

## **Mintz Group Web Site Privacy Policy**

**Effective Date May 22, 2018**

### **1.1 Your Privacy**

a. Mintz Group LLC (“MG,” a Limited Liability Company incorporated in Delaware, USA) and associated offices of MG practicing under the MG name in other jurisdictions, together referred to as “MG,” respects your concerns about privacy. This Website Privacy Notice describes the types of information we collect through the MG website ([www.mintzgroup.com](http://www.mintzgroup.com)), how we may use that information and with whom we may share it.

b. With respect to personal data received from European Union member countries, MG has entered into an intercompany Standard Contractual Clauses for Cross-Border Transfer of Personal Data with its U.K. subsidiary, James Mintz Group U.K., Ltd. (“Standard Contractual Clauses”), and MG commits to cooperate with the General Data Protection Regulation (“GDPR”).

c. Your use of our website constitutes your acceptance of the terms of this Website Privacy Notice. In particular, by using our website you consent to our collection, use, retention, disclosure and transfer of your information and our use of cookies, all as described below.

### **1.2 Information We Collect**

a. Anonymous Browsing. You are able to browse the non-password-protected sections of MG’s website without actively providing us with your personal information. We do not collect personal information when you browse, such as your email address. However, when you access our website your computer’s browser may automatically provide us with certain information, including information about your computer’s browser type, operating system and IP address, as well as your access date and time and your referring and exiting URLs.

b. Registration and Personal Information. In order to access certain areas of our website, sign up or register for MG-sponsored events, sign up for news, alerts or publications from MG, submit your resume or other information to apply for a job with MG, contact us or obtain further information from us via our website, we may ask you to provide information about yourself, including your name, address, telephone number, email address, organizational affiliation and certain other information that MG may use to identify you. If you choose not to provide such information, you may not be able to access certain areas of MG’s website or to receive information that you have requested from MG.

c. Cookies. Like many organizations, MG’s web servers (computers that host websites) place a “cookie” (a small data file) on the hard drive of your computer when you first connect to our site. This allows us to recognize your computer, on return visits, and helps us study traffic patterns on our website, to improve the site and the services that we provide. For more

information about cookies and for guidance on how to refuse cookies, please see the heading below "Cookies and how to remove them."

d. **Web Beacons.** This website may use a technology known as "web beacons" (also known as Internet tags, pixel tags and clear GIFs) that allow this website to collect web log information. A web beacon is a graphic on a web page or in an e-mail message designed to track pages viewed or messages opened. Web log information is gathered when you visit our website. The webserver automatically recognizes some non-personal information, such as the date and time you visited our site, the pages you visited, the website you came from, the type of browser you are using, the type of operating system you are using, and the domain name and address of your Internet service provider. We may also include web beacons in promotional e-mail messages in order to determine whether messages have been opened.

e. **Do Not Track Signals.** MG does not track its users over time or across third party websites to provide targeted advertising and therefore does not respond to Do Not Track (DNT) signals.

f. This website is not intended for, or designed to attract, individuals under the age of 18. We do not knowingly collect personal information from any individual under the age of 18. If you are under the age of 18, do not provide personal information of any kind.

### **1.3 Use of Information**

a. Information that is provided by your computer when you browse our website is used by MG solely for internal purposes (such as evaluation of site use, assessment and improvement of site performance and improvement of the functionality and services that we are able to offer) and is not used to target individuals for marketing unless paragraph 1.3b below applies. Moreover, we do not use cookies to collect and distribute information to third parties for marketing purposes.

b. Where you provide us with information about yourself, we will use your information for the purposes for which it was provided, which may include contacting you and providing you with the information that you have requested from MG. We may also use your information to communicate with you about events, publications and services provided by MG that may be of interest to you. However, if you are a MG client or contact in the EU and would like to receive such communications from us, we ask that you opt by emailing [dataprotection@mintzgroup.com](mailto:dataprotection@mintzgroup.com). If you are an MG client or contact in the EU and no longer wish to receive such communications from us, you may opt out by emailing [dataprotection@mintzgroup.com](mailto:dataprotection@mintzgroup.com).

c. We may share your information among MG-controlled entities and subsidiaries. We may also share your personal information with our agents or contractors in connection with services that these individuals or entities perform for MG. These agents or contractors are not authorized by us to use or disclose this information except as necessary to provide services for MG. We may, for example, provide your information to agents or contractors for hosting our databases,

for data processing services, or so that they can mail you information you requested. MG has responsibility for the processing of personal information it receives and subsequently transfers to a third party acting as an agent on its behalf. To the extent required under the GDPR and other applicable data privacy laws, MG shall remain responsible and liable if its agent processes such personal information on MG's behalf in a manner inconsistent with the purposes for which the information was provided, unless MG proves that it is not responsible for the event giving rise to the damage.

d. We reserve the right to transfer any information we have about you in the event we sell or transfer all or a portion of our business or assets. Should such a sale or transfer occur, we will use reasonable efforts to try to require that the transferee use information you have provided through this website in a manner that is consistent with this Website Privacy Notice.

e. We may disclose information we have about you (i) if we are required to do so by law or pursuant to legal process, (ii) in response to a request from law enforcement authorities or other government officials, including to meet national security requirements, or (iii) when we believe disclosure is reasonably necessary or appropriate to prevent physical harm or financial loss in connection with an investigation of suspected or illegal activity.

