

Michael Best Privacy Policy

Michael Best & Friedrich LLP (“**Michael Best**”) respects your privacy rights. We have developed this Privacy Policy (“**Policy**”) to describe and let you know how we collect, use, share, and protect your Personal Information.

This Policy applies to data we collect in multiple ways, including when we provide professional services (“**Services**”), when you visit our offices, participate in our events, when you apply for a job, when you visit our websites: www.michaelbest.com, bestworkplacesolutions.com, michaelbeststrategies.com, and venturebest.com (collectively, our “**Sites**”), or when you otherwise communicate with us.

We are committed to processing your Personal Information in accordance with applicable data privacy and security laws, including the California Consumer Privacy Act (as amended, the “**CCPA**”).

This Policy outlines our general data protection practices, including how we process Personal Information in the course of our legal representation of clients. We balance our general data protection practices with our overarching responsibilities to our clients as described in our client agreements and communications, to protect the confidentiality of our clients and to meet our rules of professional responsibilities under applicable laws.

Providing Personal Information to us, as set forth below, does not create an attorney-client relationship. If you have questions or concerns about this Notice, please contact us.

IF YOU ARE A CALIFORNIA RESIDENT, PLEASE SEE YOUR CALIFORNIA PRIVACY RIGHTS AT THE BOTTOM OF THIS POLICY FOR ADDITIONAL INFORMATION THAT APPLIES TO YOUR PRIVACY RIGHTS.

1. What Is Personal Information?

For purposes of this Policy, we define Personal Information as information that identifies, relates to, describes, is reasonably capable of being associated with, or could reasonably be linked, directly or indirectly, with you, your devices, or your household (“**Personal Information**” or “**Personal Data**”). Personal Information excludes publicly available information or aggregated information that does not include personal data elements.

2. Categories Of Personal Information We Collect

We may collect the following categories of Personal Information from or about you in connection with the operation of our organization:

Category	Examples	Retention Period
Identifiers	Your name, alias, telephone number, email address, postal address, IP address, driver's license or state identification number, social security number and passport number.	We retain this information for so long as needed for business, legal and compliance purposes, or as provided in our engagement letter with you.
Client Records	Client records such as your name, signature, social security number, address, telephone number, passport number, driver's license or state identification card number, insurance policy numbers, education, employment, employment history, bank account number, credit card number, debit card number, financial information, medical information, or health insurance information.	We retain this information in accordance with our engagement letter with you. If no engagement letter exists, we retain the information for so long as needed for business, legal and compliance purposes.
Commercial Activity	Records related to Services we provide and communications with us.	We retain this information for so long as needed for business, legal and compliance purposes or in accordance with our engagement letter with you.
Internet Activity	Internet or other electronic network activity information, including your IP Address, the websites you visit before or after you visit the Sites, the date and time you visited our Sites, search history, information regarding your interactions with the Sites, online identifiers like a Cookie ID, browser type, your internet service provider, operating system, application, or advertisement.	We retain this information as long as needed for the purpose for which we collected this information.
Geolocation	General geographic location.	We retain this information as long as needed for the purpose for which we collected this information.
Audio, Electronic, and Video Information	Recordings for events we hold, security footage and phone or video calls for business reasons as permitted by law.	We retain this information as long as needed for the purpose which we collect this information.

Protected Classifications	Characteristics such as gender, ethnicity, veteran or military status, and citizenship.	As required by law.
Employment Information	Professional or employment-related information, including information you provide when applying for a position with us.	As required by law.
Educational Information	Education-related information, including information you provide when you apply for a position with us.	As required by law.

3. Sources Of Personal Information We Collect

We collect Personal Information in the following ways:

DIRECTLY FROM YOU: We collect Personal Information directly from you as described below:

- Legal and Other Professional Services. We collect Personal Information you give us when we provide you with legal or other professional services, or when we discuss the possibility of performing services for you.
- Communications. We collect Personal Information when you communicate with us, including by e-mail, mail, phone, or when you sign up for our newsletters or events.
- Service Providers. We collect Personal Information from certain service providers who do business with us or seek to do business with us.
- Feedback. We collect Personal Information you give us when you respond to or provide feedback in response to a survey or after a seminar. Unless you are our client, we will not treat that Feedback as confidential, and we may use that Feedback for any purpose in our sole discretion, so long as it does not personally identify you. Feedback will be used without attribution or compensation to you.
- Site Visits. We collect Personal Information when you visit our Sites.
- Events. We collect Personal Information when you register for a webinar or in-person event.
- Job Applications and Inquiries. We collect your Personal Information when you submit job application materials to us directly, or when you are redirected from our Sites to our third-party business partner's job application portal.

