



## GENERAL POLICIES –

<b>Subject:</b> PRIVACY POLICY FOR CALIFORNIA RESIDENT EMPLOYEES
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<b>Policy Number:</b> 370 <b>Date Issued:</b> 1/1/2023 <b>Date Revised:</b>
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This Privacy Policy for California residents applies solely to Carlton Fields’ employees who reside in the State of California (“Employee” or “Employees”). Carlton Fields adopts this Policy to comply with the California Privacy Rights Act (CPRA) and any terms defined in the CPRA have the same meaning when used in this Policy.

“Carlton Fields,” “we,” “us,” or “our” refers to Carlton Fields, LLP and Carlton Fields, PA.

### **Information We Collect**

We collect information that identifies, relates to, describes, references, is reasonably capable of being associated with, or could reasonably be linked, directly or indirectly, with a particular individual ("**Personal Information**"). Personal Information does not include:

- Publicly available information from government records;
- Deidentified or aggregated consumer information; or
- Information excluded from the CPRA's scope, like:
  - Health or medical information covered by the Health Insurance Portability and Accountability Act of 1996 (HIPAA) and the California Confidentiality of Medical Information Act (CMIA), clinical trial data, or other qualifying research data;
  - Personal Information covered by certain sector-specific privacy laws, including the Fair Credit Reporting Act (FCRA), the Gramm-Leach-Bliley Act (GLBA), or California Financial Information Privacy Act (FIPA), and the Driver’s Privacy Protection Act of 1994.

In particular, Carlton Fields has or may have collected the following categories of Personal Information from Employees within the last twelve (12) months:

Category	Examples	Collected	How We Use It
<b>Identifiers:</b>  Information that can be used to directly identify you.	A real name, alias, postal address, unique personal identifier, online identifier, Internet Protocol address, email address, account name, Social Security number, driver's license number, passport number, or other similar identifiers.	Yes	<ul style="list-style-type: none"> <li>• Manage and document your employment with us and employment-related actions;</li> <li>• Maintain your employee information in company directories;</li> </ul>

			<ul style="list-style-type: none"> <li>• Maintain emergency contact and beneficiary details;</li> <li>• Administer employee engagement programs including online surveys;</li> <li>• Use corporate communication tools, such as video conferencing;</li> <li>• Administer occupational safety and health programs;</li> <li>• Protect the safety and security of our workforce, guests, property, and assets including monitoring activities in our facilities and activity using our computers, devices, networks, communications, and other assets and resources;</li> <li>• Detect security incidents and other fraudulent activity; Investigate and respond to claims;</li> <li>• Comply with applicable laws (e.g., health and safety, employment laws); and</li> <li>• Use in ways we have told you about for our business activities.</li> </ul>
<p><b>Personal Information Categories Listed in the California Customer Records Statute:</b></p> <p>Information that we maintain in our recruitment,</p>	<p>A name, signature, Social Security number, physical characteristics or description, address, telephone number, passport number, driver's license or state identification card 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.</p>	<p>Yes</p>	<ul style="list-style-type: none"> <li>• Manage and document your employment with us and employment-related actions;</li> <li>• Maintain your employee information in company directories;</li> </ul>

<p>employment, contractor, and other similar records.</p>	<p>Some Personal Information included in this category may overlap with other categories.</p>		<ul style="list-style-type: none"> <li>• Maintain emergency contact and beneficiary details;</li> <li>• Administer employee engagement programs including online surveys;</li> <li>• Use corporate communication tools, such as video conferencing;</li> <li>• Administer occupational safety and health programs;</li> <li>• Protect the safety and security of our workforce, guests, property, and assets including monitoring activities in our facilities and activity using our computers, devices, networks, communications, and other assets and resources;</li> <li>• Detect security incidents and other fraudulent activity; Investigate and respond to claims;</li> <li>• Comply with applicable laws (e.g., health and safety, employment laws); and</li> <li>• Use in ways we have told you about for our business activities.</li> </ul>
<p><b>Protected Classification Characteristics under California or Federal Law:</b></p> <p>Information that is considered a “protected classification”</p>	<p>Age (40 years or older), race, color, ancestry, national origin, citizenship, religion or creed, marital status, medical condition, physical or mental disability, sex (including gender, gender identity, gender expression, pregnancy or childbirth and related medical conditions), sexual orientation, veteran or military status, genetic information (including familial genetic information).</p>	<p>Yes</p>	<ul style="list-style-type: none"> <li>• Manage and document your employment with us and employment-related actions, such as requests for reasonable accommodations related to disability or religion; and</li> </ul>

