

Cozen Canadian Privacy Policy

Cozen O'Connor is an international full-service firm that recognizes the value of protecting your privacy and, for that reason, Cozen O'Connor LLP, an Ontario limited liability partnership ("**Cozen**"), has adopted this privacy policy (the "**Privacy Policy**") to explain its data collection, use, and disclosure practices.

This Privacy Policy describes, among other things:

- what information we collect from you, including Personal Information (as defined below);
- how we collect, use, and disclose your information;
- your rights regarding your information;
- how we safeguard your information;
- how we process and store your information; and
- our cookie policy.

1. The Information Cozen Collects

This Privacy Policy applies to information about our clients, service providers, and other individuals. Cozen collects two types of information (i) Personal Information; and (ii) Non-Personal Information, as defined and summarized below.

This Privacy Policy does not apply to the collection, use, or disclosure of the following information:

- business contact information; or
- publicly available information recognized under applicable privacy legislation.

a. Personal Information

Personal information is information about an identifiable individual whether factual or subjective ("**Personal Information**"). This includes information in any form including age, name, income, ethnic origin, opinions, evaluations, or personal records.

We may obtain your Personal Information from you directly including through your interaction with our website at www.cozen.com (the "**Cozen Website**") (*i.e.*, by filing out a contact form, or by answering an RSVP to a Cozen event) or our legal services. Some other examples of when Cozen collects such information is when you:

- submit an online request for information about Cozen;
- subscribe to Cozen's publications;
- ask us about employment opportunities and send us your resume or other employment experience information;
- complete a survey; and/or
- send us an e-mail message.

We may also obtain your Personal Information from a third-party source, for example, we may collect information from our clients, our clients' personnel, agents and advisors, other law firms and advisors which represent you, the company for whom you work, insurance companies, other organizations or persons with whom you have dealings, government agencies, credit reporting agencies, recruitment agencies, or service providers.

b. Non-Personal Information

The second type of information we collect is non-personal information, such as the type of web browser you use, your domain name, and links you may have used to locate the Cozen Website, but which otherwise does not identify you individually ("**Non-Personal Information**").

We will not use Non-Personal Information to try to identify you, and if we associate any Non-Personal Information with information that personally identifies you, then we will treat it as Personal Information.

2. How We Use The Information Collected

Cozen collects, discloses, and uses Personal Information for a number of reasons, including for the following purposes:

- to provide you with information about Cozen and its services;
- to provide legal advice and perform legal services, whether through Cozen, Cozen's affiliates, or Cozen's third-party partners;
- to contact you if you are involved in a matter we are undertaking for a client, whether in your professional or personal capacity;
- to process and assess potential conflicts of interest;
- to carry out investigations, risk assessments, and client due diligence;
- to review, draft, and disclose correspondence and other documents, including court documents;
- to instruct third-parties on behalf of our clients;
- for comparison/analytical purposes and to formulate legal opinions and provide advice;
- to facilitate, make, and receive payments to or from Cozen;
- to enhance or update the Cozen website;
- to advertise and market the services that we provide; and
- for purposes authorized or required by applicable privacy legislation or other law.

We may also process your Personal Information for effective business management purposes which may involve the use of your Personal Information in the following (non-exhaustive) ways:

- to engage and contact suppliers;
- to carry out internal reviews, investigations, and audits;
- for our internal record keeping;
- to conduct business reporting and analytics;
- to advertise and market the services that we provide;
- to compile demographic statistics about users of the Cozen Website;

- to help measure performance and improve our services;
- for recruitment purposes;
- for regulatory and legislative compliance and related reporting; and
- for the prevention and detection of crime.

We may also, on occasion, combine information about you that we have with information we obtain from other parties to enhance our ability to provide you with information about Cozen, our affiliates, or our services that we think may be of interest to you.

On an aggregate basis only, we may also collect Non-Personal Information about users of the Cozen Website. Cozen will never not disclose any Personal Information as part of this aggregate information but we may lend, sell, share or otherwise disclose Non-Personal Information with others so we can perform research and provide the results to third parties, enhance and market the Cozen Website, and conduct accounting and process record keeping functions. Additionally, we may use IP address information to count and track aggregate visits to the Cozen Website, to help diagnose problems with our server, and to administer the Cozen Website. Cozen does not link IP addresses to anything personally identifiable so while a particular user's session can be tracked, the user remains completely anonymous. We also may use this information to assist us in the ongoing technical development of the Cozen Website.

Cozen will make every effort to preserve user privacy but we may need to disclose Personal Information when required by law or if we have a good-faith belief that the action is necessary to comply with a pending judicial proceeding, a court order or legal process served on Cozen or to protect our rights or the rights of others, to fight fraud, identity theft, to ensure the integrity and operation of our business and systems, or to protect the rights, property, or safety of Cozen, its employees, members, or others.

