

Firm Privacy Policy, 03/21/2025

McDonald Carano LLP respects your privacy. This Policy describes how McDonald Carano LLP (“the Firm,” “we,” “us”) collects, uses, transfers, and discloses your information. It applies to all clients, potential clients and third parties whose data is processed by our law firm.

“**Personally Identifiable Information**” (“PII,” “Personal Information”) is information that identifies you as an individual or relates to an identifiable individual. This Policy describes our practices of processing Personal Information that we collect and use in connection with:

- Websites operated by us
- Services we provide
- Communications including emails, text messages and phone calls
- Offline business interactions

How PII is Collected

We collect Personal Information in a variety of ways, including through our Services and from other sources, as set out in the grid below. If you do not provide the information requested, we may not be able to provide the Services. We will note which Personal Information is required to provide the Services at the time of its collection.

If you disclose to us any Personal Information relating to other people, you represent that you have the authority to do so and to permit us to use the information in accordance with this Policy.

How PII is Processed

McDonald Carano collects Personal Information to provide Services to you, our clients, and to operate our business. The type of Personal Information we collect about you depends on the situation at hand. Please do not provide us with any Personal Information if you do not agree with this Policy.

We use your Personal Information for legitimate business purposes as described in the overview below.

Service	Examples of Processing Activities	PII Examples	Legal Basis
Providing our Legal Services	Providing legal services, including but not limited to legal research, document drafting and review, and	Name & Contact Details; Business Contact Details; Legal Services PII and Sensitive Data.	Legitimate interest, Consent.

	collection of litigation discovery.		
Customer Service	Administering customer-care services to facilitate and address inquiries, requests, comments and complaints about any of our Services (such as in person, through phone calls, text messages, or email), for example, to send you documents or information you request or assist you in using the Services.	Name & Contact Details; Business Contact Details; Account Information; Billing Information; Transaction Information; Device Information; and Preferences.	Legitimate interests, such as responding to inquiries or complaints. Legal obligations, such as when you submit a request to access your Personal Information.
Communicating important changes/service messages	Send you important information regarding our relationship with you, our Services, any changes to our terms, conditions, policies and procedures, and/or other administrative information via email, text messages, or other communication systems.	Name & Contact Details; Business Contact Details; Account Information; Preferences; Transaction Information; Device Information.	Legitimate interests, such as to ensure our Services are used in accordance with our terms, conditions, and policies.
Operations and general business	Administering online Services, client intake, practice management, employee training, and managing work activities and personnel generally.	Personal Information as relevant for the specific business operation.	Legitimate interests, such as responding to client complaints and concerns. Legal obligations.

<p>Fraud Prevention and security</p>	<p>Conduct audits; verify that our internal processes function as intended and are compliant with legal, regulatory, or contractual requirements; monitor for and prevent fraud; and security purposes, including system security and on-site security of our premises.</p>	<p>Name & Contact Details; Business Contact Details; Account Information; Billing Information; Device Information; CCTV and Site Security Information; and Transaction Information.</p>	<p>Legal obligations, such as to detect and prevent cyberattacks.</p> <p>Legitimate interests, such as identifying and/or preventing fraudulent transactions.</p>
<p>Legal and Compliance</p>	<p>Fulfill our legal and compliance-related obligations, including complying with applicable laws; complying with legal processes; responding to requests from public and government authorities; meeting national security or law enforcement requirements.</p> <p>Enforcing our terms and conditions; protecting our operations; protecting the Firm’s rights, privacy, or property; and allowing us to pursue available legal remedies, defend claims, and limit the damages that the Firm may sustain.</p>	<p>Personal Information as relevant for the specific legal action, regulatory investigation, and/or legal processes in question, which may include:</p> <p>Name & Contact Details; Business Contact Details; Account Information; Billing Information; User Content; Preferences; Visitor and Event Information; CCTV and Site Security Information; and Device Information.</p>	<p>Legal obligations, such as complying with legal processes.</p>

