

Your California Privacy Rights

1) Privacy Notice for California Residents According to the CCPA

This **Privacy Notice for California Residents** applies solely to all visitors, users, and others who reside in the State of California ("consumers" or "you"). Miller Canfield has adopted this notice to comply with the California Consumer Privacy Act of 2018 (CCPA) and any terms defined in the CCPA have the same meaning when used in this section of Privacy Policy.

2) Information Miller Canfield Collects

Miller Canfield collects information that identifies, relates to, describes, references, is reasonably capable of being associated with, or could reasonably be linked, directly or indirectly, with a particular consumer, household, or device ("Personal Information"). Personal Information does not include:

- Publicly available information from government records;
- Deidentified or aggregated consumer information;
- Information excluded from the CCPA's scope.

In particular, Miller Canfield has collected the following categories of Personal Information from its consumers within the last twelve (12) months:

Category	Examples	Collected
A. Identifiers.	A real name, alias, postal address, unique personal identifier, online identifier, Internet Protocol address, email address, account name, Social Security number, driver's license number, passport number, or other similar identifiers.	Yes
B. Personal Information categories listed in the California Customer Records statute (Cal. Civ. Code § 1798.80(e)).	A name, signature, Social Security number, physical characteristics or description, address, telephone number, passport number, driver's license or state identification card number, insurance policy number, education, employment, employment history, bank account number, credit card number, debit card number, or any other financial information, medical information, or health insurance information. Some personal information included in this category may overlap with other categories.	Yes
C. Protected classification characteristics	Age (40 years or older), race, color, ancestry, national origin, citizenship, religion or creed, marital status, medical condition, physical or mental disability, sex (including gender, gender identity, gender expression, pregnancy or childbirth and related medical conditions),	Yes

under California or federal law.	sexual orientation, veteran or military status, genetic information (including familial genetic information).	
D. Commercial information.	Records of personal property, products or services purchased, obtained, or considered, or other purchasing or consuming histories or tendencies.	Yes
E. Biometric information.	Genetic, physiological, behavioral, and biological characteristics, or activity patterns used to extract a template or other identifier or identifying information, such as, fingerprints, faceprints, and voiceprints, iris or retina scans, keystroke, gait, or other physical patterns, and sleep, health, or exercise data.	No
F. Internet or other similar network activity.	Browsing history, search history, information on a consumer's interaction with a website, application, or advertisement.	Yes
G. Geolocation data.	Physical location or movements.	No
H. Sensory data.	Audio, electronic, visual, thermal, olfactory, or similar information.	No
I. Professional or employment-related information.	Current or past job history or performance evaluations.	Yes
J. Non-public education information (per the Family Educational Rights and Privacy Act (20 U.S.C. Section 1232g, 34 C.F.R. Part 99)).	Education records directly related to a student maintained by an educational institution or party acting on its behalf, such as grades, transcripts, class lists, student schedules, student identification codes, student financial information, or student disciplinary records.	Yes
K. Inferences drawn from other Personal Information.	Profile reflecting a person's preferences, characteristics, psychological trends, predispositions, behavior, attitudes, intelligence, abilities, and aptitudes.	Yes

3) Use of Personal Information

Purposes of use or disclosure of your Personal Information are set forth in Section No. 4 “*How we use your Personal Data*” of the Miller Canfield Privacy Policy.

4) Sharing Personal Information

Miller Canfield may disclose your Personal Information to a third party for a business purpose. When Miller Canfield discloses Personal Information for a business purpose, Miller Canfield enters into a contract that describes the purpose and requires the recipient to both keep that Personal Information confidential and not use it for any purpose except performing the contract.

5) Disclosures of Personal Information for a Business Purpose

In the preceding twelve (12) months, Miller Canfield may have disclosed Personal Information for a business purpose to the categories of third parties indicated in the chart below:

Business Purpose Disclosures	
Personal Information Category	Category of Third-Party Recipients
A: Identifiers.	Service Providers
B: California Customer Records personal information categories.	Service Providers
C: Protected classification characteristics under California or federal law.	Service Providers
D: Commercial information.	Service Providers
E: Biometric information.	None
F: Internet or other similar network activity.	None
G: Geolocation data.	None
H: Sensory data.	None
I: Professional or employment-related information.	None

J: Non-public education information.	None
K: Inferences drawn from other personal information.	None

6) Sales of Personal Information

In the preceding twelve (12) months, Miller Canfield has not sold Personal Information.

