

**DICKINSON WRIGHT PLLC
ATTORNEY CANDIDATE PRIVACY NOTICE**

Effective Date: March 8, 2024

Dickinson Wright PLLC (also “**the Firm**”) collects and uses Personal Information (also herein referred to as “**PI**”) for human resources, employment, benefits administration, health and safety, and business-related purposes and to be in legal compliance. This includes personal information provided by candidates for any attorney position with the Firm and information required to be provided related to the offer and acceptance of employment.

This Privacy Notice is provided to candidates under the California Consumer Privacy Act, as amended by the California Privacy Rights Act (together, the “**CCPA**”).

Section 1 of this Job Applicant Notice provides notice of our data practices, including our collection, use, retention, and disclosure of attorney candidate PI. Sections 2-5 of this Job Applicant Notice provide information regarding rights under the CCPA and how you may exercise them.

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1. NOTICE OF DATA PRACTICES

The description the Firm’s data practices in this Privacy Notice covers the twelve (12) months prior to the Effective Date and will be reviewed at least annually and updated as required. Our data practices may differ between updates, however, if materially different from this Privacy Notice, we will provide supplemental pre-collection notice of the current practices, which may include references to other privacy policies, notices, or statements. Otherwise, this Notice serves as our notice at collection.

(a) Personal Information Sources and Use

The Firm may collect categories of Personal Information through various sources, including directly from you, such as when you submit information in response to a job posting or to complete a questionnaire we use in the hiring process, and also if you become employed by us. This information may be obtained through electronic submission of documents, through conversation using any communication platforms (such as zoom), consents to perform employment screening, in our notes or records we create about you, from others through interactions in the course of employment, from third parties (e.g., references and recruiters), or from public sources of data.

Below are the categories of Personal Information we collect and the purposes for which we intend to use this information:

- **Identifying information**, such as your full name, gender, date of birth, and signature.
- **Demographic data**, such as race, ethnic origin, marital status, disability, and veteran or military status.
- **Contact information**, such as your home address, telephone numbers, email addresses, and emergency contact information.
- **Dependent's or other individual's information**, such as their full name, address, date of birth, phone number, and Social Security numbers (SSN).
- **National identifiers**, such as SSN, passport and visa information, and immigration status and documentation.
- **Educational and professional background**, such as your work history, academic and professional qualifications, educational records, references, and interview notes.
- **Employment details**, such as your job title, position, hire dates, compensation, performance and disciplinary records, and vacation and sick leave records.
- **Financial information**, such as banking details, tax information, payroll information, and withholdings.
- **Health and Safety information**, such as health conditions (if relevant to your employment), job restrictions, workplace illness and injury information, and health insurance policy information.
- **Information Systems (IS) information**, such as your search history, browsing history, login information, and IP addresses on the Firm's information systems and networks.
- **Geolocation data**, such as time and physical location related to use of an internet website, application, device, or physical access to a Firm office location.
- **Protected information categories listed in the California Customer Records statute (Cal. Civ. Code § 1789.80(e))**, such as 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, employment history, bank account number, credit card number, debit card number, or any other financial information, medical information, or health insurance information, understanding that some personal information included in this category may overlap with other categories.

- **Protected classification characteristics under California and federal law**, such as age, 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, genetic information (including familial genetic information).
- Profile or summary about an applicant/candidate/employee's preferences, characteristics, attitudes, intelligence, abilities, and aptitudes for job performance evaluation purposes.
- **Sensitive Information**, such as social security, driver's licenses, state identification card or passport number; account log-in, financial account, debit card, or credit card number in combination with any required security or access code, password, or credentials allowing access to an account; racial or ethnic origin, religious or philosophical beliefs, genetic data.

Generally, the Firm uses candidate PI for hiring, retention, and other business purposes and as otherwise related to the operation of our business, including for the following purposes:

- Communicating with candidates
- Processing candidate applications in response to postings
- Employment eligibility screening
- Accommodation requests
- Recruitment
- Maintaining candidate application records
- Facilitating diversity and inclusion programs
- Human Resources IT systems and security
- Security (including electronic and of premises)
- Auditing, investigations, and compliance

We may also use PI for “additional business purposes” in a context that is not a Sale or Share under the CCPA, such as:

- Disclosing it to our Service Providers, Contractors, or Processors that perform services for us (“Vendors”);
- Disclosing it to you or to other parties at your direction or through your action (e.g., payroll processors, benefit providers, some software platform operators, etc.);
- For the additional purposes explained at the time of collection (such as in the applicable privacy policy or notice);
- As required or permitted by applicable law;
- To the government or private parties to comply with law or legal process or protect or enforce legal rights or obligations or prevent harm; and
- Where we believe we need to in order to investigate, prevent or take action if we think someone might be using information for illegal activities, fraud, or in ways that may threaten someone's safety or violate our policies or legal obligations.

Subject to restrictions and obligations under the CCPA, our Vendors may also use your PI for business purposes and additional business purposes, and may engage their own vendors to enable them to perform services for us.

