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Privacy Policy

OVERVIEW

Introduction

Neal, Gerber & Eisenberg LLP (“NGE”) is a Chicago-based legal services firm, which provides general legal services to private and publicly-traded businesses, not-for-profit organizations, and individuals (the “Services”). This Privacy Statement outlines our general policy and practices for protecting personal information that we collect through our website at www.nge.com and other websites (each, a “Site”) that we operate, in connection with the provision of the Services, and through other interactions with you, including those that occur through telephone, email, or in-person interactions. This Privacy Statement explains the types of information we gather, how we use that information, and the choices individuals may exercise regarding our use of that information.

By submitting personal information to us, you are consenting to the use of your personal information (including any disclosures, processing, and transfers of your information to third parties by NGE) in accordance with this Privacy Statement. Any consent you provide is entirely voluntary. If you do not accept this Privacy Statement, then you should not use or submit any personal information to NGE.

Personal Information Collection

In order to use this Site, you do not need to send us any personal information, except for Remote Access areas, which require you to log in. You may voluntarily provide us with personal information, such as your name and contact information, by submitting requests through our “Contact Us” mailboxes. In addition, you may voluntarily provide us with personal information by registering for some of our events (e.g. webcasts, seminars and conferences), or to receive media alerts through our Sites or through the registration processes on some of our Sites.

If you choose to apply for job openings through our Sites, we may collect additional information such as your name, address, and other contact information, work and educational experience, licenses and certifications, and other personal information.

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We do not seek sensitive personal information on our Sites, except where we are required to do so as part of the recruitment process. Your decision to submit such information is entirely voluntary.

Personal Information Use

The following is a description of how we use the personal information we have collected about you. Automatically-collected information and other personal information may be combined with other information that we collect directly from you or that we receive from other sources and is used for the purposes described below:

- **To provide services to you.**
- **To provide services requested by you.** When purchasing NGE products, we may ask you to provide certain information about yourself, such as your name, shipping/billing address, telephone number, email address, credit card information, etc. We also maintain a record of your online product purchases.
- **To provide our website and its functionalities to you.**
- **To respond to your requests.** If you contact us with a question or a request, we will use your information to respond to your request. For example, if you contact us via email with a question, we will use the information in that email and the email address you used to contact us to respond to you.
- **To conduct data analytics to support our website and business.** Typically, these analyses are done using aggregated or otherwise de-identified data. We use information, including automatically-collected information, to manage and improve our website and our business. For example, we use such information to:
 - **Manage our business needs, such as monitoring, analyzing, and improving the services and the website's performance and functionality.** For example, we analyze website user behavior and conduct research and analysis about the way you and other users use our website; or
 - **Manage risk and protect the website.** We use data to better protect our services, our website, and you by helping to detect and prevent fraud and abuse of the website and our services.
- **To market to you.** Information we collect about you and how you use and interact with the website and our services, ads, and other online content helps us to improve our website and offer additional products and services that we think might interest you. For example, we analyze information about user interactions with our marketing emails (such as whether emails have been opened or what content is clicked on) to determine whether those communications and ads are effective, and to understand what other website functionalities, products or services may interest you.



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- **To conduct due diligence prior to engaging in a business relationship.** Prior to engaging in a business relationship with you, we may conduct due diligence exercises such as background checks and credit checks.
- **To meet our contractual obligations with you when we engage in a business relationship with you.**
- **To operate and improve our business.**
- **To maintain our records.**
- **For legal, contractual and safety purposes.** We will use your information as necessary to enforce the terms of our website; to comply with all applicable laws and regulations; to defend or protect us, our users, you, or third parties from harm or in legal proceedings; to protect our rights; to protect our security and the security of our users, employees, and property; to respond to court orders, lawsuits, subpoenas, and government requests; to address legal and regulatory compliance; to verify your identity or communications from you; to comply with contracts and other agreements to which we are a party; and to notify you of changes to our terms, policies, or practices.
- **To conduct internal monitoring and training.**
- **For other purposes for which you provide your consent.** We will use your information for other purposes which are disclosed to you at the time your information is collected, or for purposes which can be inferred from or are obvious given the circumstances of collection.

