

CLEARY GOTTLIEB

# Applicant Privacy Policy

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2025



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Cleary Gottlieb Steen & Hamilton LLP (the “Firm”, “we” or “us” or “our”) is committed to protecting the privacy of your personal information. We created this Applicant Privacy Policy (the “Policy”) to inform you of how we collect, store, use, disclose, retain, and protect your personal information, and your rights regarding that information. This Policy applies only to job applicants and candidates for employment who are residents of the State of California.

Please read this Policy carefully before using any website or application where this Policy is posted (collectively, the “Site”) or otherwise submitting personal information to us. This Policy is incorporated into and subject to our Terms of Use. **BY SUBMITTING PERSONAL INFORMATION TO US, INCLUDING IN CONNECTION WITH YOUR USE OF THE SITE, YOU CONSENT TO THE COLLECTION, USE, AND DISCLOSURE OF YOUR PERSONAL INFORMATION AS SET FORTH IN THIS POLICY AND OUR TERMS OF USE.** If you do not consent to the collection, use, disclosure, and retention of your personal information as described in this Policy, please do not provide us such information.

We reserve the right to revise this Policy at any time. If we make any material changes, we will update the date noted above. We reserve the right to provide notice of any changes in other ways as well. Your use of this Site or submission of personal information after such changes constitutes your agreement to the Policy as amended. Except as you otherwise instruct, or as otherwise permitted or required by applicable law, we will handle your personal information in accordance with the terms of the Policy in effect at the time of the collection.

## 1. The Information We Collect

During the past 12 months, we may have collected the following categories of your personal information: Identifiers and Contact Information. This category includes names, addresses, telephone numbers, mobile numbers, email addresses, signatures, dates of birth, and other similar contact information and identifiers.

Protected Classification Information. This category includes characteristics of protected classifications under California or federal law, including sex, gender, gender identity, age, military status and sensitive personal information as listed below.

Internet or other Electronic Network Activity Information. This category includes information regarding your interaction with the Site.

Professional and Employment-Related Information. This category includes, without limitation:

- data submitted with employment applications, including employment history, job title, interviewer preferences, bar memberships etc.
- background check, criminal history, and credit check (for certain finance positions)
- references
- interview evaluation forms
- practice area preferences (attorneys only)
- emergency contact information
- language proficiency
- work authorization.

Education Information. This category includes, without limitation, education history and other non-publicly available education information.

Government-Issued Information. This category includes government-issued documentation such as:

- passports
- form i551
- government ID card, including resident citizen ID cards (Form I-179), citizen ID card (Form I-197), school ID card with a photograph, military dependent's ID card, U.S. Coast Guard merchant mariner card
- birth certificate, including a certification of report of birth issued by the Department of State (Forms DS-1350, FS-545, FS-240)
- voter registration card
- U.S. Military card or draft record
- Native American tribal document.

Sensitive Personal Information. This category includes sensitive information such as:

- social security, driver's license, state identification card, or passport number
- citizenship or immigration status
- racial or ethnic origin, or religious or philosophical beliefs (when included in a resumé or job application)
- health information
- dietary restrictions related to religious beliefs or health conditions
- sexual orientation.

## 2. Sources of Information

We may collect your personal information from the following sources:

You. We collect information you provide us in connection with your application for employment with us. For instance, when you apply for a job with us, you may provide information regarding your educational and professional history.

Related Entities and Affiliates. We may collect information about you from our affiliates and other related parties.

Service Providers and Contractors. We may collect your personal information from service providers or contractors who collected information about you that relates to your application for employment with us.

News Outlets, Social Media, Surveys, and Third Parties. In connection with your application for employment with us, we or third parties on our behalf, may conduct research and other activities that result in the collection of your personal information.

Information Collected Automatically. As you navigate through and interact with our Site, we may compile statistical information concerning your usage of the Site through analytics services. To do so, we may collect certain information about your equipment, browsing actions, and patterns, including:

- Details of your visits to our Site, such as traffic data, location data, logs and other communication data, and the resources that you access and use on the Site.
- Information about your computer and internet connection, including your IP address, operating system, and browser type.

- Information about the type of device you are using, mobile ad identifiers, the time and length of your visit, and the website that referred you to our Site.
- Information about your preferences to make your use of the Site more productive, via the use of Cookies. For more information on Cookies, please see our Cookie Policy. While all of this information can be associated with the IP address your computer had while you visited the Site, it will not be associated with you as an individual or with any other information you may submit through the Site or that we may store about you for any other purposes. We may use this information to generate aggregate statistics about visitors to our Site. Please check your web browser if you want to learn what information your browser sends or how to change your settings.