(b) PI Collection, Disclosure, and Retention - By Category of PI

We collect, disclose, and retain PI as follows:

Category of PI	Examples of PI Collected and Retained	Categories of Recipients
1. Identifiers	Real name, alias, postal address, unique personal identifiers, online identifier, Internet Protocol address, and e-mail address.	<p>Disclosures for Business Purposes:</p> <ul style="list-style-type: none"> • General IT, software, and other business and benefit vendors as needed (<i>e.g.</i>, job listing vendors; CV mail) • HR system and software vendors (<i>e.g.</i>, onboarding platform provider) • Other parties (<i>e.g.</i>, litigants and government entities) within the limits of Additional Business Purposes.
2. Personal Records	Name, signature, address, and telephone number. Some PI included in this category may overlap with other categories.	<p>Disclosures for Business Purposes:</p> <ul style="list-style-type: none"> • General IT, software, and other business and benefit vendors as needed (<i>e.g.</i>, job listing vendors; CV mail) • HR system and software vendors (<i>e.g.</i>, onboarding platform provider) • Other parties (<i>e.g.</i>, litigants and government entities) within the limits of Additional Business Purposes.
3. Personal Characteristics or Traits	In some circumstances, we may collect PI that is considered protected under U.S. law, such as age, sex, gender, gender identity, gender expression, nationality, race, ethnicity, veteran status, or disability.	<p>Disclosures for Business Purposes:</p> <ul style="list-style-type: none"> • General IT, software, and other business and benefit vendors as needed (<i>e.g.</i>, job listing vendors; CV mail) • HR system and software vendors (<i>e.g.</i>, onboarding platform provider) and/or • Other parties (<i>e.g.</i>, litigants and government entities) within the limits of Additional Business Purposes.

Category of PI	Examples of PI Collected and Retained	Categories of Recipients
4. Internet Usage Information	When you use our online systems or otherwise interact with us online, we may collect browsing history, search history, and other information regarding your interaction with our systems or other sites, applications, or content.	Disclosures for Business Purposes: <ul style="list-style-type: none"> • General IT, software, and other business vendors • HR system and software vendors and/or • Other parties (<i>e.g.</i>, litigants and government entities) within the limits of Additional Business Purposes.
5. Geolocation Data	If you use our systems or interact with us online we may gain access to the approximate location of the device or equipment you are using, or the location from which you are accessing our systems.	Disclosures for Business Purposes: <ul style="list-style-type: none"> • General IT, software, and other business vendors and/or • Other parties (<i>e.g.</i>, litigants and government entities) within the limits of Additional Business Purposes.
6. Professional or Employment Information	Professional, educational, or employment-related information like job title, office location, company email address and telephone number, start and end dates, and details on qualifications and experience (including professional certifications and credentials).	Disclosures for Business Purposes: <ul style="list-style-type: none"> • General IT, software, and other business vendors (<i>e.g.</i>, CV mail) • HR system and software vendors (<i>e.g.</i>, onboarding platform provider) and/or • Other parties (<i>e.g.</i>, litigants and government entities) within the limits of Additional Business Purposes.
7. Non-public Education Records	Education records directly maintained by an educational institution or party acting on its behalf, such as transcripts, completion of degrees, education institutions attended, and information on educational certification held by job applicants.	Disclosures for Business Purposes: <ul style="list-style-type: none"> • General IT, software, and other business vendors (<i>e.g.</i>, CV mail) • HR system and software vendors (<i>e.g.</i>, onboarding platform provider) and/or • Other parties (<i>e.g.</i>, litigants and government entities) within the limits of Additional Business Purposes.

Category of PI	Examples of PI Collected and Retained	Categories of Recipients
8. Inferences from PI Collected	We may draw inferences from other information we collect about you.	<p>Disclosures for Business Purposes:</p> <ul style="list-style-type: none"> • General IT, software, and other business vendors (e.g., CV mail; dataprocessors and storage providers) and/or • Other parties (e.g., litigants and government entities) within the limits of Additional Business Purposes.
9. Sensitive PI	Government Issued ID Numbers (social security number)	<p>Disclosures for Business Purposes:</p> <ul style="list-style-type: none"> • General IT, software, and other business vendors • HR system and software vendors (e.g., onboarding platform provider) and/or • Other parties (e.g., litigants and government entities) within the limits of Additional Business Purposes.
	Personal Characteristics (racial or ethnic origin)	<p>Disclosures for Business Purposes:</p> <ul style="list-style-type: none"> • General IT, software, and other business vendors • HR system and software vendors and/or • Other parties (e.g., litigants and government entities) within the limits of Additional Business Purposes.
	Health Information (PI collected and analyzed concerning an individual's health) for accommodation requests	<p>Disclosures for Business Purposes:</p> <ul style="list-style-type: none"> • General IT, software, and other business and benefit vendors as needed • HR system and software vendors (e.g., onboarding platform provider) and/or government entities) within the limits of Additional Business Purposes.

