

Privacy Policy

Schulte Privacy Policy

Last updated: February 22, 2024

This Privacy Policy sets forth the policies of Schulte Roth & Zabel LLP and Schulte Roth & Zabel International LLP (collectively, “Schulte,” “we,” “us” or “our”) with respect to collection and use of personal information.

“Personal information,” as used in this Privacy Policy, means information that identifies, or directly relates to identifiable, individuals. This Privacy Policy does not apply to information collected about employees in their capacity as employees. If you are an employee and have any questions about our employee privacy practices, please contact Jean Lee, Chief People Officer.

Schulte is an international law firm, with offices located in the United States and the United Kingdom. As a provider of legal services, Schulte is committed to protecting the confidentiality and integrity of your personal information. Schulte maintains appropriate technical and security arrangements in order to keep your personal information confidential and protect it against loss, misuse and unauthorized access, disclosure, or alteration, in accordance with applicable data protection and privacy laws.

We may update this Privacy Policy from time to time and will post the updated Privacy Policy here. We recommend and encourage you to visit our website periodically to view the most recent version of our Privacy Policy.

If you are a California resident, please read our Privacy Notice for California Consumers below.

Collection of Personal Information

Schulte may collect personal information about you directly from you or another person acting on your behalf. We will also collect personal

information about you if it relates to your instructions, transactions between you and us, and the services that we provide to you, your employer, or another business or entity associated with you.

You may browse areas of our website or our applications that do not require entry of login credentials without actively entering personal information. However, Schulte may receive certain information automatically from your web browser or applications you use when you access our website or our applications, including, for example, IP addresses, other device identifiers, browser types, operating systems, access dates and times, referring and exiting URLs, etc.

We may ask you to provide personal information, including through forms you complete on various pages of our website or our applications. This may include providing your personal information in order to provide legal services to you, to register for *Schulte Client Alerts* or events, to register for newsletters or other updates, to register on the Alumni Website, or to inquire about or apply for a job with Schulte.

In some circumstances, we may receive personal information about you from third parties, such as our service providers, regulatory or law enforcement agencies, your bank or other financial institutions or advisors, and agencies conducting background checks. We may also obtain personal information about you from publicly accessible sources of information, such as public databases, industry associations, social media, and online professional networks.

The categories of personal information we may collect will depend on the nature of our relationship with you or the services we provide, and the purpose for which information is collected. Such personal data may include the following: names, residential addresses or other contact details, signatures, nationality, date and place of birth, social security, national insurance or other tax identification numbers, photographs, copies of identification documents, bank account details, information about assets or net worth, credit history, criminal and administrative offences, funds' details and their sources, educational information, such as transcripts, travel-related information or, in some cases, other sensitive information, such as certain special categories of personal data (e.g., information about health, political affiliations, or religious or philosophical beliefs) contained in relevant documents or materials. If you attend events or client briefings at Schulte's offices, we may collect information about your dietary requirements and preferences.

Our Use of Personal Information

We may use your personal information where applicable law permits us to do so, including for any of the following purposes:

- To contact you and establish and administer the relationship between us;
- To provide services to you, your employer, your consultants or advisors or other persons or entities associated with or engaged by you, and administer the matters on which we are instructed by our clients;
- To contact you about legal updates, seminars or events, or Schulte developments and announcements that we believe may be of interest to you;
- To send you newsletters or other updates to which you have subscribed;
- To monitor and analyze our activities; and
- To comply with applicable legal or regulatory requirements, including rules of professional conduct, anti-money laundering and sanctions regimes.

Schulte will use one of the permitted grounds under applicable law to process your personal information. Such grounds include instances where you have given your consent or where your consent is not required under applicable law, such as where Schulte is required to comply with a legal obligation, or where Schulte, or a third party acting on our behalf, determines that it is necessary for our legitimate interests to collect and use your information.

The legitimate interests to collect your personal information may include any of the purposes identified above and any other purpose where Schulte, or a third party acting on our behalf, has determined that you have a reasonable expectation for Schulte or a third party, on our behalf, to collect or use your personal information for such purpose.

