

Davis Wright Tremaine LLP In-House Gateway to Good Privacy Policy

July 14, 2023

About DWT's Pro Bono & Social Impact Department

The DWT Pro Bono & Social Impact Department's "In-House Gateway to Good" is a first-of-its-kind platform that connects DWT attorneys and staff and in-house legal department attorneys and staff with curated pro bono opportunities, a way to measure achievements, early access to CLE and pro bono and social impact events, step-by-step guides for developing world-class in-house pro bono programs, connect to other in-house legal departments' leadership through a community chat function, and more.

Scope of this Policy

This privacy policy applies to:

- Davis Wright Tremaine ("DWT," "we," "us," "our") Pro Bono & Social Impact Department's In-House Gateway to Good platform and other online properties (including our website and/or mobile applications that link to it), our social media pages or handles, and our services (the "Services").
- This Policy does not apply to interactions with DWT outside the scope of the Gateway to Good platform. Please see the general DWT Privacy Policy [here](#).

This Policy applies when you interact with us through our Services or contact us (including via email) in the context of the Gateway for Good platform. It also applies anywhere it is linked. It does not apply to third-party websites, mobile applications, or services that may link to the Services or be linked to from the Services. Please review the privacy policies on those websites and applications directly to understand their privacy practices.

We may change this Policy from time to time. If we do, we will notify you by posting the updated version.

Information We Collect

We collect information from you directly, from the devices you use to interact with us, and from third parties. We may combine information from the Services together and with other information we obtain. We may use and share information that we aggregate (compile to create statistics that cannot identify a particular individual) or de-identify (strip information of all unique identifiers such that it cannot be linked to a particular individual) at our discretion.

Information you or your organization gives us

You or your organization may provide the following information to us directly:

- Contact and professional information, including first and last name, email address, telephone number, and job title, as well as company name and size.
- Demographic information.
- Audiovisual information, including user photos and recordings of online events.
- Content you may include in survey responses.
- Information you make available to us via a social media platform.

- Any information or data you provide by interacting in our online forums and chatrooms, or by commenting on content posted on our Services. Please note that these comments are also visible to other users of our Services.
- Any other information you submit to us.

Information we collect automatically

We and partners working on our behalf may use log files, cookies, or other digital tracking technologies to collect the following information from the device you use to interact with our Services.

- *Device information*, including IP address, device identifiers, and details about your web browser.
- *Analytical information*, including details about your interaction with our website, app, and electronic newsletters.
- *Diagnostic information*, including web traffic logs.

The following is a list of our partners who collect the information described above. Please follow the links to find out more information about the partner’s privacy practices.

Partner	Information Type Collected
Azure	<ul style="list-style-type: none"> • Device information • Analytic information • Diagnostic information

How We Use Your Information

We may use any of the information we collect for the following purposes.

- **Service functionality:** To provide you with our services, including service communications (e.g., registration emails, reminders, alerts), and conduct general operations, such as recordkeeping and audits.
- **Service improvement:** To improve and grow our Services, including to develop new pro bono services (e.g., partnerships, collaborations, and platform enhancements) and understand how our Services are being used, and the effectiveness of our marketing.
- **Personalization:** To offer you recommendations and tailor the Services to your preferences.
- **Security:** To protect and secure our Services, assets, network, and operations, and to detect, investigate, and prevent activities that may violate our policies or be fraudulent or illegal.
- **Legal compliance:** To comply with legal process, such as warrants, subpoenas, court orders, and lawful regulatory or law enforcement requests and to comply with applicable legal requirements.

How We Share Your Information

We may share any of the information we collect with the following recipients.

- **Service providers:** We may engage vendors to perform specific functions on our behalf, and they may receive information about you from us or collect it directly. These vendors are obligated by contract to use information that we share only for the purpose of providing these functions, which include:
 - *Supporting Service functionality*, such as vendors that support event registration, application development, and communications (email).
 - *Professional services consultants*, such as firms that perform analytics, provide legal services, or supply project-based resources and assistance.
 - *Analytics services*, including entities that analyze traffic on our online properties.

- *Security vendors*, such as entities that assist with security incident verification and response, service notifications, and fraud prevention.
- *Information technology vendors*, such as entities that assist with website design, hosting and maintenance, data and software storage, and network operation.
- *Marketing vendors*, such as entities that support distribution of marketing emails.
- **Government entities/Law enforcement:** We may share information when we believe in good faith that we are lawfully authorized or required to do so to respond to lawful subpoenas, warrants, court orders, or other regulatory or law enforcement requests, or where necessary to protect our property or rights or the safety of our employees or other individuals.