USING TECHNOLOGY.

We collect Personal Information using technology. For instance, we use Cookies and other online tracking mechanisms on our Sites to automatically collect certain information from you when you visit our Sites. Please review the Cookie section of our Policy below for more information.

THIRD-PARTY SOURCES. We may collect Personal Information from third-party sources as described below.

- **Affiliates.** We may collect Personal Information from our affiliates to refer clients that may have multiple business needs for our services or for marketing purposes.
- **Service Providers.** We may receive Personal Information about you from third parties that provide services to us through ("**Service Providers**"). For instance, we may receive Personal Information when you submit a resume and/or job application through our third-party job application portal. To submit a job application for an open position with us, you will be redirected to our online career portal, which is provided by Micron Systems. You will be required to create an account with Micron Systems if you wish to save and return to your application at a later time. Job applications submitted through that portal, including your resume and all other materials and information you provide in the course of submitting an application, will be submitted directly to Micron Systems and will then be shared with us. We encourage you to review Micron Systems' Privacy Policy.
- **Third Parties.** We may collect Personal Information from third party companies for our business and marketing purposes. For instance, we collect Personal Information from analytics providers and market research companies that help us understand the demographics and user preferences of visitors to our Sites and to evaluate the operation of the Sites. We also receive Personal Information from third parties that perform targeted advertising, including website analytics and targeted marketing advertisers.

4. We Use Personal Information We Collect for The Following Business and Commercial Purposes:

Purpose	Examples	Category
To Communicate with You	To respond to your questions, requests, comments, or concerns To share client alerts To provide Services To notify you of changes to this Policy, other terms on our Sites or similar communications To communicate regarding our Services To provide promotional e-mails To keep your information current As you request or consent	Identifiers Commercial Activity Client Records Internet Activity
To Provide Professional Services	To communicate with you regarding your client matters To communicate with you about Services we are providing to you or your organization To maintain your account information For billing and collection purposes	Identifiers Commercial Activity Client Records Internet Activity Audio, Electronic, and Video

Business Purposes	<ul style="list-style-type: none"> To operate our business To provide Services To facilitate transactions To inform our business strategies To recruit employees To administer employment and benefits To operate our information technology systems For marketing and advertising purposes 	<ul style="list-style-type: none"> Identifiers Client Records Commercial Activity Geolocation Internet Activity Audio, Electronic, and Video Employment Information Educational Information
For Targeted Advertising, Marketing and Promotional Activities	<ul style="list-style-type: none"> To serve targeted advertising to you about events and information which may be of interest to you To notify you about upcoming events and other information about our organization To customize content and to improve our ability to contact you To enhance our marketing capabilities, and to inform marketing, communication plans, and strategies 	<ul style="list-style-type: none"> Identifiers Geolocation Internet Activity Educational Information Employment Information
To Perform Analytics	<ul style="list-style-type: none"> To improve the content of our Sites To enhance users' experience when visiting our Sites To generate statistical information about Site usage and traffic patterns To prevent fraud 	<ul style="list-style-type: none"> Identifiers Internet Activity
Site Management	<ul style="list-style-type: none"> To operate the Sites and troubleshoot problems with the Sites To improve the content and functionality of the Sites and your user experience To improve the security of the Sites To conduct statistical and other analyses of the Sites 	<ul style="list-style-type: none"> Identifiers Internet Activity
To Process Job Applications	<ul style="list-style-type: none"> To evaluate your qualifications for employment with us 	<ul style="list-style-type: none"> Identifiers Employment Information Education Information Protected Classifications

Legal Purposes and Protection of Rights	To protect the legal rights or interests of our clients, our employees, our organization and those of third parties	Identifiers
	To bring a legal action against you or anyone who may be causing harm to us, our Sites, or to other users of the Sites	Commercial Activity
	To seek business, financial, or legal advice	Client Records
	To respond to subpoenas, court orders, and other legal processes	Internet Activity
		Employment Information

5. With Whom We Share or Disclose Personal Information

In the chart below, we explain the types of Personal Information we share or disclose, with whom, and for what purposes.

