

Privacy Policy

Last Updated: October 2, 2024

Axinn, Veltrop & Harkrider LLP and its affiliated offices (“Axinn” or “we” or “our”) are committed to respecting the privacy of all individuals, including job applicants, employees, current and prospective clients, and visitors to our website. This privacy policy (“Privacy Policy”) describes how we collect, use, disclose, and protect information that we collect. This Privacy Policy applies to Axinn, Veltrop & Harkrider LLP, its website located at www.axinn.com, that website’s mobile applications, and any other websites or applications associated with Axinn’s website (collectively, the “Axinn Website”). This Privacy Policy does not apply to websites and services that are owned and operated by third parties.

We understand the importance that our clients, prospective employees, employees, and other website visitors place on privacy and have designed this Privacy Policy to describe our information-gathering, use, and dissemination practices. You agree to this Privacy Policy when you: (1) provide us personal information in hardcopy or digital form; (2) access or use any Axinn Website; and/or (3) ask to receive email from us. By accessing or visiting the Axinn Website, or submitting personal information to us, you indicate your understanding that the collection and use of your information is subject to the terms of this Privacy Policy and our Terms of Use [[link to terms](#)]. If you do not agree to this Privacy Policy, please do not use the Axinn Website or provide us your personal information.

Please note that we reserve the right to review and update this Privacy Policy from time to time. If we make any material changes to the Privacy Policy, we will notify you by means of a general notice on the Axinn Website on or before the change takes effect. If you use the Axinn Website after the updated Privacy Policy becomes effective, you will be deemed to have agreed to the updated Privacy Policy.

WE COLLECT PERSONAL DATA OR INFORMATION FROM THE FOLLOWING:

- Clients

- Job Applicants
- Website Users
- Event Guests
- Suppliers
- Alumni
- Other Marketing Targets

PERSONAL DATA OR INFORMATION WE COLLECT (“PERSONAL INFORMATION”)

We may collect the following categories of your personal information:

Identifiers and Contact Information. This category includes names, addresses, telephone numbers, mobile numbers, email addresses, signatures, account names, dates of birth, bank account information, and other similar contact information and identifiers.

- ***Protected Classification Information.*** This category includes characteristics of protected classifications under the various state or federal laws.
- ***Commercial Information.*** This category includes, without limitation, products and services purchased, obtained, or considered, or other purchasing or consuming histories or tendencies.
- ***Education Information.*** This category includes, without limitation, information that is not publicly available personally identifiable information as defined in the Family Educational Rights and Privacy Act (20 U.S.C. section 1232g, Sec. 1232g; 34 C.F.R. Part 99).
- ***Internet or Other Electronic Network Activity Information.*** This category includes, without limitation, browsing history, search history, or a consumer’s interactions with a website, application, or advertisement.
- ***Geolocation Data.*** This category includes, without limitation, location information collected when using one of our apps, devices, or vehicles.
- ***Audio, Electronic, Visual, Thermal, Olfactory, or Similar Information.*** This category includes, without limitation, information collected from voicemail messages, while speaking with one of our representatives, and/or by video camera.
- ***Biometric Information.*** This category may include the use of biometric equipment, devices, or software to record your time worked, to enter or exit facilities or rooms, to access or use equipment, or for other business purposes.

- *Professional and Employment-Related Information.* This category includes, without limitation, information regarding job applications, information related to onboarding for payroll and benefits, and information needed for evaluating performance.
- Sensitive Personal Information. This category includes:
 - social security, driver's license, state identification card, or passport number;
 - log-in, financial account, debit card, or credit card number, in combination with any required security or access code, password, or credentials allowing access to an account;
 - precise geolocation;
 - racial or ethnic origin, religious or philosophical beliefs, or union membership;
 - citizenship or immigration status;
 - content of mail, email, and text messages (unless we are the intended recipient of the communication);
 - genetic data;
 - biometric information;
 - personal information collected from a known child;
 - health information, including mental or physical health condition or diagnosis; and
 - information regarding sex life or sexual orientation.
- *Consumer Profile.* This category includes information drawn from any of the categories above to create a profile about a consumer reflecting the consumer's preferences, characteristics, and behaviors.

