

Privacy notice

The Harley Law Group takes data privacy seriously. Every day The Harley Law Group will receive, use, and store personal information about our clients, affiliates, partners, and colleagues. It is important that this information is handled lawfully and appropriately, in line with the requirements of the Data Protection Act 2018 and the General Data Protection Regulation (collectively referred to as the 'Data Protection Requirements'). We take our data protection duties seriously, because we respect the trust that is being placed in us to use personal information appropriately and responsibly.

Our firm recognizes and value the trust that individuals place in us when providing us with personal data and we are committed to safeguarding the privacy and security of personal data we may collect from visitors to our websites and/or the clients to whom we provide legal and other services.

This Privacy notice aims to help you understand our personal data collection, usage and disclosure practices.

By providing your personal data to us (whether via one of our websites, by email, in person or over the phone), you agree to the processing set out in this Privacy notice. Further notices highlighting certain uses we wish to make of your personal data together with the ability to opt in or out of selected uses may also be provided to you when we collect personal data from you.

Please note: This Privacy notice does not apply to, and The Harley Law Group is not responsible for, any third party websites which may be accessible through links from this website. If you follow a link to any of these third party websites, they will have their own privacy policies and you will need to check these policies before you submit any personal data to such third party websites.

PERSONAL AND NON-PERSONAL INFORMATION

Our Privacy Policy identifies how we treat your personal and non-personal information.

WHAT IS NON-PERSONAL INFORMATION AND HOW IS IT COLLECTED AND USED?

Non personal information is information that cannot identify you. If you visit this web site to read information, such as information about one of our services, we may collect certain non-personal information about you from your computer's web browser. Because non-personal

information cannot identify you or be tied to you in any way, there are no restrictions on the ways that we can use or share non-personal information.

WHAT IS PERSONAL INFORMATION AND HOW IS IT COLLECTED?

Personal information is information that identifies you as an individual, such as your name, mailing address, e-mail address, telephone number, and fax number. We may collect personal information from you in a variety of ways:

- When you send us an application or other form
- When you conduct a transaction with us, our affiliates, or others
- When we collect information about in you in support of a transaction, such as credit card information.

LINKS

This site contains links to other sites that provide information that we consider to be interesting. The Harley Law Group is not responsible for the privacy practices or the content of such web sites.

INTELLECTUAL PROPERTY RIGHTS

You must not:

- Republish material from our website without prior written consent.
- Sell or rent material from our website.
- Reproduce, duplicate, create derivative, copy or otherwise exploit material on our website for any purpose
- Redistribute any content from our website, including onto another website.

Acceptable Use

You agree to use our website only for lawful purposes, and in a way that does not infringe the rights of, restrict or inhibit anyone else's use and enjoyment of the website. Prohibited behavior includes harassing or causing distress or inconvenience to any other user, transmitting obscene or offensive content or disrupting the normal flow of dialogue within our website.

You must not use our website to send unsolicited commercial communications. You must not use the content on our website for any marketing related purpose without our express written consent.

Restricted Access

We may in the future need to restrict access to parts (or all) of our website and reserve full rights to do so. If, at any point, we provide you with a username and password for you to access

restricted areas of our website, you must ensure that both your username and password are kept confidential.

Use of Testimonials

In accordance to with the FTC guidelines concerning the use of endorsements and testimonials in advertising, please be aware of the following:

Testimonials that appear on this site are actually received via text, audio or video submission. They are individual experiences, reflecting real life experiences of those who have used our products and/or services in some way. They are individual results and results do vary. We do not claim that they are typical results. The testimonials are not necessarily representative of all of those who will use our products and/or services.

The testimonials displayed in any form on this site (text, audio, video or other) are reproduced verbatim, except for correction of grammatical or typing errors. Some may have been shortened. In other words, not the whole message received by the testimonial writer is displayed when it seems too lengthy or not the whole statement seems relevant for the general public.

