

CLEARY GOTTLIEB

Addendum for California Residents



Last updated: 27, August 2024



I. About this Addendum

This Addendum applies solely with respect to personal information processing activities that are subject to the California Consumer Privacy Act of 2018 as amended by the California Privacy Rights Act of 2020 (collectively, the “CCPA”). For information about how Cleary Gottlieb processes your personal information more generally, please see our [Privacy Statement](#).

II. Categories of personal information collected

The categories of personal information we have collected about California residents in the preceding 12 months include:

- “**identifiers**” such as a real name, alias, postal address, unique personal identifier, online identifier, IP address, email address, social security number, driver’s license number, passport number, or other similar identifiers
- non-publicly available information that identifies, relates to, describes, or is capable of being associated with you, including, but not limited to, identifiers, signature, physical characteristics or description, address, telephone number, state identification card number, insurance policy number, education, employment, employment history, bank account number or any other financial information, health-related information
- commercial information, including records of personal property, products or services purchased, obtained, or considered, or other purchasing or consuming histories or tendencies
- internet or other electronic network activity information, including, but not limited to, browsing history and search history
- audio, electronic, visual or similar information
- professional or employment-related information
- non-publicly available education information
- in limited circumstances, sensitive personal information including:
 - personal information that reveals social security, driver’s license, state identification card, or passport number
 - racial or ethnic origin, citizenship or immigration status, religious or philosophical beliefs, or union membership
 - the contents of a California resident’s mail, email, and text messages
 - personal information collected and analyzed concerning a California resident’s health
 - personal information collected and analyzed concerning a California resident’s sex life or sexual orientation.

Further information about the categories of personal information we have collected and the business purposes for which we collect such information are set out in our Privacy Statement under “[What personal data do we collect and use and why?](#)”.

III. Categories of sources from which personal information is collected

The categories of sources from which we collect personal information are set out in our Privacy Statement under “[Where do we get your personal data from?](#)”.

IV. Business or commercial purpose for collection and disclosure

The following chart describes our practices with regard to the collection, use, and disclosure of your personal information:

| Personal information collected | Business purpose for collection | Categories of third parties to whom personal information is disclosed | Business or commercial purpose for disclosure of personal information |
|--|--|---|---|
| <p>Contact information such as your name and title; your contact details, including your address, e-mail address and/or telephone number; and your job title and the organization for which you work.</p> | <p>We collect and use this information to enable us to keep our contact database accurate and up-to-date and in order to communicate with you. Where you are a client or prospective client, we also use this information to carry out conflict checks prior to accepting a new engagement from you.</p> | <p>We may share contact information with:</p> <ul style="list-style-type: none"> • our affiliated legal entities • our clients and their third-party advisers or service providers • our clients’ counterparties or such counterparties’ third-party advisers or service providers • any enquiry agents, private investigators, translators, external legal counsel or other experts who we might engage or who are engaged in a client matter in which we are acting • our auditors, accountants, management and tax consultants or other third-party service providers or advisors who we might engage in connection with the Firm’s financial management • third-party service providers who we might engage to conduct due diligence, credit checking or similar services on our behalf • our banks and insurers • regulatory bodies, government agencies or authorities and law enforcement agencies • courts and other tribunals | <p>We may disclose contact information to:</p> <ul style="list-style-type: none"> • communicate with you • develop, provide or improve our legal services • engage in marketing activities • facilitate payments • maintain account integrity and security • engage in business transactions • satisfy legal and compliance obligations. |

| Personal information collected | Business purpose for collection | Categories of third parties to whom personal information is disclosed | Business or commercial purpose for disclosure of personal information |
|---|--|--|---|
| | | <ul style="list-style-type: none"> • telecommunications and information technology providers (including cloud-based technology and service providers and artificial intelligence platforms that meet our security standards and that we have specifically sanctioned for use) • business support service providers (including our caterers, couriers and word processing provider) • our landlords or their managing agents • third parties hosting events for us to which you are invited • third parties providing feedback and legal ranking services • in the event that our business or any part of it is sold or integrated with another business, any prospective purchasers, the new owners of the business and their third-party advisers or service providers. | |
| <p>Identifiers (including certain sensitive personal information) including your contact information; your bank details; your education and employment information; copies of your identification documents (for example, your passport, national identification card or driving license, which will include your date of birth, government identification number and photograph); and information about your criminal convictions and offenses.</p> | <p>We collect and use this information for the purposes of conducting anti-money laundering checks, complying with our legal and regulatory reporting obligations and responding to third-party due diligence checks. We may also ask you to provide some of this information so that we can verify your identity in the event you choose to exercise any of your rights under the CCPA.</p> | <p>We may share identifiers with:</p> <ul style="list-style-type: none"> • our affiliated legal entities • our clients and their third-party advisers or service providers • our clients’ counterparties or such counterparties’ third-party advisers or service providers • any enquiry agents, private investigators, translators, external legal counsel or other experts who we might engage or who are engaged in a client matter in which we are acting • our auditors, accountants, management and tax | <p>We may disclose identifiers to:</p> <ul style="list-style-type: none"> • communicate with you • develop, provide or improve our legal services • engage in marketing activities • facilitate payments • maintain account integrity and security • engage in business transactions • satisfy legal and compliance obligations. |