Emergency and Incident Response	Ensuring the safety of on-site personnel and visitors; responding to, handling and documenting on-site accidents and medical and other emergencies; actively monitoring properties to ensure adequate incident prevention, response and documentation (including CCTV); requesting assistance from emergency services; and sending notifications and alerts in the event of incidents or emergencies (such as via text messages, email, phone calls, audio-visual device prompts, etc.).	Name & Contact Details; CCTV and Site Security Information; and Visitor and Event Information.	Legal obligations, for example, relating to health and safety regulations and documenting on-site accidents. Legitimate interests, such as monitoring properties through CCTV to ensure individuals' safety. Protect individuals' vital interests, such as contacting medical or emergency services where an individual's life is at risk.
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Personal Information

PII Type	Description
Full Name and Contact Details	First and last name, nickname, title, prefix, email address, phone number, postal address, date of birth, gender, race, country of residence, citizenship.
Phone Number	Your personal, business, or other phone number at which you opt in/elect to receive text messages or phone calls.
Email	Your personal, business, or other email address at which you opt in/elect to receive emails.
Marketing Data	Your choices regarding our promotional emails, messages and other marketing displayed or provided to you, and preferred methods of such promotional communication.

Transaction Information	Details of services you have purchased from us.
Preferences	Language, interests, preferred means of communication, and other client feedback/preferences that you might express during your use of our Services.
User Content	Reviews about our services and other content you may create or share on our services, including posts on our social media pages, blogs, and comment sections.
Background Information	Information on, or the verification of, your employment or educational background.
CCTV	Images or Video captured or recorded by CCTV and other security measures on our premises.
Device Information	Information about your devices and your use of our systems. This may include statistics about the traffic on our site like browser type/version, device used to access our website, website usage, and any data obtained through third party cookies.
Business Contact Details	Company name, business email address, business telephone number, business postal address, country of business.
Social Media Information	Profile pictures, social media account ID, and other social media and job board profile information, including lists of friends/followers on social media.
Public Record Information	Information from public business records and industry directories.

Payments

The Firm utilizes a third-party payment processor for any paid service. The Firm does not collect or store any billing information used in third-party payment of our services. This information is provided directly to our third-party payment processor whose use of your personal information is governed by their privacy policy.

Legal Services PII and Sensitive Data

In providing legal services to our clients, we may occasionally collect additional types of PII or sensitive information. These may be collected incidentally as part of litigation discovery, trust and estate planning, bankruptcy work, gaming applications or through other means of providing our legal services. Any information collected in this way is a part of the client’s record and falls under the highest data classification. The Firm will only collect this information if it is material to

the engagement and will retain the minimum amount of data necessary for legal representation and discovery purposes.

Other Information

We collect Other Information when you access and use our website (mcdonaldcarano.com). For example, our website may automatically gather certain information and store it in log files, including IP addresses and/or click-stream data. An IP address is a number that is automatically assigned to your computer when you access the Internet. When you request web pages from our website, your IP addresses is logged. We may also collect click-stream data when you request specific pages from our website. Click-stream data may include such information as the page served, time, source of the request, type of browser making the request, preceding page view, and other such non-personal information.

We use Other Information for purposes of website system administration and to understand how visitors use our website. Tracking technologies and other website usage data help us determine how visitors arrive at our website, what content is most popular, which features are most important, what types of visitors in the aggregate are interested in particular kinds of information, and similar analytical information. We use this information to update our website design and organization, improve navigation and content, and provide additional experiential and navigational technologies to ensure we are meeting the needs of our website visitors. We may also use Other Information as part of general marketing research.

Disclosure of Personal Information

Third party platforms are used to host our applications and services on which the listed information is stored. These third parties have undergone a security review before implementation and are obligated to handle user data with the same level of care as the Firm. These vendors do not have standing access to the data and are given temporary access for maintenance when authorized by the Firm. The vendors are obligated to notify us immediately of any data breaches or security breaches, and we have the authority to enact any data subject access requests on these hosting providers.