7) Your Rights and Choices

The CCPA provides consumers (California residents) with specific rights regarding their Personal Information. This section describes your CCPA rights and explains how to exercise those rights.

a) Access to Specific Information and Data Portability Rights

You have the right to request that Miller Canfield discloses certain information to you about its collection and use of your Personal Information over the past twelve (12) months. Once Miller Canfield receives and confirms your verifiable consumer request, Miller Canfield will disclose to you:

- The categories of Personal Information it has collected about you;
- The categories of sources for Personal Information it has collected about you;
- Its business or commercial purpose for collecting or selling that Personal Information;
- The categories of third parties with whom Miller Canfield shared that Personal Information;
- The specific pieces of Personal Information it has collected about you (also called a “*data portability request*”);
- If Miller Canfield sold or disclosed your Personal Information for a business purpose, two separate lists disclosing:
 - sales, identifying the Personal Information categories that each category of recipient purchased; and
 - disclosures for a business purpose, identifying the Personal Information categories that each category of recipient obtained.

b) Deletion Request Rights

You have the right to request that Miller Canfield delete any of your Personal Information that it collected from you and retained, subject to certain exceptions. Once Miller Canfield receives and confirms your verifiable consumer request, it will delete (and direct our service providers to delete) your Personal Information from its records, unless an exception applies.

Miller Canfield may deny your deletion request if retaining the information is necessary for Miller Canfield, or its service provider(s) to:

- Complete the transaction for which Miller Canfield collected the Personal Information, provide a good or service that you requested, take actions reasonably anticipated within the context of our ongoing business relationship with you, fulfill the terms of a written warranty or product recall conducted in accordance with federal law, or otherwise perform our contract with you;
- Detect security incidents, protect against malicious, deceptive, fraudulent, or illegal activity, or prosecute those responsible for such activities;
- Debug products to identify and repair errors that impair existing intended functionality;
- Exercise free speech, ensure the right of another consumer to exercise their free speech rights, or exercise another right provided for by law;
- Comply with the California Electronic Communications Privacy Act (Cal. Penal Code § 1546 *et. seq.*);
- Engage in public or peer-reviewed scientific, historical, or statistical research in the public interest that adheres to all other applicable ethics and privacy laws, when the information's deletion may likely render impossible or seriously impair the research's achievement, if you previously provided informed consent;
- Enable solely internal uses that are reasonably aligned with consumer expectations based on your relationship with Miller Canfield;
- Comply with a legal obligation;
- Make other internal and lawful uses of that information that are compatible with the context in which you provided it.

c) Exercising Access, Data Portability, and Deletion Rights

To exercise the access, data portability, and deletion rights described above, please submit a verifiable consumer request to Miller Canfield at: dataprivacymanager@millercanfield.com, or mail Miller Canfield at 150 W. Jefferson, Suite 2500, Detroit MI 48226.

Only you, or someone legally authorized to act on your behalf, may make a verifiable consumer request related to your Personal Information. You may also make a verifiable consumer request on behalf of your minor child.

You may only make a verifiable consumer request for access or data portability twice within a 12-month period. The verifiable consumer request must:

- Provide sufficient information that allows Miller Canfield to reasonably verify you are the person about whom Miller Canfield collected Personal Information or an authorized representative;
- Describe your request with sufficient detail that allows Miller Canfield to properly understand, evaluate, and respond to it.

Miller Canfield cannot respond to your request or provide you with Personal Information if it cannot verify your identity or authority to make the request and confirm the Personal Information relates to you.

Making a verifiable consumer request does not require you to create an account with Miller Canfield.

Miller Canfield will only use Personal Information provided in a verifiable consumer request to verify the requestor's identity or authority to make the request.

d) Response Timing and Format

Miller Canfield endeavors to respond to a verifiable consumer request within forty-five (45) days of its receipt. If Miller Canfield requires more time (up to ninety (90) days), it will inform you of the reason and extension period in writing.

If you have a matter or account with Miller Canfield, Miller Canfield will deliver its written response to the individual listed as the contact person for that account. If you do not have a matter or account with Miller Canfield, it will deliver our written response by mail or electronically, at your option.

Any disclosures Miller Canfield provides will only cover the 12-month period preceding the verifiable consumer request's receipt. The response Miller Canfield provides will also explain the reasons it cannot comply with a request, if applicable. For data portability requests, Miller Canfield will select a format to provide your Personal Information that is readily useable and should allow you to transmit the information from one entity to another entity without hindrance.

Miller Canfield does not charge a fee to process or respond to your verifiable consumer request unless it is excessive, repetitive, or manifestly unfounded. If Miller Canfield determines that the request warrants a fee, it will tell you why Miller Canfield made that decision and provide you with a cost estimate before completing your request.

8) Non-Discrimination

Miller Canfield will not discriminate against you for exercising any of your CCPA rights. Unless permitted by the CCPA, Miller Canfield will not:

- Deny you goods or services;
- Charge you different prices or rates for goods or services, including through granting discounts or other benefits, or imposing penalties;
- Provide you a different level or quality of goods or services; or
- Suggest that you may receive a different price or rate for goods or services or a different level or quality of goods or services.