The Harley Law Group is not responsible for any of the opinions or comments posted on The Harley Law Group website, social media or other digital formats. These are not a forum for testimonials, however these formats provides testimonials as a means for clients to share their experiences with one another. To protect against abuse, all testimonials appear after they have been reviewed by management of The Harley Law Group.

PRIVACY POLICY

This Privacy notice aims to help you understand our personal data collection, usage and disclosure practices by explaining:

1. Who we are and what we do

The Harley Law Group is a Houston Texas based private practice law firm.

2. What personal data we collect about you

We may collect and process different types of personal data in the course of operating our business and providing our services. These include:

- Basic personal details such as your name and job title;
- Contact data such as your telephone number and postal or email address;
- Financial data such as payment related information or bank account details;
- Demographic data such as your address, preferences or interests;

- Website usage and other technical data such as details of your visits to our websites or information collected through cookies and other tracking technologies;
- Personal data provided to us by or on behalf of our clients or generated by us in the course of providing our services, which may, where relevant, include special categories of personal data;
- Identification and other background verification data such as a copy of passports or utility bills or evidence of beneficial ownership or the source of funds to comply with client due diligence/"know your client"/anti-money laundering laws and collected as part of our client acceptance and ongoing monitoring procedures;
- Recruitment related data such as your curriculum vitae, your education and employment history, details of professional memberships and other information relevant to potential recruitment to The Harley Law Group;
- Data that you may provide to us in course of registering for and attending events or meetings, including access and dietary requirements; and
Any other personal data relating to you that you may provide.

3. How we obtain the personal data about you

We may collect or receive your personal data in a number of different ways:

- Where you provide it to us directly, for example by corresponding with us by email, or via other direct interactions with us such as completing a form on our website or registering for and using one of our online tools;
- Where we monitor use of, or interactions with, our websites, any marketing we may send to you, or other email communications sent from or received by The Harley Law Group;
- Third party sources, for example, where we collect information about you to assist with "know your client" checks as part of our client acceptance procedures or where we receive information about you from recruitment agencies for recruitment purposes; or
- Publicly available sources - we may, for example, use such sources to help us keep the contact details we already hold for you accurate and up to date or for professional networking purposes, e.g. LinkedIn.

4. How we use your personal data

We will only use your personal data where we are permitted to do so by applicable law. The principal legal grounds that justify our use of your personal data are:

- **Contract performance:** where your information is necessary to enter into or perform our contract with you.
- **Legal obligation:** where we need to use your information to comply with our legal obligations.
- **Legitimate interests:** where we use your information to achieve a legitimate interest and our reasons for using it outweigh any prejudice to your data protection rights.
- **Legal claims:** where your information is necessary for us to defend, prosecute or make a claim against you, us or a third party.

- **Consent:** where you have consented to our use of your information (you will have been presented with a consent form or facility in relation to any such use and may withdraw your consent through an unsubscribe or similar facility).

We may use your personal data in the following ways. In each case, we note the grounds that we rely on to use your personal data.

- **To provide our legal and other services to you and to conduct our business** – to administer and perform our services, including to carry out our obligations arising from any agreements entered into between you and us (please note that our [Standard Terms of Engagement](#) apply where we provide legal services);
Legal grounds: contract performance, legitimate interests (to enable us to perform our obligations and provide our services to you), consent.
- **To facilitate use of our websites and to ensure content is relevant** – to respond to requests for information or enquiries from visitors to our websites and to ensure that content from our websites is presented in the most effective manner for you and for your device;
Legal grounds: legitimate interests (to allow us to provide you with the content and services on the websites), consent, contract performance.
- **For marketing and business development purposes** –to provide you with details of new services, legal updates and invites to seminars and events where you have chosen to receive these. We will provide an option to unsubscribe or opt-out of further communication on any electronic marketing communication sent to you or you may opt out by contacting us as set out in section 12 below;
Legal grounds: legitimate interests, consent.
- **For research and development purposes** – analysis in order to better understand your and our clients’ services and marketing requirements and to better understand our business and develop our services and offerings;
Legal grounds: legitimate interests (to allow us to improve our services).
- **For recruitment purposes** –to enable us to process applications for employment submitted via the Careers section of our website and to assess your suitability for any position for which you may apply at Harley Law Group;
Legal grounds: legitimate interests (to ensure that we can make the most appropriate recruitment decisions for Harley Law Group), contract performance (in order for us to take steps at your request to enter into a contract with you).
- **To fulfil our legal, regulatory, or risk management obligations** – to comply with our legal obligations (performing client due diligence/”know your client”, anti-money laundering, anti-bribery, sanctions or reputational risk screening, identifying conflicts of interests); for the prevention of fraud and/or other relevant background checks as may be required by applicable law and regulation and best practice at any given time (if false or inaccurate information is provided and fraud is identified or suspected, details may be passed to fraud prevention agencies and may be recorded by us or by them); to enforce our legal rights, to comply with our legal or regulatory reporting obligations and/or to protect the rights of third parties;
Legal grounds: legal obligations, legal claims, legitimate interests (to cooperate with law enforcement and regulatory authorities, to ensure that you fall within our acceptable risk