| Personal information collected | Business purpose for collection | Categories of third parties to whom personal information is disclosed | Business or commercial purpose for disclosure of personal information |
|--------------------------------|---------------------------------|--|---|
| | | <p>consultants or other third-party service providers or advisors who we might engage in connection with the Firm’s financial management</p> <ul style="list-style-type: none"> • third-party service providers who we might engage to conduct due diligence, credit checking or similar services on our behalf • our banks and insurers • regulatory bodies, government agencies or authorities and law enforcement agencies • courts and other tribunals • telecommunications and information technology providers (including cloud-based technology and service providers and artificial intelligence platforms that meet our security standards and that we have specifically sanctioned for use) • business support service providers (including our caterers, couriers and word processing provider) • our landlords or their managing agents • third parties hosting events for us to which you are invited • third parties providing feedback and legal ranking services • in the event that our business or any part of it is sold or integrated with another business, any prospective purchasers, the new owners of the business and their third-party advisers or service providers. | |

| Personal information collected | Business purpose for collection | Categories of third parties to whom personal information is disclosed | Business or commercial purpose for disclosure of personal information |
|--|---|---|---|
| <p>Information related to the provision of services including your contact information; records of our meetings or any Firm-affiliated or Firm-sponsored events which you may attend, which may include your photograph, recorded image or voice recording; your feedback, including your responses to any surveys we may send to you; and any other information about you that is provided to us in connection with a client matter on which we are engaged, which could include your financial information, criminal convictions and offenses data or sensitive personal information such as information about your racial or ethnic origin, religious or philosophical beliefs, trade union membership, sexual orientation or sex life or your health.</p> | <p>We collect and use this information in order to provide our services to our clients, respond to their audit inquiries and manage our relationship with you.</p> <p>We may also use records of our meetings and events for internal training and know-how purposes, and we may use your feedback or photograph or recorded image taken at a Cleary event for the purposes of promoting our future events or services to others.</p> | <p>We may share services-related information with:</p> <ul style="list-style-type: none"> • our affiliated legal entities • our clients and their third-party advisers or service providers • our clients’ counterparties or such counterparties’ third-party advisers or service providers • any enquiry agents, private investigators, translators, external legal counsel or other experts who we might engage or who are engaged in a client matter in which we are acting • our auditors, accountants, management and tax consultants or other third-party service providers or advisors who we might engage in connection with the Firm’s financial management • third-party service providers who we might engage to conduct due diligence, credit checking or similar services on our behalf • our banks and insurers • regulatory bodies, government agencies or authorities and law enforcement agencies • courts and other tribunals • telecommunications and information technology providers (including cloud-based technology and service providers and artificial intelligence platforms that meet our security standards and that we have specifically sanctioned for use) • business support service providers (including our | <p>We may disclose services-related information to:</p> <ul style="list-style-type: none"> • communicate with you • develop, provide or improve our legal services • maintain account integrity and security • engage in business transactions • satisfy legal and compliance obligations. |

