

## Privacy Policy

Last modified: 4/25/2021

### I. Introduction

The Interlex Group, Inc. ("Company," "we" "our," or "us") respect your privacy and are committed to protecting it through our compliance with this policy.

This Policy describes the types of information we may collect from you or that you may provide when you visit this website, which includes but is not limited to, all webpages on this domain (our "Website") and our practices for collecting, using, maintaining, protecting, and disclosing that information.

This Policy applies to information we collect:

- on this Website;
- in e-mail, text, and other electronic messages between you and this Website; and
- when you log in to this website as a member.

It does not apply to information collected by:

- us offline or through any other means; or
- any third-party (including from any domain other than interlexgroup.com) that links to or is linked from our Website. We have no control over the information any third-party collects.

Please read this Policy carefully to understand our policies and practices regarding your information and how we will treat it. If you do not agree with our policies and practices, your choice is to not use our Website.

By either accessing or using this Website, you agree to this privacy Policy.

This Policy may change from time to time (see Section X below). Your continued use of this Website after we make changes is deemed to be an acceptance of those changes, so please check the Policy periodically for updates.

### II. Children Under the Age of 16

Our Website is not intended for children under 16 years of age. No one under age 16 may provide any information to the Website. We do not knowingly collect personal

information from children under 16. If you are under 16, do not use or provide any information to this Website. If we learn we have collected or received personal information from a child under 16 without verification of parental consent, we will delete that information. If you believe we might have any information from or about a child under 16, please contact us at the contact information provided below or send an e-mail to [info@interlexgroup.com](mailto:info@interlexgroup.com).

### **III. Information We Collect, How We Collect It, and How We Use It**

#### **A. Information of Non-Member Users**

We collect several types of information from and about users of our Website regardless of whether or not they are members. We obtain certain information by automated means, such as cookies (including a session variable). A “cookie” is a text file that websites send to a user’s computer or other Internet-connected device to uniquely identify the user’s session or browser or to store information or settings in the browser. Cookies sometimes contain “session variables.”

A “session variable” is a random and anonymous sequence of digits that contains no human readable information. It is used to identify individual browsing sessions, and is deleted when your browser is closed. Session variables are used to ensure that when you change pages and move about the Website, your experience is continuous. Without session variables, the webserver might confuse the clicks and requests from multiple users with one another. Since they are random and anonymous, session variables do not include personally identifiable information.

The primary information we collect using cookies includes:

- a “\_ga” cookie used and analyzed anonymously by Google Analytics (a third-party, see <https://www.google.com/analytics/> and <https://policies.google.com/privacy>) to distinguish unique users of the Website, by using a randomly generated number as the unique identifier;
- a “\_gid” cookie used and analyzed anonymously by Google Analytics to understand the route a user to the Website takes when using the Website;
- a “\_gat” cookie used and analyzed anonymously by Google Analytics to limit the number of requests or clicks any individual user can make;
- a session cookie to ensure a seamless experience when navigating the Website; and

- details of your visits to our Website, including traffic data, location data, logs, and other related aggregated and anonymous information;

We may use automated technologies to collect additional information about your equipment, devices, internet connection, browsing actions, and usage patterns. The information we obtain in this manner may include your IP address, identifiers associated with your devices, types of devices connected to our services, web browser characteristics, browsing history, device characteristics, language preferences, referring/exit pages, clickstream data, and dates and times of visits to our Website. If such information is collected, it will not include personally identifiable information and will be used to streamline your navigation of the Website.

The information we collect automatically is aggregated and anonymous statistical data. It helps us to improve our Website and to deliver a better and more personalized service, including by enabling us to:

- estimate our audience size and usage patterns;
- speed up your searches;
- recognize your browsing session as separate and distinct from other users, including when you return to our Website;
- perform the services provided on the Website;
- detect security incidents;
- protect against malicious or illegal activity; or
- debug, identify, and repair errors that impair existing intended functionality.

We do **not** use third-party cookies to track browsing or purchasing behavior.

#### **B. Additional Information We Collect from Member Users**

The following describes additional information collected from member users.

We collect this additional information directly from member users when they provide it to us. It may include:

- information we request and members provide when filling in forms on our Website. This includes information provided at the time of registering to use our Website or requesting further services and may include your e-mail address;

- information to prepare and include in firm and individual profiles;
- information we request and members provide when sending RSVPs for events;
- information we request and members provide when renewing their membership;
- information you provide if you report a problem with our Website; and
- records and copies of your correspondence (including e-mail addresses), if you contact us.

The primary additional information we collect from member users using cookies includes:

- a “remember\_member\_token” that is used to remember member users from session to session.