### 3. Why We Collect Your Information

In general, we will use the personal information we collect only for the purpose it was collected, for compatible purposes, as permitted or required by law, as necessary to carry out our contractual duties and obligations, and as otherwise provided in this Policy. For example, we may use your personal information in the following ways:

- Recruiting you as a prospective job applicant, including inviting you to and hosting you at Firm events.
- Collecting and processing employment applications, including confirming eligibility for employment, background and related checks, onboarding, and related recruiting efforts.
- Complying with applicable state and federal health, labor, employment, benefits, workers compensation, disability, equal employment opportunity, workplace safety, and related laws, guidance, or recommendations.
- Evaluating an individual's appropriateness for a particular position at the Firm.
- Responding to and managing legal claims against the Firm and/or its personnel, including civil discovery in litigation.
- Facilitating other business administrative functions and strategic activities, such as risk management, information technology and communications, financial management and reporting, workforce and succession planning, merger and acquisition activities, and maintenance of licenses, permits, and authorization applicable to Firm operations.

## 4. Disclosure of Your Information

We may disclose your personal information for the same reasons that we may use it, as described in this Policy, which includes disclosing it to our affiliates and non-affiliates as we deem necessary to carry out those purposes. We endeavor to choose affiliates and non-affiliates whose standards for the protection of data match ours.

The following chart describes the categories of personal information we have collected or may collect about you and, for each category, identifies the categories of third parties to whom we have disclosed such personal information in the preceding 12 months or may disclose that information going forward and for what business purposes. We do not use or disclose sensitive personal information associated with you as a resident of California for purposes other than the limited purposes permitted by the California Consumer Privacy Act, as amended (“CCPA”).

Categories of Personal Information	Categories of Third Parties to Whom Disclosed & Purposes for Disclosure
<u>Identifiers and Contact Information.</u> This category includes names, addresses, telephone numbers, mobile numbers, email addresses, signatures, dates of birth, and other similar contact information and identifiers.	Third parties as directed by you. We may disclose your personal information to the third parties to whom you direct. Third parties that perform services on our behalf. For example, we may disclose information to certain service providers, including professional service providers, information technology providers, payroll and benefits managers, and data storage companies. We might also authorize our service providers to collect personal information on our behalf. Governmental entities, legal service providers. We may disclose your personal information in order to comply with the law. We may also disclose information if a government agency or investigatory body submits a request. Successors to all or portions of our business. If all or part of our business is sold, we may disclose personal information in preparation for or as part of that transaction.
<u>Protected Classification Information.</u> This category includes characteristics of protected classifications under California or federal law, including sex, gender, gender identity, age, military status and sensitive personal information as listed below.	Third parties as directed by you. We may disclose personal information to those third parties to whom you direct. Third parties that perform services on our behalf. For example, we may disclose information to certain service providers, including professional service providers, information technology providers, payroll and benefits managers, and data

Categories of Personal Information	Categories of Third Parties to Whom Disclosed & Purposes for Disclosure
	<p>storage companies. We might also authorize our service providers to collect personal information on our behalf.</p> <p>Governmental entities, legal service providers. We may disclose your personal information in order to comply with the law. We may also disclose information if a government agency or investigatory body submits a request.</p> <p>Successors to all or portions of our business. If all or part of our business is sold, we may disclose personal information in preparation for or as part of that transaction.</p>
<p><u>Internet or other Electronic Network Activity Information.</u> This category includes information regarding your interaction with the Site</p>	<p>Third parties as directed by you. We may disclose your personal information to the third parties to whom you direct.</p> <p>Third parties that perform services on our behalf. For example, we may disclose information to certain service providers, including professional service providers, information technology providers, payroll and benefits managers, and data storage companies. We might also authorize our service providers to collect personal information on our behalf.</p> <p>Governmental entities, legal service providers. We may disclose your personal information in order to comply with the law. We may also disclose information if a government agency or investigatory body submits a request.</p> <p>Successors to all or portions of our business. If all or part of our business is sold, we may disclose personal information in preparation for or as part of that transaction.</p>
<p><u>Professional and Employment-Related Information.</u> This category includes, without limitation:</p> <ul style="list-style-type: none"> <li>• data submitted with employment applications, including employment history, job title, interviewer preferences, bar memberships etc.</li> </ul>	<p>Third parties as directed by you. We may disclose your personal information to the third parties to whom you direct.</p> <p>Third parties that perform services on our behalf. For example, we may disclose information to certain service providers, including professional service providers, information technology</p>