<p>under California or federal law.</p>			<ul style="list-style-type: none"> <li>• Maintain emergency contact and beneficiary details;</li> <li>• Comply with applicable laws (e.g., health and safety, employment laws); and</li> <li>• Use in ways we have told you about for our business activities.</li> </ul>
<p><b>Internet or Other Similar Network Activity:</b></p> <p>Information about your activities on the Internet or other electronic network activity information using devices, applications, assets or resources that are managed by Carlton Fields.</p>	<p>Browsing history, search history, information on an Employee's interaction with a website, application, or advertisement.</p>	<p>Yes</p>	<ul style="list-style-type: none"> <li>• Protect the safety and security of our workforce, guests, property, and assets including monitoring activities in our facilities and activity using our computers, devices, networks, communications, and other assets and resources;</li> <li>• Detect and investigate incidents and other fraudulent activity; and</li> <li>• Use in ways we have told you about for our business activities.</li> </ul>
<p><b>Geolocation Data:</b></p> <p>Information that can be used to identify the physical location of devices, assets, or resources that are managed by Carlton Fields.</p>	<p>Physical location or movements.</p> <p>Location information derived from your device's GPS coordinates, geo coordinates, Cell ID, MAC addresses, Wi-Fi, Bluetooth or other technology.</p>	<p>Yes</p>	<ul style="list-style-type: none"> <li>• Protect the safety and security of our workforce, guests, property, and assets including monitoring activities in our facilities and activity using our computers, devices, networks, communications, and other assets and resources;</li> <li>• Detect and investigate incidents and other fraudulent activity; and</li> <li>• Use in ways we have told you about for our business activities.</li> </ul>

<p><b>Professional or Employment-Related Information:</b></p> <p>Information about your professional and employment status and background.</p>	<p>Current or past job history or performance evaluations.</p>	<p>Yes</p>	<ul style="list-style-type: none"> <li>• Manage and document your employment with us and employment-related actions;</li> <li>• Maintain your employee information in company directories; and</li> <li>• Use in ways we have told you about for our business activities.</li> </ul>
<p><b>Inferences Drawn from Other Personal Information:</b></p> <p>Information drawn from any of the above categories that is used to create a profile you. This is optional and is undertaken through a third-party provider</p>	<p>Profile reflecting a person's preferences, characteristics, behavior, attitudes, intelligence, abilities, and aptitudes.</p>	<p>Yes</p>	<ul style="list-style-type: none"> <li>• Manage and document your employment with us and employment-related actions;</li> <li>• Maintain your employee information in company directories;</li> <li>• Administer employee engagement programs including online surveys; and</li> <li>• Use in ways we have told you about for our business activities.</li> </ul>

**Use of Personal Information**

We may use or disclose the Personal Information we collect for one or more of the following purposes:

- To fulfill or meet the reason you provided the information.
- To maintain security on Carlton Fields' websites and Internet-connected assets, which includes hosting and maintenance of computer systems and infrastructure, management of Carlton Fields' software and hardware computer assets, systems testing, such as development of new systems and end-user testing of computer systems, training, and monitoring email and Internet access.
- To respond to law enforcement requests and as required by applicable law, court order, or governmental regulations.
- To evaluate or conduct a merger, divestiture, restructuring, reorganization, dissolution, or other sale or transfer of some or all of our assets, whether as a going concern or as part of bankruptcy, liquidation, or similar proceeding, in which Personal Information held by us about our Employees is among the assets transferred.

- To administer benefits, such as medical, dental, optical, commuter, and retirement benefits, including recording and processing eligibility of dependents, absence and leave monitoring, and insurance and accident management.
- To pay and reimburse for expenses, including salary administration, payroll management, payment of expenses, to administer other compensation related payments, including assigning amounts of bonus payments to individuals.
- To conduct performance-related reviews, including performance appraisals, career planning, skills monitoring, job moves, promotions, and staff restructuring.
- To monitor work-related licenses and credentials, including provisioning software licenses for use in the course of an employee's work-related responsibilities, ensuring compliance, training, examination, and other requirements are met with applicable regulatory bodies.
- To provide our Employees with human resources management services, including providing employee data maintenance and support services, administration of separation of employment, approvals and authorization procedures, administration and handling of employee claims, and travel administration.
- To maintain your contact information (for example personal, other employment, and transferring roles).
- To assist you in case of emergency, including maintenance of contact details for you, and your dependents in case of personal or business emergency.
- To monitor eligibility to work in the United States, which means monitoring and ensuring compliance of employees' ability to work in the United States.
- To ensure a safe and efficient working environment, which includes actions relating to disciplinary actions, and code of conduct processes and investigations.
- To comply with applicable legal or regulatory requirements, such as legal (state and federal) and internal company reporting obligations, including headcount, management information, demographic and health, safety, security, and environmental reporting.
- As described to you when collecting your Personal Information or as otherwise set forth in the CPRA.

We will not collect additional categories of Personal Information or use the Personal Information we collected for materially different, unrelated, or incompatible purposes without providing you notice.

