

## Privacy Notice

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### 1. Introduction

Bracewell LLP, Bracewell (UK) LLP and BRACEWELL France, an AARPI and member of the Bracewell Network (collectively, « Bracewell » / « we » / « us » / « our ») provide this Privacy Notice to inform you of our policy relating to the processing of your personal data. We take your privacy seriously and we are committed to protecting your personal data. This Privacy Notice sets out the basis on which we will process your personal information. Please read it carefully to understand our practices regarding your personal information and how we will use it. This Privacy Notice does not form part of any contract or retainer with you.

We will only process your personal data where it is necessary to do so for the purposes set out below and where it is fair and lawful. Most of the personal data we collect is obtained directly from you or your employer or a third party, whom you may have authorized to share your personal data with us. We may also obtain your personal data from public sources.

If you provide us with the personal data of third parties, such as your employees, you warrant that you have complied with any relevant data protection laws, including, where applicable, obtaining consent from data subjects.

If you reside in or your data is processed in the UK or the EU, plus Iceland, Liechtenstein or Norway (the European Economic Area (“EEA”)), the data controller (as defined under EU data protection law) will be the relevant Bracewell entity with whom you engage.

This website is not intended for children and we do not knowingly collect or use personal data from children.

### Contacting us

If you have any questions about this Privacy Notice, your personal information, or would like to exercise any rights that you may have in relation to your personal data, please contact us at [privacy@bracewell.com](mailto:privacy@bracewell.com).

## 2. What types of data are protected?

### A. Personal data

This Privacy Notice applies to your personal data, which is any information relating to you as an identified or identifiable person. For purposes of this Privacy Notice, your personal data may also be referred to as personal information.

### B. Special categories of personal data

We recognize that in certain contexts, we may collect personal data from one or more of the “special categories of personal data” (as defined under UK and EU data protection laws) which are subject to a greater degree of protection.

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## 3. What information we process?

The processing activities we engage in with respect to your personal data depends on the nature of our exchanges with you.

If you fail to provide certain information when requested, we may not be able to provide the services you have requested or to perform any contract which we may have entered into with you.

### A. Personal information we process

We may process one or more of the following types of personal information. Whether the information we collect constitutes your personal data will depend on the context:

Interactions with our website

1. Name
2. Personal contact details (e.g., personal email address, personal address, telephone number(s))
3. Company contact details (e.g., company name, position, business email address, business address, direct telephone number(s))

Interactions as our client, prospective client or as an aspect of the client engagement process

1. Name
2. Personal contact details (e.g., personal email address, personal address, telephone number(s), social media profile and information)
3. Company contact details (e.g., company name, position, business email address, business address, direct telephone number(s))
4. Information relating to the matter that is the subject of the engagement or potential engagement
5. Information provided by you in support of or incidental to the engagement or potential engagement
6. Information saved in video or audio recordings of

<p>Interactions related to event invitations, updates, or other marketing materials and communications; attendance at events, conferences, training and seminars</p>	<p>our interactions with you</p> <ol style="list-style-type: none"><li>7. Documents related to your identification information</li><li>8. Documents related to your financial information for servicing the engagement</li><li>9. Information required to comply with our legal and regulatory obligations</li></ol> <ol style="list-style-type: none"><li>1. Name</li><li>2. Personal contact details (e.g., personal email address, personal address, telephone number(s), social media profile and information; photograph)</li><li>3. Company contact details (e.g., company name, position, business email address, business address, telephone number(s))</li><li>4. Communication preferences (e.g., type, frequency, feedback, continuation)</li><li>5. Information collected through alumni relationship</li><li>6. Information collected through our e-mail systems (e.g., opening emails, clicking links in emails)</li><li>7. Other information, such as for purposes of attending an event, dietary requirements or for purposes of providing feedback</li><li>8. Information collected during attendance at events including photography, video or voice recording, interactions with third party polling and feedback platforms</li><li>9. Information provided to third parties and shared with us, e.g. a speaker or another business which organizes or sponsors an event</li></ol>
<p>Interactions with us during the recruitment process</p>	<ol style="list-style-type: none"><li>1. Contact details (e.g., personal, business or educational institution email address, telephone numbers, address)</li><li>2. Resumé, CV, correspondence and similar documentation, including relevant skills, education history and experience</li><li>3. Social media profile and information</li><li>4. Information disclosed to us via recruitment consultants or third-party providers who we may engage to provide recruitment services</li><li>5. Passport, work permit, visa, or other immigration documentation</li><li>6. Results of background checks including references, qualifications, and to the extent permitted by law, criminal background checks</li></ol>