#### **1.4 International Transfers of Information**

We may transfer the personal information we collect through this website to the United States and to other countries in which we do business, which may not have the same data protection laws as the country in which you reside. In cases of transfers from the European Union, the European Economic Area or Switzerland to the United States, information is transferred, stored and processed in accordance with the Standard Contractual Clauses and the GDPR.

#### **1.5 How We Protect Your Information**

We maintain administrative, technical and physical safeguards for the website designed to protect against loss, misuse or unauthorized access, disclosure, alteration or destruction of the information we collect through our website. However, we cannot ensure or warrant the security of any information you transmit to the website or to us.

#### **1.6 Reviewing and Updating Your Information**

You have the right to request a copy of all personal data which we hold in relation to you, and to have it corrected, updated or removed from our files. All such requests should be emailed to [dataprotectionteam@mintzgroup.com](mailto:dataprotectionteam@mintzgroup.com).

#### **2.0 Additional Services and Links to Other Sites**

From time to time, we may provide links to other websites for your information or convenience or offer additional services through separate websites linked to this website. These websites operate independently from our website and may be subject to alternative terms of use, including

terms concerning use of your personal information. We have not reviewed these third party sites and do not control and are not responsible for any of these sites, their content or their privacy policies. Thus, we do not endorse or make any representations about them, or any information, software, or other products or materials found there, or any results that may be obtained from using them. If you decide to access any of the third party sites listed on our website, you do so at your own risk.

## **2.1 Withdrawal of Services**

MG reserves the right to withdraw the MG website or to remove any content without notice at any time and for any reason.

## **3 Updates to Our Privacy Notice**

We may update or change this Website Privacy Notice. The “Effective Date” at the top of this page states when this Website Privacy Notice was last revised. Any change to this Website Privacy Notice will become effective when we post the revised Website Privacy Notice on our website. Keep in mind that your use of our website means that you accept our Website Privacy Notice.

If any change may materially and negatively affect the privacy of your personal information, we will use reasonable efforts to notify you in advance and give you a reasonable period of time to object to any changes.

We encourage you to periodically review this Website Privacy Notice to stay informed about how we collect, use, and share personal information.

## **4 How to Contact Us**

If you have any questions or complaints about our Website Privacy Notice or our Privacy Shield-related (or general privacy-related) practices, please contact us by:

Email at [dataprotectionteam@mintzgroup.com](mailto:dataprotectionteam@mintzgroup.com)

or

writing to us at:

Mintz Group, LLP

110 Fifth Avenue, 8<sup>th</sup> Floor

New York, NY 10011

Attn: General Counsel

Alternatively, you can contact the Data Protection Authority in the country in which you reside for further information about your rights and how to make a formal complaint.

## **5 Disputes**

## **5.1 Disputes Generally**

We take your privacy concerns seriously. If you believe that MG has not adhered to this Privacy Policy, please contact MG as described in Section 4 above. In your correspondence, please describe in as much detail as possible the ways in which you believe that this Privacy Policy has not been complied with. We will do our best to address your concerns and to respond to you within 1 to 3 months of receipt of your correspondence. If you feel that your complaint has been addressed incompletely, we invite you to let us know for further investigation.

## **5.2 Dispute Resolution**

This policy shall be governed by the laws of the State of New York, except in the case where this policy is required by applicable European Data Protection Laws to be governed by the laws of the EU or a Member State thereof, in which case this Policy shall be governed by the Member State in which MG or the relevant Controller is established.

EU citizens may report privacy complaints directly to their local Data Protection Authorities. Swiss citizens may report privacy complaints directly to the Swiss Federal Data Protection and Information Commissioner. You may also contact us to be directed to the relevant contacts.

## **6 Enforcement**

MG conducts periodic self-assessments to verify that the attestations and assertions it makes about its privacy practices are true and that such privacy practices have been implemented as presented. MG will take steps to remedy any problems arising out of failure to comply with the GDPR and other European Data Protection Laws.

The Federal Trade Commission has jurisdiction to investigate claims against MG regarding possible unfair or deceptive practices and violations of laws or regulations covering privacy.

## **Cookies and how to remove them**

### ***Purpose of our Cookies***

We use cookies in connection with this website in order to:

- allow your computer and our website to speak to each other in a more efficient manner
- allow you to navigate the website
- store normal application specific data as a you move from page to page
- authenticate you as the correct user
- overcome any technical difficulties which may threaten the availability of this Web site

### **Information stored on the Cookie**

The cookie will only contain information that your computer is set to provide to the website server and you can choose to reject all cookies, although this may affect the functionality of our website for technical reasons.

We may use "Session" and/or "Permanent" cookies. Session cookies are stored on your computer only during your browsing session. These cookies will automatically delete at the end of the session when your browser closes or you log out of the website. The information contained in these cookies will generally not identify you as the user, but will allow you to navigate the website without having to log-in repeatedly. These cookies are not written to your hard drive. The Permanent cookies we use identify your browser with a unique, random number and in themselves do not reveal any personal information about you. These cookies are stored on your hard drive and help us identify you as a returning visitor to our site. This gives us more accurate data to study traffic patterns so we can improve the website and the services that we provide through the website. We use the following cookies: Google Analytics.

### **How to control Cookies**

Depending on the type of browser you use, you can set the browser to accept or reject all or certain types of the cookies at any time even if after you have consented to our use of cookies by using our website. Your browser can also be set to tell you every time a cookie is sent to you. We have provided to you below instructions on how to choose these settings for the most popular browsers. Please note that you may not be able to receive certain services on this website if you refuse a cookie. If you require further information you could visit