

PRIVACY NOTICE FOR CALIFORNIA RESIDENTS

Last Updated: 6/5/25

Kean Miller LLP (“Kean Miller” or “we”/“our”/“us”) takes data privacy seriously. In addition to our general [Privacy Policy](#), if you are a California resident and the California Consumer Privacy Act (CCPA) applies to you, this California Privacy Notice will apply. Pursuant to the CCPA we are providing the following additional details regarding the collection, use, and disclosure of personal information about California residents. In the event of any conflict with our general [Privacy Policy](#), this California Privacy Notice will take precedence.

I. Categories of Personal Data, Purposes for Collection, Categories of Third Party for Disclosure or Sharing, and Retention

Below are the categories of personal information that we have collected and disclosed for a business purpose or shared with third parties in the past twelve (12) months:

Categories of Personal Information We May Collect, Disclose, or Share	Purposes for Collection / Use	Applicable California Residents	Categories of Third Parties To Whom PI May Be Disclosed or Shared	Retention Period
Name, contact details, and other demographic information (e.g., name, email address, mailing address, phone number, driver’s license number, and emergency contact information)	To fulfill or meet the reason for which the information is provided; to provide you with information or services that you request from us or to remove you from our direct or indirect marketing, based on your preferences; to provide you with email or direct mail alerts and other notices	Clients, Website visitors, Contractors, Employees, Applicants	Service providers, state bar associations, legal support vendors, opposing counsel, witnesses and potential witnesses, court reporters, regulators, courts, mediators, and government/law enforcement	We will retain your personal information only as long as necessary to fulfill the purposes for which it was collected, including for the purpose of satisfying legal, accounting, or auditing, or other internal policies and requirements.

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	concerning our services, or events or news, that may be of interest to you; to contact you by telephone, if you have provided a contact number, to provide you with information or services that you have requested; to carry out our obligations and enforce our rights arising from any contracts entered into between you and us, including performing client due diligence, anti-money laundering, anti-bribery, sanctions or reputational risk screening, identifying conflicts of interests; for fraud prevention, billing and collections; as necessary or		where necessary	

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	<p>appropriate to protect the rights of our clients or others ; to respond to law enforcement requests and as required by applicable law, court order, or governmental regulations.</p> <p>We also collect this information for our internal analysis purposes and other internal uses that are reasonably aligned with consumer expectations based on your relationship with us.</p>			
Personal information categories listed in the California Customer Records statute (Cal. Civ. Code § 1798.80(e)) (e.g., A name, signature, Social Security number, physical	To fulfill or meet the reason for which the information is provided; to provide you with information or	Clients, Website visitors, Contractors, Employees, Applicants	Service providers, collaborators, government/law enforcement where necessary	We will retain your personal information only as long as necessary to fulfill the purposes for

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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.)	services that you request from us or to remove you from our direct or indirect marketing, based on your preferences; to provide you with email or direct mail alerts and other notices concerning our services, or events or news, that may be of interest to you; to contact you by telephone, if you have provided a contact number, to provide you with information or services that you have requested; to carry out our obligations and enforce our rights arising from any contracts entered into between you and us, including performing client due diligence,			which it was collected, including for the purpose of satisfying legal, accounting, or auditing, or other internal policies and requirements.

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	<p>anti-money laundering, anti-bribery, sanctions or reputational risk screening, identifying conflicts of interests; for fraud prevention, billing and collections; as necessary or appropriate to protect the rights of our clients or others ; to respond to law enforcement requests and as required by applicable law, court order, or governmental regulations.</p> <p>We also collect this information for our internal analysis purposes and other internal uses that are reasonably aligned with consumer expectations</p>			

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	based on your relationship with us.			
Protected classification characteristics under California or federal law (e.g., 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))	Normal business operations, including administering of employee benefits, employee communications, diversity initiatives, compliance with legal obligations, and identity verification. We also collect this information for our internal analysis purposes and other internal uses that are reasonably aligned with consumer expectations based on your relationship with us.	Employees and Applicants	Service providers, collaborators, diversity certification entities, search firms and headhunters, law schools, opposing counsel, witnesses and potential witnesses, mediators, court reporters, regulators, courts, and government/law enforcement where necessary	We will retain your personal information only as long as necessary to fulfill the purposes for which it was collected, including for the purpose of satisfying legal, accounting, or auditing, or other internal policies and requirements.
Commercial information (e.g., records	To carry out our obligations and	Clients	Service providers,	We will retain your personal

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of services purchased, obtained, or consider, or other purchasing or consuming histories)	enforce our rights arising from any contracts entered into between Kean Miller and you, including for fraud prevention, billing and collections; to fulfill or meet the reasons for which the information is provided; to provide you with email or direct mail alerts and other notices concerning our services, or events or news, that may be of interest to you; as necessary or appropriate to protect the rights of our clients or others; to respond to law enforcement requests and as required by applicable law, court order, or governmental regulations; to		collaborators, government/law enforcement where necessary	information only as long as necessary to fulfill the purposes for which it was collected, including for the purpose of satisfying legal, accounting, or auditing, or other internal policies and requirements.

