

## Privacy Notice

Akin Gump Solutions, LLC (“AGS”) is committed to protecting and respecting your privacy. This Privacy Notice (the “Notice”) summarizes how AGS will process and protect personal information it receives about OverRuled users, prospective users, website visitors, and other third party suppliers, vendors, or agents for the provision of [www.overruled.com](http://www.overruled.com) and its associated services ([www.overruled.com](http://www.overruled.com)). Reference in this Notice to your “personal information” means any information that identifies, or could reasonably be used to identify, you, or in the event applicable law provides a broader definition, shall mean the same as the definition of “personal information,” “personal data” or similar terms under that applicable law.

Akin Gump Solutions, LLC, a Delaware limited liability company (“AGS”) is a separate entity affiliated with each of (i) Akin Gump Strauss Hauer & Feld LLP, a limited liability partnership under the laws and regulations of numerous jurisdictions both inside and outside the United States (“AGSHF LLP”); and (ii) Akin Gump LLP, a limited liability partnership under the laws of New York and operating in the United Kingdom (“AG LLP”, and together with AGSHF LLP, “Akin Gump,” “Akin,” or “we”). Please note, this policy does not cover the practices governing personal information collected via Akin’s primary website, [www.akingump.com](http://www.akingump.com). For that information, please see Akin’s primary Privacy Notice at <https://www.akingump.com/en/privacy-policy.html>.

### DATA CONTROLLER

AGS acts as the “data controller” for any data that we collect ourselves, and for which we determine the purpose and means of processing. To the extent we process data on your behalf as part of our provision of the Services, we are acting as a “data processor.” As a data controller, our contact details are as follows:

- Akin Gump Solutions, LLC  
c/o Chris Egan, Assistant General Counsel  
2001 K Street N.W.  
Washington, D.C. 20006  
[privacy@overruled.com](mailto:privacy@overruled.com)

### COLLECTING AND PROCESSING YOUR INFORMATION

Our collection and processing of personal information varies by context. Scroll down to the category that applies to you. Please note, we do not sell your personal information or share your personal information for the purpose of cross-context behavioral advertising.

## ***OverRuled Users***

### **What personal information do we collect from users?**

During our work for users or prospective users, we may collect personal information about individual users, their employees and agents, and other third parties whose personal information is held by users. We may obtain this information from users, public websites, research services, social media sites, and other third party sources. Specifically, we may collect and process:

- Identifiers such as name, address and contact details, including email address and telephone number;
- Professional or employment related information;
- Education-related information;
- Financial or other commercial information (such as bank account, and payment information).

In some cases, this personal information may reveal information about you that is considered “special category” or “sensitive” personal information. This may include such information as racial or ethnic data, data concerning political opinions, information concerning sexual orientation. Please note that under certain laws you may have additional rights, discussed in greater detail below, with respect to this type of data.

### **How do we use user information?**

We may process personal information received from, or on behalf of, users to:

- facilitate the provision of the Services;
- complete user due diligence, to include anti-money laundering checks, conflicts checks, and credit checks;
- communicate with users concerning billing, the provision of the Services, to handle complaints, or to answer questions regarding the services;
- promote our services or other AGS and/or Akin services by sending event invitations, alerts on timely issues we think may be of interest, and industry newsletters and announcements;
- improve and develop new services; and/or,
- monitor our business and compile statistical data for internal analysis and research.

We also may use a relationship-management tool, where permitted by applicable local law, to assess the strength of the relationship between individuals at AGS and/or Akin and our users or potential users based on the frequency of email contact between them. We may use that

information to uncover marketing opportunities, serve our users and update contact information within our marketing database.

Finally, in some cases we may de-identify or aggregate personal information we obtain from you for the purposes specified above.

### **Who has access to user information?**

We protect user information from disclosure in accordance with ethical obligations, legal privileges, and user requirements. In certain instances, we may disclose personal information:

- to third-party service providers in accordance with arrangements which contractually obligate those third parties to maintain the confidentiality and security of personal information;
- where we are required to do so by applicable law, regulation or court order; pursuant to discovery during litigation or arbitration; to enforce or defend our rights and property; or
- in connection with a reorganization, sale of business assets, or merger of AGS with another business.

### **How long do we retain user information?**

In accordance with applicable data protection laws, AGS will only retain your personal information for as long as is needed to provide the Services and to comply with any legal obligations, court orders, or legal claims we may have. Personal information will be retained and deleted in compliance with our internal data retention and destruction policies.

