

## Blank Rome Employee Privacy Notice for California Residents

**Effective Date:** 12/31/2019

The purpose of this **Employee Privacy Notice for California Residents** is to inform our personnel (including employees, temporary workers, job applicants, and contractors) who reside in the State of California (referred to herein as “you” or “individual”) about the categories of personal information to be collected by Blank Rome and the purposes for which the categories of personal information will be used. We adopt this notice to comply with Section 1798.100 of the California Consumer Privacy Act of 2018 (CCPA) and any terms defined in the CCPA have the same meaning when used in this notice.

### Information We Collect

We collect information that identifies, relates to, describes, is reasonably capable of being associated with, or could reasonably be linked, directly or indirectly, with a particular individual or household (“**personal information**”). In particular, Blank Rome collects the following categories of personal information from individuals:

<b>Category</b>	<b>Examples</b>	<b>Collected</b>
A. Identifiers.	A 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.	YES
B. Personal information categories listed in the California Customer Records statute (Cal. Civ. Code § 1798.80(e)).	A 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.  Some personal information included in this category may overlap with other categories.	YES
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, genetic information (including familial genetic information).	YES
D. Commercial information.	Records of personal property, products or services purchased, obtained, or considered, or other purchasing or consuming histories or tendencies.	NO
E. Biometric	Genetic, physiological, behavioral, and biological	YES

information.	characteristics, or activity patterns used to extract a template or other identifier or identifying information, such as, fingerprints, faceprints, and 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, information on a consumer's interaction with a website, application, or advertisement.	YES
G. Geolocation data.	Physical location or movements.	YES
H. Sensory data.	Audio, electronic, visual, thermal, olfactory, or similar information.	NO
I. Professional or employment-related information.	Current or past job history or performance evaluations.	YES
J. Non-public education 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, such as grades, transcripts, class lists, student schedules, student identification codes, student financial information, or student disciplinary records.	YES
K. Inferences drawn from other personal information.	Profile reflecting a person's preferences, characteristics, psychological trends, predispositions, behavior, attitudes, intelligence, abilities, and aptitudes.	YES

Personal information does not include:

- Publicly available information from government records.
- Deidentified or aggregated consumer information.
- Information excluded from the CCPA's scope, like:
  - 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.

## Use of Personal Information

We may use the personal information we collect for a range of standard employment-related and business purposes, including:

- **Workforce Planning and Recruitment**, for example for business forecasting, employee assignment planning and budgeting, job advertising, interviewing, conducting background and criminal history checks, performing drug testing, selecting and hiring and terminating staff.
- **General Human Resources Management and Administration**, for example for career development, performance management, compensation and benefits management and benchmarking, administering payroll, reimbursing expenses, managing stock options, obtaining employee satisfaction feedback, managing absences, general headcount reporting, disaster recovery and emergency response planning, equal opportunities monitoring, training employees, and carrying out disciplinary or grievance procedures.
- **Performance of our Business Operations**, for example, to carry out day to day business activities, to allow us to work together and collaborate, to provide our services, to ensure business continuity, to enforce our rights and protect our operations and those of our affiliates, and to pursue available remedies and limit damages we may sustain.
- **Security Management**, for example, to ensure the security of our premises, assets, information, employees and other personnel.
- **Legal and Regulatory Compliance**, for example, to respond to law enforcement requests; as required by applicable law, court order, or governmental regulations; to ensure compliance with health & safety requirements and other legal or fiscal obligations, or in connection with litigation or an internal investigation or audit and to ensure compliance with our policies regarding anti-money laundering, bribery and corruption.
- **As described to you when collecting your personal information.**
- **Business transactions**, for example, to evaluate or conduct a merger, divestiture, restructuring, reorganization, dissolution, or other sale or transfer of some or all of Blank Rome's assets, whether as a going concern or as part of bankruptcy, liquidation, or similar proceeding, in which personal information held by Blank Rome about you is among the assets transferred.

Blank Rome 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 additional notice.

## Changes to this Notice

Blank Rome reserves the right to amend this privacy notice at our discretion and at any time. When we make changes to this privacy notice, we will post the updated notice on the Blank Rome's intranet site and update the notice's effective date.

### **Contact Information**

If you have any questions or comments about this notice, including the ways in which Blank Rome collects and uses your information, please do not hesitate to contact us at:

**Phone:** 1-833-BROPTOUT (833-267-7868)

**Website:** [www.blankrome.com](http://www.blankrome.com)

**Email:** [privacyoffice@blankrome.com](mailto:privacyoffice@blankrome.com)

**Postal Address:**

Blank Rome

Attn: Privacy Office

130 North 18<sup>th</sup> Street, One Logan Square, Philadelphia, PA 19103