

Privacy Policy

Effective Date: December 10, 2020

Please click [here](#) for a printable PDF version of this notice.

Your privacy is important to us. This Privacy Policy describes how Davis Wright Tremaine LLP ("we" or "DWT") collects, uses, shares and protects information when you interact with our main website (www.dwt.com), as well as all of our websites, emails we send, social media accounts, and online services (our "Services"). It also contains specific disclosures for residents of California.

This Privacy Policy explains the following:

- The types of information we collect
- How we use cookies and other tracking technologies
- How we use your information
- How we share your information
- How we protect and store your information
- Marketing and other communications
- HIPAA and HITECH Act obligations
- Rights of California residents
- Rights of individuals located in the EEA, Switzerland, or UK
- Updates to this Privacy Policy
- How to contact us

This Policy applies when you interact with us through our Services. It also applies anywhere it is linked. This Privacy Policy does not apply to third-party websites, products, or services, even if they link to our Services or are linked from our Services; please review the privacy policies of those third parties directly to understand their privacy practices.

I. Information We Collect

Information you provide us

Some of the Services may permit you to directly provide us with contact information, such as your full name and email address, and other information about you. This includes the following:

- Contact information and any other information you choose to include when you communicate with us, including via email, respond to our communications, register for a

webinar or event, or subscribe to DWT publications, which include our newsletters, client advisories, blogs, and other materials.

- Biographical information when you inquire about or apply for a position with us.
- Information you provide when you complete a survey administered by us or a service provider acting on our behalf.
- Payment information and associated contact information when you engage in a transaction with us.
- Information you provide in the course of our representation of you or your company.

Some of this information may be collected by external parties on our behalf. For example, we use a payment processor when you engage in a transaction on our website; DWT does not itself collect or store payment card information.

You may also choose to submit information about you via other methods, including: (i) interaction with us via social media, including any posts, pictures, videos and messages that you submit to us either via our social media sites (including by use of hashtags associated with us) or our Services; (ii) interaction with our online forums and chatrooms, or by commenting on content posted on our Services; or (iii) in connection with an actual or potential attorney-client relationship with us. If you contact us, we may keep a record of that correspondence and any contact information provided.

Information we automatically collect

When you interact with the Services, certain information about your use of our Services is automatically collected. This includes:

- Details of your visits to our website and information generated in the course of using our website (including the timing, frequency, and pattern of service use) including, but not limited to, traffic data, location data, weblogs and other communication data, the resources that you access, and how you reached our website.
- Details regarding the device you use to interact with some of our Services, such as its location (city, state), operating system, browser type, and your internet service provider.
- Information about how you interact with our publications, including whether you open or click links in any correspondence.
- Information that you make available to us on a social media platform (such as by clicking on a social media icon linked from our Services), including your account ID or username and other information included in your posts.

Cookies and other tracking technologies

Any or all activities with regard to collecting usage information may be performed on our behalf by other companies. Much of this information is collected through cookies, web beacons, and other tracking technologies, as well as through your web browser or device. We rely on partners to provide many features of our websites and Services using data about your use of our website.

Below is a list of our partners with links to more information about their use of your data and how to exercise your options regarding tracking.

Category	Partner	Further Information
Performance	Google Analytics and Tag Manager	Privacy Policy / Opt Out
Performance	Site Improve Analytics	Privacy Policy

You may be able to opt out of or block tracking by interacting directly with the third parties who conduct tracking through our Services by following the links provided above. Most web browsers automatically accept cookies; but if you prefer, you can usually modify your browser setting to disable or reject cookies. Note that if you delete your cookies or if you set your browser to decline cookies, some features of our website or Services may not function properly or be available.

Your browser or device may include "Do Not Track" functionality. If you have selected this feature, we will continue to use cookies and other tracking technologies to provide you the features of our website but will block third parties from being able to collect data regarding your interactions with our website via cookies.

