



PRIVACY NOTICE

Shearman & Sterling LLP is a limited liability partnership organized under the laws of the state of Delaware. References in this policy to "we", "us" or "Shearman " are references to Shearman & Sterling LLP and our affiliated entities, including Shearman & Sterling (London) LLP, a limited liability partnership through which we practice in the United Kingdom and Italy, and Shearman & Sterling, a partnership through which we practice in Hong Kong. We also practice in Saudia Arabia in association with a Saudi firm, Dr. Sultan Almasoud & Partners.

Shearman is committed to protecting and respecting your privacy. This notice specifies:

Reference in this notice to "personal data" means any information that identifies, or could reasonably be used to identify, a living individual, either on its own or together with other information. Please also refer to our Cookie Policy which explains the use of cookies and other web tracking devices via our website.

Please read this notice carefully to understand our practices with respect to personal data.

How we obtain your personal data

As a law firm, we regularly receive personal data as part of our professional activities. We may collect your personal data:

- As part of our business intake procedures;
- When you or your organization seek legal advice or employment from us;
- When you or your organization offer or provide services as our vendor;
- When you browse or interact with our website(s) or use any of our online services;
- When you email us or provide such data to us in other circumstances, such as when you request details about or attend a firm sponsored event, or when you engage with the alumni or careers portal.

Ordinarily, you will have provided any such data to us. But in some cases, we may collect data about you from a third party source, such as government or credit reporting agencies, an information or service provider or from public records.

The personal data we collect and process

The personal information that we collect and process may include:

- Basic information, such as your name, your employer, your title or position and your relationship to a person;
- Contact information, such as your physical address, email address and phone number(s);
- Financial information, such as bank account details;
- Technical information (including your IP address), such as information from your visits to our website or applications or in relation to materials and communications we send to you electronically;
- Information you provide to us for the purposes of attending meetings and events, including access and dietary requirements;
- Identification and background information provided by you or collected by us as part of our business acceptance processes;
- Personal information provided to us by or on behalf of our clients, partners and employees or generated by us in the course of providing services and employment, which may include special categories of data;
- Details of your visits to our offices; and
- Any other information relating to you which you may provide to us.

How we use your personal data

Whether we receive your personal data directly from you or from a third party source, we will only use your personal data in connection with our ordinary professional activities (including the fulfilment of our legal or regulatory obligations). These “Permitted Uses” may include:

- Providing legal advice or other services to our clients;
- Managing our business relationship with you or your organization, whether in connection with the provision or procurement of goods and services or as your employer or former employer, including processing payments, accounting, auditing, billing and collection and related support services;
- Acting in compliance with our legal obligations, including with respect to anti-money laundering and sanctions checks;
- Managing and securing the access to our offices, systems and online platforms;
- Complying with court orders and other legal and regulatory requirements;
- Processing that is necessary for purposes of the legitimate interest of the firm or third parties provided that such interests are not overridden by your interests or your fundamental rights and freedoms; and
- For any purpose related to the foregoing or for any purpose for which you provided the personal data to Shearman.

If you have given us your express consent, we may process your personal data for additional purposes. You may withdraw your consent at any time. Additional purposes for which we may process your personal data may include:

- Communicating with you with respect to legal developments, announcements, events and Shearman products and services which may be of interest to you;
- Distributing surveys or marketing materials;
- Gathering information regarding your preferences to improve the quality of our communications and interaction with you, such as through website analytics or the tracking of our client publications; and
- Any other purpose for which you have given consent.

How we share your personal data

Shearman is a global firm and a list of our offices, together with relevant contact information, may be found on our website. Irrespective of how we obtain your personal data, it may be shared among all the offices within Shearman (both inside and outside the European Economic Area). Our global policy requires all offices to at all times ensure a level of data protection at least as protective as those mandated by the European Economic Area. We may also need to transfer personal data to third parties, including third parties based outside the European Economic Area, for example (but not limited to) sub-contractors, other counsel and accountants and third parties involved in your matters.

Where we share or transfer your personal data, we will do this in accordance with applicable data protection laws and will take appropriate safeguards to ensure its integrity and protection.

Keeping your personal data secure

We will take appropriate technical and organizational measures against unauthorized or unlawful processing of your personal data and against accidental loss or destruction of, or damage to, your personal data in accordance with our internal security procedures covering its storage, access and destruction. Personal data may be stored on our own technology systems or those of our vendors or in paper files.

Retaining your personal data

We will delete your personal data when it is no longer reasonably required for the Permitted Uses or you withdraw your consent (where applicable), provided that we are not legally required or otherwise permitted to continue to hold such data. We may retain your personal data for an additional period to the extent deletion would require us to overwrite our automated disaster recovery backup systems or to the extent we deem it necessary to assert or defend legal claims during any relevant retention period.

Your rights regarding your personal data

In addition to your rights under applicable data protection legislation and where we are permitted or required by applicable law and regulation and by our professional obligations, we will provide you, upon request, with a copy of your personal data and we will correct any errors identified by you. Except as set forth above, we will not use your data for any automated decision making or any profiling and you have the right to restrict our processing of your personal data as well as the right to lodge a complaint with supervisory authorities regarding the processing of your personal data. We will refrain from sending you marketing materials without your express consent and will also comply with your request to stop sending any such further communications. All such requests, or any questions or comments regarding this policy or our handling of your personal data, should be addressed to personal.data@shearman.com.

Updates

This Privacy Notice was updated in April, 2018. We reserve the right to amend this Privacy Notice from time to time to reflect changing legal requirements or our processing practices. Any such changes will be posted on this website and will be effective upon posting.