| Personal information collected | Business purpose for collection | Categories of third parties to whom personal information is disclosed | Business or commercial purpose for disclosure of personal information |
|--|--|---|---|
| | | <p>caterers, couriers and word processing provider)</p> <ul style="list-style-type: none"> • our landlords or their managing agents • third parties hosting events for us to which you are invited • third parties providing feedback and legal ranking services • in the event that our business or any part of it is sold or integrated with another business, any prospective purchasers, the new owners of the business and their third-party advisers or service providers. | |
| <p>Payment information, including your contact information; your government identification numbers; your bank details; details of payments to or from you; and executed documents in connection with your relationship with the Firm.</p> | <p>We collect and use this information in order to manage our finances and process payments.</p> | <p>We may share payment information with:</p> <ul style="list-style-type: none"> • our affiliated legal entities • any enquiry agents, private investigators, translators, external legal counsel or other experts who we might engage or who are engaged in a client matter in which we are acting • our auditors, accountants, management and tax consultants or other third-party service providers or advisors who we might engage in connection with the Firm’s financial management • third-party service providers who we might engage to conduct due diligence, credit checking or similar services on our behalf • our banks and insurers • regulatory bodies, government agencies or authorities and law enforcement agencies • courts and other tribunals | <p>We may disclose payment information to:</p> <ul style="list-style-type: none"> • develop, provide or improve our legal services • facilitate payments • maintain account integrity and security • engage in business transactions • satisfy legal and compliance obligations. |

| Personal information collected | Business purpose for collection | Categories of third parties to whom personal information is disclosed | Business or commercial purpose for disclosure of personal information |
|---|---|--|--|
| | | <ul style="list-style-type: none"> • telecommunications and information technology providers (including cloud-based technology and service providers and artificial intelligence platforms that meet our security standards and that we have specifically sanctioned for use) • business support service providers (including our caterers, couriers and word processing provider) • in the event that our business or any part of it is sold or integrated with another business, any prospective purchasers, the new owners of the business and their third-party advisers or service providers. | |
| <p>Information related to marketing and communications including, your contact information; your education and employment information; your marketing preferences; details of the services you have obtained or have considered obtaining from the Firm; your feedback, including your responses to any surveys we may send to you; and information about whether you open our e-mails or click any of the links in the e-mails we send to you. For more information about the technologies we use in e-mails please refer to our Cookie Policy.</p> | <p>We collect and use this information for the purposes of determining the services that we offer that may be of interest to you, sending you information about such services, inviting you to Firm-affiliated or Firm-sponsored events and sending you periodic updates on legal developments.</p> | <p>We may share marketing-related information with:</p> <ul style="list-style-type: none"> • our affiliated legal entities • our auditors, accountants, management and tax consultants or other third-party service providers or advisors who we might engage in connection with the Firm’s financial management • telecommunications and information technology providers (including cloud-based technology and service providers and artificial intelligence platforms that meet our security standards and that we have specifically sanctioned for use) • business support service providers (including our caterers, couriers and word processing provider) • third-party website operators who place third- | <p>We may disclose marketing-related information to:</p> <ul style="list-style-type: none"> • develop, provide or improve our legal services • communicate with you • engage in marketing activities • satisfy legal and compliance obligations. |

| Personal information collected | Business purpose for collection | Categories of third parties to whom personal information is disclosed | Business or commercial purpose for disclosure of personal information |
|--|---|---|---|
| | | <p>party cookies on our websites</p> <ul style="list-style-type: none"> in the event that our business or any part of it is sold or integrated with another business, any prospective purchasers, the new owners of the business and their third-party advisers or service providers. | |
| <p>Information about your use of our websites including, your IP address; information related to the browser or device you use to access our website; information related to the operating system your device uses; the dates and times of your visits to our website; the country you are visiting our website from, and in some cases, depending on the size of the country, your nearest city; and whether you have interacted with our website’s cookie banner in the previous three months and, where you have done so, whether you have consented to any categories of non-essential cookies.</p> | <p>We use cookies and similar technologies on our websites to collect this information. We use this information to ensure the security and successful navigation of our websites and to provide a better user experience, such as by measuring interactions with particular content or remembering settings. We also use this information to compile statistical data on the use of our websites to enable us to evaluate and improve their performance. The information is collected and used in a way that does not directly identify you.</p> <p>For more information about the cookies we use on our websites, please refer to our Cookie Policy.</p> | <p>We may share website-related information with:</p> <ul style="list-style-type: none"> our affiliated legal entities telecommunications and information technology providers (including cloud-based technology and service providers and artificial intelligence platforms that meet our security standards and that we have specifically sanctioned for use) third-party website operators who place third-party cookies on our websites in the event that our business or any part of it is sold or integrated with another business, any prospective purchasers, the new owners of the business and their third-party advisers or service providers. | <p>We may disclose payment information to:</p> <ul style="list-style-type: none"> develop, provide or improve our legal services or our website engage in marketing activities satisfy legal and compliance obligations. |
| <p>Information related to accessibility and security including, information about your access and/or dietary requirements when you attend one of our events; the times and dates you visit our office buildings; and your recorded image on CCTV</p> | <p>We use this information in order to ensure the accessibility and security of our premises.</p> | <p>We may share accessibility and security-related information with:</p> <ul style="list-style-type: none"> our affiliated legal entities business support service providers (including our caterers, couriers and word processing provider) | <p>We may disclose accessibility-related information to:</p> <ul style="list-style-type: none"> develop, provide or improve our legal services satisfy legal and compliance obligations. |