profile and to assist with the prevention of crime and fraud). Where we process special categories of personal data we may also rely on substantial public interest (prevention or detection of crime) or legal claims.

- **To ensure that we are paid** – to recover any payments due to us and where necessary to enforce such recovery through the engagement of debt collection agencies or taking other legal action (including the commencement and carrying out of legal and court proceedings);

Legal grounds: contract performance, legal claims, legitimate interests (to ensure that we are paid for our services).

- **To inform you of changes** – to notify you about changes to our services or our Standard Terms of Engagement for legal services or this Privacy notice;

Legal grounds: legitimate interests (to ensure we can notify you about changes to our service, Standard Terms of Engagement etc).

- **To reorganize or make changes to our business** -In the event that we are undergo a re-organization (for example if we merge, combine or divest a part of our business), we may need to transfer some or all of your personal data to the relevant third party (or its advisors) as part of any due diligence process or transfer to that re-organized entity or third party your personal data for the same purposes as set out in this Privacy notice or for the purpose of analyzing any proposed re-organization;

Legal grounds: legitimate interests (in order to allow us to change our business).

5. Who we share your personal data with

The Harley Law Group is a private law practice and as such any personal data that we collect or you provide to us may be shared with and processed by any our paralegals, legal assistants, attorneys and interns.

We may also share your personal data with a variety of the following categories of third parties:

- Our professional advisors (e.g. legal, financial, business, risk management or other advisors), bankers and auditors;
- Our insurers and insurance brokers;
- Third party service providers, to whom we outsource certain functions such as information and document management, office support, technology and IT services, word processing, photocopying and translation services (we have agreements in place with these service providers to protect the confidentiality and security of information (including personal data) shared with them);
- Other third party external advisors or experts engaged in the course of the services we provide to our clients and with their prior consent, such as local counsel and technology service providers such as eDiscovery and document review platforms.

We may also process your personal data to comply with our regulatory requirements or in the course of dialogue with our regulators as applicable, which may include disclosing your personal data to government, regulatory or law enforcement agencies in connection with enquiries, proceedings or investigations by such parties anywhere in the world or where compelled to do

so. Where permitted, or unless to do so would prejudice the prevention or detection of a crime, we will direct any such request to you or notify you before responding.

6. How long we keep your personal data

We will retain your personal data for as long as is necessary to fulfil the purpose for which this data was collected and any other permitted linked purpose (for example certain transaction details and correspondence related to any legal services we provide may be retained until the time limit for claims in respect of the transaction has expired or in order to comply with regulatory requirements regarding the retention of such data). If your personal data is used for two purposes we will retain it until the purpose with the latest period expires; but we will stop using it for the purpose with a shorter period once that period expires. Our retention periods are also based on our business needs and good practice.

7. How we protect your personal data

We recognize that information security is an integral element of data privacy. While no data transmission (including over the Internet or any website) can be guaranteed to be secure from intrusion, we implement a range of commercially reasonable physical, technical and procedural measures to help protect personal data from unauthorized access, use, disclosure, alteration or destruction in accordance with data protection law requirements.