II. How We Use Your Information

We use the information we collect from you for the following purposes:

- To respond to your inquiries or requests for information.
- To provide you with legal and other services, including to take steps to enter into an attorney-client relationship, process payments, and send service communications.
- To manage, operate, and improve the Services and grow our business, including understanding our customer base and the effectiveness of our marketing, events, promotional campaigns, and publications.
- To interact with you, including to send you newsletters, client advisories, and direct marketing communications and other materials if you consented to us doing so.
- To understand how users use our Services, including by generating and analyzing statistics.
- To evaluate, recruit, and hire personnel.

- To comply with legal requirements; to detect, investigate, and prevent activities that may violate our policies or be fraudulent or illegal; and to protect the rights of DWT, you, or others.

III. How We Share Your Information

- **Service Providers.** We engage vendors to perform services on our behalf, such as billing and collection providers; website, software, or data hosting; content management; database management; technical integration; marketing automation; providers of analytics services; and payment processing.
- **Analytics Partners.** Where you choose to interact with our website, we partner with third-party cookie providers to count visits and traffic sources so we can measure and improve the performance of our website. To learn more, please see "Cookies and other tracking technologies" above, or visit the third parties' respective privacy policies to better understand their data collection practices and controls they make available to you.
- **Social Media Platforms.** If you interact with us on social media platforms, the platform may be able to collect information about you and your interaction with us. If you interact with social media objects on our Services (for example, by clicking on a Facebook "like" button), both the platform and your connections on the platform may be able to view that activity. To control this sharing of information, please review the privacy policy of the relevant social media platform.
- **Change of Ownership or Corporate Organization.** We may transfer to another entity or its affiliates or service providers some or all information about you in connection with, or during negotiations of, any merger, acquisition, sale of assets or any line of business, change in ownership control, or financing transaction. We cannot promise that an acquiring party or the merged entity will have the same privacy practices or treat your information the same as described in this Policy.
- **Compliance and Harm Prevention.** To comply with applicable law; as provided for under contract; to protect the rights of DWT, you, or others; to respond to requests from law enforcement agencies or other government authorities or third-parties; or as we deem reasonably necessary to provide legal services.

We may also analyze aggregated, de-identified data and share these analyses at our discretion, including with analytics providers to analyze the usefulness and popularity of various web pages on our website.

IV. How We Protect and Store Your Information

We use a combination of physical, technical, and administrative safeguards to protect the information we collect through the Services. While we use these precautions to safeguard your information, we cannot guarantee the security of the networks, systems, servers, devices, and databases we operate or that are operated on our behalf.

If you use our Services outside of the United States, you understand that we may collect, process, and store your personal information in the United States and other countries. The laws in the U.S. regarding personal information may differ from the laws of your jurisdiction.

V. Marketing and Other Communications

We may send you marketing communications about our products and services, invite you to participate in our events, or otherwise communicate with you for marketing purposes with your consent. If at any time you no longer wish to receive marketing communications from us, you can click the unsubscribe link at the bottom of any email or email us at dwtalert@dwt.com.

VI. HIPAA and HITECH Act Obligations

DWT agrees to be bound by and will comply with our Business Associate Contract to the extent that: you are our client; you are a covered entity or a business associate under the administrative simplification provision of the Health Insurance Portability and Accountability Act and its implementing regulations (HIPAA); and DWT is acting as your business associate under HIPAA (in that we are providing certain services to you involving your protected health information). Our business associate contract has been updated to reflect the 2013 amendments to HIPAA.

[View our Business Associate Contract](#)

VII. Your California Privacy Rights

Persons with disabilities may obtain this notice in alternative format upon request by contacting us at privacy@dwt.com or calling 1.800.398.0223.

California Consumer Privacy Act

The California Consumer Privacy Act ("CCPA") provides California residents with rights to receive certain disclosures regarding the collection, use, and sharing of information about them, as well as rights to know/access, delete, and limit sharing of personal information. You have the right to be free from discrimination based on your exercise of your CCPA rights.

To the extent that we collect personal information that is subject to the CCPA, that information, our practices, and your rights are described below.

Notice at Collection Regarding the Categories of Personal Information Collected

You have the right to receive notice of the categories of Personal Information we collect, and the purposes for which those categories of Personal Information will be used. The categories we use below to describe the information are those enumerated in the CCPA.