### ***Website Visitors***

Please note, as stated above, this Notice applies only to the [www.overruled.com](http://www.overruled.com) site and not to any other AGS and/or Akin sites, applications, or services. Those other sites or services have specific privacy notices or terms and conditions that take precedence over this policy.

### **What personal information do we collect from website users?**

[www.overruled.com](http://www.overruled.com) employs “cookies” to facilitate use of the site. For detailed information on the cookies used and the purposes for which they are used, see our Cookie Notice. The cookies and other tracking technologies may automatically collect, or you may voluntarily provide:

- Identifiers such as your name and contact information provided via the Sign UP;
- Information which could be used to infer your general geographic location (such as your IP address); and,

- Internet or other electronic network activity information, including content you view or engage with, and device identifiers such as IP or MAC addresses.

Please note, we do not process “Do Not Track” requests sent from your browser.

### **How do we use website visitor information?**

We use Information collected directly from website visitors to:

- facilitate the provision of the website;
- provide information requested by website visitors;
- monitor our business and compile statistical data for internal analysis and research; and,
- to improve the site.

In some cases we may de-identify or aggregate personal information we obtain from you for the purposes specified above.

### **Who has access to website visitor information?**

Our marketing team, and website development personnel access website visitor information for the above purposes. We also provide reports with website visitor information to our management. Finally, as noted above in reference to user information, in certain instances we may disclose personal information:

- to vendors and service providers who assist us in maintaining the website and in accordance with arrangements which contractually obligate those third parties to maintain the confidentiality and security of personal information;
- where we are required to do so by applicable law, regulation or court order; pursuant to discovery during litigation or arbitration; to enforce or defend our rights and property; or
- in connection with a reorganization, sale of business assets, or merger of AGS with another business.

### **How long is website user information retained?**

In accordance with applicable data protection laws, AGS will only retain your personal information for as long as is needed to provide the Services and to comply with any legal obligations, court orders, or legal claims we may have. Personal information will be retained and deleted in compliance with our internal data retention and destruction policies.

## **MARKETING TO YOU**

If you have affirmatively consented to receive marketing materials from us, we may send emails with information about our firm, services, legal developments and upcoming events. We may use cookies and other tracking technologies to determine whether you read the emails, click on embedded links and visit our websites. If your email address is in our database, your cookie-tracked activity may be associated with that address. See our Cookie Notice <https://agsolutionstest.akingump.com/overruled/russia/external/?cookies> for more details.

If you no longer wish to receive marketing communications from us, you may unsubscribe at any time either by (i) clicking a link at the bottom of each marketing email which enables you to opt out of our mailing lists or (ii) sending an e-mail to [privacy@overruled.com](mailto:privacy@overruled.com).

## **SECURING YOUR INFORMATION**

We take commercially reasonable steps designed to protect your personal information. We employ a team of cyber security professionals dedicated to information security and the servers that host the Services are configured to meet industry standards. However, no security system can guarantee complete or perfect protection, so there is some chance a security incident could occur which may impact your personal information.

## **PROTECTING YOUR INFORMATION ACROSS BORDERS**

The Services are provided from and in the United States. Accordingly, if you are located outside the United States, in certain instance your personal information may cross international borders:

- We have offices around the world. To the extent necessary to provide the Services, we may transfer information between those offices.
- We store the information we collect in the United States. In particular, our primary servers for document management, web services, vendor management, and accounting are located in the United States.
- Some of the third party vendors we retain to assist us in providing the services, and who may in turn process personal information on our behalf, are located in the United States.

In these instances, we have executed agreements, both intra-company and with our third party partners that incorporate the European Commission's standard contractual clauses, and/or the United Kingdom's international data transfer agreement, to ensure any personal information transferred from the European Economic Area or the United Kingdom is afforded appropriate legal protection.



## **LAWFUL BASES FOR PROCESSING**

The lawful basis for processing your information varies by information type and context. AGS will primarily rely upon four such bases to provide the Services and this website. Specifically, AGS may process your personal information where:

- it is necessary for the performance of a contract to which you are a party;
- it is necessary for our compliance with legal obligations;
- you have consented to the processing; or,
- it is necessary for AGS's legitimate interests or those of a third party (except where such interests are overridden by the interests or rights of the data subject concerned).