Entity	Purpose	Category of Information
Affiliated Companies	We may share your Personal Information with our affiliates to assist in offering and providing Services.	Identifiers
		Client Records
Service Providers	<i>We share your Personal Information with our service providers in accordance with contracts we have with them requiring that they protect your Personal Information.</i>	Commercial Activity
	To help us collect and analyze Personal Information for a Business Purpose	Client Records
	To help us host, operate, support and secure our Sites	Internet Activity
	To improve the content and functionality of the Sites	Employment Information
	To provide public relations and marketing services	Information
	To provide IT services	Educational Information
	To provide data processing services	Geolocation
		Audio, Electronic, and Video
Third Party Advertising Networks and Analytics Providers	To enable them to provide services to us	Identifiers
	To provide us targeted advertising or analytics services	Commercial Activity
	To perform data analysis and statistical analysis of our website usage and operations	Internet Activity
	To provide learning management systems	

Social Media Companies	To allow you to interface with our Sites and your social media sites	Identifiers Internet Activity
	To receive advice from our professional advisors, such as our attorneys, accountants, financial advisors, and business advisors, in their capacity as advisors to us	Identifiers Commercial Activity Client Records Internet Activity Audio, Electronic, and Video Educational Information Protected Classifications Employment Information
Government Officials and Law Enforcement	To comply with court orders or other valid legal process	Identifiers Commercial Activity
	To comply with applicable laws To enforce our website policies To protect our Sites, clients, employees or others To identify, contact, or bring a legal action against someone who may cause or be causing harm to our clients, employees, our organization or to another person, including persons who are interfering with our information technology systems and equipment, or an individual's privacy or property	Commercial Records Internet Activity Geolocation Educational Information Employment Information
Parties to Business Transactions	If we are involved in a potential business transaction, including a due diligence process, merger, asset sale, financing, corporate divestiture, reorganization, or acquisition of all or some portion of our business to another company or if we undergo liquidation or bankruptcy proceedings, we may share your Personal Information in connection with such transaction or proceeding before and or after the transaction closes or the proceedings are completed, and we may transfer that Personal Information to be used by the new owner or successor at the end of the process.	Identifiers Commercial Activity Client Records Internet Activity Audio, Electronic, and Video Protected Classifications Employment Information Educational Information

6. Additional Information Regarding Our Privacy Practices

USE AND DISCLOSURE OF DE-IDENTIFIED OR AGGREGATED INFORMATION

We may de-identify or aggregate Personal Information to create an anonymous data set. We will maintain this data in a de-identified form and will not attempt to re-identify such data. When we enter into agreements with Service Providers, or third parties, where we share de-identified or aggregated data, we will implement contractual data protection restrictions to prevent Service Providers or third parties from attempting to re-identify the de-identified data.

CHILDREN

The Sites are not directed at, nor do we knowingly collect information from, individuals under the age of legal age of majority. If a parent or legal guardian learns that their child provided us with Personal Information without his or her consent, please contact us and we will delete such Personal Information.

For clarity, we do not knowingly sell or share the Personal Information of anyone under the age of majority without affirmative authorization.

SOCIAL MEDIA

We are active on social media, including Facebook, YouTube, Twitter, and LinkedIn (“**Social Media**”). Anything you post on Social Media is public information and will not be treated confidentially. We may post (or re-post) on the Sites and our Social Media pages any comments or content that you post on our Social Media pages. Your use of Social Media is governed by the privacy policies and terms of the third parties that own and operate those websites and not by this Policy. We encourage you to review those policies and terms.

YouTube. We use the YouTube application programming interface (API) Services to allow you to access YouTube content from our Sites. Your use of YouTube is governed by YouTube’s [Terms of Service](#) and [Privacy Policy](#), and not by our Terms of Use or Privacy Policy. We encourage you to read the YouTube Terms of Service and Privacy Policy, which are available on its websites at <https://www.youtube.com/t/terms>.