Entities to whom we disclose information for business purposes are service providers, which are companies that we engage to conduct activities on our behalf. Service providers are restricted from using personal information for any purpose that is not related to our engagement.

Entities to whom we "sell" information are third parties. Under the CCPA, a business "sells" personal information when it discloses it to a company for monetary or other benefit. A company may be considered a third party either because the purpose for its sharing of personal information is not for an enumerated business purpose under California law, or because its contract does not restrict it from using personal information for other purposes.

We collect this Personal Information for the purposes described in the "How We Use Your Information" section above.

Information Type	Collected	Disclosed to?	Sold to?
<i>Personal Identifiers</i>	<ul style="list-style-type: none"> • Contact information (name, phone number, address) • Social media handles and account information • Unique identifiers (such as those assigned in cookies) • Social Security Number, Driver's License Number, or Passport Number under certain circumstances 	Service Providers	Analytics partners
<i>Health Information</i>	<ul style="list-style-type: none"> • Protected health information • Physical or mental status or ailments 	Service Providers	Not sold
<i>Payment Information</i>	<ul style="list-style-type: none"> • Payment card data • Bank account information 	Service Providers	Not sold
<i>Protected Classifications</i>	<ul style="list-style-type: none"> • Age • Date of Birth • Gender • Race • Ethnic origin • Disability status • Sexual orientation 	Service Providers	Not sold
<i>Geolocation Information</i>	<ul style="list-style-type: none"> • Coarse information (e.g., ZIP code, IP address) 	Service Providers	Analytics partners
<i>Internet or Electronic Network Activity Information</i>	<ul style="list-style-type: none"> • IP address • Information provided in URL string (e.g., search keywords) • Cookie or tracking pixel information • Information about your interaction with our website, app, or email correspondence 	Service Providers	Analytics partners
<i>Professional or Employment-Related Information</i>	<ul style="list-style-type: none"> • Current employer • Employment history 	Service Providers	Not sold
<i>Education Information</i>	<ul style="list-style-type: none"> • Education history • Level of education 	Service Providers	Not sold
<i>Inferences Drawn About You</i>	<ul style="list-style-type: none"> • User profile • Interests • Preferences 	Service Providers	Not sold

We do not collect Commercial Information, Biometric Information, or Audio, Electronic, Visual, Thermal, Olfactory, or Similar Information.

Right to Opt Out of Sale of Personal Information to Third Parties

You have the right to opt out of the sale of your Personal Information by DWT to third parties. To exercise your right to opt out of the sale of your Personal Information, please visit our "Do Not Sell My Information" page.

Please note that your right to opt out does not apply to our sharing of Personal Information with Service Providers, as described above.

Right to Know and Request Access to and Deletion of Personal Information

You have the right to request access to personal information collected about you and information regarding the source of that personal information, the purposes for which we collect it, and the third parties and service providers with whom we share it. You also have the right to request in certain circumstances that we delete personal information that we have collected directly from you. We may have a reason under the law why we do not have to comply with your request, or why we may comply with it in a more limited way than you anticipated. If we do, we will explain that to you in our response.

How to Submit a Request

You may submit a request to exercise your rights to know/access or delete your Personal Information through one of two means:

- (1) By filling out a Consumer Data Request Form available [here](#).
- (2) By calling us at 1.800.398.0223

You may authorize another individual or a business registered with the California Secretary of State, called an authorized agent, to make requests on your behalf through these means.

Verification Procedures

In order to process your request to access or delete Personal Information we collect, disclose, or sell, we must verify your request. We do this by asking you to provide personal identifiers we can match against information we may have collected from you previously; and by confirming your request using the email or telephone account stated in the request. We will not use Personal Information we collect in connection with verifying or responding to your request for any purpose other than responding to your request.

VIII. Special Information for Job Applicants

When you apply for a job with DWT, we collect certain information about you as outlined in this Policy. Information may be collected about you in multiple ways: you may provide it to us in connection with your application; we may make observations in the application process or collect information from public information sources; or you may authorize us to collect information from other sources, such as a former employer or reference.

The following table describes our practices with regard to information submitted in the job application process. If you use our website in the job application process, additional information may be automatically collected, as described above.

