portability requests, we will select a format to provide your personal information that is readily useable and should allow you to transmit the information from one entity to another entity without hindrance.

For all requests, it is helpful to put the statement "California Privacy Rights" in the body of your request, describe the nature of your request, and provide your name, street address, city, state, and zip code. In your request, you need to provide enough information that allows us to reasonably verify that you are the person that we collected information about.

Sales and Sharing Opt-Out and Opt-In Rights

While California residents have the right to opt-out of the sale of their personal information under CCPA, we do not sell personal information to any third parties. However, we may share some personal information with our service providers as described below. If you would like to opt-out of all such nonessential sharing, you may click the button below. If our practices change, we will update this Privacy Policy and take any other necessary action to comply with applicable law.

We partner with the following service providers:

- Our Site is integrated with Google Analytics, a service that we use to better understand how users interact with the website. You can read more about how Google uses your Personal Information here: <https://policies.google.com/privacy?hl=en>. You can also opt-out of Google Analytics here: <https://tools.google.com/dlpage/gaoptout>
- Our Site is integrated with Mailchimp, a service that we use to automate our email marketing. You can read more about how Mailchimp uses your Personal Information here: <https://mailchimp.com/legal/privacy/>
- Our Site is integrated with Constant Contact, a service that we use for marketing and relationship management. You can learn more about how Constant Contact uses your Personal Information here: <https://www.constantcontact.com/legal/privacy-center>

If you would like to opt-out of all such nonessential sharing, you may click the button below:

SUBMIT OPT-OUT REQUEST

A consumer or their representative may instead submit a request to opt out of sharing by sending an email to privacycontact@rc.com.

Please note that online opt-outs are device and browser-specific. You may still see personalized ads from us while using a different device or browser, unless you also opt-out using that device or browser.

Additionally, we do not intend to market to any individual under the age of 18, and we expressly prohibit, anyone under the age of 16 from disclosing or submitting any personal information to us through our Site or other means. Therefore, we do not sell any information of any individual under the age of 18.

'Do Not Track' Signals

Some browsers can be configured to send a 'Do Not Track' flag visible to websites. We process these signals as if you had clicked on the 'Submit Opt-Out Request' button.

NON-DISCRIMINATION/NON-RETALIATION

We will not discriminate against you for exercising any of your CCPA rights. Unless permitted by the CCPA, we will not:

- Deny you goods or services.
- Charge you different prices or rates for goods or services, including through granting discounts or other benefits, or imposing penalties.
- Provide you a different level or quality of goods or services.
- Suggest that you may receive a different price or rate for goods or services or a different level or quality of goods or services.

OTHER CALIFORNIA PRIVACY RIGHTS

California Civil Code Section § 1798.83, the "Shine the Light" law, permits users of our Site that are California residents to request certain information regarding our disclosure of personal information to third parties for their direct marketing purposes. To make such a request, please send an email to: PrivacyContact@rc.com.

Accessibility Statement

We are committed to making sure that our Site is accessible to everyone. To access this information in an alternative form and for more information, including our Accessibility Statement, please [click here](#).

Contacting Us

We welcome any queries, comments, complaints or requests you may have regarding this Notice. Please do not hesitate to contact us at:

Robinson & Cole LLP
280 Trumbull Street
Hartford, CT 06105

webmaster@rc.com

800-826-3579