**Commented [1]:** Confirm with web developer.

Additionally, we may use third-party services for payment process (e.g., payment processors) in connection with member user dues. We will not store, collect, or use any payment details. That information is provided directly to our third-party payment processors whose use of personal information is governed by their privacy policy.

We use the personal information collected from member uses for the following reasons:

- to maintain record of your membership registration with us so that we can identify you;
- to reserve spots at events pursuant to your RSVPs;
- to present our Website and its contents to you;
- to provide you with information that you request from us;
- to fulfill any other purpose for which you provide it;
- to provide you with notices about your account;
- to store and disclose profiles of member firms and attorneys;
- in any other way we may describe when you provide the information; and
- for any other purpose with your consent.

#### IV. Disclosure of Your Information

We may disclose anonymous and aggregated information about our users without restriction.

We may disclose personal information that we collect or you provide as described in this privacy policy:

- to our subsidiaries and affiliates;
- to contractors, service providers, and other third-parties we use to support our business and who are bound by contractual obligations to keep personal information confidential and use it only for the purposes for which we disclose it to them;
- to a buyer or other successor in the event of a merger, divestiture, restructuring, reorganization, dissolution, or other sale or transfer of the Company or its assets;
- for any other purpose disclosed by us when you provide the information; or
- otherwise, with your consent.

We may also disclose your personal information:

- to comply with any court order, law, or legal process, including to respond to any government or regulatory request;
- to enforce or protect our Website and any Company or intellectual property contained on it; or
- if we believe disclosure is necessary or appropriate to protect the rights, property, or safety of the Company, our customers, or others.

#### V. Choices About How We Use and Disclose Your Information

You have choices regarding the personal information you provide to us. The following mechanisms provide you with control over your information:

- **Tracking Technologies and Advertising.** You can set your browser to refuse all or some browser cookies, or to alert you when cookies are being sent. If you disable or refuse cookies, please note that some parts of this Website may then be inaccessible or not function properly.

- **Promotional Offers from the Company.** If you do not wish to be contacted via e-mail in connection with automated or blast e-mails, you can opt out by using the contact information provided below or sending an e-mail to info@interlexgroup.com and requesting to be removed from such e-mails.
- **Disclosure of Your Information for Third-Party Advertising.** We do **not** share your personal information with unaffiliated or non-agent third-parties for promotional purposes. Thus, there is no need for you to opt out of such disclosure.
- **Targeted Advertising.** We do **not** use information we collect or that you provide to us to deliver advertisements according to our advertisers' target-audience preferences. Thus, there is no need for you to opt out of such use.

We do not control third-parties' collection or use of your information to serve interest-based advertising. However these third-parties may provide you with ways to choose not to have your information collected or used in this way.

#### **VI. Accessing, Correcting, or Deleting Your Information**

We do **not** store personal information of non-members.

You may also contact us by using the contact information provided below or sending us an e-mail at info@interlexgroup.com to request access to, to correct, or to delete any personal information that you have provided to us. We may not accommodate a request to change information if we believe the change would violate any law or legal requirement or cause the information to be incorrect.

#### **VII. Other Privacy Rights, Including California**

The California Consumer Privacy Act ("CCPA") provides California residents with specific rights regarding their personal information. This Section describes your CCPA rights and explains how to exercise those rights.

Note that the terms of the CCPA may not apply to this Website. The following is a disclosure of your rights and related instructions if and to the extent that the CCPA does apply.

For more details about the personal information we may have collected about you over the last 12 months, including categories of sources of personal information, please see the Section III above. We collect and use your personal information for the reasons described in Section III as well.

## A. Rights

- **Right to Know:** You have the right to request that the Company disclose what personal information about you it collects, uses, discloses, and sells. These provisions are set forth above in Sections IIIIV above.
- **Right to Request Deletion of Your Personal Information:** You have the right to request that the Company delete any of your personal information that we collected from you and retained, subject to certain exceptions.
- **The Right to Opt-Out/Opt-In to Sale of Your Personal Information:** If you are 16 years of age or older, you have the right to direct the Company not sell your personal information at any time. However, as stated above, we do **not** sell personal information.
- **The Right to Non-Discrimination for Exercise of Consumer Privacy Rights:** You have the right not to receive discriminatory treatment for the exercise of the privacy rights conferred by the CCPA. Neither the Company nor the Website will discriminate between you and other users based upon your choices or requests to access, correct, or delete personal information. However, as a technical matter, we may not be maintain your user account, depending upon your choices.