If you apply for job openings through our Sites, we may use this information to process and evaluate your application for employment and to communicate with you about employment opportunities. We may also retain and use this information to identify and communicate with you about future potential employment opportunities with us. If we elect to make an offer of employment, this information may become part of the employee file and may be used for other employment and work-related purposes.

We do not use profiling or make any decisions based solely on the automated processing of your personal information. We retain personal information for only so long as necessary for the intended purpose for which it was collected, unless a longer retention period is required or permitted by law or our document retention policies, which are based on professional standards and best practices.

Disclosures and Transfers

NGE will not disclose an individual's personal information to third parties, except as set forth in this Privacy Statement, when we have the individual's permission to make the disclosure, or as necessary to fulfill the purpose for which the information was submitted. We also may use or disclose personal information as we believe to be necessary or appropriate (a) under applicable law (including to meet a national security or law enforcement requirement), (b) to comply with legal process or professional standards, (c) to protect our rights,



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privacy, safety or property and/or those of our affiliates or clients; or (d) in a merger, acquisition, bankruptcy, liquidation or asset sale.

NGE may use third-party service providers to provide administrative or operational support to NGE, or to provide engagement team resource services, and may disclose and transfer personal information to such service providers. We require all such service providers to protect the information we entrust to them and to use such information only as necessary to provide services to us. This transfer may result in data passing from one jurisdiction to another, including to and from the United States of America, and possibly other countries outside of the European Economic Area, some of which may not have been deemed by the European Commission to ensure an adequate level of protection for personal information. Accordingly, the level of safeguards and legal protections provided in such other non-European countries may not be as stringent as those under European data protection standards or the privacy laws of some other countries, possibly including your home jurisdiction.

In the event NGE goes through a business transition, such as a merger, or the acquisition or sale of all or a portion of its assets, your personal information may be among the assets transferred.

Cookies and Similar Technologies

NGE automatically collects certain information about users who access the Site, which may include a user's internet protocol address, location, browser type, internet service provider, referring/exit pages, operating system, as well as date and time stamps. To do this, we use "cookies," which are small data files stored on a user's computer to enhance your on-line experience when visiting our Site, and other tracking technologies. The use of "cookies" is common practice for most websites; however, most Web browsers include settings that allow users to decline cookies.

In addition, we use the services of Google Analytics, a web analytics service provided by Google, Inc. ("Google"). This analytical tool uses cookies and similar technologies to help analyze how users use the Sites. For more information about the collection and use of data through Google Analytics, please refer to <https://www.google.com/policies/privacy/partners>. Google offers the ability to opt out from tracking through Google Analytics cookies; for more information, visit <http://tools.google.com/dlpage/gaoptout>.

Your Choices

We offer certain choices about how we communicate with you and what personal information we obtain about you and share with others, described below.

Information Provided by You

Depending on the activity, some of the information we ask you to provide is mandatory and some is voluntary. Whether or not to provide such information is completely your own choice. But if you choose not to provide the information we request, you may be unable to take advantage of certain functionalities on the Site.



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Email

You may unsubscribe from emails from us by clicking the Unsubscribe at the bottom of any promotional email from us. You may also contact us by email or postal address as noted below. Please include your current contact information and your requested changes.

Cookies

We provide a variety of services on our website using cookies. We place cookies on your device in order to provide you with personalized access to essential services, enhance website functionality, and to show you offers and services tailored to your interests.

What is a Cookie?

A cookie is a small piece of data that a website can store on your hard drive that identifies your computer. Cookies help to navigate from page to page on a website, provide secure connections, gather statistics about the usage and effectiveness of our site, and remember preferences from a previous visit.

We also use third-party services for analytics and interest-based advertising purposes. These service providers and ad partners may use cookies alone or in conjunction with unique identifiers, beacons, and other tracking technologies to collect information about you when you use our website and open our emails.

For example, we use Google Analytics to help us analyze how visitors use our websites and mobile applications. The information generated by the cookie, including your IP address, is transmitted to Google. This information is then used to evaluate visitors' use of the website and mobile applications, and to compile statistical reports on website activity for us. If you do not want any information to be collected and used by Google Analytics, you can install an **opt-out** in your web browser.