Categories of Personal Information	Categories of Third Parties to Whom Disclosed & Purposes for Disclosure
<ul style="list-style-type: none"> <li>background check, criminal history, and credit check (for certain finance positions)</li> <li>reference</li> <li>interview evaluation forms</li> <li>practice area preferences (attorneys only)</li> <li>emergency contact information</li> <li>language proficiency</li> <li>work authorization.</li> </ul>	<p>providers, payroll and benefits managers, and data storage companies. We might also authorize our service providers to collect personal information on our behalf.</p> <p>Governmental entities, legal service providers. We may disclose your personal information in order to comply with the law. We may also disclose information if a government agency or investigatory body submits a request.</p> <p>Successors to all or portions of our business. If all or part of our business is sold, we may disclose personal information in preparation for or as part of that transaction.</p>
<p><u>Education Information.</u> This category includes, without limitation, education history and other non-publicly available education information.</p>	<p>Third parties as directed by you. We may disclose your personal information to the third parties to whom you direct.</p> <p>Third parties that perform services on our behalf. For example, we may disclose information to certain service providers, including professional service providers, information technology providers, payroll and benefits managers, and data storage companies. We might also authorize our service providers to collect personal information on our behalf.</p> <p>Governmental entities, legal service providers. We may disclose your personal information in order to comply with the law. We may also disclose information if a government agency or investigatory body submits a request.</p> <p>Successors to all or portions of our business. If all or part of our business is sold, we may disclose personal information in preparation for or as part of that transaction.</p>
<p><u>Government-Issued Information.</u> This category includes government-issued documentation such as:</p> <ul style="list-style-type: none"> <li>passports</li> <li>form i551</li> <li>government ID card, including resident citizen ID cards (Form I-179), citizen ID</li> </ul>	<p>Third parties as directed by you. We may disclose your personal information to the third parties to whom you direct.</p> <p>Third parties that perform services on our behalf. For example, we may disclose information to certain service providers, including professional</p>

Categories of Personal Information	Categories of Third Parties to Whom Disclosed & Purposes for Disclosure
<ul style="list-style-type: none"> <li>• card (Form I-197), school ID card with a photograph, military dependent's ID card, U.S. Coast Guard merchant mariner card</li> <li>• birth certificate, including a certification of report of birth issued by the Department of State (Forms DS-1350, FS-545, FS-240)</li> <li>• voter registration card</li> <li>• U.S. Military card or draft record</li> <li>• Native American tribal document.</li> </ul>	<p>service providers, information technology providers, payroll and benefits managers, and data storage companies. We might also authorize our service providers to collect personal information on our behalf.</p> <p>Governmental entities, legal service providers. We may disclose your personal information in order to comply with the law. We may also disclose information if a government agency or investigatory body submits a request.</p> <p>Successors to all or portions of our business. If all or part of our business is sold, we may disclose personal information in preparation for or as part of that transaction.</p>
<p><b>Sensitive Personal Information.</b> This category includes sensitive information such as:</p> <ul style="list-style-type: none"> <li>• social security, driver's license, state identification card, or passport number</li> <li>• citizenship or immigration status</li> <li>• racial or ethnic origin, or religious or philosophical beliefs (when included in a resumé or job application)</li> <li>• health information</li> <li>• dietary restrictions related to religious beliefs or health conditions</li> <li>• sexual orientation.</li> </ul>	<p>Third parties as directed by you. We may disclose your personal information to third parties to whom you direct.</p> <p>Third parties that perform services on our behalf. For example, we may disclose information to certain service providers, including professional service providers, information technology providers, payroll and benefits managers, and data storage companies. We might also authorize our service providers to collect personal information on our behalf.</p> <p>Governmental entities, legal service providers. We may disclose your personal information in order to comply with the law. We may also disclose information if a government agency or investigatory body submits a request.</p> <p>Successors to all or portions of our business. If all or part of our business is sold, we may disclose personal information in preparation for or as part of that transaction.</p>

## 5. Selling and Sharing Personal Information

We do not “sell” or “share” (as those terms are defined under the CCPA) personal information, nor have we done so in the preceding 12 months. Further, we do not have actual knowledge that we “sell” or “share” personal information of California residents under 16 years of age.