SOURCES OF PERSONAL INFORMATION

We may collect your personal information from the following sources:

- *You.* We collect information you provide us – e.g., in connection with your use of our products or services or application for or employment with us. For instance, when you contact us regarding our products or services, you may provide your name, email address, and information related to the product or service you request. When you apply for a job with us, you may provide information regarding your educational and professional history. In connection with your employment with us, you may provide financial account information needed for payroll processing and government identification numbers needed to verify your identity and work authorization status. We use a Customer Relationship Management application that records your email address and other contact details, including job title, company, and date and time of interaction, when you send an email to or receive an email from an Axinn attorney.

- *Related Entities and Affiliates.* We may collect information about you from our affiliates and other related parties.
- *Service Providers and Contractors.* We may collect your personal information from service providers or contractors who collected information about you that is needed to provide you products or services or in connection with your application for or employment with us.
- *News Outlets, Social Media, Surveys, and Third Parties.* In the course of performing our services or marketing activities, or in connection with your application for or employment with us, we or third parties on our behalf may conduct research and other activities that result in the collection of your personal information.
- *Information Collected Automatically.* As you navigate through and interact with our Site, we may compile statistical information concerning your usage of the Site through analytics services, such as those provided by Google Analytics, for example. To do so, we may collect certain information about your equipment and browsing actions and patterns, including:
 - Details of your visits to our Site, such as traffic data, location data, logs and other communication data and the resources that you access and use on the Site.
 - Information about your computer and internet connection, including your IP address, operating system, and browser type.
 - Information about the type of device you are using, mobile ad identifiers, the time and length of your visit, and the website that referred you to our Site.
 - Information about your preferences to make your use of the Site more productive, via the use of cookies. For more information on cookies, please see the Our Use of Cookies and Log Files section below. While all of this information can be associated with the IP address your computer had while you visited the Site, it will not be associated with you as an individual or with any other information you may submit through the Site or that we may store about you for any other purposes. We may use this information to generate aggregate statistics about visitors to our Site. Please check your web browser if you want to learn what information your browser sends or how to change your settings.

PURPOSES FOR COLLECTING AND USING YOUR PERSONAL INFORMATION

In general, we will use the personal information we collect only for the purposes for which it was collected, for compatible purposes, as permitted or required by law, as necessary to carry out our contractual duties and obligations, and as otherwise provided in this Privacy Policy. For example, Axinn uses the personal information we collect from you for the following reasons:

1. to administer and use the Axinn Website,
2. to obtain contacts from prospective employees or clients,

3. to communicate with vendors, service providers, employees, applicants, and clients,
4. to communicate with individuals about events that Axinn is hosting or supporting,
5. to respond to any other questions individuals have about Axinn,
6. to comply with legal requirements that we reasonably believe are applicable,
7. in connection with marketing activities,
8. to ensure the security of our systems and services,
9. 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 part of a bankruptcy, liquidation, or similar proceeding, in which personal information held by us is among the assets transferred, and
10. for other internal purposes, such as operation of our business; assessing trends, interests, and demands of clients, applicants, and employees; and/or carrying out obligations and enforcing our rights, including those arising from any contracts entered into between you and us, including for billing, payment, and collections.

DISCLOSURE OF YOUR PERSONAL INFORMATION

In general, we will not disclose your personal information except with your consent or as otherwise described in this Privacy Policy. We may disclose your personal information for the same purposes for which we may use it, as described above, which includes disclosing it to our affiliates and non-affiliates, as we deem necessary to carry out those purposes. We endeavor to choose affiliates and non-affiliates whose standards for the protection of data match ours. The following chart describes the categories of personal information we have collected or may collect about you and, for each category, identifies the categories of third parties to whom we may disclose that information and for what purposes.

Categories of Personal Information	Categories of Third Parties to Whom Disclosed & Purposes for Disclosure
<p>Address and other identifiers – such as name, postal address, email address, phone number, account name, date of birth, social security number, driver’s license number, photograph, passport number, unique personal identifier, online identifier, Internet Protocol address, email address, account name, or other similar identifiers</p> <p>NOTE: The information in this category may include the following elements of Sensitive Personal Information: social security number,</p>	<p>Third parties as directed by you. We may disclose your personal information to the third parties to whom you direct.</p> <p>Our business partners. For example, we might disclose your personal information to one of our business partners for purposes of collaborating on providing services to you, or to invite you to an event we are organizing. These business partners should also have their own privacy statements that set out the manner in which they will collect, use, and disclose personal information. Where</p>

driver's license number, state identification card number, and/or passport number.

applicable, we encourage you to review each such business partner's privacy statement before signing on with them.

