

Hickey Smith LLP Client Portal Privacy Policy

Hickey Smith LLP (collectively, "Hickey Smith" the "firm," "we," "us" or "our") is committed to safeguarding your privacy. By using the Hickey Smith Client Portal ("Client Portal), including by providing us with any personally identifiable information, you are accepting and consenting to the practices described in this policy.

1. Collection and Use of Personal Information

a. Collection of Personal Information

We may collect and/or store the following personal information from you within the the Client Portal:

- Contact Information, such as name, email address, mailing address, or phone number;
- Financial data such as bank account numbers, statements, invoices, or other information;
- Social security numbers, employer identification numbers, etc.; and
- Other sensitive data related to legal matters in which you have engaged Hickey Smith to represent you ("Personal Information").

b. Use of Personal Information

We may use the personal information collected from the Portal to:

- Complete certain functions on the Portal.
- Send you communications from the Portal.
- Administer your account
- Respond to your questions and concerns
- Share documents related to legal matters on your behalf

When you provide us with personal information about your contacts we will only use this information for the specific reason for which it is provided.

c. Legally Required Disclosure

We may disclose any information, including Personal Information, we deem necessary, in our sole discretion, to comply with any applicable law, regulation, legal process or governmental request.

d. Third Parties

Except as otherwise disclosed in this Privacy Policy, we will not sell, rent or transfer your Personal Information to third parties without your consent. We may, however, use the information you provide in aggregate form for internal business purposes, such as generating statistics and developing marketing plans. We may also collect, store or accumulate certain non-personally identifiable information concerning use of the Client Portal, such as information regarding which of the functions of the Client Portal are most used.

We may retain other companies and individuals to perform functions on our behalf. Examples include data analysis firms, webhosting companies, storage facilities, and parties that may assist in our hiring process. Such third parties may be provided with access to Personal Information needed to perform their functions for us, but may not use such information for any other purpose. Such third parties may be located in countries that may not be subject to data protection laws similar to those prevailing in the jurisdiction in which such Personal Information is provided to or received by us. However, we require these third parties to adhere to procedures that are at least as restrictive as the procedures we follow ourselves with respect to your Personal Information, including this Privacy Policy.

e. Links

The Hickey Smith Client Portal may contain links to or from other websites. Please be aware that we are not responsible for the privacy practices of other websites. We encourage you to read the privacy policies of other websites you link to from the Hickey Smith Client Portal or otherwise visit. Third parties that have content embedded on Hickey Smith's Client Portal such as a social feature may set cookies on a user's browser and/or obtain information about the fact that a web browser visited the Hickey Smith Client Portal from a certain IP address. Third parties cannot collect any other personally identifiable information from the Client Portal unless you provide it to them directly.

f. Business Transfers

As we continue to develop our business, we might sell or otherwise transfer certain of our assets. In such transactions, user information, including Personal Information, is generally one of the transferred business assets, and by providing your Personal Information to us you agree that your data may be transferred to such parties in these circumstances.

g. Retention or Correction of Personal Information

We retain Personal Information for as long as the information remains valid and as long as necessary to comply with our legal obligations, maintain accurate financial and other records, resolve disputes, and enforce our agreements. If you want us to remove or

correct your Personal Information, please contact us at privacy@hickeysmith.com. We may decline to process requests that are frivolous/vexatious, jeopardize the privacy of others, are extremely impractical, or for which access is not otherwise required by local law.

h. Do Not Track

Hickey Smith does not track visitors to the Client Portal over time and across third party websites to provide targeted advertising and therefore does not respond to Do Not Track (DNT) signals.

2. Data Sharing and Transfer

Hickey Smith has operations or otherwise has work performed outside of the United States. Any information received by us through the Client Portal, including Personal Information, may be transferred to or shared to members of the firm or third parties performing work on behalf of the firm located in other countries that may not be subject to data protections laws similar to those prevailing in the jurisdiction in which such information is provided to or received by us. However, all of members of the firm or third parties who provide work on behalf of the firm adhere to the same procedures with respect to your Personal Information, including this Privacy Policy.

3. Changes to this Privacy Policy

We may revise this Privacy Policy from time to time. If we make changes to our Privacy Policy, we will post the revised policy here. The revised policy will also apply retroactively to all data we have collected through the website.

4. Use of Cookies

When you use the Client Portal, we may store some information on your computer. This information will be in the form of a “cookie” or similar file/technologies. Cookies are small pieces of information stored on your hard drive. We do not use cookies to spy on you or otherwise invade your privacy. They cannot invade your hard drive and steal information. We use cookies to help you navigate the Portal as easily as possible, and to remember information about your current session. These are the Session Cookies and they are removed from your system when you close the web browser or turn off the computer.

Essential Cookies: These cookies are essential for the basic functionalities offered by the Portal. These cookies help in keeping a user logged in to the Service(s) and remember relevant information when they return to the Service(s). These cookies are essential for the basic functionalities offered by the Portal and remember relevant information.

5. Communications from the Client Portal

We may use your email address to send notifications. If you no longer wish to receive these communications, you can opt out by changing your notification preferences in the My Account page.

We will send you announcements on occasions when it is necessary to do so. For instance, if the Client Portal is temporarily suspended for maintenance, we might send you an email. You may not opt-out of communications of this nature. If you do not wish to receive them, you may request that we deactivate your account by sending an email to helpdesk@hickeysmith.com.

6. Effective Date

March 19, 2018

7. Comments

If you have any questions, comments or concerns about our privacy policy or practices, please contact us by email at privacy@hickeysmith.com.