What Are the Consequences of Failing to Provide Your Personal Information?

Depending on the purpose for which your personal information is required, a refusal to provide Schulte with personal information may have various

consequences, such as Schulte being unable to communicate with you, to provide our services to you, or to permit you to access our offices or other facilities. If your personal information is necessary for Schulte to carry out our anti-money laundering checks, failure to provide such information may result in the firm not being able to provide the representation. If Schulte has a reasonable suspicion of illegal activity, we may be required, under applicable law, to make a report to regulatory or enforcement agencies.

Sharing of Personal Information

We will only disclose your personal information outside Schulte in limited circumstances. Such circumstances include disclosures to our agents or service providers acting on our behalf and at our direction (“processors”), where we believe disclosure is necessary to provide a service that you have requested, or as otherwise authorized or directed by you. Where we transfer, or give access to, your personal information to our processors, we ensure that such processors have committed themselves to appropriate confidentiality and information security obligations.

Subject to compliance with applicable law and our professional obligations, we may share your personal information with the following:

- Our affiliates;
- Any person to whom Schulte has a right or obligation to disclose your personal information under applicable law, or any person where Schulte determines that disclosure is necessary to protect or defend our rights or property, including with regulators, courts of law, governmental, regulatory, or law enforcement agencies;
- Our internet, IT, telecommunications and other relevant service providers, or law firm ranking agencies;
- Any person or entity, as directed by you; or
- Any person or entity, as directed by you, including as part of hiring and recruiting activities; or
- Any person to whom Schulte transfers any of our rights or obligations under any agreement, or in connection with a sale, merger or consolidation of our business or other transfer of our assets, whether

voluntarily or by operation of law, or who is otherwise deemed to be our successor or transferee.

Security of Personal Information and Retention Periods

Schulte maintains appropriate technical and organizational security procedures in order to keep your personal information confidential and protect it against loss, misuse and unauthorized access, disclosure, or alteration, in accordance with applicable data protection and privacy laws.

Schulte will generally keep information about you for as long as necessary in relation to the purpose for which it was collected, as set forth in this Privacy Policy, or for such longer period if required under applicable law, or necessary for the purposes of Schulte's other legitimate interests.

Additional Information for Residents of the EEA and United Kingdom

Given the global nature of our business, we operate systems that may make personal information collected in the United Kingdom or a country in the European Economic Area ("EEA") accessible from our offices in the United States or other countries outside the United Kingdom or EEA (as relevant) (each, a "third country"). We may also transfer personal information to our offices in the United States, or service providers in a third country to enable us to provide legal services to you, or for our internal administration or compliance purposes. You should note that such third countries may not offer the same level of data protection as that afforded by the EU General Data Protection Regulation, including as it forms part of the law of England and Wales, Scotland and Northern Ireland by virtue of section 3 of the European Union (Withdrawal) Act 2019 ("GDPR"). Where we transfer personal data to such third countries, Schulte will ensure that such personal information receives appropriate protections, including having contractual undertakings in legal agreements with our data processors, such as Standard Contractual Clauses adopted by the European Commission or the standard International Data Transfer Agreement ("IDTA") adopted by the UK Information Commissioner. We maintain IDTA for transfers between our offices.

You may have certain rights under GDPR in respect of the personal information Schulte holds about you. These rights include the ability:

- To request access to your personal information;
- To request rectification of inaccurate or incomplete information;
- To request erasure of your information (a “right to be forgotten”);
- To restrict the processing of your information in certain circumstances;
- To object to our use of your information, such as where we have considered such use to be necessary for our legitimate interests (e.g., in the case of direct marketing activities);
- Where relevant, to request the portability of your information;
- Where you have given consent to the processing of your personal information, to withdraw your consent; and
- To lodge a complaint with the competent supervisory authority.

How to Contact Schulte

If you have any questions about this Privacy Policy, comments or enquiries regarding the collection, processing, and storage of your personal information by Schulte, or to exercise your rights under GDPR, please contact us via email at privacy@srz.com or, in writing, to:

Schulte Roth & Zabel LLP

Attn: General Counsel
919 Third Avenue
New York, NY 10022

Schulte will handle all such requests in accordance with applicable data protection and privacy laws.