- **Automated Decision Making Technology**

We **do not currently use** automated decision-making technology that makes or influences significant decisions about consumers or job applicants. Should this change, we will update our Privacy Policy accordingly.

- **Data Minimization**

We are committed to collecting, processing, and retaining **only the data necessary** to provide or maintain the products and services you request.

- ◇ **Personal Information**
We limit collection and use of personal data to what is **adequate, relevant, and reasonably necessary (or proportionate)** for the specific purposes we disclose.
- ◇ **Sensitive Personal Information (SPI)**
As required by laws in **California, Colorado, Connecticut, Maryland, and Massachusetts**, we collect sensitive information (e.g., health data, precise geolocation, race, ethnicity, etc.) **only when strictly necessary** to deliver a specific product or service you request or with your consent.

7. How We Secure Your Personal Information

We use commercially reasonable physical, technical, and organizational measures to help secure Personal Information against unauthorized access to, acquisition of, loss, misuse, or alteration. If we learn of an unauthorized access to or acquisition of your Personal Information, we will notify you of the incident as required under applicable law.

8. Third-Party Websites

The Sites may link to, or be linked to, websites not maintained or controlled by Michael Best, including YouTube. Michael Best is not responsible for the privacy policies or practices of any third parties or any third-party websites. This Policy does not apply to any third-party websites, or to any personal or other information that you may provide to third parties. We encourage you to read the privacy policy for each website that you visit.

9. Use Of Cookies and Your Consumer Data Choices

We use Cookies, web beacons, and other tracking technologies (collectively **“Cookies”**) when you use our Sites. A Cookie is a small text file that our Sites save onto your computer or device when you use the Sites. The Cookies allow the Sites to remember your actions and preferences and recognize you or your browser. Web beacons are small graphics on a webpage that monitor your activity when viewing a webpage.

Most browsers automatically accept Cookies. You can disable this function by changing your browser settings, but disabling Cookies may impact your use and enjoyment of the Sites. You cannot disable all Cookies, such as Cookies that are essential to the functioning of the Sites. You can manually delete persistent Cookies, or Cookies that track your activity across websites, through your browser settings.

We describe below some of the tools we use on our Sites to collect information, including Personal Information, for Targeted Advertising and Analytics and how you can opt-out, customize ad preferences, or limit collection of use of Personal Information for those purposes.

TARGETED ADVERTISING AND ANALYTICS

We use Cookies to serve targeted advertising to you, using Google Double Click.

We use Google Analytics and other analytics and advertising tools to serve targeted advertising to you, to learn more about how our Sites are used and to improve our Sites.

- Google Analytics and Google Advertising Features. We use Google Analytics, a third-party data analytics service, to collect and process information about how you use the Sites. Google Analytics will set Cookies on your browser or device and then your web browser will automatically send information to Google Analytics. Google Analytics uses this information to provide us with reports that we use to better understand and measure how users interact with the Sites.

We have enabled and implemented the following Google Analytics Advertising Features: Remarketing with Google Analytics, and Google Beacons. To opt out of remarketing advertising provided through Google, to customize your ad preferences, or to limit Google's collection or use this information, visit Google's Safety Center and Google's Ad Settings and follow Google's personalized ad opt-out instructions. Opting out will not affect your use of the Sites.

For more information on how Google uses this data, visit Google's Privacy Policy and Google's page on How Google uses data when you use our partners' Sites or apps. To prevent this data from being used by Google Analytics, follow the instructions to download and install the Google Analytics Opt-out Browser Add-on for each web browser you use. Using the Google Analytics opt-out browser add-on will not prevent the Company from using other analytics tools and will not prevent Personal Information from being sent to the Sites or to Google.

10. Your Consumer Privacy Options

You have a number of options with regard to limiting the use of your Personal Information.

FOR OPT-OUT OF USE OF COOKIES.

