

PRIVACY STATEMENT—CALIFORNIA JOB APPLICANTS

In response to the California Consumer Privacy Act of 2018 (“CCPA”), the firm is providing this supplement Privacy Statement, which applies solely to job applicants who reside in the State of California (“you”). We adopt this notice to comply with the CCPA and other California privacy laws. Any terms used in this notice have the same meaning as defined in the CCPA.

Information We Collect

We collect information that identifies, relates to, describes, references, is capable of being associated with, or could reasonably be linked, directly or indirectly, with a particular individual or electronic device (“personal information”). In particular, we have collected personal information in the following categories where the box “Collected” is checked from job applicants/candidates within the last twelve (12) months:

Category	Examples*	Collected
A. Identifiers.	Your real name, alias, postal address, unique personal identifier, online identifier, Internet Protocol address, email address, account name, Social Security number, driver’s license number, passport number, or other similar identifiers.	X
B. Personal information categories listed in the California Customer Records statute (Cal. Civ. Code § 1798.80(e)).	Your name, signature, Social Security number, physical characteristics or description, address, telephone number, passport number, driver’s license or state identification card number, insurance policy number, education, employment, or employment history. Some personal information included in this category may overlap with other categories.	X
C. Protected classification characteristics under California or federal law.	Age (40 years or older), 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, or genetic information (including familial genetic information).	X
D. Commercial information.	Records of personal property; products or services purchased, obtained, or considered; or other purchasing or consuming histories or tendencies.	

E. Biometric information.	Genetic, physiological, behavioral, and biological characteristics; activity patterns used to extract a template or other identifier or identifying information, including fingerprints, faceprints, voiceprints, iris or retina scans, keystroke, gait, or other physical patterns; and sleep, health, or exercise data.	
F. Internet or other similar network activity.	Browsing history; search history; and information on a consumer's interaction with an Internet website, application, or advertisement.	X
G. Geolocation data.	Physical location or movements.	
H. Sensory data.	Audio, electronic, visual, thermal, olfactory, or similar information.	
I. Professional or employment-related information.	Current or past job history and/or performance evaluations.	X
J. Education information that is not publicly available personally identifiable information (per the Family Educational Rights and Privacy Act (20 U.S.C. Section 1232g, 34 C.F.R. Part 99)).	Education records directly related to a student maintained by an educational institution or party acting on its behalf, including grades, transcripts, class lists, student schedules, student identification codes, student financial information, and student disciplinary records; personally identifiable information, including but not limited to an individual's student number and indirect identifiers (e.g., dates of birth, place of birth, mother's maiden name).	X
K. Inferences drawn from other personal information.	Information used to create a profile reflecting a person's preferences, characteristics, psychological trends, predispositions, behavior, attitudes, intelligence, abilities, and aptitudes.	

* The “examples” provided are simply intended to illustrate the types of data included in each “category” and these examples are not all inclusive (may not include all types of data that we collect) and, similarly, we may not collect all types of data that are included in the examples.

Personal information does not include:

- Publicly available information from government records.
- De-identified or aggregated consumer information.
- Information excluded from the CCPA’s scope, including:
 - Health or medical information covered by the Health Insurance Portability and Accountability Act of 1996 (HIPAA) and the California Confidentiality of Medical Information Act (CMIA) or clinical trial data;

- Personal information covered by certain sector-specific privacy laws, including the Fair Credit Reporting Act (FRCA), the Gramm-Leach-Bliley Act (GLBA) or California Financial Information Privacy Act (FIPA), and the Driver's Privacy Protection Act of 1994.

We obtain the categories of personal information listed above from the following categories of sources:

- Directly from you. For example, from your responses to information sought in your job application.
- Indirectly from you. For example, from your activities on Company-provided software, including email accounts and computers.

Use of Personal Information

We may use or disclose the personal information we collect for one or more of the following business purposes:

- To fulfill or meet the reason for which the information is provided. For example, if you provide us with personal information on a job application, we will use that information to assess your qualifications for the job and to communicate with/contact you. To perform background and/or reference checks.
- To carry out our obligations and enforce our rights arising from any contracts entered into between you and us.
- As necessary or appropriate to protect the rights, property, or safety of us, our clients, or others.
- To respond to law enforcement requests and as is otherwise required by applicable law, court order, or governmental regulations.
- To respond to mandatory regulatory filings with federal, state, or local governmental agencies.
- To respond to client requests, industry diversity surveys and related audits; however, any personal information is provided on an anonymous basis.
- As described to you when collecting your personal information or as otherwise set forth in the CCPA.

We will not collect additional categories of personal information or use the personal information we collected for materially different, unrelated, or incompatible purposes without providing you notice.

Changes to Our Privacy Notice

We reserve the right to amend this privacy notice at our discretion and at any time. You can find our general privacy policy on our website at www.klgates.com/privacy_policy/.

Contact Information

If you have any questions or comments about this notice, our Privacy Statement, or the ways in which we collect and use your personal information, please do not hesitate to contact your HR representative or send an email to privacy@klgates.com.