You have the right to object to the use of your personal information for direct marketing purposes. If you do not wish to receive our publications or details of events that we consider may be of interest to you, we ask that you notify us by clicking on the unsubscribe link in any electronic marketing communications that you receive, or by emailing privacy@srz.com.

Use of Cookies

We may send text files (e.g., “cookies” or other cached files) or images to your web browser to store information on your computer. We may use these files and images for technical convenience to store information on your computer. For example, we may use a session cookie to store form information that you have entered so that you do not have to enter such information again. We may use information stored in such text files and images to customize and monitor your experience and use of this website. You may set your browser to notify you when you receive a cookie. Many web browsers also allow you to block cookies. If you block cookies, you may not be able to access certain parts of this website. You can disable cookies from your computer system by following the instructions on your browser or at <http://www.allaboutcookies.org/>.

Links to Other Websites

This website may contain hyperlinks to the websites of third parties. If you decide to follow such links, be aware that Schulte does not take any responsibility for the third-party content or compliance of the third-party website with data privacy laws. This Privacy Policy does not apply to such third-party content or sites.

Alumni Website

Schulte maintains an alumni website (“Alumni Website”), which is governed by this Privacy Policy. The Alumni Website collects Personal Information such as your name (including name prefix or title), your recent Schulte career history (job title, current or last office, current or last department, and your last start date and, if applicable, end date), your current employment status and, if applicable, current job title and employer, contact information, such as your email address and phone number(s), career and biographical information, such as your start and (if applicable) end dates at Schulte, position(s) held at Schulte, including your department and office at Schulte, other employment and education information, as well as information about your outside interests and activities. The Alumni Website does not solicit or seek to collect, nor do we recommend you upload to the Alumni Website, any sensitive personal information. The Alumni Website provides an opportunity to link your LinkedIn account to the site and to sign up for opportunities, programming and news in select areas. The Alumni Website uses multi-factor authentication (“MFA”) for purposes of logging in.

Privacy Notice for California Consumers

This Privacy Notice for California Consumers contains disclosures required by the California Consumer Privacy Act, as amended by the California Privacy Rights Act ("CPRA"). Terms defined in the CPRA have the same meaning when used in this notice. This notice is only relevant to California residents ("consumers" or "you"), including job applicants and current or former employees. Consumers with disabilities may access a printable copy of this notice in PDF format using the link provided above.

Information We Collect. In the past 12 months, we have collected and disclosed for a business purpose the following categories of personal information ("Personal Information"):

Category	Examples
Identifiers	A real name, alias, email address, postal address, Internet Protocol (IP) address, account name, Social Security number, driver's license number, passport number, or other similar personal identifiers.
Other personal information categories, as listed in the California Customer Records statute	A signature, physical characteristics or description, telephone 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.
Protected classification under California or federal law	Age (40 years or older), race, color, national origin, characteristics religion, disability, sexual orientation, medical condition, ancestry, citizenship, marital status, sex/gender, or veteran or military status.
Commercial information	Records of your receipt and payment for services and of personal property.
Biometric information	Body temperature for COVID-19 screening purposes, or fingerprints, such as in connection with criminal or immigration matters.
Internet or other similar	Information on your interaction with our website, social media accounts, or electronic communications we send to you.

network

activity

Audio and visual Information, such as your voice and likeness as captured in photographs, video, or audio

Sensory data recordings for audio and video meetings, as well if you attend our events, webinars, visit our offices, or leave us a voicemail.

Professional or

employment-

related

information

Current or past job history or performance evaluations.

Non-public

education

information

Records concerning your education maintained by or on behalf of an educational institution, such as transcripts.

Inferences

drawn from

other personal

information

Profile reflecting a person's preferences, abilities, and aptitudes.

A consumer's SS, driver's license, state ID card, or passport number; account log-in or debit/credit card number in combination with any access code, password, or account credentials; precise geolocation; racial/ethnic origin, religious/philosophical beliefs, or union membership; contents of mail, email, and text messages; genetic data; biometric information; PHI; or sex life or sexual orientation.[6]

Sensitive

personal

information

Personal Information does not include information that is publicly available, de-identified/ aggregated, or subject to HIPAA.

