

PRIVACY NOTICE FOR TEXAS 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 Texas resident and the Texas Data Privacy and Security Act (TDPSA) applies to you, this Texas Privacy Notice will apply. Pursuant to the TDPSA we are providing the following additional details regarding the collection, use, and disclosure of personal information about Texas residents. In the event of any conflict with our general [Privacy Policy](#), this Texas Privacy Notice will take precedence.

Please note that the TDPSA does not cover personal information collected in business-to-business transactions or in the employment or offers for employment context.

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 Texas 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	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	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

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	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, anti-money laundering, anti-bribery, sanctions or reputational risk screening, identifying conflicts of		enforcement where necessary	policies and requirements.

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	<p>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 based on your relationship with us.</p>			
Additional Personal information	To fulfill or meet the reason for	Clients, Website	Service providers,	We will retain your personal

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<p>categories(e.g., A name, signature, Social Security number, physical 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.)</p>	<p>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 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</p>	<p>visitors, Contractors, Employees, Applicants</p>	<p>collaborators, government/law enforcement where necessary</p>	<p>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.</p>

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	<p>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 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</p>			

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	purposes and other internal uses that are reasonably aligned with consumer expectations based on your relationship with us.			
Commercial information (e.g., records of services purchased, obtained, or consider, or other purchasing or consuming histories)	To carry out our obligations and 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	Clients	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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	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 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).			

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Internet or similar network activity (e.g., browsing history, search history, information on a consumer's interaction with a website, application, or advertisement)	To provide you with email or 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	Clients, Website Visitors, 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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	<p>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.</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>			

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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.
Inferences drawn from other personal information (e.g., inferences drawn from any of the information above to make a profile of a Texas 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	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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	<p>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 profile about an employee reflecting the employee's preferences, characteristics, psychological trends, predispositions, behavior, attitudes, intelligence, abilities, and aptitudes.</p> <p>We also collect this information for our internal analysis purposes and</p>			

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	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 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</u> ; <u>data of a known child under 13</u> ; or	Performing client due diligence/"know your client", anti-money laundering, 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	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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personal information collected and analyzed concerning your sexual orientation.)	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 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 TDPSA.
- 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 TDPSA. We have not engaged in such activities in the preceding 12 months.

II. Your Rights in Your Personal Data

Texas 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 (which Kean Miller does not), the **right to limit the use or disclosure of sensitive personal information** by us.
- (F) **Right to opt-out of targeted advertising or profiling** in furtherance of a decision that produces a legal or other significant effect on the consumer.

- (G) The right to not receive discriminatory treatment by us for exercise of privacy rights conferred by the TDPSA.

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.

III. How to Appeal

IN THE EVENT THAT WE DENY YOUR REQUEST, YOU MAY APPEAL OUR DECISION BY CALLING TOLL FREE AT 1-800-688-3513 OR EMAIL PRIVACY@KEANMILLER.COM FOR ASSISTANCE. PLEASE NOTE THAT FOR YOUR PROTECTION, CERTAIN REQUESTS SENT TO US WILL BE SUBJECT TO A VERIFICATION PROCESS THAT MAY REQUIRE YOU TO PROVIDE INFORMATION THAT WE HAVE IN OUR FILES. YOU MAY CONTACT THE TEXAS ATTORNEY GENERAL IF YOU HAVE ANY CONCERNS ABOUT THE RESULTS OF YOUR APPEAL AT <https://oag.my.salesforce-sites.com/CPDOnlineForm>.

IV. Texas Limitations

The requests addressed in this Texas supplement apply only to Texas 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 TDPSA.

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.