

Revised/updated: November 11, 2020

# SYCAMORELEGAL.COM

## PRIVACY POLICY

This Privacy Policy (“Policy”) lists, and generally describes policies and procedures related to, information and data Sycamore Legal®, P.C. (“we,” “us,” “our,” “our company”) and/or its contractors collect from visitors to SycamoreLegal.com (our “Website”).

This Policy relates only to [SycamoreLegal.com](http://SycamoreLegal.com) and our company, not any third party site or service linked to our Website or recommended or referred by us or through our Website.

### A. Personal Information We Collect

We, and/or our contractors, collect and store any information you choose to put in an e-mail or contact form you send us, including your e-mail address, your name, and any other information you include. YOU SHOULD **NOT** SEND US POTENTIALLY PRIVILEGED OR CONFIDENTIAL INFORMATION VIA E-MAIL ADDRESSES LISTED AT THE WEBSITE, UNLESS YOU ARE ALREADY A SYCAMORE LEGAL®, P.C. CLIENT WITH AN ENGAGEMENT LETTER SIGNED BY BOTH YOU AND US. OTHERWISE, WE CAN'T PROMISE TO KEEP YOUR INFORMATION CONFIDENTIAL OR TO TREAT IT AS ATTORNEY-CLIENT PRIVILEGED.

We, and/or our contractors, also collect data on how our Website is used: for example, number of page visits and duration, type of browser. This “usage data” includes what some jurisdictions consider personal information, like visitors’ devices’ Internet Protocol (“IP”) addresses (which include general location).

Some of this usage data may come through “cookies,” and other technologies. A cookie is a string of data our system sends your device and then uses to identify that device when used to return to our Website. You can set up most browsers to refuse all cookies, or to notify you of any cookies you receive. (Do be aware that if you don’t accept certain cookies, you won’t be able to make as efficient use of many websites, including ours).

Our Website is not meant to collect data from anyone under age 18. If you know of children’s information collected through our Website, please contact us at [info@SycamoreLegal.com](mailto:info@SycamoreLegal.com).

### B. Our Use of Personal Information

We use your personal information to reply to messages you send us through via e-mail, and to otherwise correspond with you. Also, if you send us an e-mail, we may put your name and e-mail address and any other contact information you provide on our notices list(s), so that you get e-mail or other notice of future announcements from us. (You can unsubscribe when you receive one of those announcements, or at any time by contacting us at the e-mail address below.)

We use cookies and other technologies – including the personal information they collect – so that, for example, our Website can remember your device(s) and give you the information you’re

most likely to need. We also use information gained through cookies and other technologies to compile statistical information about use of our Website, such as the pages users visit most often, and for Website security.

*User Tracking and Do Not Track Notice:* Do Not Track (“DNT”) is a setting in a web browser (but for which there is no universal standard) that expresses a preference that websites not track your on-line behavior elsewhere. Our Website does not respond to DNT signals. We do not track Website users across other websites or devices; see Section E below, as to our contractors.

### **C. Retention of Personal Information**

We retain your personal information so long as it serves the purposes listed in this Privacy Policy, including to send you notices and e-mails, to collect and monitor traffic and other usage statistics at our Website, and to comply with our legal obligations.

### **D. Transfer of Data**

We may store or process your data outside your city, province, state, or country, including through one of our contractors (described below). So your personal information may be stored in a jurisdiction that operates under privacy and data protection laws different from (and potentially less protective than) those of your home jurisdiction.

### **E. Contractor and Other Third Party Access to Personal Information**

We may disclose personal information to attorneys or law enforcement authorities to address contract violations or illegal behavior, or to enforce our rights. We disclose information demanded in a court order, subpoena, or otherwise required by law, or to prevent harm to persons or property. We may share personal information in connection with a corporate transaction, like a merger or sale of our company, the sale of most of our assets, or a bankruptcy.

Certain contractors can access data we collect, including personal information. Notably:

#### *WordPress and Associated Contractors*

Our Website is hosted on the WordPress system, provided by a company called Automattic. All data collected through our Website is collected by WordPress’ computers. If you are interested in WordPress’ privacy practices, visit [WordPress.org](https://www.wordpress.org).

Our Website also uses “plugin” software from various third party contractors who serve WordPress users. We may change these plugins from time to time. These third parties may access data collected by or through WordPress at our Website.

#### *Mailchimp*

Our independent contractors may include Mailchimp, which may send e-mails for us. If you are interested Mailchimp’s privacy practices, visit [mailchimp.com](https://mailchimp.com).