Additionally, certain services are provided by third parties, and we may use various third parties to help in whole or in part to host, operate, analyze, maintain, upgrade, monitor, improve, and/or secure our systems. We may share certain limited Personal Information and/or Other Information with such entities only as specifically needed for them to perform the particular task(s) described in Services Agreements signed with such entities.

We may share certain limited Personal Information and/or Other Information with third party communications or marketing services providers that assist us with communicating or marketing to users of our website or individuals that request information from us through our website. For example, we may share certain limited information, such as your email address, with a third-party systems provider that distributes to you email notifications on behalf of McDonald Carano about our events, CLE training programs, and invitations to conferences, among others. Similarly, we may share certain limited information with third-party organizations

with whom we may collaborate on marketing-oriented activities or events, and the use of such information will be limited to the specific activity or event.

Security

McDonald Carano deploys reasonable organizational, technical and administrative measures to protect personal information within our organization. Since no data transmission and storage is 100% secure, please contact us as described below in the “**Contacting the Company**” section if you believe any personal information may have been compromised.

Retention Period

McDonald Carano will retain your personal information only for as long as necessary to fulfill the purposes outlined in this Policy, including legal, regulatory and business requirements. The criteria determining our retention periods can include the length of time we have an ongoing relationship with you, legal obligations, and legitimate business operation needs.

Where a legal obligation arises, in some circumstances, we will retain certain Personal Information, even after we no longer provide the Services to you, for example:

To cooperate with law enforcement or public, regulatory and government authorities: We may share information if we receive a request for disclosure from one of these authorities.

To pursue or defend a legal action: We may retain relevant Personal Information in the event of a legal claim or complaint, including regulatory investigations or legal proceedings about a claim related to your Personal Information, or if we reasonably believe there is a prospect of litigation (whether in respect of our relationship with you or otherwise) as permitted by applicable laws and Firm policies after the dispute has been settled or decided by a court or tribunal from which there is no further right of appeal.

To document security or fraud incidents: We may keep and archive records of incidents for internal purposes and as documentation of steps taken.

Third Party Services

We do not sell any information collected on, through or by our website or services, nor do we provide Personal Information or Other Information to third parties for the purposes of their marketing products or services to you.

Individual’s Rights

Providing personal information to us is voluntary, although if you do not provide certain Personal Information, you may not be able to participate in our services. We will specify what information is required for our services at the time of services. Please contact privacy@mcdonaldcarano.com to learn more about what information is collected, how the information is collected, or how we intend to use the information.

We do not provide a method to opt out of the sale of personal information since we do not sell any information to third party providers. You can contact privacy@mcdonaldcarano.com for any additional information on the sale of information.

Updating Policy

The Firm reviews our privacy procedures regularly and updates our policies to reflect any changes in our practices or legal requirements. Any changes to the Policy will be posted with a revision date and will become effective upon posting the updated Policy on our website. If any material changes occur to the Policy, we will notify our clients making them aware of any updates to how Personal Information is collected and processed.

Contacting the Company

To contact the company or submit questions regarding this Privacy Policy, please email us at privacy@mcdonaldcarano.com or send postal mail to PO Box 2670, Reno, NV 89505.

Because email communications are not always secure, please do not include any sensitive information in any email communications with us.

California Residents

This privacy notice section for California residents supplements the information contained in our Privacy Policy, and it applies solely to California residents from whom we collect, use and disclose categories of personal information.

The following is a list of categories of personal information which we may collect or have been collected from California residents within the last 12 months.

- **Identifiers:** name, contact information, IP address, and other online identifiers
- **Personal Information categories listed in the California Customer Records Statute:** as defined in the California customer records law, such as name, contact information, medical information, insurance information, education information, employment information, and government-issued ID numbers
- **Protected classification characteristics under California or federal law:** age, sex, disability status, primary language, race, citizenship, and marital status, to the extent required or permitted by applicable law
- **Commercial Information,** such as transaction information and purchase history
- **Biometric Information:** age, race, color, ancestry, national origin, citizenship, religion or creed, marital status, medical condition, physical or mental disability, sex (including gender, gender identity, gender expression, pregnancy or childbirth and related medical conditions), sexual orientation, veteran or military status, genetic information (including familial genetic information).
- **Internet or other similar network activity,** such as browsing history and interactions with our website
- **Geolocation data,** such as device location and approximate location derived from IP address
- **Sensory Data:** audio, electronic, visual and similar information, such as photographs or audio and video recordings created in connection with our business activities
- **Professional or employment-related information:** work history and prior employer, information relating to references, details of qualifications, skills and experience,

human resources data, and data necessary for benefits and related administration services

