

Caribou™ Privacy Policy

Seyfarth Shaw LLP (“Seyfarth”) is committed to protecting your privacy. This Privacy Policy is intended to inform you of our policies and practices regarding our collection, use, and disclosure of the data you submit to us and that we collect from you through the Seyfarth Caribou™ online case tracking system (the “Website”). This Privacy Policy does not govern data you might provide through a channel other than the Website. This Privacy Policy applies to all visitors to the Website.

Collection of Your Personal Data

In general, with the exception of cookie information disclosed below, no Personal Data is collected from your visit to the Website unless an account is created for you on the Website. "Personal Data" means: (a) your first and last name; (b) your home or other physical address, street name, and name of city or town, state or province, and country; (c) your email address(es); (d) your telephone number(s); (e) your social security number; (f) your date of birth; (g) any other identifier that permits you to be contacted in person or online; (h) employment and other personal, financial, or demographic data; and (i) data about you that we collect from you which relates to you as an individual. When you create an account, we collect your Personal Data as defined above, as well as information related to your immigration status and application(s) for immigration. We may also collect information about you that does not personally identify you, such as data collected automatically regarding your visits to our Website.

Users are either individuals seeking immigration status with the United States government, or employees (or other agents) of an employer that are seeking immigration status on behalf of an individual. Users may enter Personal Data directly through the Website or Personal Data may be entered via the Website by a User's staff, or other systems (that is, data entered manually or fed electronically from another system into the Website via an integration). By using the Website, the technical processing and transmission of your data may involve (a) transmissions over various networks, including the transfer of the data to other countries for storage, processing and use by Seyfarth, its affiliates, and their agents; and (b) changes to Personal Data to conform and adapt to technical requirements of connecting networks or devices. Accordingly, you understand such transmissions and changes are being made for your interest, and the legitimate interest of a Seyfarth client.

Certain data relating to your use of the Website, including but not limited to the type of browser you are using, the operating system running that browser, your IP address, and any other data provided or entered by you on the Website ("Non-Personal Data"), may be automatically recorded by the normal operation of the Website. This Non-Personal Data is used by Seyfarth for several purposes, including resiliency and performance analytics related to the Website's operation. Should Non-Personal Data be linked to Personal Data, such Non-Personal Data shall be deemed Personal Data.

We reserve the right to collect Personal Data about you from other sources and store it in connection with other data we may have about you for our legitimate interest in providing legal services.

Use of Cookies

In general: When you visit the Website, data about your visit may automatically be collected through cookies. Cookies are bits of text that are placed on your computer's hard drive when you visit certain websites. We may use cookies to tell us, for example, whether you have visited us before. If you wish, you may decline cookies or set your browser to refuse

cookies. Most browsers will tell you how to stop accepting new cookies, how to be notified when you receive a new cookie, and how to disable existing cookies.

Type of Cookies Used: Cookies are set by Seyfarth directly on the Website. Refusal of these cookies may result in your inability to access some pages or use some of the features and functions of the Website. If you accept but then decline cookies, please note that some cookies may remain on your computer's hard drives unless and until you manually delete the cookie file. However if you do this you may not be able to use the full functionality of the Website.

Functionality: These cookies allow the Website to remember choices you make (such as your user name, language or the region you are in) and provide enhanced features. For instance, the Website may be able to remember your login details, so that you do not have to repeatedly sign in to your account when using a particular device. These cookies can also be used to remember changes you have made to text size, font, and other parts of web pages that you can customize. The data these cookies collect is usually anonymized. They do not gather any data about you that will be used for advertising or remember where you have been on the internet.

Do Not Track Standard: The major browsers have attempted to implement the draft "Do Not Track" ("DNT") standard of the World Wide Web Consortium ("W3C") in their latest releases. As this standard has not been finalized, Seyfarth's sites are not compatible with DNT and so do not recognize DNT settings.

Use of Your Personal Data

Seyfarth collects and uses your Personal Data to operate the Website and to deliver legal services. In the course of providing immigration and other legal services, we are required to submit Personal Data to various government agencies such as U.S. Citizenship and Immigration Services (USCIS), the U.S. Department of Labor, and the relevant consulates. We also use your personal information to communicate with you regarding the services that we provide.