Our contractors help with hosting and storage of this Website, monitoring Website use, and marketing to and communications with Website users. Except where stated to the contrary in this Policy, in some cases, particularly given the limited amount and type of information and data collected, we have not restricted those contractors' own use or disclosure of that information or data. We are not responsible for the conduct or policies of WordPress, Automatic, Mailchimp, or other contractors (including plug-ins). (This does not alter our responsibility as attorneys for our client's privileged information).

Finally, as noted above, we compile Website usage statistics from data collected such as through cookies. We may publish those statistics or share them with third parties.

## **F. Protection of Personal Information**

We do not directly store the personal information that may be included in usage data collected by cookies and other mechanisms on our Website – with two exceptions (described below). The data we don't store ourselves is collected and stored by our contractors, including WordPress, under their policies and procedures. See Section E, above, for information on those contractors and their policies.

We do store information you send us via e-mail and through contact forms (if any) (such as your contact information). We keep that information on password-protected computers and share it only with contractors who agree to use it only as we instruct.

Unfortunately, neither we nor any website can *guarantee* the security of personal information or other data, including during transmission and storage. Use of the Website is at your own risk.

## **G. Accessing and Correcting Your Contact Information**

You can access and change contact information we store about you by e-mailing us at [info@SycamoreLegal.com](mailto:info@SycamoreLegal.com).

## **H. Special Notices Related to Privacy Laws**

We provide this Policy in the interest of transparency to our Website users. Doing so is not intended to suggest, and does not mean that, legal responsibilities apply that would not otherwise. Legal protections for personal information (and even what information is governed) are not the same in all jurisdictions, inside and outside and among the United States, and are rapidly evolving and complex. Simply put, not all laws, including collection notice requirements, apply to all entities, individuals, or information, in all locations, or in all circumstances.

For example, Sycamore Legal®, P.C.'s Website is for business (not personal, family, or household use), and as such is not regulated by certain on-line privacy laws (such as California's Shine the Light law and Online Privacy Protection Act ("Cal-OPPA")). Additionally, it is not a "business" as so defined and regulated by the California Consumer Privacy Act ("CCPA"). Without conceding that either the CCPA or any data privacy law outside the United States (for example, those applying in the European Economic Area ("EEA"), Switzerland, the United Kingdom, or Brazil) applies to data including personal information collected through out Website:

1. We process (use) the personal information you give us by e-mailing us or in contact forms (e-mail address, other information you choose to provide) because, by contacting us and providing that information, you've authorized us to use it. We (and/or our contractors) process usage data, like number of page visits and IP addresses. That data is used for to, for example, understand usage of and manage our Website (our legitimate interest), and otherwise as described in and pursuant to your consent to this Policy. As noted elsewhere in this Policy, we also process personal information wherever we have a legal obligation, for instance, if it is subpoenaed.

2. Entities which the CCPA defines as a "business" have special obligations to Californians including, for example, to respond to requests "to know," for copies of "personal information" (as defined by the CCPA), and to delete it; to provide specific collection notices; *if* personal information is "sold," to post a "do not sell" link, and implement requests to opt-out of sale. Sycamore Legal®, P.C. is not a "business" required to do so by the CCPA.

3. Individuals in certain jurisdictions outside the United States (for example, "data subjects" in the EEA) have rights as to certain entities processing their "personal data" (for example, as defined by the European Union's General Data Protection Regulation ("GDPR")) including, for example, to access, update, or delete it; to have it altered if inaccurate or incomplete; to object to processing or request a company restrict how it is processed; to withdraw consent to processing; to receive a copy, in a structured, machine-readable, and commonly used format; to complain to a data protection authority (a government agency) about management of personal data. Sycamore Legal®, P.C. does not believe its Website's processing of limited personal data of those outside the United States (if any) brings it within the jurisdiction of these laws.

## **I. Amendment of This Privacy Policy**

We may change this Privacy Policy at any time by posting a new version on this page or on a successor page. The new version will become effective on the date it is posted, which will be listed at the top of the page as the new Effective Date. Via a "cookie banner" appearing each time the Website is accessed, users are invited to view (and are deemed to have accepted and agreed to) the Policy.

## **J. Contacting Us**

For questions about this Privacy Policy, including if you believe you have legal rights related to our Website to not addressed here (which requests we will evaluate and comply with to the extent required under then-applicable law), or to unsubscribe from communications, please contact us at [info@SycamoreLegal.com](mailto:info@SycamoreLegal.com). We strive to keep the Website reasonably accessible to users with disabilities, but feel free to contact us if you wish to request a reasonable accommodation. Finally, please do not provide us personal information about others unless you have their permission.