We may or may not have used Personal and Sensitive Personal Information about you for each of the above purposes.

### **Sharing Personal Information**

Carlton Fields may share your Personal Information by disclosing it to a third party for a business purpose. We only make these business purpose disclosures under written contracts that describe the purposes, require the recipient to keep the Personal Information confidential, and prohibit using the disclosed information for any purpose except performing the contract.

We do not sell your personal information.

In the preceding twelve (12) months, Company has disclosed Personal Information for a business purpose to the categories of third parties indicated in the chart below.

Personal Information Category	Business Purpose Disclosures
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Identifiers	<ul style="list-style-type: none"> <li>Public entities and institutions (e.g., regulatory, quasi-regulatory, tax or other authorities, law enforcement agencies, courts, arbitrational bodies, fraud prevention agencies);</li> <li>Professional advisors including law firms, accountants, auditors, insurers, and tax advisors;</li> <li>Website hosting or information technology consulting service providers;</li> <li>Data analysis service providers;</li> <li>Administrative service providers;</li> <li>Application service providers;</li> <li>Benefits providers;</li> <li>Insurance providers;</li> <li>Travel service providers; and</li> <li>Telecommunications and messaging services.</li> </ul> <p>We may also disclose your Personal Information for other purposes permitted by law such as to:</p> <ul style="list-style-type: none"> <li>Comply with applicable laws; or</li> <li>Respond to governmental inquiries or requests.</li> </ul>
Personal Information Categories Listed in the California Customer Records Statute	
Protected Classification Characteristics under California or Federal Law	
Internet or Other Similar Network Activity	
Geolocation Data	
Professional or Employment-Related Information	
Inferences Drawn from Other Personal Information	

**Your Rights and Choices**

The CPRA provides Employees who are California residents with specific rights regarding their Personal Information. This section describes your CPRA rights and explains how to exercise those rights.

In accordance with our policies and procedures, we will not discriminate or retaliate against you if you choose to exercise any of your rights under the CPRA.

<b>Right to Access</b>
<p>You have the right to request that we disclose certain information to you about our collection and use of your Personal Information over the past twelve (12) months (the "Right to Access"). Once we receive your request and confirm your identity, we will disclose to you:</p> <ul style="list-style-type: none"> <li>The categories of Personal Information we collected about you.</li> <li>The categories of sources for the Personal Information we collected about you.</li> <li>Our business or commercial purpose for collecting that Personal Information.</li> </ul>

- The categories of third parties with whom we share that Personal Information.
- If we disclosed your Personal Information for a business purpose, identifying the Personal Information categories that each category of recipient obtained.
- The specific pieces of Personal Information we collected about you.

### **Right to Delete**

You have the right to request that we delete any of your Personal Information that we collected from you and retained, subject to certain exceptions (the "Right to Delete"). Once we receive your request and confirm your identity, we will review your request to see if an exception allowing us to retain the information applies. We may deny your deletion request if retaining the information is necessary for us or our service provider(s) to:

- Take actions reasonably anticipated within the context of our ongoing business relationship with you, or otherwise perform our contract with you.
- Detect security incidents, protect against malicious, deceptive, fraudulent, or illegal activity, or prosecute those responsible for such activities.
- Comply with the California Electronic Communications Privacy Act (Cal. Penal Code § 1546 *et. seq.*).
- Enable solely internal uses that are reasonably aligned with your expectations based on your relationship with us.
- Comply with a legal obligation.
- Make other internal and lawful uses of that information that are compatible with the context in which you provided it.

We will delete or deidentify Personal Information not subject to one of these exceptions from our records and will direct our service providers to take similar action.

### **Right to Correct**

You have the right to request that we correct any of your Personal Information that we collected from you and retained, subject to certain exceptions (the "Right to Correct"). Once we receive your request and confirm your identity, we will review your request to see if an exception allowing us to retain the information applies. We may deny your correction request if retaining the information is necessary for us or our service provider(s) to:

- Take actions reasonably anticipated within the context of our ongoing business relationship with you, or otherwise perform our contract with you.
- Detect security incidents, protect against malicious, deceptive, fraudulent, or illegal activity, or prosecute those responsible for such activities.
- Comply with the California Electronic Communications Privacy Act (Cal. Penal Code § 1546 *et. seq.*).
- Enable solely internal uses that are reasonably aligned with your expectations based on your relationship with us.
- Comply with a legal obligation.



- Make other internal and lawful uses of that information that are compatible with the context in which you provided it.

We will correct your Personal Information not subject to one of these exceptions from our records and will direct our service providers to take similar action.

