

Privacy Policy

VLP LAW GROUP PRIVACY POLICY

Last updated: June 30, 2022

Introduction and Overview

VLP Law Group LLP (“VLP”) respects your privacy and is committed to protecting it through our compliance with this VLP Law Group Privacy Policy (this “Privacy Policy”).

This Privacy Policy describes how we collect, use and share personal information about you, as well as your rights and choices about such collection, use and sharing. For purposes of this Privacy Policy, “personal information” means any information relating to an identified or identifiable individual, or as otherwise defined under applicable law.

This Privacy Policy applies to visitors to the VLP website at www.vlplawgroup.com and to VLP’s social media sites (collectively, the “Sites”). It does not apply to information provided to us in the course of our attorney-client relationships or information protected by confidentiality, the attorney-client privilege, the attorney work product doctrine, or any other applicable privilege or protection.

Please read this Privacy Policy carefully to understand our policies and practices regarding your information and how we will treat it. If you do not agree with our policies and practices, your choice is not to access the Sites. By accessing the Sites, you agree to this Privacy Policy.

This Privacy Policy may change from time to time (see *Changes to this Privacy Policy*). Your continued access to the Sites after we make changes is deemed to be acceptance of those changes, so please check this Privacy Policy periodically for updates. If you have any questions about our privacy practices, please contact us as set forth in the *Contact Us* section below.

Information Collection

We collect the following types of information from visitors to the Sites.

1. Information You Provide to VLP

We collect certain information you provide directly via the Sites:

- ➔ Your contact information when you contact us by email, telephone, or via a contact form.
- ➔ Professional information about you, if you inquire about VLP services or about joining VLP.
- ➔ The content of any communications we have with you.
- ➔ Information you provide in response to a VLP survey or other solicitation from us.

2. Information Collected Automatically

As you navigate through and interact with the Sites, we may use automatic data collection technologies to collect certain information about your equipment, browsing actions and patterns, including:

- ➔ Details of your use of the Sites, including traffic data, logs, and other communication data and the resources that you access and use on the Sites.
- ➔ Information about the type of device or browser you use, your device's operating software, your internet service provider, your device's regional and language settings, and other similar information. This data may include IP address, MAC address, device advertising ID (e.g., IDFA or AAID), and other device identifiers.

The information we collect automatically helps us to improve the Sites, including by enabling us to:

- ➔ Estimate our audience size and usage patterns.
- ➔ Store information about your preferences, allowing us to customize the Sites according to your individual interests.
- ➔ Speed up your searches.
- ➔ Recognize you when you return to the Sites.
- ➔ Make content (including advertising) available to you via the Sites.

3. Types of Cookies Used

The technologies we use for automatic data collection include cookies. A cookie is a small file placed on the hard drive of your computer. You may refuse to accept browser cookies by activating the appropriate setting on your browser. However, if you select this setting, you may be unable to access certain parts of the Sites. Unless you have adjusted your browser setting so that it will refuse cookies, our system will issue cookies when you direct your browser to the Sites.

We use three types of cookies:

Strictly Necessary Cookies. These cookies are essential for the Sites to perform basic functions and are necessary for us to operate certain features. These include those required to ensure the Sites are operating properly. You can set your browser to block or alert you about these cookies, but consequently some parts of the Sites may not work.

Performance Cookies. These cookies allow us to optimize performance by collecting information on how users interact with the Sites, including which pages are visited most, as well as other analytical data. We use these details to improve how the Sites function and to understand how users interact with them. If you do not allow these cookies, we will not know when you have visited the Sites, and will not be able to monitor their performance.

Among the performance cookies we use is Google Analytics. Google Analytics helps us understand how visitors use the Sites. Google Analytics collects only the IP address assigned to you on the date you visit the Sites, rather than your name or other identifying information. Google will not associate your IP address with any other data held by Google. Google's privacy policy is available at <https://policies.google.com/privacy>.

Targeting Cookies. These cookies are set by us and our partners to provide you with relevant content (including advertising) and to understand the content's effectiveness. They may be used to collect information about your online activities over time and across different websites to predict your preferences and to display more relevant content to you. These cookies also allow a profile to be built about you and your interests and enable personalized content to be shown to you based on your profile. If you do not allow these cookies, you may receive less targeted content.

Among the targeting cookies we use is LinkedIn Insight. LinkedIn Insight is a tag or pixel that allows us to measure the activity of users on the Sites by means of a link with the LinkedIn advertising system and the personal information that LinkedIn collects. LinkedIn Insight enables us to see aggregate reports about the users of the Sites who have a LinkedIn account and allows us to provide relevant content (including advertising) on LinkedIn. LinkedIn does not supply us with the identity of the users concerned. LinkedIn's privacy policy is available at <https://www.linkedin.com/legal/privacy-policy>.