Information Type	Collected	Disclosed to?	Sold to?
<i>Personal Identifiers</i>	<ul style="list-style-type: none"> • Contact information (name, phone number, address) • Social media handles and account information 	Service Providers	Not sold
<i>Protected Classifications</i>	<ul style="list-style-type: none"> • Race and ethnicity • Date of Birth 	Service Providers	Not sold
<i>Geolocation Information</i>	<ul style="list-style-type: none"> • Coarse information (e.g., ZIP code, IP address) 	Service Providers	Not sold
<i>Professional or Employment-Related Information</i>	<ul style="list-style-type: none"> • Current employer • Employment history 	Service Providers	Not sold
<i>Education Information</i>	<ul style="list-style-type: none"> • Education history • Level of education 	Service Providers	Not sold

In certain circumstances, you may submit your application for employment through a third-party service that displays our job posting. We do not control the privacy practices of these third-party services. Please review their privacy policies carefully prior to submitting your application materials.

IX. Rights of Individuals Located in the EEA, Switzerland, or the UK

If you are located in the EEA, Switzerland, or the UK, you are entitled to certain rights, subject to applicable exceptions, under the GDPR, Swiss, and UK data protection laws. Please note that, in order to verify your identity, we may require you to provide us with information prior to accessing any records containing information about you.

We typically will process your information pursuant to the following legal bases: (1) with your consent; (2) as necessary to perform our agreement to provide Services to you; or (3) as necessary for our legitimate interests in providing the Services where those interests do not override your fundamental rights and freedoms related to data privacy. We also may process your information where it is necessary to comply with a legal obligation to which we are subject.

Right of Access

You have the right to obtain confirmation as to whether we are processing personal data about you, and if so, request a copy of the personal data. If you would like a copy of the personal data that we hold about you, please send a description of the personal data you would like a copy of and proof of your identity to our email as set forth below.

Right to Correction

You have the right to correct any inaccuracies in the personal data that we hold about you and, where applicable, to complete any incomplete personal data that we hold.

Right to Erasure

You have the right to request that we erase the personal data that we hold about you if one of the conditions in Article 17 of the GDPR applies. The right to erasure does not apply in certain

circumstances, including where the processing is necessary for the establishment, exercise, or defense of legal claims.

Right to Restriction of Processing

You have the right to restrict our processing of your personal data if one of the conditions in Article 18 of the GDPR applies.

Right to Data Portability

You have the right to receive personal data concerning you in a structured, common, and machine-readable format or request transmission of the data to a third party, if the conditions in Article 20 of the GDPR are met..

Right to Object

You have the right to object to the processing of your personal data based on our legitimate interests at any time. We will no longer process the data, unless there are compelling legitimate grounds for our processing that override the interests, rights, and freedoms of the data subject, or the processing serves the purpose of asserting, exercising, or defending legal claims. You also have the right to object at any time to the use of your data for direct marketing.

Right to Withdraw Consent

If we are processing your personal data based on your consent, you have the right to withdraw your consent at any time.

To submit a request to exercise your rights, please fill out a Consumer Data Request Form [here](#) or call us at 1.800.398.0223. We may have a reason under the law why we do not have to comply with your request, or may comply with it in a more limited way than you anticipated. If we do, we will explain that to you in our response.

Lodging a Complaint

Users that reside in the EEA, Switzerland, or the UK have the right to lodge a complaint about our data collection and processing actions with the supervisory authority concerned. Contact details for data protection authorities are available [here](#).

To submit a request to exercise your rights, please contact us at privacy@dwt.com. We may have a reason under the law why we do not have to comply with your request or may comply with it in a more limited way than you anticipated. If we do, we will explain that to you in our response.

X. Updates to This Privacy Policy

We may make changes to this Policy from time to time. The "Effective Date" at the top of this page indicates when this Privacy Policy was last revised. We may also notify you in other ways from time to time about the collection, use, and disclosure of your personal information described in this Policy.

XI. Contact Us

For questions about our privacy practices, please send us an email at privacy@dwt.com or write to us at:

Davis Wright Tremaine LLP
920 5th Avenue, Suite 3300
Seattle, WA 98104