Cookie Choices

Most web browsers automatically accept cookies, but you can change your browser's settings to disable all or certain cookies. For more information on how to manage browser cookies, see <http://www.allaboutcookies.org>. Click on the links below to learn how to manage cookies on these browsers:

- Google Chrome
- Microsoft Edge
- Mozilla Firefox
- Microsoft Internet Explorer
- Opera
- Apple Safari



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Please note that by disabling or deleting cookies, you may not be able to access the full functionality of our website. Disabling or clearing cookies also may affect cookie-based opt-outs by either preventing you from using such cookie-based opt-outs or clearing opt-outs that you previously set.

You may control your advertising preferences or opt-out of certain Google advertising products by visiting the Google Ads Preferences Manager, available at <https://google.com/ads/preferences> or by visiting NAI's online resources at <http://www.networkadvertising.org/choices>.

Some of the third parties that we may work with may participate in the Digital Advertising Alliance's self-regulatory program, which provides consumers tools to opt-out of receiving interest-based advertising. Click [here](#) to learn more about the DAA's WebChoices tool. To help control or block certain ads in mobile applications, you may choose to download and utilize the DAA mobile app by clicking [here](#). If you are an E.U. resident, visit Your Online Choices [here](#).

You also can learn more about opting out of third parties' use of cookies used to tailor ads and other content by visiting <https://thenai.org/opt-out/> and <http://www.aboutads.info/choices>.

Do Not Track Signals

Some Web browsers incorporate a "Do Not Track" or similar feature that signals to websites with which the browser communicates that a visitor does not want to have his or her online activity tracked. Not all browsers offer a "Do Not Track" option and "Do Not Track" signals are not yet uniform. For this reason, NGE's Site does not respond to "Do Not Track" signals.

Third-Party Sites

This Site may contain links to Third-Party Sites. We are not responsible for the privacy practices of any third parties, including any third party operating any website or service to which the Site links. The inclusion of a link on the Site does not imply endorsement of the linked site or service by us. Please review the Privacy Policies of third parties to learn more about their privacy practices.

Data Security

The security of your personal information is important to us. We use reasonable physical, technical, and administrative safeguards to protect the information we process. However, no method of transferring data over the Internet or storing electronic data is completely secure. Therefore, while we strive to use reasonable and appropriate means to protect your personal information, we cannot guarantee absolute security.

Minors

This Site is not designed for or directed at persons 18 years of age or younger, and we do not intentionally collect information from anyone under the age of 18 through this Site.



Your California Privacy Rights

Pursuant to applicable California law, including the CCPA, NGE makes the following disclosures regarding the personal information it collects:

| Category of Personal Information | Category of Source from Which Data is Collected | Purpose of Collection | Category of Third Parties to Whom Data is Disclosed |
|---|---|--|---|
| Name, profession, company name and address, job title, e-mail address, telephone number | Directly from client | To operate and make our services available to our clients; to contact our clients; identification and authentication | Our Service Providers |
| Financial Information | Directly from client | To facilitate payment processing | Our Service Providers |
| Estate Planning and Tax Information | Directly from client | To provide our legal services | N/A |
| Client Asset and Ownership Information | Directly from client | To provide our legal services | N/A |
| IP address, browser type, domain name, the activities of users' computers on our Website, users' activities in connection with our advertisements and other marketing and promotional efforts, and other statistical data | Cookies/action tags and other tracking technologies | To improve the content and functionality of our services and Site, to monitor our Site's use, to gather general demographic information, to conduct marketing and promotional efforts, to allow us to statistically monitor how users are using our Site for purposes of improving our online offerings. | N/A |

NGE has not sold consumers' personal information in the twelve (12) months preceding the Effective Date of this Privacy Statement.

If you are a California resident, pursuant to the California Consumer Protection Act (CCPA), you have the right to request:



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- the categories of personal information NGE has collected about you;
- the categories of sources from which your personal information is collected;
- the business or commercial purpose of collecting or selling your personal information;
- the categories of third parties with whom NGE shares your personal information;
- the specific pieces of personal information NGE has collected about you;
- the categories of personal information that NGE has sold about you and the categories of third parties to whom the personal information was sold, if applicable;
- deletion of your personal information; and
- an opt out of having your personal information disclosed or sold to third parties.

