

JOSEPH M. VINCENT, LTD., P.C.

PRIVACY POLICY

Last Revised: April 1, 2021

YOUR PRIVACY: OVERVIEW

This privacy policy explains how Joseph M. Vincent, Ltd., P.C. ("Joseph M. Vincent," "we" or "us") collects, uses and discloses information about you when you use our websites, mobile applications, and other online services (collectively, the "Services"), when you visit our offices, attend our events or when you otherwise interact with us as described below. Please note that in some cases we may provide separate or additional privacy notices. For example, we have a separate privacy policy that applies to the information we collect from our clients in connection with providing legal services.

REVISIONS TO THIS PRIVACY POLICY

We may change this policy from time to time. If we make changes, we will notify you by revising the date at the top of this policy, and in some cases, we may provide you with additional notice (such as by adding a statement to our website homepage or by sending an email notification). We encourage you to review this policy frequently to stay informed about our information practices and the choices available to you.

COLLECTION OF PERSONAL INFORMATION

In this Privacy Policy, "personal information" means any information that identifies, relates to, describes, is reasonably capable of being associated with or reasonably can be used to identify an individual or household and other data that is linked to personal information.

The types of personal information we collect about you depend on your interactions with us and are described in more detail below.

Personal Information You Provide Directly to Us

We collect personal information you provide directly to us. For example, we collect information when you create an account to access or use the Services, access, or use any collaboration tools or participate in any interactive features of the Services, send us an email, fill out a form, respond to a survey, comment on a blog, register for or participate in an event, apply for a job, interact with us on social media, enter a promotional drawing, or otherwise communicate with us.

The types of personal information we may collect include your:

- Contact information, such as name, email address, postal address, and phone number;
- Education information, such as educational degrees, languages, professional memberships, qualifications, and certifications;
- Employment information, such as business unit/division, company name, job status, job title, and office location;

- Health and health-related information, such as accessibility requirements, dietary restrictions, and, where necessary and appropriate to protect the health and safety of our personnel and others, information related to symptoms of, or risk of exposure to, certain illnesses;
- Demographic information, which may include sensitive personal information or information about protected classifications, such as age, gender, race/ethnic origin, and nationality; and
- Any other information you choose to provide.

Personal Information We Collect Automatically

We automatically collect personal information when you access or use the Services. The types of information we collect may include:

- **Log Information:** We collect log information about your use of the Services, including your browser type and language, app version, access times, pages viewed, Internet Protocol (IP) address, approximate geographic location, and the webpage or online service you visited before navigating to the Services.
- **Device Information:** We collect information about the mobile device you use to access our mobile applications, including the hardware model, operating system and version, unique device identifiers, and mobile network information.
- **Location Information:** In accordance with your device permissions, we may collect information about the precise location of your device. You may stop the collection of precise location information at any time (see the Your Choices section below for details).
- **Information Collected by Cookies and Other Tracking Technologies:** We and our service providers use various technologies to collect information, including cookies and web beacons (or pixel tags). Cookies are small data files stored on your hard drive or in device memory that help us to, among other things, improve the Services and your experience, see which areas and features of the Services are popular and count visits. Web beacons are clear, electronic images that may be used on the Services or in our emails and help deliver cookies, count visits, understand usage and campaign effectiveness and determine if an email has been opened and acted upon. For more information, please refer to our Cookie Policy.

Personal Information We Collect from Other Sources

We may also collect personal information from other sources and combine that with information we collect through the Services. For example, we may use information from LinkedIn to update information about you in our contact database.

Personal Information We Derive

We may derive information or draw inferences about you based on the other types of personal information we collect. For example, we may infer your location based on your IP address, or that you are interested in employment or participating in an event based on your browsing behavior on our Services.

