

Your Rights and Choices under the California Consumer Privacy Act

The California Consumer Privacy Act of 2018 (“CCPA”) provides California residents with specific rights regarding their personal information. In addition to our Privacy Policy <http://www.rc.com/privacy-policy.cfm> this webpage further describes your CCPA rights and explains how to exercise those rights.

Access to Specific Information and Data Portability 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 (see **Exercising Access, Data Portability, and Deletion Rights** below), 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 Request 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 (see **Exercising Access, Data Portability, and Deletion Rights** below), we will delete (and direct our service providers to delete) your personal information from our records, 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.

Exercising Access, Data Portability, and Deletion Rights

To exercise the access, data portability, 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.

Response Timing and Format

We will confirm receipt of a verifiable consumer request within ten (10) 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) days of its receipt. If we require more time (up to 45 days), we will inform you of the reason and extension period in writing, specific details are [available here](#).

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, specific details are [available here](#).

We do not charge a fee to process or respond to your verifiable consumer request unless it is excessive, repetitive, or manifestly unfounded. If we determine that the request warrants a fee, we will tell you why we made that decision and provide you with a cost estimate before completing your request.

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.

Personal Information Sales 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, and therefore, we have not included a “Do Not Sell My Personal Information” link on our Site. If our practices change, we will update this Privacy Policy and take any other necessary action to comply with applicable law.

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.

NON-DISCRIMINATION

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 Privacy Policy as a pdf, [please click here](#). For more information, please see our Accessibility Statement [here](#).