To submit a request, or designate an authorized agent to make a request under the CCPA on your behalf, please contact us at privacy@nge.com, our phone number 833-471-0008, or complete the web form located at www.nge.com/CCPA. To verify your identity when you submit a request, NGE will match the identifying information you provide us to the personal information we have about you. If necessary, we may ask you to provide additional information for verification or ask for your oral confirmation regarding your request.

However, NGE will not be required to comply with your request to delete your personal information if it is necessary for NGE to maintain your personal information in order to:

- complete the transaction for which the personal information was collected, provide a good or service requested by you, or reasonably anticipated within the context of NGE's ongoing business relationship with you, or otherwise perform a contract between you and NGE;
- detect security incidents, protect against malicious, deceptive, fraudulent, or illegal activity; or prosecute those responsible for that activity;
- debug to identify and repair errors that impair existing intended functionality;
- exercise free speech, ensure the right of another consumer to exercise his or her right of free speech, or exercise another right provided for by law;
- comply with the California Electronic Communications Privacy Act pursuant to Chapter 3.6 (commencing with Section 1546) of Title 12 of Part 2 of the Penal Code;
- engage in public or peer-reviewed scientific, historical, or statistical research in the public interest that adheres to all other applicable ethics and privacy laws, when NGE's deletion of the information is likely to



render impossible or seriously impair the achievement of such research, if you have provided informed consent;

- to enable solely internal uses that are reasonably aligned with your expectations based on your relationship with the NGE;
- comply with a legal obligation; or
- otherwise use your personal information, internally, in a lawful manner that is compatible with the context in which you provided the information.

NGE will not discriminate against you in the event you exercise any of the aforementioned rights under CCPA, including, but not limited to, by:

- denying goods or services to you;
- charging different prices or rates for goods or services, including through the use of discounts or other benefits or imposing penalties;
- providing a different level or quality of goods or services to you; or
- suggesting that you will receive a different price or rate for goods or services or a different level or quality of goods or services

The Policy is available to consumers with disabilities. To access this Policy in an alternative downloadable format, please [click here](#).

Individuals Within the European Union

If you are a resident of the European Union and your inquiry with NGE has not been satisfactorily addressed, or if you believe we are processing your personal information not in accordance with the law or this Privacy Statement, you may file a complaint to the Data Protection Authority in your country of residence.

Controllers of Personal Data

Neal, Gerber & Eisenberg LLP
225 W. Randolph St., Suite 2800
Chicago, IL 60606

is the data controller of the personal data processed through the website.

Legal Bases for Processing Personal Data

If you are an individual located in the European Union (EU), we collect and process personal data about you where we have a legal basis for doing so under applicable EU laws. This means we collect and process your data only when:

- It is necessary for a legitimate interest (which is not overridden by your individual privacy interests), such as preventing fraud, improving our website, and increasing the security of the website and network infrastructure;
- You have consented to this collection and processing for a specific purpose;
- It is necessary to fulfil our contractual obligations; or
- It is necessary to comply with a legal obligation.

Where we rely on your consent to process your personal data, you have the right to withdraw or decline consent at any time. An example of where we rely on your consent to process your personal data includes sending you our newsletter and marketing emails. If you wish to withdraw your consent, please contact us at privacy@nge.com.

Some examples of our legitimate interests for processing personal data include:

- Website and network security;
- Customer support;
- Marketing to current customers;
- Fraud prevention; or
- Improving our website.

Where we rely on our legitimate interests to process your personal data, you may have the right to object. More information on exercising this right can be found in the Individual Rights section below.

If you have any questions about or need further information concerning the legal basis on which we collect and use your personal data, please contact us at privacy@nge.com.

Individual Rights

If you are located in the EU, you have certain rights under EU data protection law with respect to your personal data, including the right to request access to, correct, and delete your personal data. You may also have the right to receive a copy of your personal data in a commonly-used and machine-readable format, and to



transmit such data to another controller. You also may object to processing of your personal data, or ask that we restrict the processing of your personal data in certain instances.

To request deletion of, access to, or to make changes to your personal data, or to any of the rights in this section, please email us at privacy@nge.com. Please note that not all requests can be honored.