Information that you provide to us is stored on our or our service providers' secure servers and accessed and used subject to our security policies and standards, or those agreed with our service providers.

Everyone at The Harley Law Group and any third party service providers we may engage that process personal data on our behalf (for the purposes listed above) are also contractually obligated to respect the confidentiality of personal data.

Alongside our role, please also note that where we have given you (or where you have chosen) a password which enables you to access certain parts of our websites or online services, you are responsible for keeping this password confidential and for complying with any other security procedures that we notify you of. We ask you not to share a password with anyone.

8. What rights you have in relation to your personal data

If you have any questions about our use of your personal data, you should first contact us via the details provided in section 11 below. Under certain circumstances and in accordance with applicable data protection laws, you may have the right to require us to:

- provide you with further details on the use we make of your information
- provide you with a copy of information that we hold about you;
- update any inaccuracies in the personal data we hold;
- delete any personal data that we no longer have a lawful ground to use;

- where processing is based on consent, to withdraw your consent so that we stop that particular processing;
- object to any processing based on the legitimate interests ground unless our reasons for undertaking that processing outweigh any prejudice to your data protection rights; and
- restrict how we use your information whilst a complaint is being investigated.

You may also ask us not to process your personal data for marketing purposes. We will inform you if we intend to disclose your information to any third party service provider for this purpose. As indicated in section 4 above, you can exercise your right to prevent such processing at any time by using an unsubscribe facility or contacting us at info@harleylawgroup.com.

We are also required to take reasonable steps to ensure that your personal data remains accurate. In order to assist us with this, please let us know of any changes to the personal data that you have provided to us by contacting us at info@harleylawgroup.com or by using any relevant facilities that we provide.

While it is our policy to respect the rights of individuals, please be aware that your exercise of these rights is subject to certain exemptions to safeguard the public interest (e.g. the prevention or detection of crime), our interests (e.g. the maintenance of legal privilege) and some of these rights may be limited (for example the right to withdraw consent) where we are required or permitted by law to continue processing your personal data to defend our legal rights or meet our legal and regulatory obligations.

If you contact us to exercise any of these rights we will check your entitlement and respond in most cases within a month.

If you are not satisfied with our use of your personal data or our response to any exercise of these rights, you have the right to complain to the relevant Supervisory Authority (data protection regulator).

9. EU General Data Protection Regulation (GDPR) Protection Law

The GDPR (General Data Protection Regulation) protection law describes how organizations who conduct business with individuals or entities located in EU (European Union) nations — including The Harley Law Group — must collect, handle, and store personal information. These rules apply regardless of whether data is stored electronically, on paper, or in any other manner. To comply with the law, personal information must be collected and used fairly, stored safely, and not disclosed unlawfully.

The EU GDPR is underpinned by eight core principles. These state that personal data must:

- ✓ Be processed fairly and lawfully
- ✓ Be obtained only for specific, lawful purposes
- ✓ Be adequate, relevant, and not excessive

- ✓ Be accurate and kept up to date
- ✓ Not be held for any longer than necessary
- ✓ Processed in accordance with the rights of data subjects
- ✓ Be protected in appropriate ways

Not be transferred outside the European Economic Area (EEA), unless that country or territory also ensures an adequate level of protection.

10. How we use cookies and similar technologies

When you visit our websites we may send a cookie to your computer. This is a small data file stored by your computer to help improve functionality or tailor information to provide visitors with more relevant pages. We may also analyze website traffic to identify what visitors find most interesting so we can tailor our websites accordingly.

11. How you can contact us

If you have any questions about this Privacy notice or how we process your personal data, please contact us by sending an email to: info@harlelawgroup.com, call 713-968-6540 or by writing to:

The Harley Law Group
4801 Woodway Drive
Suite 300E
Houston, Texas 77056
Data Protection Officer
799 9th Street NW, Suite 1000
Washington DC 20001
United States