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	<p>ensure that we are paid – to recover any payments due to us and where necessary to enforce such recovery through the engagement of debt collection agencies or taking other legal action (including the commencement and carrying out of legal and court proceedings). We also collect this information for our internal analysis purposes and other internal uses that are reasonably aligned with consumer expectations based on your relationship with us.</p>			
Internet or similar network activity (e.g.,	To provide you with email or	Clients, Website	Service providers,	We will retain your personal

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browsing history, search history, information on a consumer's interaction with a website, application, or advertisement)	direct mail alerts and other notices concerning our products or services, or events or news that may be of interest to you; to improve our Website and present its contents to you; for testing, research, analysis, and product development; as necessary or appropriate to protect the rights of our clients and others; in connection with ensuring the security of our computing systems and network; to respond to law enforcement requests and as required by applicable law, court order, or governmental regulations. We	Visitors, Employees	collaborators, government/law enforcement where necessary	information only as long as necessary to fulfill the purposes for which it was collected, including for the purpose of satisfying legal, accounting, or auditing, or other internal policies and requirements.

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	also collect this information for our internal analysis purposes and other internal uses that are reasonably aligned with consumer expectations based on your relationship with us.			
Geolocation data (e.g., physical location or movements)	As necessary or appropriate to protect the rights of clients or others; in connection with ensuring the security of our computing system and network; to respond to law enforcement requests as required by applicable law, court order, or governmental regulations.	Employees	Service providers, collaborators, government/law enforcement where necessary	We will retain your personal information only as long as necessary to fulfill the purposes for which it was collected, including for the purpose of satisfying legal, accounting, or auditing, or other internal policies and requirements.

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Audio, electronic, visual, and similar information	To fulfill or meet the reason for which the information is provided; normal business operations including communications with clients, related to HR knowledge management, maintenance of employment records, and attorney case management.	Clients, Employees, Applicants, Contractors	Service providers, legal support vendors, opposing counsel, witnesses and potential witnesses, court reporters, regulators, courts, mediators, and legal authorities	We will retain your personal information only as long as necessary to fulfill the purposes for which it was collected, including for the purpose of satisfying legal, accounting, or auditing, or other internal policies and requirements.
Sensory data (e.g., thermal)	Health and safety purposes.	Clients, Employees, Applicants that visited a Kean Miller office in-person	Service providers, where necessary	We do not retain this information.
Professional or employment-related information (e.g., current or past job history or performance evaluations)	To fulfill or meet the reason for which the information is provided; normal business operations including related	Employees, Applicants, and Contractors	Service providers, legal support vendors, opposing counsel, witnesses and potential witnesses, court	We will retain your personal information only as long as necessary to fulfill the purposes for which it was

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	to HR, training and performance, salary review, talent and skills management, HR knowledge management, HR case management, and maintenance of employment records.		reporters, regulators, courts, mediators, and legal authorities	collected, including for the purpose of satisfying legal, accounting, or auditing, or other internal policies and requirements.
Non-public education information (per the Family Educational Rights and Privacy Act) (e.g., 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.)	Normal business operations including related to HR, training and performance, talent and skills management, HR knowledge management, HR case management, and maintenance of employee records.	Applicants	Service providers, collaborators, government/law enforcement where necessary	We will retain your personal information only as long as necessary to fulfill the purposes for which it was collected, including for the purpose of satisfying legal, accounting, or auditing, or other internal policies and requirements.

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Inferences drawn from other personal information (e.g., inferences drawn from any of the information above to make a profile of a California resident, including preferences, behavior, characteristics, and attitudes.)	To fulfill or meet the reason for which the information is provided; as generated in the providing of legal services; Normal business operations including related to HR, training and performance, salary review, talent and skills management, HR knowledge management, HR case management, and maintenance of employment records. We may use electronic systems to assist humans in making some of these uses, and in making inferences drawn from any of the information identified above to create a	Clients, Employees, Applicants	Service providers, legal support vendors, opposing counsel, witnesses and potential witnesses, court reporters, regulators, courts, mediators, and legal authorities, where necessary	We will retain your personal information only as long as necessary to fulfill the purposes for which it was collected, including for the purpose of satisfying legal, accounting, or auditing, or other internal policies and requirements.