You may reduce the number of advertisements by changing your preferences online. To change your preferences with respect to certain online ads and to obtain more information about third-party ad networks and online behavioral advertising, visit the National Advertising Initiative Consumer opt-out page Opt Out - NAI: Network Advertising Initiative (thenai.org) or the Digital Advertising Alliance Self-Regulatory Program. YourAdChoices.com | Consumer Assistance | WebChoices, AppChoices and YourAdChoices. Changing your settings with individual browsers or ad networks will not necessarily carry over to other browsers or ad networks. As a result, depending on the opt-outs you request, you may still see our ads.

MARKETING COMMUNICATIONS – OPT-OUT.

If you Opt-In to receive marketing communications from us, we will collect your name, email, mailing address, and phone number. We use this information to send you promotional and other electronic and hardcopy communications. We may use third-party providers to deliver communications to you. You may Opt-Out of such emails by using the unsubscribe link in the email or contacting us at Privacy@michaelbest.com with “Unsubscribe” in the subject line. To Opt-Out of other communications (e.g. postal marketing), please contact us by phone, e-mail or mail using the contact information below. Opting-Out of marketing communications does not opt you out of communications about your account or transactions.

11. Contact Us

If you have any questions, you may contact us as set forth below:

- By **e-mail** to: Privacy@michaelbest.com
- By **phone**: (262) 956-6560
- By **mail**, address your letter to:
Privacy Department, Two Riverwood Place, N19 W24133 Riverwood Drive, Suite 200,
Waukesha, WI 53188

12. Access From Outside the United States

If you access the Sites from outside the United States, please be aware that Personal Information may be transferred to, stored in, and processed in the United States. Certain governmental authorities may not consider the level of protection of Personal Information in the United States to be equivalent to that required by that of other jurisdictions.

13. Updates

We may update this Policy at any time. All changes will be effective immediately upon posting to the Sites. We will notify you of such updates by posting a notice at the top of the Policy or the Sites or communicating to you in another manner.

14. Terms Applicable to California Residents Only, Including Your California Privacy Rights

Under the California Consumer Privacy Act (“**CCPA**”), California residents have additional rights with regard to their Personal Information. We provide a summary of those rights below. In the event of a conflict between this Section and the remainder of this Policy, this Section shall take precedence for California residents. Certain capitalized terms not defined in this Policy have the meanings set forth in the CCPA.

CATEGORIES OF PERSONAL INFORMATION SOLD OR SHARED

In the last 12 months, we have not sold Personal Information within the meaning of the California Consumer Privacy Act. In the last 12 months, we have shared the following categories of Personal Information with certain third parties for targeted advertising and analytics. See the section above titled “Categories of Personal Information We Collect” for more detail on the type of Personal Information in each category.

- Internet Activity
- Geolocation

CATEGORIES OF PERSONAL INFORMATION DISCLOSED FOR A BUSINESS PURPOSE

In the last 12 months, we have disclosed the following categories of Personal Information to our service providers for business purposes. See the section above titled “Categories of Personal Information We Collect” for more detail on the type of Personal Information in each category.

- Identifiers
- Commercial Activity
- Client Records
- Internet Activity
- Audio, Electronic, and Video
- Geolocation
- Protected Class Information
- Educational Records
- Employment Records

YOUR CONSUMER PRIVACY RIGHTS.

Subject to certain limitations such as (a) exceptions permitted by applicable law and (b) verification of your identity, California residents may exercise the following privacy rights with regard to your Personal Information:

Right to know or access your Personal Information

California residents have a right to access any of the following which occurred on or after January 1, of 2022::

- The specific pieces of Personal Information that we collected from you;
- The categories of Personal Information that we collected from you;
- The categories of sources from which the Personal Information was collected;
- The categories of third parties to whom we have disclosed your Personal Information;
- The categories of Personal Information that we Sold or Shared for a Business Purpose and the categories of third parties to whom it was disclosed for a Business Purpose; and
- The Business or Commercial Purpose for collecting, sharing, or selling your Personal Information.

Right to Request Deletion

You have a right to request that we delete the Personal Information we collect from or about you.

Right to Correct Your Information

You have a right to request that we correct your inaccurate Personal Information. If you request that we correct inaccurate Personal Information about you, we will use commercially reasonable efforts to correct it. If necessary, we may ask that you provide documentation showing that the information we retained is inaccurate.