Security

We use a combination of physical, technical, and administrative safeguards to protect the information we collect through the Services. While we use these precautions to safeguard your information, we cannot guarantee the security of the networks, systems, servers, devices, and databases we operate or that are operated on our behalf.

Your Options and Rights Regarding Your Information

Your Account: Please contact us if you would like to update your account information.

Email Unsubscribe: If you do not wish to receive marketing information from us or wish to opt out of future email promotions from us, please contact us. Please note that all promotional email messages you receive from us will include an option to opt out of future email communications.

Do Not Track: Your browser or device may include "Do Not Track" functionality. The information collection and disclosure practices and the choices that we provide to you will continue to operate as described in this privacy policy regardless of whether a Do Not Track signal is received.

Jurisdiction-specific rights: You may have certain rights with respect to your personal information depending on your location or residency. Please see "privacy disclosures for specific jurisdictions" below. Please contact us to exercise your rights.

Other Important Information

Data retention

We may store information about you for as long as we have a legitimate organizational need for it.

Cross-border data transfer

We may collect, process, and store your information in the United States and other countries. The laws in the United States regarding information may be different from the laws of your country. Any such transfers will comply with safeguards as required by relevant law.

Information about children

The Services are intended for users age thirteen and older. We do not knowingly collect information from children. If we discover that we have inadvertently collected information from anyone younger than the age of 13, we will delete that information. Please contact us with any concerns.

Privacy Disclosures for Specific Jurisdictions

European Economic Area, United Kingdom, and Switzerland

We process "personal data," as that term is defined in the European Union's General Data Protection Regulation ("GDPR").

Your rights under the GDPR: Users who are located in the European Economic Area ("EEA"), U.K., or Switzerland have the right to lodge a complaint about our data collection and processing actions with the supervisory authority concerned. Contact details for data protection authorities are available here:

http://ec.europa.eu/justice/data-protection/bodies/authorities/index_en.htm.

If you are located in the EEA, U.K., or Switzerland, you have the following rights.

- **Access and Portability:** Request access to personal data we hold about you or request transmission of your data to a third party.
- **Correction:** Request that we rectify inaccurate or incomplete personal data we store about you.
- **Erasure:** Request that we erase personal data when such data is no longer necessary for the purpose for which it was collected, when you withdraw consent and no other legal basis for processing exists, or when you believe that your fundamental rights to data privacy and protection outweigh our legitimate interest in continuing the processing.
- **Restriction of processing:** Request that we restrict our processing of personal data if there is a dispute about the accuracy of the data; if the processing is unlawful; if the processing is no longer necessary for the purposes for which it was collected but is needed by you for the establishment, exercise or defense of legal claims; or if your request to object to processing is pending evaluation.
- **Objection to processing:** Object to processing of your personal data based on our legitimate interests or for direct marketing (including profiling). We will no longer process the data unless there are compelling legitimate grounds for our processing that override your interests, rights, and freedoms, or for the purpose of asserting, exercising, or defending legal claims.
- **Transfers:** Obtain information about and a copy of the safeguards we use to transfer personal data across borders.

Please contact us to exercise these rights.

California

Your California Privacy Rights; "Shine the Light" Law

We do not share your personal information with third parties for those third parties' direct marketing purposes.

California Consumer Privacy Act

The California Consumer Privacy Act ("CCPA") provides California residents with rights to receive certain disclosures regarding the collection, use, and disclosure of information about them, as well as rights to know/access, correct, delete, and limit disclosure of personal information. You have the right to be free from discrimination based on your exercise of your CCPA rights. To the extent that we collect personal information that is subject to the CCPA, that information, our practices, and your rights are described below.

Notice at Collection Regarding the Categories of Personal Information Collected

You have the right to receive notice of certain information about our data collection, use, and disclosure. The following table summarizes the categories of personal information we collect; the categories of sources of that information; whether we disclose, sell, or share that information to service providers or third parties, respectively; and the criteria we use to determine the retention period for such information. The categories we use to describe

personal information are those enumerated in the CCPA. We collect this personal information for the purposes described above in “How We Use Your Information.”