Third parties that perform services on our behalf. For example, we may disclose information to certain service providers, including marketing companies, professional service providers, debt collectors, information technology providers, payroll and benefits managers, and data storage companies. We might also authorize our service providers to collect personal information on our behalf.

Governmental entities, legal service providers. We may disclose your personal information in order to comply with the law and in the course of providing our products and services. We may also disclose information if a government agency or investigatory body submits a request.

Successors to all or portions of our business. If all or part of our business is sold, we may disclose personal information in preparation for or as part of that transaction.

Protected status – such as citizenship, immigration status, ethnic background, gender, or other similar identifiers

NOTE: The information in this category may include the following elements of Sensitive Personal Information: racial, ethnic, or national origin, or immigration status.

Third parties as directed by you. We may disclose personal information to those third parties to whom you direct.

Our business partners. For example, we might disclose your personal information to one of our business partners for purposes of collaborating on providing services to you, or to invite you to an event we are organizing. These business partners should also have their own privacy statements that set out the manner in which they will collect, use, and disclose personal information. Where applicable, we encourage you to review each such business partner's privacy statement before signing on with them.

Third parties that perform services on our behalf. For example, we may disclose information to certain service providers, including marketing companies, professional service providers, debt collectors, information technology providers, payroll and benefits

managers, and data storage companies. We might also authorize our service providers to collect personal information on our behalf.

Governmental entities, legal service providers. We may disclose personal information in order to comply with the law and in the course of providing our products and services. We may also disclose information if a government agency or investigatory body submits a request.

Successors to all or portions of our business. If all or part of our business is sold, we may disclose personal information in preparation for or as part of that transaction.

Financial information – such as bank account details, credit history, income details or other similar identifiers

NOTE: The information in this category may include the following elements of Sensitive Personal Information: log-in, financial account, debit card, or credit card number, in combination with any required security or access code, password, or credential allowing access to an account.

Third parties as directed by you. We may disclose your personal information to the third parties to whom you direct.

Our business partners. For example, we might disclose personal information to one of our business partners for purposes of collaborating on providing products or services to you, or to invite you to an event we are organizing. These business partners should also have their own privacy statements that set out the manner in which they will collect, use, and disclose personal information. Where applicable, we encourage you to review each such business partner's privacy statement before signing on with them.

Third parties that perform services on our behalf. For example, we may disclose information to certain service providers, including marketing companies, professional service providers, debt collectors, information technology providers, payroll and benefits managers, and data storage companies. We might also authorize our service providers to collect personal information on our behalf.

Governmental entities, legal service providers. We may disclose your personal information in order to comply with the law and in the course of providing our products and services. We may also disclose information if a government agency or investigatory body submits a request.

	<p>Successors to all or portions of our business. If all or part of our business is sold, we may disclose personal information in preparation for or as part of that transaction.</p>
<p>Commercial information – such as records of personal property, products or services purchased, obtained, or considered, or other purchasing or consuming histories or tendencies or other similar identifiers</p>	<p>Third parties as directed by you. We may disclose your personal information to the third parties to whom you direct.</p> <p>Our business partners. For example, we might disclose personal information to one of our business partners for purposes of collaborating on providing products or services to you, or to invite you to an event we are organizing. These business partners should also have their own privacy statements that set out the manner in which they will collect, use, and disclose personal information. Where applicable, we encourage you to review each such business partner’s privacy statement before signing on with them.</p> <p>Third parties that perform services on our behalf. For example, we may disclose information to certain service providers, including marketing companies, professional service providers, debt collectors, information technology providers, payroll and benefits managers, and data storage companies. We might also authorize our service providers to collect personal information on our behalf.</p> <p>Governmental entities, legal service providers. We may disclose personal information in order to comply with the law and in the course of providing our products and services. We may also disclose information if a government agency or investigatory body submits a request.</p> <p>Successors to all or portions of our business. If all or part of our business is sold, we may disclose personal information in preparation for or as part of that transaction.</p>
<p>Education or professional information, including veteran status or other similar identifiers</p>	<p>Third parties as directed by you. We may disclose your personal information to the third parties to whom you direct.</p> <p>Our business partners. For example, we might</p>

NOTE: The information in this category may include the following elements of Sensitive Personal Information: union membership.

disclose personal information to one of our business partners for purposes of collaborating on providing products or services to you, or to invite you to an event we are organizing. These business partners should also have their own privacy statements that set out the manner in which they will collect, use, and disclose personal information. Where applicable, we encourage you to review each such business partner's privacy statement before signing on with them.