- **Non-public education information:** Education records directly related to a student maintained by an educational institution or party acting on its behalf, such as grades, transcripts, class lists, student schedules, student identification codes, student financial information, or student disciplinary records
- **Inferences drawn from any of the Personal Information** listed above to create a profile about, for example, an individual's preferences or abilities.
- **Sensitive Personal Information:** Any personal information that reveals a consumer's social security, driver's license, state identification card, or passport number; account log-in, financial account, debit card, or credit card number in combination with any required security or access code, password, or credentials allowing access to an account; precise geolocation; racial or ethnic origin, citizenship or immigration status, religious or philosophical beliefs, or union membership; the contents of a consumer's mail, email, and text messages unless we are the intended recipient of the communication; genetic data; neural data.
 - The processing of biometric information for the purpose of uniquely identifying a consumer
 - Personal information collected and analyzed concerning a consumer's health
 - Personal information collected and analyzed concerning a consumer's sex life or sexual orientation

For information on the sources of these categories of Personal Information, please refer to the "How PII is Collected" section in this Policy, above. For information on retention periods for Personal Information and Sensitive Personal Information, please refer to the "Retention Period" section in this Policy, above.

For details on how we use your Personal Information, please refer to the chart under the "How PII is Processed" section at the start of this Policy and the "Legal Services PII" section.

We do not sell any information collected on, through or by our website or services nor do we provide Personal Information or Other Information to third parties for the purposes of their marketing products or services to you. Additionally, we do not "share" Personal Information, including Sensitive Personal Information, for purposes of cross-context behavioral advertising, as defined under the CCPA, and we have not engaged in "sharing" in the 12 months preceding the date this Policy was updated. Without limiting the foregoing, we do not knowingly "sell" or "share" Personal Information, including Sensitive Personal Information, of minors under 16 years of age.

If you are a California resident, you may request that we:

- Delete Personal Information we collected from you.
- Access Personal Information about yourself.
- Disclose to you the following information:
 - The categories of Personal Information we collected about you and the categories of sources from which we collected such Personal Information;

- The specific pieces of Personal Information we collected about you;
- The categories of Personal Information about you that we sold and the categories of third parties to whom we sold such Personal Information (we do not sell any personal information);
- The business or commercial purpose for collecting or selling Personal Information about you (we do not sell any personal information); and
- The categories of Personal Information about you that we otherwise disclosed, and the categories of third parties with whom we disclosed or to whom we disclosed such Personal Information (if applicable).
- Correct inaccurate Personal Information about yourself.
- Opt-out of the future sale of your Personal Information. (We do not sell any personal information.)

To make a request for disclosures, deletion, access or correction, as described above, or to opt-out of the future sale of your Personal Information*, please contact us at privacy@mcdonaldcarano.com or send postal mail to PO Box 2670, Reno, NV 89505. (*Future sale of your Personal Information is not planned.)

We will verify and respond to your request consistent with applicable law. When a request is submitted McDonald Carano will verify your identity by confirming that:

- You control the email address associated with your Personal Information
- Your description of your interactions with McDonald Carano matches our record

If necessary, we may require additional information to verify your request.

If an agent would like to make a request on your behalf as permitted under applicable law, the agent may use the submission methods noted above. As part of our verification process, we may request that the agent provide, as applicable, proof concerning his or her status as an authorized agent. In addition, we may require that you verify your identity as described above or confirm that you provided the agent permission to submit the request.

You have the right to be free from unlawful discrimination for exercising your rights under the CCPA.