Use of Personal Information

We use personal information for various purposes, including to:

- Operate and improve the Services;
- Respond to your questions, comments and requests;
- Provide the information or services you request and send you related information, including confirmations and receipts;
- Send you newsletters and updates;
- Communicate with you about our services, programming and events, and other information we think will be of interest to you;
- Assess job applicants and make hiring decisions;
- Monitor and analyze usage, trends, and activities related to the Services;
- Manage your online account(s) and send you technical notices, updates, security alerts, and support and administrative messages;
- Protect the health, safety, and vital interests of our personnel and others; and
- Notify you about any changes to the Services.

We may process and store your personal information in the United States and other countries, which may have less-protective data protection laws than the region in which you are situated. Please note that this processing, including storage, may involve cross-border transfers of your personal information as described in the “Data Transfers” section below.

Disclosure of Personal Information

We may share your personal information as follows or as otherwise described in this Privacy Policy:

- With the applicable state bar association, we may share your name and bar number in connection with an application for CLE credit;
- With vendors, consultants, professional advisors, and other service providers (collectively, “Service Providers”) working on our behalf and needing access to your personal information to carry out their work for us. Since our Service Providers are located around the world, please note that these disclosures may involve cross-border transfers of your personal information as described in the “Data Transfers” section below;
- In connection with, or during negotiations of, any merger, sale of Joseph M. Vincent’s assets, financing or acquisition of all or a portion of our business to another company;
- In response to a request for information if we believe disclosure is in accordance with, or required by, any applicable law or legal process, including lawful requests by public authorities to meet national security or law enforcement requirements;
- If we believe your actions are inconsistent with our user agreements or policies, or to protect the rights, property, and safety of us or any third party;
- For users of our collaboration site, your name, contact information, and any content or materials you submit or post to that site may be shared with other users of the collaboration site; and
- With your consent or at your direction, including if we notify you that your personal information will be shared in a particular manner and you provide such personal information. We may also share your personal information with third parties when you intentionally direct us to do so or when you use our Services to intentionally interact with third parties. We may also share aggregated or de-identified information, which cannot reasonably be used to identify you.

Please note that any personal information you post in your profile, blogs, listings, public or private groups, forums and any other interactive areas of the Services will be available to other users of those features and, in some cases, may be publicly available.

ADVERTISING AND ANALYTICS SERVICES PROVIDED BY OTHERS

We work with analytics providers to better understand your use of our Services. These providers use cookies, web beacons, and other tracking technologies to collect information about your use of the Services and other websites and applications. We use this information to monitor and analyze your browsing behavior, determine the popularity of certain content on our Services, and improve your experience while using our Services.

DATA SECURITY AND DATA TRANSFERS

Data Security

Although we employ reasonable security measures, the transmission of information via the internet is not completely secure or private. If you have any questions about the security of personal information we collect, please contact: privacy@vincent.attorney.

Data Transfers

For the reasons and purposes set forth in this Privacy Policy, the personal information we collect may be transferred to, stored, or otherwise processed in the United States, Canada, and other locations. We also transfer personal information to service providers that process personal information for us in the United States, Canada, and other locations. (As an example, GoDaddy, our web host, may process information for us in various data center locations. In its 10-K Annual Report filed with the U.S. Securities & Exchange Commission for the period ending December 31, 2020, GoDaddy represented that it has data center locations in the United States in the states of Arizona, California, Missouri, Virginia, and New York, as well as international data center locations in the countries of France, Germany, the Netherlands, Singapore, and the United Kingdom.) While in another jurisdiction for processing, your personal information may be accessed by the courts, law enforcement, and national security authorities of that jurisdiction. These jurisdictions may not provide the same level of data protection as your home jurisdiction.

When GoDaddy, our web host, transfers personal data from the European Union (“EU”), United Kingdom (“U.K.”), or Switzerland to the United States, it complies with the EU-U.S. Privacy Shield Framework and the Swiss-U.S. Privacy Shield Framework as set forth by the U.S. Department of Commerce regarding the collection, use, and retention of personal data.