Right to Data Portability

You may request a copy of the Personal Information you previously provided to us in a portable form and, to the extent technically feasible, readily usable format.

Right to Non-Discrimination

You have a right to not receive discriminatory treatment for exercising any of your rights under the CCPA.

Universal Opt-Out Signals

If you are a California resident, our website automatically honors the **Global Privacy Control (GPC)** or other browser-based “universal opt-out preference” signals as legally valid consumer requests. This means:

- When your browser or privacy tool sends a GPC or similar signal, we treat it as an instruction to **opt out of the sale or sharing of your personal information** under California law.
- We honor this signal for at least **12 months**, unless you revoke it or reauthorize data sharing. [\[clarkhill.com\]](https://clarkhill.com)
- This is **in addition** to the “Do Not Sell or Share My Personal Information” and “Limit the Use of My Sensitive Personal Information” links available on our site.

HOW TO EXERCISE YOUR CALIFORNIA PRIVACY RIGHTS

If you are a California resident, you may exercise your privacy rights described in this Policy by submitting your request to us:

- By **e-mail** to: Privacy@michaelbest.com
- By **phone**: (262) 956-6560
- By **mail** by addressing your letter to: Privacy Department, Two Riverwood Place, N19 W24133 Riverwood Drive, Suite 200, Waukesha, WI 53188

Who May Exercise Your Rights. You may only make a request to exercise your rights on behalf of yourself. A parent or legal guardian may make a request on behalf of their child. If you are a California resident, a person that you authorize to act on your behalf may make a request related to your Personal Information. See the section titled "Authorized Agents" below for more information.

Verifiable Consumer Request. In order to verify your request, you must provide sufficient information that allows us to reasonably verify you are the person about whom we collected Personal Information, and you must describe your request with sufficient detail that allows us to properly understand, evaluate, and respond to it. To verify your identity, we may ask you to provide additional information. Any information you provide will only be used to verify your request. When seeking additional information from you, we may contact you through your account or the contact phone number or email address you provided in your request. If we cannot verify your identity, we may deny your request.

Authorized Agents. You may designate an authorized agent to make a request on your behalf to exercise your rights under the CCPA by doing the following: (1) provide the authorized agent written permission to do so; and (2) verify your own identity (per the process stated above), as well as the identity of the authorized agent directly (when authorizing the agent to exercise the right to delete, correct, know, or to port your data). We may deny a request from an authorized agent if we do not have proof that they are authorized by you to act on your behalf.

When We Will Respond. We will try to respond to your request within 45 days. If we require additional time, we will inform you of the reason and extension period. Any disclosures we provide to California residents will only cover the 12-month period preceding our receipt of your request.

NOTICE OF RIGHT TO OPT-OUT OF SALE OR SHARING OF PERSONAL INFORMATION

California residents may direct us not to Sell or Share their Personal Information at any time (this is your right to "opt-out").

You may submit your opt-out request by:

- **E-mail** to: Privacy@michaelbest.com
- **Phone:** (262) 956-6560
- **Mail** by addressing your letter to: Privacy Department, Two Riverwood Place, N19 W24133 Riverwood Drive, Suite 200, Waukesha, WI 53188

You may also submit a request through our [Do Not Sell or Share My Personal Information page](#).

Opt-Out Preference Signal. California residents may opt out of the sale or sharing of their Personal Information by broadcasting an Opt-Out Preference Signal, such as the Global Privacy Control (GPC) (on the browsers and/or browser extensions that support such a signal). To download and use a browser supporting the GPC browser signal, click here: <https://globalprivacycontrol.org/orgs>. If you choose to use the GPC signal, you will need to turn it on for each supported browser or browser extension you use.

If you are a California resident using an authorized agent to exercise your right to opt-out of the sale or sharing of Personal Information, please see the section entitled “Authorized Agents” above for the proof required when you use an authorized agent.

ADDITIONAL INFORMATION FOR CALIFORNIA RESIDENTS

Shine the Light. Pursuant to California Civil Code Section 1798.83, if you are a California resident you have the right to obtain: (a) a list of all third parties to whom we may have disclosed your Personal Information within the past year for direct marketing purposes, and (b) a description of the categories of Personal Information disclosed, by contacting us per the “Contact Us” section above.