To process "special categories" of information, also sometimes known as "sensitive personal information," (such as racial or ethnic data, data concerning political opinions, information concerning sexual orientation, or other sensitive information) we rely upon one of the following additional legal grounds:

- Processing is necessary for carrying out obligations and/or exercising our specific rights or those of the data subject in the field of employment and social security and social protection law.
- Processing is necessary to protect the vital interests of a data subject who is physically or legally incapable of giving consent.
- The data has been manifestly made public by the data subject.
- Processing is necessary for the establishment, exercise or defense of legal claims or whenever courts are acting in their judicial capacity.
- The data subject has provided explicit consent.

## **HONORING YOUR RIGHTS**

AGS controls the information that it collects about you and is responsible for honoring your rights. Subject to our legal obligations and rights, if you are a resident of the European Union ("EU"), United Kingdom ("UK"), or California you have certain rights over your personal information. These rights are described in detail, below.

### ***Residents of the European Union and the United Kingdom***

If you are a subject of the UK or another EU country, you have the following rights over your personal information:

- to be informed about the collection and use of your personal information;
- to access a copy of the personal information we hold or over which we have control;
- to rectify any mistakes, inaccuracies, or inconsistencies in the personal information we hold or over which we have control;
- to the erasure of your personal information;
- to, in certain cases, restrict our processing your personal information;
- to receive your personal information in a structured, commonly used and machine readable format (commonly called “data portability”);
- to object to our processing your personal information; and,
- rights related to automated decision making and profiling (to the extent we carry it out).

Please note, that in certain instances, we may not be able to honor your request, in which instance we will provide an explanation concerning that determination. You also have the right to complain to the data protection authority in your country.

For more details on your rights and exceptions to those rights, please visit the [UK Information Commissioner’s Office website](#).

### **Exercising Your EU/UK Rights**

If you wish to exercise your data privacy rights, make a complaint, or request more information, please contact us at [privacy@overruled.com](mailto:privacy@overruled.com).

### ***Residents of California***

If you are a resident of California, you have the following rights under the California Consumer Privacy Act (“CCPA”):

- **Right to Know:** You have the right to request that we disclose to you the personal information we collect, use, or disclose, and information about our data practices.
- **Right to Request Deletion:** You have the right to request that we delete your personal information that we have collected from you.
- **The Right to Correct:** You have the right to request that we correct any inaccurate personal information that we maintain about you.
- **The Right to Limit the Use and Disclosure of Sensitive Personal Information:** Some of the personal information we collect may be considered sensitive personal information.



You have the right to request that we limit the use and disclosure of your sensitive personal information to that use which is necessary to provide you with services you have requested and for certain other limited purposes as provided under the CCPA.

- **Right to Non-Discrimination:** We will not discriminate against you for exercising any of these rights.

Please note that to protect your information and the integrity of our Services, we may need to verify your identity before processing your request. In some cases we may need to collect additional information to verify your identity, such as a government issued ID.

For more details on your rights and exceptions to those rights, please visit the [California Attorney General's website](#).

### **Exercising Your California Rights**

If you wish to exercise your data privacy rights, make a complaint, or request more information, please contact us at:

[privacy@overruled.com](mailto:privacy@overruled.com)

OR

- Akin Gump Solutions, LLC  
c/o Chris Egan, Assistant General Counsel  
2001 K Street N.W.  
Washington, D.C. 20006

You may also authorize an agent to make requests to exercise the above rights on your behalf. If you do so, please note that we will request information from that agent to verify that agent's identity and the agent's authority to make a request on your behalf.

### **CHANGES TO THIS NOTICE**

We may change or update this Notice over time, so please check this policy regularly. Though, we will make a reasonable effort to notify you by email of any substantive changes to the Notice, the most up-to-date version of the Notice will be posted on this website. Any changes or updates to this Notice will be reflected in a new effective date, posted at the top of the page.

### **CHILDREN'S INFORMATION**

We do not knowingly collect personal information from children under the age of 16. If we discover that we have inadvertently collected any personal information from a child under the age of 16, we will promptly delete it. If you are a parent or guardian and believe your child provided us with their personal information without your consent, please contact us using the contact information above.

## **ANSWERING YOUR QUESTIONS**

If you have additional questions, email our data privacy team at [privacy@overruled.com](mailto:privacy@overruled.com).