## 6. Links to Third-Party Sites and Third-Party Integrations

We may provide links to websites or resources outside of our Site for your informational purposes only. We may also provide links to third-party integrations. Third party integrations are websites or platforms that synchronize with our Site to provide you with additional functionality, tools, or services such as maps, sending requested information, etc.

You acknowledge and agree we are not responsible for the availability of third-party sites, resources, or integrations and do not endorse and are not responsible or liable for any content, advertising, goods, services or other materials on, available through, or provided by such sites, resources, or integrations. We are not responsible for the privacy or other practices of such sites and cannot guarantee the security of personal information that you provide, or that is collected by, such sites. We encourage you to review the privacy policies and terms and conditions on those linked sites.

## 7. Security

We take precautions to protect data and information under our control from misuse, loss or alteration. Our security measures include industry-standard physical, technical, and administrative measures to prevent unauthorized access to or disclosure of your information, to maintain data accuracy, to ensure the appropriate use of information, and otherwise safeguard your personal information. However, no system for safeguarding personal or other information is 100% secure and, although we have taken steps to protect your personal information from being intercepted, accessed, used or disclosed by unauthorized persons, we cannot fully eliminate security risks associated with personal information.

Please recognize that protecting your personal information is also your responsibility. We ask you to be responsible for safeguarding the password, security questions and answers, and other authentication information you use to access our Site.

## 8. Retention

We retain your personal information for as long as is necessary to process your application for employment and in accordance with the Firm’s policies and procedures. We may retain your personal information for longer if it is necessary to comply with our legal or reporting obligations (for example, if we are required to retain your data to comply with applicable laws), resolve disputes, enforce our legal agreements and policies, address other legitimate business needs, or as permitted or required by applicable law. We may also retain your personal information in a deidentified or aggregated form so that it can no longer be associated with you. To determine the appropriate retention period for your personal information, we consider various factors such as the amount, nature, and sensitivity of your information; the potential risk of unauthorized access, use or disclosure; the purposes for which we collect or process your personal information; and applicable legal requirements. Personal information does *not* include certain categories of

information, such as publicly available information from government records, and deidentified or aggregated consumer information.

## 9. Children's Privacy

Our Site is not intended for use by children under 16. Accordingly, we do not knowingly solicit or collect personal information from anyone we know to be under 16 years of age. If you are a parent or guardian and you are aware that your child has provided us with personal information, please contact us. If we become aware that we have collected personal information from children without verification of parental consent, we will take appropriate steps to remove such information from our servers.

## 10. Applicable Law

This Policy is governed by the internal substantive laws of the state of California, without regard to its conflict of laws principles. Jurisdiction for any claims arising under or out of this Applicant Privacy Policy shall lie exclusively with the state and federal courts within California. If any provision of this Policy is found to be invalid by a court having competent jurisdiction, the invalidity of such provision shall not affect the validity of the remaining provisions of this Policy, which shall remain in full force and effect.

## 11. Your Rights

***Shine the Light.*** California Civil Code Section 1798.83 permits you to request information regarding the disclosure of your personal information by us to third parties for the third parties' direct marketing purposes. Such requests must be submitted to us in accordance with the instructions in the Contact Us section of this Policy. We do not disclose personal information obtained through our Site or services to third parties for their direct marketing purposes. Accordingly, we have no obligations under California Civil Code § 1798.83..

### ***California Consumer Privacy Act Rights.***

As a California resident, you may have certain rights related to your personal information, subject to certain exceptions. Specifically:

1. ***Right to Know.*** You have the right to request that we disclose the following to you upon receipt of your verifiable consumer request:
  - The categories of personal information we have collected about you
  - The categories of sources from which we collected that information
  - The business or commercial purposes for collecting, selling, or sharing that information
  - The categories of third parties to whom we sold or disclosed that information
  - The specific pieces of personal information we collected about you
2. ***Right to Delete.*** You have the right to request that we delete your personal information from our records, subject to certain exceptions. Upon receipt of a verifiable consumer request, and as required by the CCPA, we will delete and direct any service providers to delete your personal information.

