

CLEARY GOTTLIEB

# Applicant CCPA Notice

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2025



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This notice describes the categories of personal information collected by Cleary Gottlieb Steen & Hamilton LLP (“**the Firm**”) and the purposes for which such information may be collected and used. For additional information about the Firm’s data privacy practices, please review our [Applicant Privacy Policy](#).

## 1. Categories of Personal Information Collected

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. Purposes Personal Information, Including Sensitive Personal Information, is Collected and Used

- Recruiting prospective job applicants, including inviting them to and hosting them 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.

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 by the California Privacy Rights Act of 2020 (collectively, the “CCPA”).

**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.

**Disclosure.** To carry out the purposes outlined above, the Firm may disclose personal information to service providers or other third parties, such as background check vendors, third-party staffing vendors, information technology vendors, outside legal counsel, and state or federal governmental agencies. The Firm does not sell or share, as those terms are defined under applicable law, the above categories of personal information. The Firm may add to the categories of personal information it collects and the purposes for which it uses that information. The Firm will inform you in the event it does so.

We reserve the right to amend this notice at any time without advance notice.