## B. Instructions for Your or Your Agent to Exercise Its Rights

To exercise the access and deletion rights described above, you or your authorized agent must submit a verifiable consumer request to the contact information below or by sending an e-mail to [info@interlexgroup.com](mailto:info@interlexgroup.com).

Importantly, only you, or a person that you authorize to act on your behalf, may make a verifiable consumer request related to your personal information. Upon submitting a requests, we will attempt to verify your identity by matching the identifying information provided by you (or your authorized representative) to the personal information already maintained by us. The type of information you must provide depends on the type of request you make. Alternatively, we may use a third-party verification service to verify your identity. You may only make a verifiable consumer request for access or data portability twice within a 12-month period. We cannot respond to your request or provide you with personal information if we cannot verify

your identity or authority to make the request and confirm the personal information relates to you.

### C. Authorized Agents

If you are using an authorized agent to submit a request to know or request to delete under the CCPA, you must provide the authorized agent written permission to do so. Please contact us at to the contact information below or by sending an e-mail to [info@interlexgroup.com](mailto:info@interlexgroup.com) to request a CCPA Agent Authorization form. Written permission must be submitted to the Company as part of the verification process and the agent must also verify their own identity with us using the verification methods described above. We may deny requests from an agent that does not submit proof that they have been authorized by the consumer to act on their behalf.

### D. Questions

If you have any questions please contact the Company at the information provided below or by sending an e-mail to [info@interlexgroup.com](mailto:info@interlexgroup.com).

## VIII. European Users and Visitors

If you are located outside of the United States, you acknowledge and agree that your personal information may be processed outside of the country in which you are a resident and in countries that are not subject to an adequacy decision by the European Commission and that may not provide for the same level of data protection as the European Economic Area (EEA). In such cases, Company will ensure that we or the recipient of your personal information offer an adequate level of protection and that such transfers are made consistent with applicable law, for instance by entering into binding corporate rules or standard contractual clauses for the transfer of data as approved by the European Commission. Alternatively, we may use and rely upon other methods of certifying protection of your personal information that are approved by the European Commission.

If you are located in the EEA, you have certain statutory rights in relation to your personal information. Subject to any exemptions provided by law, you may have the right to request access to, as well as to seek to update, delete, correct, or restrict, or object to the processing of your personal information. As explained in Section III above, we process personal information in various ways depending upon your use of our Website. Also explained in Section III above, we rely on the following bases to process personal information:

**Commented [2]:** NOTE: if we start to receive CCPA requests, there are record keeping requirements. This will take additional investigation and review to ensure compliance.



- as necessary for our legitimate interests in providing, enhancing, and protecting our Website; and
- with your lawful consent.

You have a right to object to the Company's use of your personal information for direct marketing purposes at any time.

You may contact us at the information below, or by sending an e-mail to [info@interlexgroup.com](mailto:info@interlexgroup.com) with any questions or complaints. You also have the right to complain to the data protection authority in the country where you reside, work, or where an alleged infringement of data protection laws has taken place.

#### **IX. Data Security**

We have implemented measures designed to secure your personal information from accidental loss and from unauthorized access, use, alteration, and disclosure. Firewalls are utilized to restrict access to systems from external networks and between systems internally. By default, all access is denied and only explicitly allowed ports and protocols are allowed based on business need.

The safety and security of your information also depends on you. Where we have given you (or where you have chosen) a password for access to certain parts of our Website, you are responsible for keeping this password confidential. We ask you not to share your password with anyone.

Unfortunately, the transmission of information via the internet is not completely secure. Although we do our best to protect your personal information, we cannot guarantee the security of your personal information transmitted to our Website. Any transmission of personal information is at your own risk. We are not responsible for circumvention of any privacy settings or security measures contained on the Website.

You hereby acknowledge that the Company is not responsible for any intercepted information sent via the Internet, and you hereby release us from any and all claims arising out of or related to the use of intercepted information in any unauthorized manner.

#### **X. Changes to Our Privacy Policy**

It is our policy to post any changes we make to our privacy policy on our Website. The date the privacy policy was last revised is identified at the top of the page. You are

responsible for periodically visiting our Website and this privacy policy to check for any changes.

#### **XI. Contact Information**

To ask questions or comment about this privacy policy and our privacy practices, contact us at:

Lawrence B. Swibel, President  
200 W. Madison, Suite 3000  
Chicago, IL 60606 U.S.A.  
Telephone: 1-312-224-1214  
E-mail: lswibel@fslc.com

Fannie Gilligan, Director of Global Administration  
200 W. Madison, Suite 3000  
Chicago, IL 60606 U.S.A.  
Telephone: 1-312-224-2515  
E-mail: fgilligan@interlexgroup.com