

# Privacy Policy

## Introduction

SHARTSIS FRIESE LLP wants you to be familiar with how we collect, use and disclose information. This policy describes the types of information that we may collect from you, or that you may provide to us when you visit our website; and our practices for collecting, using, maintaining, protecting, and disclosing that information.

This policy applies to information that we collect:

- On our website [www.sflaw.com](http://www.sflaw.com) (“the Website” or “our Website”).
- In email, text, and other electronic messages between you and our Website.
- When you interact with our advertising and applications on third-party websites and services, if those applications or advertising include links to this policy.

This policy does not apply to information that is collected:

- By us offline or through any other means, including on any other website operated by us.
- By any third party, including through any application or content (including advertising) that may link to, be accessible from, or be on the Website.

By accessing or using this Website, you agree to this privacy policy. This policy may change from time to time (as detailed in the “Changes to Our Privacy Policy” section). Your continued use of this Website after changes are made is deemed to be an acceptance of those changes.

## Children Under the Age of 16

Our Website is not intended for children under 16 years of age. No one under age 16 may provide any personal information on the Website. We do not knowingly collect personal information from children under 16. If you are under 16, do not use or provide any information on this Website. If we learn that we have collected or received personal information from a child under 16 without verification of parental consent, we will delete that information. If you believe that we may have any information from or about a child under 16, please contact us at the email address below.

## Sensitive Information

We ask that you do not send or disclose to us any sensitive personal information or personally identifiable information (e.g., social security numbers, driver’s license numbers, passport numbers, academic transcripts, information related to racial or ethnic origin, political opinions, religion or other beliefs, health, biometrics or genetic characteristics, criminal background or trade union membership) on or through our Website or email.

## Information Collected

We collect several types of information from and about users of our Website, including:

- Information by which you may be personally identified (i.e., personal information), such as name and contact information (e.g., postal address, email address, telephone number, etc.).
- Information that is about you, but cannot individually identify you (e.g. demographic information).
- Information about your internet connection, the equipment you use to access our Website, and usage details.

## How Information is Collected

We collect information:

- Directly from you when you provide it to us.
- Automatically as you navigate through our website site. Information collected automatically may include usage details, IP addresses, and information collected through cookies, and other tracking technologies.
- From third parties (e.g., from our business partners or service providers).

## Information You Provide to Us

The information we collect on or through our Website may include:

- Information that you provide by filling in forms or sending email through our Website. This includes information provided at the time of subscribing to newsletters, inquiring about our service, or requesting further services.
- Records and copies of your correspondence (including email addresses), if you contact us.

## Information Collected Through Automatic Data Collection Technologies

As you navigate through and interact with our Website, we may use automatic data collection technologies to collect certain information about your equipment, browsing actions, and patterns; this may include:

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

The information we collect automatically is only statistical data that does not include personal information. This data is collected to help us to improve our Website and deliver a better and more personalized service, by enabling us to:

- Estimate our audience size and usage patterns.
- Store information about your preferences, allowing us to customize our Website according to your individual requirements.
- Recognize you when you return to our Website.

The technologies we use for this automatic data collection may include:

- Cookies (i.e., browser cookies)
  - A cookie is a small file placed on the hard drive of your computer.
  - You may refuse to accept browser cookies by activating the appropriate setting on your browser; however, if you select this setting you may be unable to access certain parts of our Website.
  - If you have not adjusted your browser settings so that it will refuse cookies, our system will issue cookies when you direct your browser to our Website.
  - To learn more about how we use cookies, please see our Cookies Policy by clicking [here](#).
- Analytics
  - We use Google Analytics, which uses cookies and similar technologies to collect and analyze information about the use of our Website and report on activities and trends. This service may also collect information regarding the use of other websites, apps and online resources. You can learn about Google's practices by going to [google.com/technologies/partner-sites](https://www.google.com/technologies/partner-sites), and opt out of them by downloading the Google Analytics opt-out browser add-on, available at <https://tools.google.com/dlpage/gaoptout>.
  - We use Clicky, which uses cookies to collect information about how visitors use our Website. Clicky does not log any personal data and all information provided to us is anonymized. You can learn about Clicky's practices by going to [com/help/faq/privacy](https://www.clicky.com/help/faq/privacy), and opt out of being tracked by setting a global opt out cookie available at [https://clicky.com/optout](https://www.clicky.com/optout).

## How We Use Your Information

We use the information that we collect about you or that you provide to us, including any personal information, to:

- Present our Website and its contents to you.
- Provide you with information, products, or services that you request from us.
- Fulfill any other purpose for which you provide it.
- Notify you about changes to our Website or any products or services we offer or provide through it.

## Sale of Your Information

We do not sell personal information that we collect or that you provide us.

## Disclosure of Your Information

We may disclose personal information that we collect or you provide as described in this privacy policy:

- To fulfill the purpose for which you provide it.
- To comply with any court order, law, or legal process, including responses to government or regulatory requests.

## Controlling How We Use and Disclose Your Information

You may use the following mechanisms to control how we use and disclose your information:

- Tracking Technologies and Advertising:
  - You can set your browser to refuse all or some browser cookies, or to alert you when cookies are being sent.
  - Although we do not control third parties' collection or use of your information to serve interest-based advertising, these third parties may provide you with ways to choose not to have your information collected or used in this way.
  - You can opt out of receiving targeted ads from members of the Network Advertising Initiative (NAI) on the NAI's website.
  - California residents may have additional personal information rights and choices; for more information, please refer to the relevant information on the California Attorney General's Office Website, at: <https://oag.ca.gov/privacy/privacy-laws>

## Your California Privacy Rights

We do not share personal information as defined by California Civil Code Section 1798.83 ("Shine the Light law") with third parties for their direct marketing purposes absent your consent. If you are a California resident, you may request information about our compliance with the Shine the Light law by contacting us here or by sending a letter to SHARTSIS FRIESE LLP: Compliance Team, One Maritime Plaza, Eighteenth Floor, San Francisco, CA 94111. Any such request must include "California Privacy Rights Request" in the first line of the description and include your name, street address, city, state, and ZIP code. Please note that we are only required to respond to one request per customer each year, and we are not required to respond to requests made by means other than through this email address or mail address.

## Changes to Our Privacy Policy

It is our policy to post any changes we make to our privacy policy on this page with a notice that the privacy policy has been updated on the Website home page. If we make material changes to how we treat our users' personal information, we will notify you through a notice on the Website home page. The date the privacy policy was last revised is identified at the top of the page. You are responsible for ensuring that we have an up-to-date active and

deliverable email address for you, and for periodically visiting our Website and this privacy policy to check for any changes.

## Security

We seek to use reasonable organizational, technical and administrative measures to protect personal information within our organization. Unfortunately, no data transmission or storage system can be guaranteed to be 100% secure. If you have reason to believe that your interaction with us is no longer secure, please immediately notify us using the "Contact Information" below.

## Contact Information

To ask questions or comment about this privacy policy and our privacy practices, please contact us at:

- SHARTSIS FRIESE LLP  
Compliance Team  
One Maritime Plaza  
Eighteenth Floor  
San Francisco, CA 94111
- [compliance-team@sflaw.com](mailto:compliance-team@sflaw.com)
- (415) 421-6500