Third parties that perform services on our behalf. For example, we may disclose information to certain service providers, including marketing companies, professional service providers, debt collectors, information technology providers, payroll and benefits managers, and data storage companies.

We might also authorize our service providers to collect personal information on our behalf. Governmental entities, legal service providers. We may disclose personal information in order to comply with the law and in the course of providing our products and services. We may also disclose information if a government agency or investigatory body submits a request. Successors to all or portions of our business. If all or part of our business is sold, we may disclose personal information in preparation for or as part of that transaction.

Internet or other electronic network activity – such as browsing history, search history, a consumer's interaction with an internet website, application, or advertisement

NOTE: The information in this category may include the following elements of Sensitive Personal Information: the contents of mail, email, or text messages, to which the business was not the intended recipient.

Third parties as directed by you. We may disclose your personal information to third parties to whom you direct.

Our business partners. For example, we might disclose personal information to one of our business partners for purposes of collaborating on providing products or services to you, or to invite you to an event we are organizing. These business partners should also have their own privacy statements that set out the manner in which they will collect, use, and disclose personal information. Where applicable, we encourage you to review each such business partner's

privacy statement before signing on with them.

Third parties that perform services on our behalf. For example, we may disclose information to certain service providers, including marketing companies, professional service providers, debt collectors, information technology providers, payroll and benefits managers, and data storage companies. We might also authorize our service providers to collect personal information on our behalf.

Governmental entities, legal service providers. We may disclose personal information in order to comply with the law and in the course of providing our products and services. We may also disclose information if a government agency or investigatory body submits a request.

Successors to all or portions of our business. If all or part of our business is sold, we may disclose personal information in preparation for or as part of that transaction.

Geolocation data

NOTE: The information in this category may include the following elements of Sensitive Personal Information: precise geolocation.

Third parties as directed by you. We may disclose your personal information to the third parties to whom you direct.

Our business partners. For example, we might disclose personal information to one of our business partners for purposes of collaborating on providing products or services to you, or to invite you to an event we are organizing. These business partners should also have their own privacy statements that set out the manner in which they will collect, use, and disclose personal information. Where applicable, we encourage you to review each such business partner's privacy statement before signing on with them.

Third parties that perform services on our behalf. For example, we may disclose information to certain service providers, including marketing companies, professional service providers, debt collectors, information technology providers, payroll and benefits

managers, and data storage companies. We might also authorize our service providers to collect personal information on our behalf.

Governmental entities, legal service providers. We may disclose personal information in order to comply with the law and in the course of providing our products and services. We may also disclose information if a government agency or investigatory body submits a request.

Successors to all or portions of our business. If all or part of our business is sold, we may disclose personal information in preparation for or as part of that transaction.

Audio, electronic, visual, thermal, olfactory, or similar information.

Third parties as directed by you. We may disclose personal information to the third parties to whom you direct.

Our business partners. For example, we might disclose personal information to one of our business partners for purposes of collaborating on providing products or services to you, or to invite you to an event we are organizing. These business partners should also have their own privacy statements that set out the manner in which they will collect, use, and disclose personal information. Where applicable, we encourage you to review each such business partner's privacy statement before signing on with them.

Third parties that perform services on our behalf. For example, we may disclose information to certain service providers, including marketing companies, professional service providers, debt collectors, information technology providers, payroll and benefits managers, and data storage companies. We might also authorize our service providers to collect personal information on our behalf.