On July 16, 2020, the Court of Justice of the EU issued a judgment declaring as “invalid” the European Commission’s Decision (EU) 2016/1250 of July 12, 2016, on the adequacy of the protection provided by the EU-U.S. Privacy Shield. As a result of that decision, the EU-U.S. Privacy Shield Framework is no longer a valid mechanism to comply with EU data protection requirements when transferring personal data from the European Union to the United States.

Nonetheless, the U.S. Department of Commerce continues to administer the Privacy Shield program, and the parent company of our web host, GoDaddy Operating Company, LLC (and related entities, including GoDaddy.com LLC, GoDaddy Media Temple, Inc., GoDaddy Sellbrite, Inc., Domains by Proxy, LLC, and GoDaddy Corporate Domains, LLC) complies with the EU-U.S. Privacy Shield Framework as set forth by the

U.S. Department of Commerce regarding the collection, use, and retention of personal information transferred from the EU to the United States. GoDaddy Operating Company, LLC, has certified to the U.S. Department of Commerce that it adheres to the Privacy Shield Principles. If there is any conflict between the terms in this privacy policy and the Privacy Shield Principles, the Privacy Shield Principles shall govern. To learn more about the Privacy Shield program, and to view our certification, please visit <https://www.privacyshield.gov/>.

GoDaddy.com, LLC is responsible for the processing of personal information it receives, under each Privacy Shield Framework, and subsequently transfers to a third party acting as an agent on its behalf. GoDaddy.com, LLC, complies with the Privacy Shield Principles for all onward transfers of personal information from the EU and Switzerland, including the onward transfer liability provisions.

In compliance with the Privacy Shield Principles, we are committed to resolving complaints about our processing of your personal data. Individuals in the EU, U.K. and Switzerland who have inquiries or complaints regarding our compliance with the Privacy Shield program should first contact us. We have further committed to refer unresolved Privacy Shield complaints to JAMS, an alternative dispute resolution provider located in the United States. If you do not receive timely acknowledgment of your complaint from us, or if we have not addressed your complaint to your satisfaction, please contact JAMS by visiting <https://www.jamsadr.com/file-an-eu-us-privacy-shield-or-safe-harbor-claim>. JAMS provides dispute resolution services at no cost to you.

Under certain conditions, you may be able to invoke binding arbitration to resolve your complaint. Joseph M. Vincent is subject to the investigatory and enforcement powers of the Federal Trade Commission.

If we share personal data transferred to the U.S. under the Privacy Shield with a third-party service provider that processes such data on our behalf, then we will be liable for that third party's processing in violation of the Privacy Shield Principles, unless we can prove that we are not responsible for the event giving rise to the damage.

Children's Privacy

The Services are not intended for children under the age of 18. Joseph M. Vincent does not target our Services to children under 18 or knowingly collect information from children under the age of 18.

LINKS TO OTHER WEBSITES AND THIRD-PARTY CONTENT

We may provide links to or embed videos hosted by third-party websites, services, and applications, such as YouTube, that are not operated or controlled by Joseph M. Vincent. This Privacy Policy does not apply to third-party services, and we cannot take responsibility for the content, privacy policies, or practices of third-party services. We encourage you to review the privacy policies of any third-party service before providing any information to or through them. The Services may include an activity feed, social media buttons and widgets, such as the Facebook "Like" button or the "Share This" button. Your interactions with these features are governed by the privacy policy of the third-party service that provides the feature.

YOUR CHOICES

You have certain choices with respect to how we treat your personal information, as described below.

Correction

You may review and request modifications to your personal information by contacting us at privacy@vincent.attorney.

Marketing Communications

You may opt out of receiving promotional communications from us or request changes to your communication preferences by following the instructions in those communications. If you opt out, we may still send you non-promotional communications, such as those about your account or our ongoing business relations.

Location Data

When you first launch any of our mobile applications that collect precise location information, you will be asked to consent to the application's collection of location information. If you initially consent to our collection of this information, you can subsequently stop the collection of this information at any time by changing the preferences on your mobile device. If you do so, our mobile applications, or certain features thereof, may no longer function properly.