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	profile about an employee reflecting the employee's preferences, characteristics, psychological trends, predispositions, behavior, attitudes, intelligence, abilities, and aptitudes. We also collect this information for our internal analysis purposes and other internal uses that are reasonably aligned with consumer expectations based on your relationship with us			
Sensitive Personal Information (e.g., social security, driver's license, state identification card, or passport number; financial account, debit	Performing client due diligence/"know your client", anti-money laundering,	Clients, Employees, Applicants	Service providers, legal support vendors, opposing counsel, witnesses and	We will retain your personal information only as long as necessary to fulfill the

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card, or credit number; precise geolocation; racial or ethnic origin, religious or philosophical beliefs, or union membership; the contents of mail, email, and text messages, unless we are the intended recipient of the communication; <u>sexuality or citizenship or immigration status</u> , personal information collected and analyzed concerning your health; <u>mental or physical health diagnosis; data of a known child under 13</u> ; or personal information collected and analyzed concerning your sexual orientation.)	antibribery, sanctions or reputational risk screening, identifying conflicts of interest, performing expected services; short transient use; servicing accounts; and processing payments. Personal data provided to us by or on behalf of our clients or generated by us in the course of providing our services, which may, where relevant, include special categories of personal data; for fraud prevention; normal business operations, including administering your benefits, and		potential witnesses, court reporters, regulators, courts, mediators, and legal authorities, where necessary	purposes for which it was collected, including for the purpose of satisfying legal, accounting, or auditing, or other internal policies and requirements.

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	communicating with you, diversity initiatives, compliance with legal obligations, and identity verification; to respond to law enforcement requests and as required by applicable law, court order, or governmental regulations.			

In addition to the chart above, we may use, disclose, or share your information:

- As described to you when collecting your personal information or as otherwise set forth in the CCPA.
- To evaluate or conduct a merger, divestiture, restructuring, reorganization, dissolution, or other sale or transfer of some or all of our assets, whether as a going concern or as a part of bankruptcy, liquidation, or similar proceeding, in which personal information held by us is among the assets transferred.

We will not collect additional categories of or use the personal information we collected for materially different, unrelated, or incompatible purposes without providing you notice. We do not use or disclose sensitive personal information for purposes other than those specified in the law or regulations.

We do not “sell” Personal Information, including Sensitive Personal Information, and we do not “share” Personal Information, including Sensitive Personal Information, for purposes of cross-context behavioral advertising, as defined under the CCPA. We have not engaged in such activities in the preceding 12 months.

II. Your Rights in Your Personal Data

California residents have certain rights in their data, including:

- (A) **Right to know** what personal information we have collected about you, including the categories of personal information, the categories of sources from which the personal information is collected, the business or commercial purpose for collecting, selling, or sharing personal information, the categories of third parties to whom the business discloses personal information, and the specific pieces of personal information we have collected about you.
- (B) **Right to delete** personal information we have collected from you, subject to certain exceptions.
- (C) **Right to correct** inaccurate personal information we maintain about you.
- (D) If we sell or share personal information (which Kean Miller does not), the **right to opt-out of the sale or sharing** (information for cross-context behavioral advertising purposes) of their personal information by us.
- (E) If we use or disclose sensitive personal information for reasons other than those set forth in the law or regulations, the **right to limit the use or disclosure of sensitive personal information** by us.
- (F) The right to not receive discriminatory treatment by us for exercise of privacy rights conferred by the CCPA, including a California employee's, applicant's, or independent contractor's right to not be retaliated against for the exercise of their CCPA rights.

If you opt to exercise your privacy rights, we are required to first verify your identity. This may require us to ask you certain questions to confirm your identity or require you to provide state-issued identification. If you make a deletion request, we may ask you to verify your request before deleting your personal information.

To submit any of the above requests, please send an email to privacy@keanmiller.com with the subject line "Data Subject Request" providing the following information:

- Whether you are making the request on behalf of yourself or another person. If you are an authorized agent making a request for another person, please provide documentation confirming that authority.
- Which of the following types of requests you are making:
- Your first and last name
- Your mailing address

- Your email address
- A telephone number, if you consent to us contacting you via telephone
- A short description of your relationship to Kean Miller
- If known, what personal information you anticipate that Kean Miller is holding on you

You may also call us at 1-800-688-3513 to make the request and provide the above information. We will endeavor to respond to your request within 45 days.

VI. California Limitations

The requests addressed in this California supplement apply only to California residents. Kean Miller, in its discretion, may choose to respond to requests from residents of other states, but is not legally required to do so under the CCPA.

If you are a current or former Kean Miller client, Kean Miller's professional ethical obligations govern the production of your file. Please contact your Kean Miller attorney contact or complete our [online contact form](#) concerning any client file requests.