Governmental entities, legal service providers. We may disclose personal information in order to comply with the law and in the course of providing our products and services. We may also disclose

	<p>information if a government agency or investigatory body submits a request.</p> <p>Successors to all or portions of our business. If all or part of our business is sold, we may disclose personal information in preparation for or as part of that transaction.</p>
<p>Biometric Information</p> <p>NOTE: Biometric information is considered an element of Sensitive Personal Information.</p>	<p>Third parties as directed by you. We may disclose your personal information to those third parties to whom you direct.</p> <p>Our business partners. For example, we might disclose personal information to one of our business partners for purposes of collaborating on providing products or services to you, or to invite you to an event we are organizing. These business partners should also have their own privacy statements that set out the manner in which they will collect, use, and disclose personal information. Where applicable, we encourage you to review each such business partner's privacy statement before signing on with them.</p> <p>Third parties that perform services on our behalf. For example, we may disclose information to certain service providers, including marketing companies, professional service providers, debt collectors, information technology providers, payroll and benefits managers, and data storage companies. We might also authorize our service providers to collect personal information on our behalf.</p> <p>Governmental entities, legal service providers. We may disclose personal information in order to comply with the law and in the course of providing our products and services. We may also disclose information if a government agency or investigatory body submits a request.</p> <p>Successors to all or portions of our business. If all or part of our business is sold, we may disclose personal information in preparation for or as part of that transaction.</p>
<p>Information collected from a known child – for</p>	<p>Third parties as directed by you, in your</p>

instance, information related to a minor dependent's participation in a group health plan

NOTE: Information collected from a known child is considered an element of Sensitive Personal Information.

capacity as parent or guardian of the minor data subject.

Third parties that perform services on our behalf. For example, we may disclose information to certain service providers, including marketing companies, professional service providers, debt collectors, information technology providers, payroll and benefits managers, and data storage companies. We might also authorize our service providers to collect personal information on our behalf.

Governmental entities, legal service providers. We may disclose personal information in order to comply with the law and in the course of providing our products and services. We may also disclose information if a government agency or investigatory body submits a request.

Successors to all or portions of our business. If all or part of our business is sold, we may disclose personal information in preparation for or as part of that transaction.

Health information, including mental or physical health condition or diagnosis – such as information collected in connection with an employee's request for leave or an accommodation, or their participation in a group health plan

NOTE: Health information is considered an element of Sensitive Personal Information.

Third parties as directed by you. We may disclose your personal information to the third parties to whom you direct.

Our business partners. For example, we might disclose personal information to one of our business partners for purposes of collaborating on providing products or services to you, or to invite you to an event we are organizing. These business partners should also have their own privacy statements that set out the manner in which they will collect, use, and disclose personal information. Where applicable, we encourage you to review each such business partner's privacy statement before signing on with them.

Third parties that perform services on our behalf. For example, we may disclose information to certain service providers, including marketing companies, professional service providers, debt collectors, information technology providers, payroll and benefits

	<p>managers, and data storage companies. We might also authorize our service providers to collect personal information on our behalf.</p> <p>Governmental entities, legal service providers. We may disclose personal information in order to comply with the law and in the course of providing our products and services. We may also disclose information if a government agency or investigatory body submits a request.</p> <p>Successors to all or portions of our business. If all or part of our business is sold, we may disclose personal information in preparation for or as part of that transaction.</p>
<p>Inferences drawn from personal information – such as individual profiles, preferences, characteristics, behaviors or other similar identifiers</p> <p>NOTE: The information in this category may include the following elements of Sensitive Personal Information: racial or ethnic origin, religious or philosophical beliefs, union membership, health information, genetic information, and/or information regarding an individual’s sex life or sexual orientation.</p>	<p>Third parties as directed by you.</p>

We do not sell or share your personal information, as those terms are defined under applicable law. Nor do we have actual knowledge of selling personal information of minors under the age of 16.

RETENTION

We retain your personal information for as long as is necessary to process your application for employment, process your payroll, administer your benefits, perform services on your behalf, or to provide you with general information about the industry or Axinn, and in accordance with our data retention schedule. We may retain your personal information for longer if it is necessary to comply with our legal or reporting obligations (for example, if we are required to retain your data to comply with applicable laws), resolve disputes, enforce our legal agreements and policies, address other legitimate business needs, or as permitted or required by applicable law. We may also retain your personal information in a deidentified or aggregated form so that it can no longer be associated with you. To determine the appropriate retention period for your personal information, we consider various factors such as the amount, nature, and sensitivity of your information; the potential risk of unauthorized access, use or disclosure; the purposes for which we collect or process your personal information; and applicable legal

requirements. Personal information does not include certain categories of information, such as publicly available information from government records, personal information you make available to the public, and deidentified or aggregated information.