Mobile Push Notifications/Alerts

With your consent, we may send promotional and non-promotional push notifications or alerts to your mobile device. You can deactivate these messages at any time by changing the notification settings on your mobile device.

Cookies

Most web browsers are set to accept cookies by default. If you prefer, you can usually set your browser to remove or reject cookies. Please note that if you choose to remove or reject cookies, this could affect the availability and functionality of our Services. For more information, please see our Cookie Policy.

INFORMATION FOR EUROPEAN ECONOMIC AREA RESIDENTS

If you are a resident of the European Economic Area (EEA), you have certain rights and protections under applicable law regarding the processing of your personal information. The term “personal information” has the meaning given to it by the European General Data Protection Regulation (GDPR). When we process your personal information as described in this Privacy Policy, we will only do so when we have a legitimate interest in processing your personal information (for example, our legitimate interest in providing the Services, responding to your inquiries, or sending you marketing communications), when the processing is necessary for the performance of a contract between you and us (for example, to provide you with legal services), when the processing is necessary for compliance with a legal obligation to which we are subject, or when we have your consent to process your personal information. When processing is based on consent, you have the right to revoke such consent at any time. You also have the right to access personal information we hold about you and to ask that your personal information be corrected, erased, or transferred. You may also have the right to object to, or request that we restrict, certain processing. If you would like to exercise any of these rights, you may contact us as indicated below. If you have a concern about our processing of personal information that we are not able to resolve, you have the right to lodge a complaint with the data privacy authority where you reside. For contact details of your local Data Protection Authority, please see: http://ec.europa.eu/justice/data-protection/article-29/structure/data-protection-authorities/index_en.htm.

INFORMATION FOR CALIFORNIA CONSUMERS: YOUR CALIFORNIA PRIVACY RIGHTS

Additional Disclosures Related to Collection, Use, and Disclosure of Personal Information

If you are a California consumer, the California Consumer Privacy Act (CCPA) requires us to disclose the following information with respect to our collection, use, and disclosure of personal information.

Categories of Personal Information Collected: In the preceding 12 months, we have collected the following categories of personal information: identifiers, characteristics of protected classifications under California or U.S. law, professional and employment-related information, education information, commercial information, internet and electronic network activity, inferences drawn about your preferences, and other categories of personal information that relates to or is reasonably capable of being associated with you. For examples of the precise data points we collect, please see “Collection of Personal Information” above.

Business or Commercial Purpose for Collecting and Using Data: We collect personal information for the business or commercial purposes described in the “Use of Personal Information” section above.

Categories of Sources of Personal Information: We collect personal information from you and the sources described in the *“Personal Information We Collect from Other Sources”* section above.

Categories of Personal Information Disclosed and Categories of Third-Party Recipients: In the preceding 12 months, we have disclosed identifiers, commercial information, and internet and electronic network activity with the following categories of recipients: cloud service providers, consultants, data analytics providers, state bar associations, internet service providers, data storage providers, and operating systems and platforms. We also disclosed professional and employment-related information and education information with cloud service providers and consultants.

Sale of Personal Information (as defined by the CCPA): We do not sell the personal information we collect.

Your Consumer Rights as a California Consumer

Subject to certain limitations, you have the right to request to know more about the categories and pieces of personal information we collect, use, and disclose and to request deletion of their personal information. You also have the right to opt out of sales of personal information, if applicable, and to not be discriminated against for exercising their rights under the CCPA. You may make a rights request by calling 01.425.444.0545 or emailing privacy@vincent.attorney. We will verify your request by asking for information sufficient to confirm your identity, such as your name, email address, and information about your interactions with us. If you would like to use an authorized agent registered with the California Secretary of State to exercise your rights, we may request evidence that you have provided such agent with power of attorney or that the agent otherwise has valid written authority to submit requests on your behalf. We will not discriminate against you if you choose to exercise your rights under the CCPA.

CONTACT US

If you have any questions or comments about this Privacy Policy, you may call us at 01.425.444.0545 or email privacy@vincent.attorney.