Also, in the (i) unlikely event of a bankruptcy or other insolvency event; or (ii) in the event that Cozen, or substantially all of its assets, is acquired by another firm, Personal Information may then be transferred to the successor firm.

3. How We Disclose The Information Collected to Third Parties

Cozen may disclose Personal Information and Non-Personal Information to third party providers engaged to perform functions on our behalf (such as processing of payments, provision of data storage, hosting of our website, marketing of our products and services, and conducting audits). When we use such a third party, we require that the provider use and disclose the Personal Information and Non-Personal Information received from us only to provide their services to us or as required by applicable law.

Such recipients include but are not limited to:

- other lawyers, experts, consultants and foreign law firms whom we instruct on your behalf;
- courts and governmental authorities;
- Cozen's affiliated entities;
- Cozen's insurance brokers and underwriters;
- Cozen's banks, auditors and accountants;

- Cozen’s outsourced IT providers and other service providers and suppliers;
- law societies and other professional licensing or regulatory organizations to which our lawyers are subject; and
- the other side/other parties on any given matter.

Cozen may also use third-parties to collect information for the purpose of tracking information about the Cozen Website, in which case the information it receives is subject to the Online Tool Provider’s own privacy policy. By “Online Tool Provider” we mean a third-party that provides a specialized function or service to us and that requires the transmission of information. You can read more about our Online Tool Providers’ privacy policies here:

1. [Google Analytics](#)
2. [Lucky Orange](#)

Online Tool Providers are restricted to only access the information they need in order to operate, develop, improve, or support our services and the Cozen Website. We require that they also use reasonable information security measures to safeguard information and comply with any applicable laws or regulations with respect to information security.

Cozen does not sell or rent any Personal Information. Except as stated in this Privacy Policy, we will not share your Personal Information with anyone outside of Cozen and those hired by Cozen to perform work on its behalf.

4. Consent

Cozen obtains your consent to collect, use, or disclose any Personal Information pursuant to this Privacy Policy. Your consent can be expressly provided, implicitly given, or provided through an authorized representative (*i.e.*, a lawyer). However, there may be exemptions when we may collect, use, or disclose Personal Information without knowledge or consent, such as:

- if the Personal Information is publicly available from an authorized source; or
- where we are authorized or required by law.

When your consent is obtained, either expressly or implicitly (*e.g.*, through a signed engagement letter with Cozen, by using the Cozen Website or attending a Cozen event), you agree that we may collect, use, and disclose your Personal Information as set out in this Privacy Policy and as otherwise authorized or required by law.

You have the right to withdraw your consent to our collection, use, and disclosure of your Personal Information at any time, subject to legal and/or contractual restrictions and by providing Cozen with reasonable notice. On receipt of notice of withdrawal of consent, we will advise you of the likely consequences of the withdrawal of consent, which may include our inability to provide services for which that information is necessary.

5. Your Rights

You have the right to ask for access to your own Personal Information in Cozen's control. You also have the right to challenge the accuracy and completeness of your information, to amend it as appropriate, to delete it, or change how we use it subject to a limited number of exceptions prescribed by law.

To access, amend, rectify, or delete your information, please send us an email to privacy@cozen.com with your instructions. We typically ask individuals making a request to identify themselves to ensure our compliance with privacy legislation. Cozen will respond to any requests within 30 days of receipt and authentication of your identity, or provide written notice where additional time is required to fulfill the request.

In some situations, we may decline to process requests if authorized or required by law. This may be the case where, for example, a request could jeopardize the privacy of others or relates to information that is not associated with your Personal Information. If we are unable to fulfil your request, we will notify you in writing explaining why we are unable to do so and provide you with any further recourse available to you. In any case, where we provide information access or correction, we perform this service free of charge, except if doing so would require a disproportionate effort.

Cozen values the accuracy of your Personal Information. We will make reasonable efforts to ensure that Personal Information we collect, use, or disclose is accurate and complete. If any of your Personal Information changes, please promptly inform us so that we may make any necessary changes. We may also ask you from time to time to update your Personal Information or confirm that it is up-to-date.

6. How do we protect your Personal Data?

Cozen has reasonable physical, technological, administrative and procedural security arrangements in place intended to guard against unauthorized access, improper use, alteration, destruction, or accidental loss of your Personal Information. However, you should be aware that no method of data transmission or storage over the Internet can be 100% secure, and we cannot ensure the full security of any information provided to us. Nonetheless, we take appropriate organizational and technical security measures and have rules and procedures in place to ensure that any Personal Information in our custody is not accessed by anyone unauthorized to access it. We have in place, and abide by, an information security program which includes policies and standards to protect Personal Information.