Category of PI	Examples of PI Collected and Retained	Categories of Recipients
		Sale/Share: None

There may be additional information we collect that meets the definition of PI under the CCPA but is not reflected by a category above, in which case we will treat it as PI as required, but will not include it when we describe our practices by PI category.

As permitted by applicable law, we do not treat deidentified data or aggregate consumer information as PI and we reserve the right to convert, or permit others to convert, your PI into deidentified data or aggregate consumer information, and may elect not to treat publicly available information as PI. We will not attempt to reidentify data that we maintain as deidentified.

Retention of PI: Because there are numerous types of PI in each category, and various uses for each PI type, actual retention periods vary. We retain specific PI pieces based on how long we have a legitimate purpose for the retention, including as mandated by applicable laws.

2. WE DO NOT SELL OR SHARE PERSONAL INFORMATION

The Firm does not sell or share (in the context of the targeting of advertising to a consumer based on the consumer’s personal information obtained from the consumer’s activity across businesses including distinctly-branded websites, applications, or services) your Personal Information, including sensitive personal information, and to the extent we have such information at present have not done so in the immediate twelve months. We do not plan to ever do so. However, if we ever do, you will be notified of it prior to or at the point of such collection for those purposes, and provided a link to opt-out of the selling/sharing of your personal information.”

3. YOUR RIGHTS AND HOW TO EXERCISE THEM

You have the following rights under applicable California law in relation to your Personal Information, subject to certain exceptions:

- **Right to Know:** You have the right to, up to twice in a 12-month period, request what categories and/or specific pieces of Personal Information we collect, use, disclose, share, and/or sell, as applicable.
- **Right to Delete:** You have the right to request the deletion of your Personal Information that is collected by us, subject to our need to collect such information necessary to comply with applicable laws.
- **Right to Opt-Out of Sale:** You have the right to opt-out of the sale or sharing of your Personal Information by a business. However, as noted above, we do not currently sell

or share any Personal Information.

- **Right to Non-Discrimination:** You have the right not to receive discriminatory treatment for the exercise of the privacy rights described above.
- **Right to Correct:** You have the right to correct inaccurate Personal Information that we maintain about you.
- **Right Not to Be Discriminated Against:** You have the right not to receive discriminatory treatment by us for exercising your privacy rights, including the right not to be retaliated against.

You may submit a request to delete, correct, and/or to know by contacting the following:

Tish Browning
Legal Recruiting Manager
313.223.3680
TBrowning@dickinson-wright.com

For any request sent by email please reference: "California Data Subject Request". Once we receive your request, we will follow-up within 10 days and confirm receipt of your request and request information about you that we have collected, as set forth above, to allow us to verify your identity to ensure that you are submitting a request on behalf of who you say you are. You may also have an authorized representative submit a request on your behalf, but we will have to have proof that the person is indeed your authorized representative by seeing a signed authorization document signed by you, which can include a Power of Attorney or other similar authorizing document.

For purposes of requests to delete, correct and to know, we will verify your identity based on information we have collected about you, including your name, address, and phone number, but will not fulfill your request unless you have provided sufficient information that enables us to reasonably verify that you are the job candidate about whom we collected the personally identifying information on. If we are unable to verify your identity, we may deny your request.

We will respond to your request within 45 days after receipt of your request for a period covering 12 months and for no more than twice in a twelve-month period. We reserve the right to extend the response time by an additional 45 days when reasonably necessary and provided consumer notification of the extension is made within the first 45 days.

If necessary, we may take an additional 45 calendar days to respond to your request, but, if we do, we will provide you notice of the reason for this additional time needed to process your request.

You may make two requests to know within any 12-month period. There are no similar limits on the number of deletion or corrections requests. We do not charge a fee to process or respond to your verifiable consumer request unless it is excessive, repetitive, or manifestly unfounded. If we determine that the request warrants a fee, we will tell you why we made that decision and provide you with a cost estimate before completing your request.

These rights are also subject to various exclusions and exceptions under applicable laws.

We may also have to delay complying with a request to delete with respect to data stored on an archived or backup system until such time as that system is restored to an active systems or is next accessed or used for sale, disclosure or commercial purpose.

4. NON-DISCRIMINATION / NO RETALIATION

The Firm will not discriminate or retaliate against you in a manner prohibited by the CCPA for your exercise of your privacy rights.

5. OUR RIGHTS AND THE RIGHTS OF OTHERS

Notwithstanding anything to the contrary, we may collect, use and disclose your PI as required or permitted by applicable law and this may override your rights under the CCPA. In addition, we are not required to honor your requests to the extent that doing so would infringe upon our or another person's or party's rights or conflict with applicable law.

6. QUESTIONS

If you have any questions about this Notice or need to access this Notice in an alternative format due to having a disability, please contact:

Tish Browning
Legal Recruiting Manager
313.223.3680
TBrowning@dickinson-wright.com