SECURITY

We take precautions to protect data and information under our control from misuse, loss or alteration. Our security measures include industry-standard physical, technical, and administrative measures to prevent unauthorized access to or disclosure of your information, to maintain data accuracy, to ensure the appropriate use of information, and otherwise safeguard your personal information. However, no system for safeguarding personal or other information is 100% secure and, although we have taken steps to protect your personal information from being intercepted, accessed, used or disclosed by unauthorized persons, we cannot fully eliminate security risks associated with personal information.

Please recognize that protecting your personal information is also your responsibility. We ask you to be responsible for safeguarding the password, security questions and answers, and other authentication information you use to access our Site.

OUR USE OF COOKIES AND LOG FILES

Cookies are pieces of data that sites and services can set on your browser or device that can be read on future visits.

The types of cookies that we use on the Axinn Website are outlined below:

- **Analytical/Statistic Cookies:** These cookies collect information about how visitors use the Axinn Website. All information from these cookies is aggregated and is used only to improve the performance of the Axinn Website. It is not our practice to link the information we record using cookies to any Personal Information you submit through the Axinn Website. You can disable cookies by changing your browser settings. Further information about the procedure to follow in order to disable cookies may be found on your internet browser provider's website via your help screen.
- **IP Logs:** The Axinn Website records IP addresses of website visitors. This is necessary for the Axinn Website to function. Server software maintains access logs, error logs, and security audit logs that are critical in detecting fraud, preventing unauthorized system access, and avoiding system attacks. The data maintained is not shared outside of programmers/network administrators and is not linked to any other activity.

OPT OUT POLICY

To stop receiving newsletters or marketing communications from us, please send an email to webinfo@axinn.com with "UNSUBSCRIBE" in the subject line.

YOUR RIGHTS

You may have certain rights related to your personal information, subject to certain exceptions. Specifically:

Right to Know. You may have the right to confirm whether or not we process your personal information and, if we do, to request that we disclose the following to you upon receipt of your verifiable consumer request:

- The categories of personal information we have collected about you
- The categories of sources from which we collected that information
- The business or commercial purposes for collecting, selling, or sharing that information
- The categories of personal information we sold or disclosed for a business purpose
- The categories of third parties to whom we sold or disclosed that information
- The specific pieces of personal information we collected about you

Right to Delete. You may have the right to request that we delete your personal information from our records, subject to certain exceptions. Upon receipt of a verifiable consumer request, and as required by applicable law, we will delete and direct any service providers to delete your personal information.

- We may not be required to comply with deletion requests if we, or our service providers or contractors, need the subject information in order to:
- Complete the transaction for which the personal information was collected, provide a good or service requested by you or reasonably anticipated within the context of our ongoing business relationship with you, or otherwise perform a contract between us and you.
- Detect security incidents, protect against malicious, deceptive, fraudulent, or illegal activity, or prosecute those responsible for that activity.
- Debug to identify and repair errors that impair existing intended functionality.
- Exercise free speech, ensure the right of another consumer to exercise their right of free speech, or exercise another right provided for by law.
Comply with the California Electronic Communications Privacy Act pursuant to Chapter 3.6 (commencing with Section 1546) of Title 12 of Part 2 of the Penal Code.
- Enable solely internal uses that are reasonably aligned with your expectations based on your relationship with us and compatible with the context in which you provided the information to us.
Comply with a legal obligation.
- Otherwise use your personal information, internally, in a lawful manner that is compatible with the context in which you provided the information.

Right to Correct. You may have the right, subject to certain limitations, to request that we correct any inaccurate personal information we maintain about you. Upon receipt of a verifiable consumer request, and as required by applicable law, we will take appropriate steps to respond to your request.

Right to Opt-Out of Selling, Sharing, Targeted Advertising, and/or Certain Automated Decision Making. You may have the right, subject to certain limitations, to opt-out of having your personal information sold, shared, used for targeted advertising, and/or used to create a profile for use in connection with making solely automated decisions that produce legal or similarly significant effects. However, we do not use personal information for any of the foregoing purposes, and do not have actual knowledge that we have sold personal information of minors under age 16.