### **Right to Opt-Out of the Sharing of Personal Information**

You have the right to request to opt-out of the sharing of Personal Information that may be collected and used, subject to certain exceptions (“Right to Opt-Out”). Once we receive your request and confirm your identity, we will review your request to see if an exception allowing us to retain the information applies. We may deny your opt-out request if retaining the information is necessary for us or our service provider(s) to:

- Take actions reasonably anticipated within the context of our ongoing business relationship with you, or otherwise perform our contract with you.
- Detect security incidents, protect against malicious, deceptive, fraudulent, or illegal activity, or prosecute those responsible for such activities.
- Comply with the California Electronic Communications Privacy Act (Cal. Penal Code § 1546 *et. seq.*).
- Enable solely internal uses that are reasonably aligned with your expectations based on your relationship with us.
- Comply with a legal obligation.
- Make other internal and lawful uses of that information that are compatible with the context in which you provided it.

We will opt you out of the sharing of your Personal Information not subject to one of these exceptions from our records and will direct our service providers to take similar action.

### **Right to Limit the Disclosure of Sensitive Personal Information**

You have the right to request that we limit the disclosure of certain sensitive Personal Information about our collection and use of your Personal Information over the past twelve (12) months pertaining to information that may be collected and used, subject to certain exceptions (“Right to Limit Disclosure”). Once we receive your request and confirm your identity, we will review your request to see if an exception allowing us to retain the information applies. We may deny your limitation request if retaining the information is necessary for us or our service provider(s) to:

- Take actions reasonably anticipated within the context of our ongoing business relationship with you, or otherwise perform our contract with you.
- Detect security incidents, protect against malicious, deceptive, fraudulent, or illegal activity, or prosecute those responsible for such activities.
- Comply with the California Electronic Communications Privacy Act (Cal. Penal Code § 1546 *et. seq.*).
- Enable solely internal uses that are reasonably aligned with your expectations based on your relationship with us.
- Comply with a legal obligation.

- Make other internal and lawful uses of that information that are compatible with the context in which you provided it.

We will opt you out from the disclosure of your sensitive Personal Information not subject to one of these exceptions from our records and will direct our service providers to take similar action.

#### **Right to Opt-Out of Automated Decision-Making**

We do not engage in automated decision-making.

#### **Right to Non-Discrimination**

We will not discriminate against you for exercising any of your CPRA rights.

### **Exercising Your Rights and Choices**

#### **To Exercise**

To exercise your rights as described above, please submit a request by either:

- Emailing us at [DLhumanresources@carltonfields.com](mailto:DLhumanresources@carltonfields.com); or
- Visiting us at [Privacy Policy for California Resident Employees - Request Form](#)

Only you, or someone legally authorized to act on your behalf, may make a request related to your Personal Information. To designate an authorized agent, click [here](#) for the form and instructions.

You may only submit a request to know twice within a twelve (12) month period. Your request must:

- Provide sufficient information that allows us to reasonably verify you are the person about whom we collected Personal Information or an authorized representative.
- Describe your request with sufficient detail that allows us to properly understand, evaluate, and respond to it.

We cannot 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.

We will only use Personal Information provided in the request to verify the requestor's identity or authority to make it.

#### **Response Timing and Format**

We will confirm receipt of your request within ten (10) business days. If you do not receive confirmation within the ten (10) day timeframe, please contact [DLhumanresources@carltonfields.com](mailto:DLhumanresources@carltonfields.com).

We endeavor to substantively respond to a verifiable consumer request within forty-five (45) days of its receipt. If we require more time (up to another forty-five (45) days), 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.

Any disclosures we provide will only cover the twelve (12) month period preceding our receipt of your request. The response we provide will also explain the reasons we cannot comply with a request, if applicable.

For data portability requests, we will select a format to provide your Personal Information that is readily useable and should allow you to transmit the information from one entity to another entity without hindrance, specifically a .csv or .pdf file.

### **Retention of Personal Information**

Personal information will not be kept for longer than is necessary for the business purpose for which it is collected and processed and will be retained in accordance with our internal document retention policies. In certain cases, laws or regulations require us to keep records for specific periods of time, including following termination of the employment relationship. In other cases, records are retained in order to administer the employment relationship or to resolve queries or disputes which arise from time to time.

### **Changes to Our Privacy Policy**

We reserve the right to amend this privacy policy at our discretion and at any time. When we make changes to this Privacy Policy, we will post the updated notice on the Carlton Fields website and update the notice's effective date.

### **Contact Information**

If you have any questions or comments about this notice, the ways in which Carlton Fields collects and uses your information described here, your choices and rights regarding such use, or wish to exercise your rights under California law, please do not hesitate to contact us at:

**Phone:** 813.872.1487

**Website:** [Privacy Policy for California Resident Employees - Request Form](#)

**Email:** [DLhumanresources@carltonfields.com](mailto:DLhumanresources@carltonfields.com)

**Postal Address:**

4221 West Boy Scout Boulevard, Suite 1000  
Tampa, FL 33607