Technical data we may collect

7. Application reasons
  8. Language capabilities
  9. Special requirements, such as, or relating to, a disability / health issue or requests for reasonable adjustments
  10. Other personal data provided during the recruitment process
1. Your IP address
  2. Browser type and version
  3. Time zone setting and location
  4. Browser plug-in types and versions
  5. Automated technology and data on the devices you use to access this website.

## **B. Personal data that we may collect through cookies**

« [Cookies](#) » are small pieces of information that are stored by your browser on your computer's hard-drive for record-keeping purposes.

Bracewell uses cookies on its website to obtain web analytics from third-party vendors. These third parties use cookies to help analyze how users use the website. The information generated by the cookie about your use of the website (including your IP address) will be transferred to and stored by third-party vendors on servers in the United States. These vendors will use this information for the purposes of analyzing your use of the website, creating reports on the website activity, and providing other services relating to the website activity. These vendors may also transfer this information to other third parties where required to do so by law, or where such third parties process the information on the vendor's behalf.

You can refuse the use of cookies by selecting the appropriate settings on your browser, though please note that if you do so, you may not be able to use the full functionality of the Bracewell website.

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## **4. What we do with your information and on what basis?**

### **A. Ways we process your personal data**

We may process your personal data in one or more of following ways:

1. *Collecting* your personal data, such as through our website, from conversations, emails, or meetings with us, from third parties or from public sources.
2. *Recording* your personal data, such as through electronic or handwritten notes that we make.
3. *Organizing and storing* your personal data, such as on our servers, in our management systems, in our electronic systems, in individual email repositories, with cloud-based services, or in hard copy files.
4. *Using* your personal data, such as to provide our services to you, to a third party or to your employer, or address any preferences, complaints, or comments that you have.
5. *Disclosing* your personal data within the firm or to third parties, such as where necessary, appropriate and/or as required by law (see section 5 providing more information on this below).

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We do not subject your personal data to automated decision making. However, we will notify you in writing if this position changes and we may need to obtain your consent.

## **B. Our purposes for processing your personal data**

We may process your personal data for one or more of the following purposes:

1. To process and manage the provision of our services to you or to your employer or to a third party
2. To create and deliver personalized communications that are relevant to your preferences
3. To provide invitations to events or other sponsored meetings
4. To facilitate the recruitment process
5. To respond to your questions, comments, complaints, or requests
6. To comply with our legal and regulatory obligations
7. To prevent fraud
8. To ensure network and information security, including preventing unauthorised access to our computer and electronic communications systems and preventing malicious software distribution

## **C. Legal basis for processing your personal data**

We may process your personal data on one or more of the following bases:

1. Consent
2. To perform under a contract with you or to take steps to enter into a contract
3. To comply with our legal obligations
4. In pursuit of our legitimate interests or that of a third party

Our legitimate interests include but are not limited to, one or more of the following:

1. Supporting client representations, including business communications
2. Complying with our ethical obligations
3. Maintaining and managing our subscription offerings
4. Maintaining and managing our communications with you
5. Expanding our service offerings
6. Growing our business
7. Expanding our professional networks
8. Consideration for future employment
9. Marketing and events management
10. Network security and fraud prevention

We may also process your special category personal data under one or more of the following conditions:

1. Your explicit consent

2. To meet our obligations under employment law
3. In relation to the establishment, exercise or defense of legal claims

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## 5. Disclosure of your information

We take your privacy seriously and will not share your personal data with others, except in the following circumstances:

1. Our affiliated offices – we may disclose your personal data to our other group entities in order to provide you or your employer with tailored services and communications, or in accordance with our business administrative practices.
2. Service providers – we may disclose your personal data to third-party service providers, such as website hosting, information technology services, payroll services, auditing services, consultancy services, regulatory services, and legal services in other countries.
3. Government Agencies – we may disclose your personal data to government agencies as required, for example to provide services, at your direction, or at the direction of your employer.
4. To fulfill your option to share our website content with third parties – using the sharing features on our website (to share content with Facebook, LinkedIn, or Twitter, for example).
5. Legal reasons – we may use or disclose your personal data as required under applicable laws or if we are required to disclose your information by law or by the order of any court of competent jurisdiction or any regulatory, judicial, governmental or similar body or any taxation authority to which we are subject.

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## 6. International transfers of personal data

Some of our affiliated offices and service providers are located in the United States. Accordingly, please note that we will transfer personal data from our non-US offices to the United States in accordance with relevant data protection law requirements by using standard contractual clauses that have been approved by the European Commission and the UK International Data Transfer Addendum.

We may also transfer personal data between our offices in the EEA and our offices in the UK, where one office will be the data exporter and the other office will be the data importer, under a European Commission adequacy decision.

If you would like further information or a copy of the standard contractual clauses, please contact us.

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## 7. Retaining your data

We retain your personal data in accordance with our retention policies, and in accordance with applicable laws. The actual retention period for your personal data depends on the nature of our exchanges with you. We will securely delete or destroy any personal data we retain at the end of the applicable period. We do not collect more personal data than we need to fulfill our purposes stated in this Privacy Notice.

## 8. How will we protect your personal data?

We have implemented security policies and technical measures to protect the personal data that we collect, consistent with applicable privacy and security laws. These security measures are designed to prevent unauthorized access, improper use or disclosure, unauthorized modification, and unlawful destruction or accidental loss of your personal data.

We update and test our personal data privacy and security measures on an ongoing basis. We also provide training to our employees on privacy laws and how to comply with them. We ensure

that only employees who need to know your personal data to fulfill the purposes of processing that personal data (as described in this privacy policy) have access to it.

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## 9. What rights do you have with respect to your personal data?

If you are a client of Bracewell (UK) LLP or BRACEWELL France, an AARPI and member of the Bracewell Network or if your data is processed in the UK or EEA, you may have the following rights with respect to your personal data you provide to us, to the extent permitted by applicable data protection laws:

- a) To withdraw any consent that you have provided to us to process your personal data.
- b) To access or rectify your personal data.
- c) To have your personal data erased if it is no longer necessary for the purposes for which it was processed; you have withdrawn your consent to its processing; or you object to its processing and there is no overriding legitimate interest to continue its processing.
- d) To have the processing of your personal data restricted if you contest its accuracy, its processing is unlawful, we no longer need it but you need it for a legal claim, or you have objected to its processing and await verification of our legitimate grounds for processing it.
- e) To have your personal data transferred to another company under certain circumstances.
- f) To complain to your national data protection regulator if you feel that your personal data has been unlawfully processed.

To make an enquiry regarding these rights or to make a request with regard to one of these rights, please contact [privacy@bracewell.com](mailto:privacy@bracewell.com). Please be prepared to provide information that will allow us to confirm your identity and indicate the nature of our exchanges with you, e.g., client context, solely marketing context. By providing us this information it will enable us to better respond to your inquiry.

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## 10. Links to third-party sites

Our website may include links to other sites operated by third parties. We are not responsible for information on these sites, nor for services or products offered by them. Use of such sites, including transmitting your personal data to them, is at your own risk. You should check the privacy policies (and other applicable terms and conditions) of these third-party sites.

## **11. Changes**

We review our privacy practices on an ongoing basis, and as such we may change this privacy policy from time to time. If such change includes any significant, material changes, we will provide clear notice of the update on the homepage of our website. Please check this policy frequently to ensure that you are familiar with its current content.

This privacy policy was last updated on 5 August 2024.