Cozen is affiliated with other Cozen O'Connor entities such as Cozen O'Connor, a Pennsylvania professional corporation ("Cozen US"). Cozen works closely with Cozen US to transfer, process, use, and store your Personal Information through itself and contracted third-parties. For example, Cozen makes use of Cozen US's firm-wide administrative resources, including email systems, document retention systems, conflict check systems, bill payment and collection systems, and other joint systems. This may involve your Personal Information being stored or accessed in other countries, including the United States, making such Personal Information subject to disclosure to authorized governmental officials or law enforcement of such other

countries, pursuant to the laws of such countries. To further ensure that your Personal Information is adequately protected, Cozen and Cozen US have agreed to comply with the security measures and safeguards set forth in this Privacy Policy, your instructions relating to your Personal Information, and all applicable data protection legislation. By engaging Cozen for legal services or ancillary services, visiting the Cozen Website, attending a Cozen event, and/or providing your information, you acknowledge and agree that your Personal Information can be transferred, used, and stored as provided in this Privacy Policy.

7. How long will your Personal Information be retained by Cozen?

It is our policy to retain your Personal Information for the length of time required for the specific purposes for which it is processed by Cozen and which are set out in this Privacy Policy. However, we may be obliged to keep your Personal Information for a longer period, for example, where required by our legal and regulatory obligations or in order to ensure we have effective back-up systems. In such cases, we will ensure that your Personal Information will continue to be treated in accordance with this Privacy Policy, restrict access to any archived Personal Information and ensure that all Personal Information is held securely and kept confidential.

8. Direct Marketing

We may use your contact details to send you marketing materials, provided we are permitted to do so by applicable law. You always have the right to unsubscribe from any marketing. You can do so by clicking on the relevant link in the next email we send you.

9. Other Websites and Links

We may include links to other websites that we think will be of interest to you or operated by our business partners, affiliates, advertisers and others. These third parties have separate data collection and privacy practices independent from ours, and Cozen cannot be responsible for their policies or activities. Please contact those third parties directly if you have questions about their privacy policies.

10. Cookies, Web Beacons and Clear Gifs; Third Party Advertising

Cozen also uses a feature of your browser called a “cookie.” Your cookie automatically identifies your computer – but not you – to our servers when you visit the Cozen Website and allows us to correlate your computer with certain usage patterns which are stored in our log files. We use cookies to gather general, aggregate statistics about the overall popularity and usage of the Cozen Website. Cozen also uses more temporary cookies, often referred to as session cookies, to keep a user logged into the system and aid in the exchange of information between pages without loss of data. Such a cookie, however, is only stored for the current browsing session and is deleted once the browser is closed. Cozen can also only read cookies from the Cozen Website.

Cozen may also collect information through the use of clear gifs (also called Web beacons and Web bugs) in selected email messages we send to you. These are tiny graphic files, not visible to the human eye, that are included in HTML-based emails and used to let us know which emails

we send are opened. Clear gifs may also see or read cookies on your computer. When authorized by Cozen, third parties specializing in monitoring aggregate statistical use of our site with whom we contract, may use cookies, our web log files, web beacons, and other monitoring technologies to compile anonymous aggregate data.

Cozen allows third parties to place cookies on our site for advertising purposes. This Privacy Policy does not cover the collection methods or use of the information collected by these vendors. These vendors have their own privacy policies. Some Online Tool Providers may allow you to opt out of certain collection and/or uses of your information. You can read more here: [Google Analytics](#).

Your operating system and web browser may allow you to erase information stored in cookies and local browser storage. But if you do so, you may be forced to login again and you may lose some preferences or settings. You may also be able to set your browser to refuse all website storage or to indicate when it is permitted, but some features of our Cozen Website may not function properly without it. Search for Cookies under your web browser's "help" menu for more information on cookie management features available to you.

11. How to make a complaint

If you are unhappy with the information provided in this Privacy Policy or have concerns about the way in which Cozen processes your Personal Information you may contact us at privacy@cozen.com.

12. Changes to this Privacy Policy

We encourage you to review our Privacy Policy not just the first time you visit the Cozen Website or use our services, but periodically afterward since we may modify our Privacy Policy from time to time. The date of the last update of the Privacy Policy will always be posted below.

THIS PRIVACY POLICY WAS LAST REVISED ON: December 20, 2022.

If we make any substantive changes to our Privacy Policy in the future with regard to how we use your Personal Information, we will incorporate those changes here. We encourage you to review our Privacy Policy from time to time to ensure you are aware of the most updated version. If you do not agree to the changes and use our services please provide us with notice at privacy@cozen.com. If you do not agree to the changes and only use the Cozen Website, please discontinue from visiting the Cozen Website.

13. Contacting Cozen

Please feel free to share any comments and concerns with us. If you have any questions about this Privacy Policy, please contact our Privacy Officer:

Shane Hardy
Cozen O'Connor
Bay Adelaide Centre – West Tower
333 Bay Street, Unit 1100

Toronto, ON M5H 2R2
Or by e-mail at: privacy@cozen.com