



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 from job applicants/candidates within the last twelve (12) months:

Category of Personal Information	Examples*	Purpose
A. Identifiers.	Your real name, alias, postal address, unique personal identifier, online identifier, Internet Protocol address, email address, account name, or other similar identifiers.	<ul style="list-style-type: none">• To communicate with applicants.• To manage job applications, recruitment activities, and events.• For reporting and recordkeeping purposes.• To manage our website.• To demonstrate applicants’ agreement to, or acceptance of documents presented to them (e.g. acknowledgment of employment application, offer letter, relocation agreement).
B. Personal information categories listed in the California Customer Records statute (Cal. Civ. Code § 1798.80(e)).	Your name, signature, address, telephone number, education, employment, or employment history.	<ul style="list-style-type: none">• To evaluate applicants’ qualifications for employment.• For reporting and recordkeeping purposes.

Category of Personal Information	Examples*	Purpose
	Some personal information included in this category may overlap with other categories.	<ul style="list-style-type: none"> • To communicate with applicants. • To manage job applications, recruitment activities, and events. • To conduct background and conflicts checks. • To demonstrate applicants' agreement to, or acceptance of documents presented to them (e.g. acknowledgment of employment application, offer letter, relocation agreement).
C. Commercial information.	Records of personal property; products or services purchased, obtained, or considered; or other purchasing or consuming histories or tendencies.	<ul style="list-style-type: none"> • For reimbursement of expenses related to applicant interview travel and lodging.
D. Internet or other similar network activity.	Browsing history; search history; and information on a consumer's interaction with an Internet website, application, or advertisement.	<ul style="list-style-type: none"> • To manage our website.
E. Professional or employment-related information.	Current or past job experience; vocational memberships, requirements, and certifications.	<ul style="list-style-type: none"> • To verify eligibility to work in the relevant jurisdiction or position. • To evaluate applicants' qualifications for employment. • To manage job applications, recruitment activities, and events. • To conduct background and conflicts checks.
F. Education information that is not publicly available personally identifiable information (per the	Education records directly related to a student maintained by an educational institution or party acting on its behalf, including grades, transcripts, class lists,	<ul style="list-style-type: none"> • To evaluate applicants' qualifications for employment. • To conduct background and conflicts checks.

Category of Personal Information	Examples*	Purpose
Family Educational Rights and Privacy Act (20 U.S.C. Section 1232g, 34 C.F.R. Part 99)).	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).	
G. 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.	<ul style="list-style-type: none"> • To evaluate applicants' qualifications for employment. • To assess job-relevant behavioral traits and compare candidates on objective, standardized criteria.

Category of Sensitive Personal Information	Examples*	Purpose
A. Personal information categories listed in the California Customer Records statute (Cal. Civ. Code § 1798.80(e)).	<p>Your Social Security number, passport number, driver's license, or state ID, or financial information.</p> <p>Some personal information included in this category may overlap with other categories.</p>	<ul style="list-style-type: none"> • To evaluate applicants' qualifications for employment. • To manage job applications, recruitment activities, and events. • To conduct background and conflicts checks. • To demonstrate applicants' agreement to, or acceptance of documents presented to them (e.g. pre-employment arbitration, acknowledgment of employment application, offer letter, relocation agreement).
B. Protected classification characteristics under	Age (40 years or older), race, color, ancestry, national origin, citizenship, religion or creed,	<ul style="list-style-type: none"> • To assess and provide reasonable accommodation.

Category of Sensitive Personal Information	Examples*	Purpose
California or federal law.	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).	<ul style="list-style-type: none"> • For compliance with legal or regulatory obligations. • For reporting and recordkeeping purposes. <ul style="list-style-type: none"> ○ Voluntary except where required by law and used only in compliance with applicable laws and regulations.
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.	<ul style="list-style-type: none"> • To assess job-relevant behavioral traits and compare candidates on objective, standardized criteria.

* 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 (FCRA), 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 provided in your job application and conflicts forms.
- Indirectly from you. For example, from your activities on Company-provided software, including email accounts and computers.
- Screening providers. For example, consumer reporting agencies, for background or credit checks.
- Service providers. We may receive information about you from service providers, business partners or others. For example, we may receive your résumé and other application information from entities such as LinkedIn, Indeed, Leopard Solutions, Suited, recruiters, or other job boards or job posting aggregates.

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, résumé, or academic transcript, we will use that information to assess your qualifications for employment and to communicate with/contact you.
- To perform conflicts and background checks.
- To carry out our obligations and enforce our rights arising from any agreements or 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.

We will not sell the personal information, including any sensitive personal information, we collect about our employees or applicants for employment or share it with third parties for cross-context behavioral advertising.

Your Privacy Rights Under the California Consumer Privacy Act (Effective January 1, 2026)

California employees, job applicants, interns, and independent contractors of K&L Gates have specific rights regarding their personal information under the California Consumer Privacy Act (CCPA), as amended by the California Privacy Rights Act (CPRA).

You may exercise any of the following rights, subject to verification of your identity and certain legal limitations:

1. Right to Know

You may request that we disclose:

- The categories and specific pieces of personal information we have collected about you;
- The categories of sources from which we collected it;
- The business or commercial purposes for which we collected, used, or disclosed it; and
- The categories of third parties, service providers, or contractors to whom we disclosed it for business purposes.

2. Right to Delete

You may request that we delete personal information we collected from you. We will honor your request unless we are required or permitted to retain the information – for example, to comply with law, maintain records of work performed, meet tax and accounting obligations, or manage ongoing legal or ethical duties.

3. Right to Correct

You may request that we correct inaccurate personal information we maintain about you. We will use commercially reasonable efforts to verify the accuracy of the information and make the requested correction, or explain why the information is already accurate or must be retained.

4. Right to Limit Use and Disclosure of Sensitive Personal Information

We limit our use and disclosure of Sensitive Personal Information (SPI) – such as government-issued identifiers, financial or health data, or demographic information – to lawful and reasonably necessary employment-related purposes (e.g., payroll, benefits, legal compliance). You may nevertheless submit a request to verify or further limit our use and disclosure of your SPI.

5. Right to Non-Retaliation and Non-Discrimination

K&L Gates will not retaliate, discipline, deny employment opportunities, reduce pay, withhold benefits, or otherwise discriminate against any employee, applicant, intern, or contractor for exercising rights under the CCPA.

How to Submit a Privacy Request

You or your authorized agent may submit a request to: privacy@klgates.com.

Retention Period

We will retain personal information for the period necessary to fulfill the purposes outlined in this Notice and in accordance with our Information Governance Policy unless a longer retention period is required or permitted by law. Please note, the information collected about you during the job application process may become part of your personnel file and may be used to administer the employment relationship and for related reporting and recordkeeping purposes should you be hired.

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, the ways in which we collect and use your personal information, or need access to this Notice in an alternative format due to having a disability, please do not hesitate to contact your HR representative, [AskHR](#), or send an email to privacy@klgates.com.