Use of Information

We use information that we collect about you or that you provide to us, including any personal information:

- ➔ To present the Sites and its contents to you, including to provide support.
- ➔ To provide you with information or services that you request from us.
- ➔ To fulfill any other purpose for which you provide it.
- ➔ To notify you about changes to the Sites.
- ➔ To provide relevant content (including advertising) to you.
- ➔ In any other way we may describe when you provide the information.
- ➔ For any other purpose with your consent.

We may use information that does not identify you (including information that has been de-identified) without obligation to you except as prohibited by applicable law.

For information on your rights and choices regarding how we use your information, see *Your Rights and Choices* below.

Sharing of Information

We share information about you as follows:

- ➔ *Service Providers.* We may share your information with our agents, vendors and other service providers (collectively, "Service Providers") in connection with their work on our behalf. Service Providers assist us with services such as data analytics, marketing and promotional services, website hosting, and technical support. Service Providers are prohibited from using your information for any purpose other than to provide this assistance, although we may permit them to use aggregate information which does not identify you or de-identified data for other purposes.
- ➔ *Merger or Acquisition.* We may share your information in connection with, or during negotiations of, any proposed or actual merger, purchase, sale or any other type of acquisition or business combination of all or any portion of our assets, or transfer of all or a portion of our business to another business.

- ➔ **Security and Compelled Disclosure.** We may share your information to comply with the law or other legal process, and where required, in response to lawful requests by public authorities, including to meet national security or law enforcement requirements. We may also share your information to protect the rights, property, life, health, security and safety of VLP or any third party.
- ➔ **Consent.** We may share your information for any other purpose disclosed to you and with your consent.

Without limiting the foregoing, in our sole discretion, we may share aggregated information that does not identify you or de-identified information about you with third parties or affiliates for any purpose except as prohibited by applicable law. For information on your rights and choices regarding how we share your information, please see *Your Rights and Choices* below.

Your Rights and Choices

1. Review and Update of Your Information

You may access, update, or remove any information that you have voluntarily submitted to us through the Sites by sending an email to us at privacy@vlplawgroup.com. We may require additional information from you to allow us to confirm your identity.

Please note that we will retain and use your information as necessary to comply with our legal obligations, resolve disputes, and enforce our agreements. California residents have additional rights as set forth in *Your California Privacy Rights* below.

2. Tracking Technology Choices

Cookies. Most browsers accept cookies by default. You can instruct your browser, by changing its settings, to decline or delete cookies. If you use multiple browsers on your device, you will need to instruct each browser separately. Your ability to limit cookies is subject to your browser settings and limitations. For more information on managing cookie preferences, visit <https://www.allaboutcookies.org/manage-cookies/>.

Do Not Track. Your browser settings may allow you to automatically transmit a “Do Not Track” signal to online services you visit. There is no industry consensus as to what site and app operators should do with regard to these signals. Accordingly, we do not monitor or take action with respect to “Do Not Track” signals or other mechanisms. For more information on “Do Not Track,” visit <http://www.allaboutdnt.com>.

Please be aware that if you disable or remove tracking technologies, some parts of the Sites may not function correctly.

3. Communications

You can opt-out of receiving emails from us at any time by following the instructions as provided in emails to click on the unsubscribe link, or by emailing us at privacy@vlplawgroup.com with the word UNSUBSCRIBE in the subject field of the email.

Your California Privacy Rights

California law grants additional privacy rights to California residents. In particular, the California Consumer Privacy Act (“CCPA”) requires businesses to disclose, for the past 12 months, (i) the categories of personal information collected, (ii) the sources of the collected personal information, (iii) the purposes for which the collected personal information is used, (iv) the categories of personal information disclosed for a business purpose, and (v) the categories of any personal information sold. VLP provides these disclosures in the following table. (Note that VLP does not sell any personal information, even under the broad CCPA definition of a “sale.”)

Category	Sources of Collection	Purposes of Collection	Disclosures for a Purpose
Identifiers	Site visits and communications with VLP	To allow VLP to communicate with you and provide you with relevant content	To VLP service providers to assist in providing services and content
Personal information categories listed in the California Customer Records statute	Site visits and communications with VLP	To allow VLP to communicate with you and provide you with relevant content	To VLP service providers to assist in providing services and content
Internet or other electronic network activity	Your browsing and search history on the Sites and other interaction with the Sites	To improve the visitor experience on the Sites, diagnose server problems and administer the Sites, and provide relevant content to you	To third-party analytics services providers for the purpose of enhancing the Sites and to deliver content

California residents also have the rights described below. We will not discriminate against any California resident who exercises these rights.