We are not required to comply with deletion requests if the information is exempt from the CCPA, we cannot verify your request or we, or our service providers or contractors, need the information in order to:

- Complete the transaction for which the personal information was collected, provide a good or service requested by you or reasonably anticipated within the context of our ongoing business relationship with you, or otherwise perform a contract between us and you.
- Detect security incidents, protect against malicious, deceptive, fraudulent, or illegal activity, or prosecute those responsible for that activity.
- Debug to identify and repair errors that impair existing intended functionality.
- Exercise free speech, ensure the right of another consumer to exercise their right of free speech, or exercise another right provided for by law.
- Comply with the California Electronic Communications Privacy Act pursuant to Chapter 3.6 (commencing with Section 1546) of Title 12 of Part 2 of the Penal Code.
- Enable solely internal uses that are reasonably aligned with your expectations based on your relationship with us and compatible with the context in which you provided the information to us.
- Comply with a legal obligation.

3. *Right to Correct.* You have the right, subject to certain limitations, to request that we correct any inaccurate personal information we maintain about you. Upon receipt of a verifiable consumer request, and as required by the CCPA, we will take appropriate steps to respond to your request and will use commercially reasonable efforts to correct the inaccurate information.
4. *Right to Opt-Out of Selling or Sharing.* We do not “sell” or “share” (as such terms are defined under the CCPA) your personal information and therefore do not provide rights to opt-out of such processing nor respond to opt-out preference signals.
5. *Right to Limit Use or Disclosure of Sensitive Personal Information.* As noted above, we do not use or disclose any sensitive personal information for any other purpose other than as noted above or as expressly permitted by the CCPA, and therefore do not offer rights to limit our use or disclosure of such information.
6. *Right Against Discrimination.* You have the right not to be discriminated against for exercising any of the rights described in this section.

#### Submitting Consumer Rights Requests

To submit a consumer rights request, please contact us by e-mailing [dataprivacy@cgsh.com](mailto:dataprivacy@cgsh.com) or by telephoning us toll-free at +1-833-560-0482.

*Verification.* To the extent permitted by applicable law, we reserve the right to only respond to verifiable consumer requests. A verifiable consumer request is one made by:

- the consumer who is the subject of the request,
- a consumer on behalf of the consumer’s minor child, or
- a natural person or business entity authorized to act on behalf of a consumer.

To verify your identity, we may ask you to verify personal information we already have on file for you. If we cannot verify your identity from the information we have on file, we may request additional information

from you, which we will only use to verify your identity, and for security or fraud-prevention purposes. Making a verifiable consumer request does not require you to create an account with us. Additionally, you will need to describe your request with sufficient detail to allow us to review, understand, assess, and respond.

*Authorized Agents.* You may authorize a natural person or business entity to act on your behalf with respect to your rights under this section. Unless you have provided the authorized agent with a qualifying power of attorney pursuant to California Probate Code sections 4000 to 4465, you must provide your authorized agent written permission, signed by you, to act on your behalf and verify your identity directly with us. We reserve the right to deny requests from persons or businesses claiming to be authorized agents that do not submit sufficient proof of their authorization.

We may not be able to respond to your request or provide you with personal information if we cannot verify your identity or authority to make the request and confirm the personal information relates to you.

*Our Response.* We will endeavor to respond to a verifiable consumer request within forty-five (45) calendar days of receipt, but we may require an extension of up to forty-five (45) additional calendar days to respond and we will notify you of the need for the extension.

If you have an account with us, we will deliver our written response to that account. If you do not have an account with us, we will deliver our written response by mail or electronically. Any disclosures we provide will only cover the 12-month period preceding the receipt of your verifiable consumer request. With respect to personal information collected on and after January 1, 2022, and to the extent expressly permitted by applicable law, you may request that such disclosures cover a period beyond the 12 months referenced above, provided doing so would not be impossible or require a disproportionate effort by us. The response we provide will also explain the reasons we cannot comply with a request, if applicable. To the extent permitted by the CCPA, we will respond to no more than two requests during any 12-month period.

## 12. Do Not Track Disclosure

Third parties such as advertising networks, analytics providers and widget providers may collect information, including personal data, over time and across different websites when you access or use the Site. Currently, various browsers offer a “Do Not Track” option, but there is no standard for how “Do Not Track” should work on commercial websites. Due to lack of such standards, our Site does not respond to “Do Not Track” consumer browser settings.

## 13. Contact Us

If you have questions or comments about this Applicant Privacy Policy or this Site, you may contact us by e-mailing [dataprivacy@cgsh.com](mailto:dataprivacy@cgsh.com) or by telephoning us toll-free at +1-833-560-0482.

