

# Privacy Policy

**Effective Date: January 1, 2020**

This privacy policy (the "Privacy Policy") describes Robinson & Cole LLP's ("Robinson+Cole", "our", "us", or "we") practices regarding the handling of content provided by visitors to our website, located at <http://www.rc.com>, (the "Site") and our use, storage, and destruction of personal information.

Please carefully read this Privacy Policy. By using this Site, you indicate your understanding and acceptance of these terms. If you do not accept these terms, please do not use this Site. We do update this Privacy Policy from time to time so please review this Privacy Policy regularly. If we materially alter our Privacy Policy, we will notify you of such changes by posting a notice on our Site. Your continued use of the Site will be deemed your agreement that your information be used in accordance with the new policy. If you do not agree with the changes, then you should stop using the Site and you should notify us that you do not want your information used in accordance with the changes.

## **Site Privacy Policy**

### What is Robinson+Cole's Website Privacy Policy?

This portion of our Privacy Policy explains what types of information we gather, how we gather that information, what disclosures of that information we might make, and how we safeguard that information. Our Privacy Policy does not cover the privacy practices of any other websites to which the Site may link. We encourage you to read and understand those websites' policies prior to using those websites. We do not accept any responsibility or liability for their policies whatsoever as we have no control over them. You agree that by using our Site, we may collect, use, and disclose certain information in accordance with our Privacy Policy.

### How does Robinson+Cole gather my information?

We gather information in two ways. One way is when you send us your information directly, such as by making an email inquiry or submitting a registration form to receive our newsletters. The other way is by using technology to collect information regarding your use of the Site.

### What information does Robinson+Cole collect?

We collect both personally identifiable information ("PII") and non-personally identifiable information ("Non-PII"). PII refers to information that identifies you directly, such as your name, business affiliation, postal address, telephone number, and e-mail address. We collect PII only when you voluntarily provide it to us.

Non-PII refers to information that does not identify you personally, which we use to track your Internet use. For instance, we may collect information about your computer's IP address, what type of web browser you use, and what pages of the Site you visit to understand how the Site is being used. See the "What are "cookies" and how does Robinson+Cole use them?" section below for more information.

By submitting a telephone number to Robinson+Cole you agree that a representative of Robinson+Cole can contact you at the number you provide, potentially using automated technology (including texts/SMS messaging) or a pre-recorded message. Your consent is not an obligation to receive any of our services.

#### What are "cookies" and how does Robinson+Cole use them?

Cookies are small text files that a website sends to a web browser, which are stored on the web browser's computer. Cookies are commonly used to track web activity and provide an enhanced web experience. We use cookies to collect Non-PII. If you do not want websites, including this Site, to be able to use cookies, we suggest that you alter the configuration of your browser to refuse to accept cookies. We do not track our users across time or across websites, nor do we use flash cookies.

#### How does Robinson+Cole use and disclose my information?

We do not disclose any of the information we receive from you to any third parties, other than our service partners who provide information security, and marketing and promotional services to us, or if we were to sell any or all of our business and/or our assets, or where we are legally or contractually required to disclose your information. Otherwise, we will use your information only for our own internal purposes and, where appropriate, to contact you directly. Access to your information is restricted to those of our employees who need to know your information in order to provide services to you.

We will not use PII we collected for materially different, unrelated, or incompatible purposes without providing you with notice and/or updating this Privacy Policy.

Where we disclose PII for a purpose set forth herein, as applicable, we enter a contract with the third party that describes the purpose and requires the third-party recipient to both keep that PII confidential and not use it for any purpose except performing the contract.

We do not sell PII to third parties.

#### How does Robinson+Cole safeguard my information?

We have implemented appropriate safeguards to protect your information from improper access, use and disclosure. First, we use a secure operating environment to seamlessly protect any information you transmit to us. Once received, we then limit access of your information to only

those employees with a legitimate business need. Finally, we take care to dispose of your information properly so that third parties will not be able to access it. This includes destroying, erasing, or making unreadable the information prior to disposal. While we are committed to protecting your privacy, please be aware that no transaction over the Internet can be completely secure, and transmission of such data is therefore entirely at your own risk.

#### How can I stop receiving information from Robinson+Cole?

If at any time you do not wish us to contact you using the information we have collected, including sending you newsletters and notices about seminars, please send an email with your name, mailing address, and email address to [webmaster@rc.com](mailto:webmaster@rc.com). You may also mail this information to us at:

Webmaster - IT Department  
Robinson & Cole LLP  
280 Trumbull Street  
Hartford, CT 06105

#### NOTICE TO CHILDREN UNDER THE AGE OF 18 AND THEIR PARENTS OR LEGAL GUARDIANS

OUR SITE IS INTENDED FOR ADULTS. WE DO NOT KNOWINGLY OR INTENTIONALLY COLLECT PERSONAL INFORMATION FROM ANYONE UNDER THE AGE OF 18. IF YOU ARE UNDER THE AGE OF 18, PLEASE DO NOT SEND ROBINSON & COLE ANY PERSONAL INFORMATION. IF YOU KNOW OF ANYONE UNDER THE AGE OF 18 WHO HAS PROVIDED US WITH INFORMATION, PLEASE CONTACT US IMMEDIATELY AND WE WILL REMOVE THE INFORMATION.

#### **Privacy Protection Policy**

Pursuant to Connecticut Public Act No. 08-167, this Privacy Protection Policy outlines the additional security measures we use in regards to our collection, storage, and disposal of Social Security numbers. We regularly review our physical, electronic, and procedural safeguards so that they effectively protect the confidentiality of Social Security numbers. We limit access to Social Security numbers to only those persons with a legitimate business purpose and prohibit the unlawful disclosure of Social Security numbers. We also provide appropriate training to our employees. Finally, we protect the confidentiality of Social Security numbers by using data encryption and secure data storage procedures and destroying, erasing, or making unreadable Social Security numbers prior to disposal.

#### **For California Residents**

If you reside in California and have provided personally identifiable information to us, you may request information about our disclosure of certain categories of personal information to third

parties for their direct marketing purposes under California's Shine the Light law. Such requests must be submitted to us at one of the following addresses: Robinson & Cole LLP, 280 Trumbull Street, Hartford, CT 016103 or call 800-826-3579.

If you are a resident of California, effective January 1, 2020, you have the following rights under the California Consumer Privacy Act of 2018 ("CCPA"):

- a) to know what categories of personal information about you we have collected and used, including how the personal information was collected;
- b) to know what categories of personal information are being sold or disclosed, or to know that your information is not being sold or disclosed;
- c) to opt out of the sale of your personal information if we sell your information;
- d) to access your personal information, including the right to download or transfer personal information collected during the previous 12 months;
- e) to request that your personal information be deleted; and
- f) to equal service and equal price for goods or services even if you exercise your rights under the CCPA.

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.

If you are a California resident and you want to exercise any of your rights as set forth above, please contact us at [800-826-3579 or [privacycontact@rc.com](mailto:privacycontact@rc.com)]. 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 attest to the fact that you are a California resident and provide a current California address for our response. **[For more information click here.](#)**

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.

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

Robinson & Cole LLP  
280 Trumbull Street  
Hartford, CT 06105

**[webmaster@rc.com](mailto:webmaster@rc.com)**

800-826-3579