Category	Information Type	Source	We disclose to:	We sell to/share with:
Identifiers	<ul style="list-style-type: none"> Contact information or personal characteristics (name; email address; postal address; telephone number; job title; signature) Social media handles 	You; our social media pages; third party subscription service providers	Service Providers	Not sold/shared
Geolocation Information	<ul style="list-style-type: none"> Coarse (information that describes location at ZIP code-level or less precision) 	You; our analytics	Service Providers	Not sold/shared
Internet or Electronic Network Activity Information	<ul style="list-style-type: none"> IP address Device identifier (e.g., MAC) Advertising identifier (e.g., IDFA, AAID) Information provided in URL string (e.g., search keywords) Cookie or tracking pixel information Information about your interaction with our website, app, email correspondence, or products Browsing history Search history Diagnostic information (e.g., crash logs, performance data) 	You; our analytics	Service Providers	Not sold/shared
Audio, Electronic, Visual, Thermal, Olfactory, or Similar Information	<ul style="list-style-type: none"> Call recordings Photographs Video 	You	Service Providers	Not sold/shared
Professional or Employment-Related Information	<ul style="list-style-type: none"> Current employer Job title 	You	Service Providers	Not sold/shared
Content of Communications	<ul style="list-style-type: none"> Contents of community messaging platform Photos 	You	Service Providers	Not sold/shared

We determine the retention period for each of the categories of personal information listed above based on (1) the length of time we need to retain the information to achieve the pro bono and social impact purpose for which it was obtained, (2) any legal or regulatory requirements applicable to such information, (3) internal operational needs, and (4) any need for the information based on any actual or anticipated investigation or litigation.

Entities to whom we disclose information for pro bono and social impact purposes are *service providers*, which are companies that we engage to conduct activities on our behalf. We restrict service providers from using personal information for any purpose that is not related to our engagement.

Entities to whom we “sell” or with whom we “share” information are *third parties*. Under the CCPA, a business “sells” personal information when it discloses personal information to a company for monetary or other benefit. A company may be considered a third party either because we disclose personal information to the company for something other than an enumerated business purpose under California law, or because its contract does not restrict it from using personal information for purposes unrelated to the service it provides to us. An organization

"shares" personal information when it discloses personal information to a company for purposes of cross-context behavioral advertising. We do not sell or share your personal information.

Your rights under the CCPA

- *Know and request access to and correction or deletion of personal information:* You have the right to request access to personal information collected about you and information regarding the source of that personal information, the purposes for which we collect it, and the third parties and service providers to whom we sell, share, or disclose it. You also have the right to request in certain circumstances that we correct personal information that we have collected about you and to delete personal information that we have collected directly from you. Please contact us to exercise these rights.

Residents of the States of Colorado, Connecticut, Utah, and Virginia have the following rights:

- *Confirm processing of and access to personal information* under certain circumstances.
- *Correct personal information* under certain circumstances. (Residents of Colorado, Connecticut, and Virginia only.)
- *Delete personal information* under certain circumstances.

Residents of these states can exercise their rights by contacting us at using one of the methods listed below.

Nevada

Residents of the State of Nevada have the right to opt out of the sale of certain pieces of their information to third parties. Currently, we do not engage in such sales. If you are a Nevada resident and would like more information about our data sharing practices, please contact us.

Contact information, submitting requests, and our response procedures

Contact

Please contact us if you have questions or wish to take any action with respect to information to which this privacy policy applies.

Email:

privacy@dwt.com

Telephone:

206.622.3150

Mail:

Davis Wright Tremaine LLP
920 5th Avenue, Suite 3300
Seattle, WA 98104

Making a request to exercise your rights

Submitting requests: You may request to exercise your rights by submitting the form on [this page](#) or making a request using the contact information above.

If you are a resident of California, Colorado, or Connecticut, you may, under certain circumstances, authorize another individual or a business, called an authorized agent, to make requests on your behalf. (Authorized agents in California must be registered with the California Secretary of State.)

We may have a reason under the law why we do not have to comply with your request, or why we may comply with it in a more limited way than you anticipated. If we do, we will explain that to you in our response.

Verification: We must verify your identity before responding to your request. We verify your identity by asking you to provide personal identifiers that we can match against information we may have collected from you previously. We may need to follow up with you to request more information to verify identity.

We will not use personal information we collect in connection with verifying or responding to your request for any purpose other than responding to your request.

Appeals

Residents of Colorado, Connecticut, and Virginia have the right to appeal a denial of their request by contacting us as described in the notice of denial.