Right to Limit Use or Disclosure of Sensitive Personal Information. You may have the right, subject to certain exceptions, to request that we limit the use and disclosure of your sensitive personal information, as that term is defined under applicable law. Upon receipt of a verifiable consumer request, and as required by applicable law, we will take appropriate steps to respond to your request.

Right Against Discrimination. You may have the right not to be discriminated against for exercising any of the rights described in this section. For example, we generally will not provide you a different level or quality of goods or services if you exercise these rights.

Submitting Consumer Rights Requests

To submit a consumer rights request, please contact us toll-free at (888) 206-2208 or by completing this [Consumer Rights Request Form](#).

Verification. We reserve the right to only respond to verifiable consumer requests. A verifiable consumer request is one made by:

- the consumer who is the subject of the request,
- a consumer on behalf of the consumer's minor child, or
- a natural person or business entity authorized to act on behalf of a consumer.

To verify your identity, we may ask you to verify personal information we already have on file for you. If we cannot verify your identity from the information we have on file, we may request additional information from you, which we will only use to verify your identity, and for security or fraud-prevention purposes. Making a verifiable consumer request does not require you to create an account with us. Additionally, you will need to describe your request with sufficient detail to allow us to review, understand, assess, and respond.

Authorized Agents. You may authorize a natural person or business entity to act on your behalf with respect to your rights under this section. Unless you have provided the authorized agent with a qualifying power of attorney, you must provide your authorized agent written permission, signed by you, to act on your behalf and verify the authorized agent's identity with us. We

reserve the right to deny requests from persons or businesses claiming to be authorized agents that do not submit sufficient proof of their authorization.

We may not be able to respond to your request or provide you with personal information if we cannot verify your identity or authority to make the request and confirm the personal information relates to you.

Our Response. We reserve the right to charge a fee to process or respond to your request if it is excessive, repetitive, or manifestly unfounded. If we determine that a request warrants a fee, we will attempt to notify you as to why we made that decision and provide a cost estimate before completing your request. We will endeavor to respond to a verifiable consumer request within forty-five (45) calendar days of receipt, but we may require an extension of up to forty-five (45) additional calendar days to respond and we will notify you of the need for the extension.

If you have an account with us, we will deliver our written response to that account. If you do not have an account with us, we will deliver our written response by mail or electronically, at your option. Our response may be limited to personal information we collected and maintain on or after January 1, 2022, unless you request a narrower time period or providing a response covering this full time period would be impossible or involve disproportionate effort. In the event we deny your request, in whole or in part, we will explain the bases for that denial.

Please note that when we function as a service provider or contractor to our business clients, and have received your personal information in connection with those functions, we may not be obligated to respond to your requests concerning personal information. In those cases, we may direct you to the applicable business client(s) with whom you have a direct relationship.

Appeal of Our Response. In the event you believe we have erroneously denied your request, in full or in part, you may, within sixty (60) days of receipt of that denial, submit an appeal at (888) 206-2208 or by completing this [Consumer Rights Request Form](#). In your appeal submission, please explain why you believe our decision to deny your request was incorrect and please provide any additional information you believe we should consider in connection with your appeal. Within sixty (60) days of receipt of your appeal, we will advise you in writing of any action we have taken, or refrained from taking, in response to your appeal, along with an explanation of why we have taken, or refrained from taking, such action.

MISCELLANEOUS

International Transfers of EU Customers' Personal Information. We will take steps reasonably necessary to ensure that personal information is treated securely and in accordance with this Privacy Policy. If you are from a region with laws governing data collection and use that may differ from U.S. law, please note that U.S. law does not have the same data protection laws as the European Union and may provide more limited recourse mechanisms than in your home region. By providing your personal information you acknowledge this risk and also consent to: (i) the use of your personal information for the uses identified above in accordance with this Privacy Policy; and (ii) the transfer of your personal information to the U.S. as indicated above.

Children's Privacy. Visitors under 13 years of age are not permitted to use and/or submit their personal information to us via the Axinn Website or by other communications without the permission and supervision of a parent or legal guardian. We do not knowingly solicit or collect information from visitors under 13 years of age with the exception of information provided by, or with the express permission and under the direct supervision of, the visitor's parent or legal guardian. If you are under 13 years of age, please do not submit any information to us without permission from your parent or legal guardian. In the event that we learn that a person under the age of 13 has provided us with personal information without permission from a parent or legal guardian, we will, within a reasonable time of learning such information, delete that personal information.