Use restrictions: Seyfarth will not sell, rent, trade, exchange, share, or otherwise disclose data Personal Data that visitors submit through our Website, except as identified in this Privacy Policy.

Sharing Your Personal Data

Seyfarth may share Personal Data with its affiliates, subsidiaries, or divisions, and with their officers, directors, employees, accountants, attorneys, and agents; with third-parties to comply with applicable laws or legal processes (including but not limited to regulatory data requests); with third-parties to protect the rights or property of Seyfarth; and with law enforcement, regulatory, and government authorities.

We may share your data with service providers we have retained to perform services on our behalf (for example, to host the Website and send email communications). We obligate these service providers to not use or disclose the data they receive from us except as necessary to perform services on our behalf, or to comply with legal requirements.

In the event Seyfarth or substantially all of its assets are acquired, or in the unlikely event that Seyfarth goes out of business or enters bankruptcy, Website user information, including Personal Data, would be one of the assets that is transferred or acquired by a third party. The acquirer of this data under these circumstances may continue to use your Personal Data as set forth in this Privacy Policy.

External Links

The Website may include links to other websites whose privacy practices and policies we do not control. Such links do not imply an endorsement with respect to any third party, any website, or the products or services provided thereby. Once you leave the Website, disclosure or provision of your personal information, if any, is governed by the privacy policy and terms of use of the owner of the site you are visiting.

Security of Your Personal Data

We maintain administrative, technical, and procedural safeguards for the Website designed to protect against unauthorized access to, unauthorized disclosure, or loss of Personal Data we collect through the Website. We do not guarantee or warrant the security of any information you transmit to or from our Website, and you do so at your own risk.

Privacy Rights of EU Residents

If you are a resident of the European Union, you have a general right to: (a) access the Personal Data we hold about you; (b) have any inaccurate Personal Data about you corrected; (c) obtain a copy of any Personal Data you provided to us under the legal basis of consent; (d) object to processing of Personal Data when the processing is based on Seyfarth's or a third party's legitimate interest; (e) withdraw your consent at any time, where we have used consent as a basis for processing; (f) have your Personal Data deleted from our files and data stores, as well as from those third parties providing services to Seyfarth, where required by law; (g) restrict the processing of your personal data; and (h) lodge a complaint with the relevant supervisory authority in your country of residence.

Note that some of these rights are limited by other individuals' rights to data protection, or the rights of a Seyfarth client which are not overridden by your fundamental rights and freedoms. For example, where access to your Personal Data would implicate another individual's Personal Data, or an employer's proprietary trade secrets, we may deny your request. Should Seyfarth deny your request to exercise any right, we will provide you our justification within 30 days of receipt of your request. In the event that you disagree with our reasons, you may contact the relevant supervisory authority as noted above.

Processing of Personal Data In Countries Outside of the EU: Your Personal Information may be processed in the United States and other countries outside the European Union ("Third Countries"), that may not offer the same level of data protection as that afforded by the privacy law that applies to you. We will process Personal Data (or procure that it be processed) in the Third Countries in accordance with the requirements of applicable law, which will include having appropriate contractual undertakings in legal agreements with service providers who process Personal Information on our behalf in such Third Countries.

Retention Period and Security Measures: We will generally keep Personal Information about you for as long as necessary in relation to the purpose for which it was collected, or for such longer period if required under the applicable law or necessary for the purposes of our other legitimate interests.

The applicable retention period will depend on various factors, such as any legal obligation to which we or our service providers are subject as well as on whether you decide to exercise your right to request the deletion of your information from our systems. Our customary retention practice is to delete information associated with an account six years after activity has concluded. In addition to that practice, we will, from time to time, review the purpose for which we have collected information about you and decide whether to retain it, update it, or securely delete it, if the information is no longer required.