Right to access/know your information. You may request from us a list of (i) the personal information that we have collected about you, and (ii) the categories of third parties to whom we have disclosed your personal information. You have the right to up to two (2) access requests each twelve (12) months.

Right to delete your information. You may request, at any time, that we delete your information and direct our service providers to delete your information from their records. We are not required to delete any information that is necessary to detect security incidents, or to comply with a legal obligation, among other limited exceptions.

You may contact us to exercise these rights at privacy@vlplawgroup.com. To ensure the privacy and protection of individuals, we are required to verify your identity (or that of your authorized agent) or

otherwise authenticate your request(s), which we will do in accordance with the CCPA regulations. Please note that, under the CCPA, we are not required to grant a request to access/know or a request to delete with respect to personal information obtained from you in your role as an employee, owner, director, officer or contractor of a company and within the context of VLP providing its services to such a company.

Your European and United Kingdom Data Protection Rights

If you are a resident of the European Union or the United Kingdom, you are entitled to certain information and have certain rights under the General Data Protection Regulation (Regulation (EU) 2016/679) (the “EU GDPR”) and the EU GDPR as implemented by the United Kingdom pursuant to the Data Protection, Privacy and Electronic Communications (Amendments etc) (EU Exit) Regulations 2019 (“UK GDPR”), respectively (collectively, the “GDPR”). Those rights include:

- ➔ The right of access to your information.
- ➔ The right to rectify your information if it is incorrect or incomplete.
- ➔ The right to have your information erased (“right to be forgotten”) if certain grounds are met.
- ➔ The right to withdraw your consent to our processing of your information at any time (if our processing is based on consent).
- ➔ The right to object to our processing of your information (if processing is based on legitimate interests).
- ➔ The right to object to our processing of your information for direct marketing purposes.
- ➔ The right to receive your information from us in a structured, commonly used and machine-readable format, and the right to transmit your information to another controller without hindrance from us (data portability).

If you are located in the European Union or the United Kingdom and you are or have been a visitor to the Sites or user of our services, we may send you marketing communications based on our legitimate interests, subject always to your right to opt out of such communications. Further, if you are located in the European Union or the United Kingdom, we will never share your information with a third party for such third party’s marketing purposes, unless you have specifically consented to us doing so.

You may contact us at privacy@vlpawgroup.com to exercise any of the above rights. We may request specific information from you to confirm your identity, and in some circumstances, we may charge a reasonable fee for access to your information.

Furthermore, if you believe that our processing of your information is inconsistent with your data protection rights under the GDPR and we have not adequately addressed your concerns, you have the right to lodge a complaint with the data protection supervisory authority of your country.

For purposes of the GDPR, we are a “controller” and you are a “data subject.”

Visitors Outside the United States

VLP is a U.S.-based law firm. If you are a non-U.S. resident and provide us with your personal information, you acknowledge and agree that your personal information may be transferred to and processed in the United States, where the laws regarding processing of personal information may be less stringent than the laws in your country. By providing your information, you consent to such

transfer and processing.

Children

The Sites are intended for a general audience and are not directed to children under 16 years of age. VLP does not knowingly collect personal information as defined by the Children's Online Privacy Protection Act ("COPPA") in a manner that is not permitted by COPPA. If you are a parent or guardian and believe VLP has collected such information in a manner not permitted by COPPA, please contact us as at privacy@vlplawgroup.com and we will remove such information.

Data Security

We have implemented measures designed to secure your personal information from accidental loss and from unauthorized access, use, alteration, and disclosure.

Unfortunately, the transmission of information via the internet is not completely secure. Although we do our best to protect your personal information, we cannot guarantee the security of your personal information transmitted to the Sites. Any transmission of personal information is at your own risk. We are not responsible for circumvention of any privacy settings or security measures contained on the Sites.

Changes to this Privacy Policy

We reserve the right to revise this Privacy Policy at any time. Any changes will be effective immediately upon posting of the revised Privacy Policy and updating the "last updated" date above. Your continued access to the Sites indicates your consent to the Privacy Policy then posted. You are responsible for periodically visiting our website and this Privacy Policy to check for any changes.

Contact Us

If you have any questions or comments about this Privacy Policy or our privacy practices, please contact us at privacy@vlplawgroup.com.