

RANDALL|DANSKIN, P.S.

PRIVACY AND DATA SECURITY POLICY

Updated October 28, 2019

As professionals engaged in the provision of legal services, Randall | Danskin, P.S., a Washington professional services corporation, including any affiliated partnerships (collectively, the “Firm”) is committed to protecting the privacy of confidential and “Personal Information” (i.e., information that directly or indirectly identifies individuals who may be clients, staff, agents, lawyers, law students, job applicants or others inside or outside the Firm). It has always been and remains the policy of the Firm to comply with the Rules of Professional Conduct, which impose upon lawyers and their employed staff a duty to preserve and protect confidential client information.

This Privacy and Data Security Policy (the “Policy”) will be applied in light of our overarching obligations to comply with law, to preserve client confidentiality and to represent our clients as effectively as possible within the bounds of the law, with the intent of promoting an effective balance between information security practices and business needs. This Policy is intended to summarize the Firm’s data protection practices generally, and to help the Firm meet its legal obligations and client expectations, to advise our clients, prospective clients, job applicants, website visitors and other third parties about the Firm’s privacy policy as the same may be applicable to them.

This Policy is also specifically addressed to parties outside the Firm who provide Personal Information to the firm or who visit or use the Firm’s website, payment portals, data rooms, apps and social media sites, extranets, as well as those who communicate with employed attorneys and staff of this firm via electronic mail messages (collectively, the “Internet Services”). This Policy also describes how the Firm collects, processes and discloses Personal Information in connection with the provision of legal services and the Internet Services.

From time to time, the Firm may implement different levels of security controls for different information assets, based on risk and other considerations.

Collection and Use of Personal Information

The Firm collects Personal Information in the course of providing legal services to clients and as provided by visitors to its website or users of Internet Services. We may also collect Personal Information about you when you interact with us and other third parties on social media sites and we may also automatically collect information that may contain Personal Information as described below in the “Cookie Policy”.

Where doing so is in furtherance of the provision of our legal services or otherwise in our legitimate interests, we may use that Personal Information for the following purposes:

- to contact you and respond to your requests and inquiries;

- to personalize your visit and use of our Internet Services and to assist you while you use those services;
- to carry out, monitor and analyze our business or Internet Services;
- to conduct our recruiting and selection processes;
- to provide you with legal services, if you are or become a client of the firm, and otherwise deal with you and administer the matters that you instruct us on;
- to contact you (unless you tell us that you prefer us not to contact you) regarding legal or law firm developments that may be of interest to you;
- to enter into or carry out contracts of various kinds; or
- to comply with applicable laws, regulations, guidance or professional obligations that we may be subject to, including anti-money laundering requirements.

Where Personal Information is necessary for the Firm to carry out its anti-money laundering checks, failure to provide such information may result in the Firm not being able to provide or continue the representation.

Confidentiality, Security and Retention of Personal Information

Consistent with our professional obligations, it has always been the policy of the Firm to exercise the utmost discretion regarding the information our clients entrust to us. To that end, we maintain reasonable and appropriate, albeit not infallible, physical, electronic and procedural safeguards intended to maintain the confidentiality of Personal Information, including that provided by a visitor to this website and provided while using other Internet Services.

Also, we require consultants, suppliers and vendors to maintain data protection consistent with reasonable and appropriate obligations of data processors. We maintain information provided by you, including Personal Information, for as long as necessary to comply with our legal obligations or to achieve the purposes for which the information was originally collected, for purposes of maintaining appropriate records of the prior representations of this Firm to assist in the identification and avoidance of conflicts of interest, and for other legally permissible purposes not inconsistent with the duties owing to our clients. We do not, in any manner, guarantee that such safeguards will provide perfect protection of Personal Information.

Disclosure and Transfer of Personal Information

We do not disclose any Personal Information to unrelated parties outside of the Firm, except in very limited circumstances. Such circumstances include disclosures to our agents or data processors or other contractors acting on our behalf and at our direction, subject to appropriate confidentiality, privacy and information security commitments provided by the

receiving party, or where we believe it necessary to provide a service that you have requested, or as permitted or required by law or as otherwise authorized or directed by you. Consistent with our professional obligations, we may provide Personal Information to regulatory authorities and law enforcement officials in accordance with applicable law or when we otherwise believe in good faith that the provision of such information is required or permitted by law, such as in connection with the investigation and assertion of our legal defenses or for our compliance matters.

Cookie Policy

A cookie is a text file sent by a web server and placed on your computer by your web browser. Cookies can be usefully divided into two different types: session and persistent. Session cookies differ from persistent cookies primarily in that session cookies are temporary and expire and are normally deleted when you close your browser. Persistent cookies, in contrast, remain stored on your computer after you close your browser until they are deleted either because they expire or you delete them. The Firm uses session cookies in connection with its Internet Services.

The Firm uses session cookies in connection with its Internet Services, specifically, the cookie is used to store and identify a user's unique identification for the purpose of managing use sessions on the website. This cookie should not persist over time and should be deleted when all the browser windows from that session of usage of Internet Services are closed.

Although the Firm uses the services of third parties in connection with these cookies, we do not allow the third party service provider to use Personal Information about the users of our Internet Services. The Firm does not use Google Analytics.

None of these cookies are strictly necessary to access our Internet Services. You may reset your browser to refuse all cookies or to allow your browser to alert you when a cookie is set. However, certain parts of the Internet Services may function differently and not as well when cookies are not enabled. Unless you have adjusted your browser setting so that it will refuse cookies, our Internet Services will issue cookies when you logon to the Firm's Internet Services. For more information about how to manage your cookie preferences, you should use the "help" menu on your web browser or explore the customer support sections of your web browser. Please note that you need to configure each browser on each device that you use if you wish to opt-out or block some or all cookies. If you do not wish to receive advertising cookies, you may wish to visit the Network Advertising Initiative (NAI) website (<https://www.networkadvertising.org>) and the Digital Advertising Alliance (DAA) website (<https://www.digitaladvertisingalliance.org>).

Do Not Track Signals

"Do Not Track" signals are options available on your browser to tell operators of websites that you do not wish to have your online activity tracked. Our websites operate no differently if these "Do Not Track" signals are enabled or disabled. Our Internet Services are not

intended allow any third parties to collect Personal Information about your online activities over time or across websites for their own purposes.

Children

In order to respect the privacy of minors, the Firm does not knowingly collect, maintain or process Personal Information submitted online via our Internet Services by anyone under the age of 18. To the extent the Firm collects Personal Information on minors in the context of one of the purposes mentioned in this Policy, the Firm will only knowingly do so with the appropriate consent or as otherwise permitted under applicable laws.

Third Party Marketing

This Firm does not knowingly or intentionally engage in any third party marketing practices in relation to the use of our Internet Services. The Firm does not sell or share your Personal Information with third party companies for their direct marketing purposes.

Changes

The Firm reserves the right to change this Policy at any time without advance notice. Should any new policy go into effect for our Internet Services, the Firm will post it on this website and relevant Internet Services.

Contact Us

The Firm's Management Committee and its IT Coordinator serve as points of contact for answering questions, accessing, amending or correcting your information and resolving issues and disputes concerning the use of our Internet Services and this Policy. If you have any questions relating to our use of your Personal Information, please contact the Firm by e-mail at info@randalldanskin.com. Also, please feel free to contact this Firm via telephone at 509-747-2052 and request to speak with our IT Coordinator.