Onward Transfers

You should be aware that by using the Website, and by using services provided by Seyfarth, your Personal Data may be uploaded into, processed in, or transferred to computer systems residing in the United States. By using this Website, you understand that any of your Personal Data that is collected by this Website may be managed in this way. The basis for this transfer is that the processing of your Personal Data in the United States is necessary for the performance of a contract executed between Seyfarth and your current or potential employer or between Seyfarth and you.

Rights of California Residents

This California Privacy Notice (“California Notice”) applies to California residents whose Personal Information is processed by Seyfarth pursuant to the California Consumer Privacy Act (“CCPA”) or other California privacy laws described below. The California Notice describes how we protect the Personal Information we process and control relating to California residents and rights California residents may have in relation to this Personal Information. For purposes of this California Notice, “Personal Information” has the meaning provided by the CCPA and does not include information that is publicly available, that is deidentified or aggregated such that it is not capable of being associated with you, or that is excluded from the CCPA’s scope.

Users who are residents of California may be able to request to exercise the following rights:

- The Right to Know any or all of the following information relating to your Personal Information we have collected and disclosed in the last 12 months, upon verification of your identity:
 - The specific pieces of Personal Information we have collected about you;
 - The categories of Personal Information we have collected about you;
 - The categories of sources of the Personal Information;
 - The categories of Personal Information that we have disclosed to third parties for a business purpose, and the categories of recipients to whom this information was disclosed;
 - The categories of Personal Information we have sold and the categories of third parties to whom the information was sold; and
 - The business or commercial purposes for collecting or selling the Personal Information.

- The Right to Request Deletion of Personal Information we have collected from you.

However, this right is limited by a number of exceptions. Fundamentally, if Seyfarth has a permissible need to retain Personal Information, it is not under an obligation to delete such information, even when requested. Generally, we retain Personal Information so we may 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 of our online properties; enable solely internal uses that are reasonably aligned with your expectations based on your relationship with Seyfarth; comply with a legal obligation; or otherwise use your Personal Information, internally, in a lawful manner that is compatible with the context in which you provided the information. As such, we generally do not accept requests to delete Personal Information.

- The Right to Opt Out of Personal Information Sales to third parties now or in the future.

You also have the right to be free of discrimination for exercising these rights. However, please note that if the exercise of these rights limits our ability to process Personal Information, for example, if you submit a deletion request, we may no longer be able to provide you our products and services or engage with you in the same manner.

Seyfarth does not sell or share your Personal Data with third parties for their direct marketing purposes.

You may submit a request to exercise your California Consumer Rights through one of the mechanisms described below. We will need to verify your identity before processing your request, which may require us to request additional Personal Information from you or require you to log into your account, if you have one. In certain circumstances, we may decline or limit your request, particularly where we are unable to verify your identity or locate your information in our systems, or as permitted by law.

To exercise your California Consumer Rights to Know, Delete, or for additional information, please submit a request to 1-877-860-3852 or dataprotection@seyfarth.com].

Finally, you may also submit a verifiable consumer request through an authorized agent. To do so please be prepared for your agent to provide a signed permission to do so, to verify their own identity with us, and to directly confirm with us that you provided the agent permission to submit the request.

Retention

Seyfarth will not retain your Personal Data longer than is necessary to fulfill the purpose for which it was collected or as required by applicable laws, regulations, or data retention policies. Should you feel that your Personal Data is being retained outside the scope of this Privacy Policy, you may request deletion of your Personal Data.

Changes to Privacy Policy

From time to time, we may change this Privacy Policy. We will post a prominent notice of any material changes to the Privacy Policy on the Website, and indicate at the top of the notice when it was most recently updated. Your use of the Website following any such change constitutes your agreement to follow and be bound by the Privacy Policy, as amended.

Your Choices

If you would like to update your contact data or preferences, or have your data removed from our mailing list, or if you have comments or questions about the administration of the Website or this Privacy Policy, please contact us by:

Emailing us at dataprotection@seyfarth.com or

Writing us at
Seyfarth Shaw LLP
Attention: Marketing and Business Development
233 South Wacker Drive, Suite 8000
Chicago, IL 60606-6448
(312) 460-5000
SEYFARTH - Privacy Policy

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