We collect Personal Information from the following categories of sources:

- Your communications with us;
- By observing your actions on our website;
- Service providers, including, but not limited to: clients, administrators, lenders, banks, brokers, auditors, law firms, consultants, placement

agents, employment agencies, benefit and payroll providers, credit bureaus;

- Nonprofit organizations; and
- Government entities.

Use of Personal Information. We may use the personal information we collect for one or more of the following purposes:

- To contact you and establish and administer the relationship between us;
- To provide services to you, your employer, your consultants or advisors or another person or entity associated with or engaged by you, and administer the matters on which you or your representatives instruct us;
- To contact you about legal updates, seminars or events, or Schulte developments and announcements that we believe may be of interest to you;
- To send you newsletters or other updates to which you have subscribed;
- To address one or more of the following business purposes:
 - Account servicing and processing payments;
 - Auditing related to our interactions with you (e.g., your interactions with emails and other communications we send to you);
 - Legal compliance;
 - Detection of and protection against security incidents, fraud, and illegal activity; and
 - Internal operations.

The use of sensitive personal information is limited to only those purposes authorized under the CPRA.

Sharing Personal Information. We may disclose personal information in one or more of the categories identified above to:

- Service providers, including but not limited to, third parties that provide website hosting, off-business hour user support, security monitoring and

response, professional services, including information technology services and related infrastructure, document review, auditing, benefits administration, hiring and recruitment and other similar services;

- Affiliates;
- Business partners;
- Law firm ranking agencies;
- Legal or government regulatory authorities as required by applicable law;
- Other parties as intentionally directed by you; and
- Other parties in connection with a potential business transfer.

In the past 12 months, we have not sold or shared (for cross-context behavioral advertising) Personal Information to third parties.

Length of Time. We will keep your Personal Information for as long as necessary to comply with our regulatory obligations.

Rights of California Consumers. The CPRA provides a California consumer the following rights, subject to certain exceptions and limitations:

- The right to request: (a) the categories and specific pieces of Personal Information we collect about you; (b) the categories of sources from which we collect your Personal Information; (c) our business or commercial purposes for collecting, selling or sharing your Personal Information; (d) the categories of Personal Information disclosed for a business purpose or shared with third parties (for cross-context behavioral advertising) and the categories of persons to whom it was disclosed or shared; (e) the categories of your Personal Information (if any) that we have either sold, shared, or disclosed.
- The right to request that we delete your Personal Information, subject to certain exceptions.
- The right to opt out of our sale(s) (if any) of your Personal Information to third parties or sharing with such third parties for the purpose of cross-context behavioral advertising.

- The right to request we correct any inaccurate Personal Information maintained about you.
- The right to limit our use of your sensitive personal information to only use that is necessary to perform the services expected or provide the goods reasonably expected.
- The right not to receive discriminatory treatment for exercising your CPRA rights.

You may submit requests relating to your exercise of rights under the CPRA to us:

By telephone at (800) 346-9644;

By submitting a request online using the following online form at <https://srzinsights.com/6/29/landing-pages/contact-us.asp>; or

By email at privacy@srz.com.

You may only make a verifiable request for access or data portability twice within a 12-month period. All verifiable requests must provide (1) enough information that allows us to reasonably verify you are the person about whom we collected Personal Information or an authorized agent and (2) sufficient detail that allows us to properly evaluate and respond to it. We may need to request additional information from you to verify your identity or understand the scope of your request. If we are unable to verify your identity, we will need to deny your request. You may designate an authorized agent to make a CPRA request on your behalf and we reserve the right to seek proof that you have given the authorized agent signed permission to act on your behalf.

We endeavor to respond to a verifiable request within 45 days of its receipt. If we require more time, we will inform you of the reason and extension period in writing. We will deliver our written response by mail or electronically, at your option.

Questions

If you have questions regarding this Notice, please contact us at privacy@srz.com.

Disclaimer and Notices

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Privacy Policy