Shine the Light California Civil Code Section 1798.83 permits you to request information regarding the disclosure of your personal information by us to third parties for the third parties' direct marketing purposes. Such requests must be submitted to us in accordance with the instructions in the Questions or Comments section of this Policy. Please mention when contacting us that you are making a "California Shine the Light" inquiry. Within 30 days of receiving such a request, we will provide a list of the categories of personal information disclosed to third parties for third-party direct marketing purposes during the immediately preceding calendar year, along with the names and addresses of these third parties. This request may be made no more than once per calendar year. We reserve our right not to respond to requests submitted other than in accordance with the instructions specified in this paragraph.

Eraser Law. If you are a California resident under the age of 18, and a registered user of any site where this policy is posted, California law permits you to request and obtain removal of content or information you have publicly posted. You may submit your request using the contact information at the end of this Policy. Please be aware that such request does not ensure complete or comprehensive removal of the content or information you have posted and that there may be circumstances in which the law does not require or allow removal even if requested.

Disputes, Agreement to Arbitrate, and Choice of Law. If you have a concern about your personal information being protected, you can notify us at webdisputes@axinn.com. If you are still concerned after communicating with Axinn directly about your issue, you have the right to lodge a complaint with the applicable supervisory authority. All disputes relating in any way, directly or indirectly, to any breach or alleged breach of this Privacy Policy will be subject to arbitration pursuant to the Commercial Arbitration Rules of the American Arbitration Association, by one arbitrator appointed in accordance with those rules. The seat of the arbitration shall be New York, New York, United States, and the language of the arbitration shall be English. By using the Axinn Website, you agree that the arbitrator will decide any and all disputes including any dispute about the scope of this arbitration agreement, including all questions about the types of disputes that are subject to this arbitration agreement. You acknowledge and agree that in any arbitration proceeding no depositions will be taken, and that discovery shall be limited to the exchange of the documents on which each party intends to rely during the hearing and affidavits from any witnesses the party intends to present at the hearing. If a party submits an affidavit from a witness, the affidavit shall constitute the witness's direct examination hearing testimony, and the opposing party shall have the right to cross examine the witness during the hearing. Further, in any arbitration proceeding, (i) there shall be no award of punitive, exemplary, incidental or consequential or other special damages, (ii) the

parties shall conduct the arbitration confidentially and expeditiously, and (iii) the parties shall pay their own costs and expenses of arbitration, including their own attorneys' fees. You agree that binding arbitration shall be your exclusive remedy, and you expressly waive any right to have your claim heard in any court. You also waive any right to trial by jury. You also agree not to join your claim with the claim of any other person who is not a member of your immediate family (i.e., parent, sibling, or child) or in a legal guardianship relationship with you, and you specifically agree that you are waiving any right to pursue claims as a class action in federal or state court or in arbitration. The arbitration proceeding and the decision shall be kept confidential by the parties. All claims you may have under this Privacy Policy must be brought within one (1) year of the date on which the claim arose.

Links to Third-Party Sites and Integrations. We may provide links to websites or resources outside of our Site for your informational purposes only. We may also provide links to third-party integrations. Third party integrations are websites or platforms that synchronize with our Site to provide you with additional functionality, tools, or services such as maps, sending requested information, etc.

You acknowledge and agree we are not responsible for the availability of third-party sites, resources, or integrations and do not endorse and are not responsible or liable for any content, advertising, goods, services or other materials on, available through, or provided by such sites, resources, or integrations. We are not responsible for the privacy or other practices of such sites and cannot guarantee the security of personal information that you provide, or that is collected by, such sites. We encourage you to review the privacy policies and terms and conditions on those linked sites.

QUESTIONS OR COMMENTS

If you would like to receive further information about this Policy or any of our safeguards, please contact us via email at webinfo@axinn.com.

** ** *

This Privacy Policy is current as of October 2, 2024. By using the Axinn Website, you accept all of the terms of this Privacy Policy. If you do not agree, please do not use the Axinn Website. Your continued use and/or continued provision of personal information to Axinn through the Axinn Website is subject to the current Privacy Policy as posted here. If you have any questions, please contact us at webinfo@axinn.com.

If you would like more information on Axinn's California Consumer Privacy Act Employee and Applicant Disclosure, please click [here](#).