| Personal information collected | Business purpose for collection | Categories of third parties to whom personal information is disclosed | Business or commercial purpose for disclosure of personal information |
|---|---------------------------------|---|---|
| when you visit a Cleary office in which CCTV is used. | | <ul style="list-style-type: none"> • our landlords or their managing agents • third parties hosting events for us to which you are invited • in the event that our business or any part of it is sold or integrated with another business, any prospective purchasers, the new owners of the business and their third-party advisers or service providers. | |

Additional information regarding the categories of personal information we collect and use, the third parties to which we have disclosed personal information for a business purpose to in the preceding 12 months and the purposes for which we disclosed such personal information are set out in our Privacy Statement under the sections titled “[What personal data do we collect and use and why?](#)” and “[Who will we provide your personal data to and where?](#)”.

V. Selling and sharing personal information

We do not sell or share personal information to or with third parties nor have we done so in the preceding 12 months.

VI. Children’s privacy

Our services are not intended for children under 16 years of age. We do not knowingly collect, use or disclose personal information from children under 16 years of age.

VII. Retention of your personal information

The length of time we intend to retain your personal information for is set out in our Privacy Statement under “[How long will we keep your personal data for?](#)”.

VIII. Your rights under the CCPA

The CCPA provides you with the following rights with respect to your personal information:

- The right to know information about the categories and sources of personal information collected; the purposes for which the personal information is collected, used, shared, and disclosed; and the categories of third parties to which personal information is disclosed.
- The right to access specific information about personal information collected.
- The right to request correction of inaccurate personal information that we maintain.

- The right to request deletion of personal information that we have collected or maintain, subject to certain exceptions.
- If we are deemed to sell or share your personal information, the right to opt-out of the sale or sharing of your personal information.
- The right to freedom from discrimination in connection with the exercise of your CCPA rights.

Note that as we do not do not collect or process sensitive personal information for purposes of inferring characteristics about individuals, nor use or disclose such information to any third parties for any other purposes other than as expressly permitted by the CCPA, we do not offer a right to limit the use or disclosure of such information.

When contacting us in connection with any of your rights (described above), you may need to provide sufficient identifying information before your request can be processed. We will need to verify your identity to a reasonable degree of certainty by verifying at least two data points that you previously provided to us and which we have determined to be reliable for the purpose of verifying identities; this information may include your name, address, birth date or other means of identification as appropriate in each case. Note that with respect to requests to know specific pieces of personal information, we may require three data points to verify your identity. We may limit or deny access to personal information only where permitted by law.

IX. How to exercise your rights

If you would like to exercise any of these rights, or if you have any questions or concerns about our processing of your personal information, you may contact us by e-mailing dataprivacy@cgsh.com or by telephoning us toll-free on +1-833-560-0482.

You may also use an authorized agent to submit certain privacy rights requests (e.g., requests to know or delete) on your behalf. If you use an authorized agent to submit such requests, we may require that: (1) the authorized agent provide proof of your written permission; and (2) you verify your identity directly with us. These requirements do not apply if you have provided the authorized agent with a power of attorney pursuant to California Probate Code sections 4000 to 4465.

X. Your privacy rights under the California “Shine the Light” law

Under California Civil Code Section 1798.83, if you are a California resident and your business relationship with us is primarily for personal, family or household purposes, you may request certain data regarding our disclosure, if any, of personal information to third parties for the third parties’ direct marketing purposes. We do not disclose personal information obtained through our website or services to third parties for their direct marketing purposes. Accordingly, we have no obligations under California Civil Code § 1798.83.

XI. Do not track disclosure

Third parties such as advertising networks, analytics providers and widget providers may collect information, including personal information, about your online activities over time and across

different websites when you access or use our services. Currently, various browsers offer a “Do Not Track” option, but there is no standard for how “Do Not Track” should work on commercial websites. Due to lack of such standards, our websites do not respond to “Do Not Track” consumer browser settings.