Transfers, Storage, and Processing

Our website is operated from and hosted on servers located in the United States. If you access and use our website from a location outside of the United States, any personal data you provide to us or that is otherwise collected may be transferred to and processed in the United States or any other jurisdiction in our sole discretion. The laws that apply to the use and protection of personal data in the United States or other countries or jurisdictions to which we transfer, or in which we process, personal data may differ from those of your country of residence. Users who access or use our website from jurisdictions outside of the United States do so at their own choice and risk, and are solely responsible for compliance with local law. While we take steps to safeguard your personal data, the United States has NOT been deemed by the European Commission to ensure an adequate level of protection for personal data. Accordingly, the level of protection provided in the United States or other non-EU countries and jurisdictions from which you may access our website may not be as stringent as that under EU data protection standards or the data protection laws of some other countries, possibly including your home jurisdiction.

Enforcement and Dispute Resolution

We will investigate and attempt to resolve complaints and disputes regarding our use and disclosure of personal information in accordance with this Privacy Statement. We encourage interested persons to raise any concerns with us using the contact information below.

Privacy Statement Changes

NGE reserves the right to amend or modify this Privacy Statement from time to time. We will post any revised Privacy Statement on this Site, or a similar website that replaces this Site. By continuing to use any of our Sites after we post any revised Privacy Statement, you agree that the terms of the revised Privacy Statement as of the effective date will apply to information previously collected or collected in the future, as permitted by law.

How to Contact Us

Questions, comments, or complaints about Neal Gerber Eisenberg LLP's Privacy Statement or data collection and processing practices can be e-mailed to privacy@nge.com, or sent to us using the contact details below:

Matthew Baker, Director of Compliance & Information Governance
Neal, Gerber & Eisenberg LLP
225 W. Randolph St., Suite 2800
Chicago, IL 60606

Cookies and Other Tracking Technologies

Social Media Providers. We have presence on several social media platforms so that we can share information about our firm and our services with you. Information collected by social media platforms when you interact with their services is governed by the social media platforms’ respective privacy policies. For more information about how you can customize your privacy settings and how third-party social media websites handle your personal information, please refer to their privacy policies. You can learn more about privacy practices of each platform by clicking on “Privacy Policy” next to the platform’s name below. You can also learn about their use of cookies by clicking on “Cookie Policy.”

- **LinkedIn** – Privacy Policy and Cookie Policy
- **Twitter** – Privacy Policy and Cookie Policy

Analytics Providers and Advertising Networks. We allow certain analytics providers and online advertising networks and partners, such as those listed below, to set cookies and other tracking technologies during your visit to our website to collect information in order to provide tailored services and to personalize ads shown to you when you visit other websites. Some of our partners will use your location to provide more relevant messaging. You can learn more about privacy practices of each provider by clicking on “Privacy Policy” next to each provider’s name below. If there is an opt-out option offered, you may click on “Opt-Out” to be taken to the provider’s opt-out page. Some providers also may provide opt-out options within their Privacy Policies.

| Cookie Provider | Cookie Type | Privacy Policy and Opt Out Options |
|----------------------------|---------------|--|
| AddThis | Functionality | Privacy Policy and Opt-Out |
| Blue Kai (Oracle) | Targeting | Privacy Policy and Opt-Out |
| DoubleClick (Google) | Targeting | Privacy Policy and Opt-Out |
| Google Universal Analytics | Performance | “How Google uses data when you use our partners’ websites or apps”, Google Analytics Browser Ad-On, Privacy Policy |
| Semasio | Targeting | Privacy Policy and Opt-Out |
| Tapad Inc. | Targeting | Privacy Policy |
| SiteImprove | Performance | Privacy Policy |



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Cookie Provider Cookie Type Privacy Policy and Opt Out Options

Vimeo Functionality Privacy Policy

Latome, Inc. Targeting Privacy Policy and Opt-Out

In addition to any management tools above, you can manage third-party advertising preferences for some of the third-party partners we work with to serve advertising across the Internet by utilizing the choices available at <https://thenai.org/opt-out/> and <http://www.aboutads.info/choices>. If you are an E.U. resident, visit Your Online Choices [here](#).

For mobile users, you also have numerous controls in your Operating System that enable you to choose whether to allow cookies or to share your advertising ID with third parties. For some information on controlling your mobile choices, [click here](#). To help control or block certain ads in mobile applications, you may choose to download and utilize the Digital Advertising Alliance's mobile app by [clicking here](#). We do not guarantee that all of the third parties we work with will honor the elections you make using any of these options.