

Privacy Policy

Gunderson Dettmer Stough Villeneuve Franklin & Hachigian LLP

Privacy Policy

Effective Date: January 1, 2025

This Privacy Policy describes the policies and procedures of Gunderson Dettmer Stough Villeneuve Franklin & Hachigian LLP (“GDSVF&H,” “we,” “us,” or “our”) regarding the collection, use, and disclosure of your information in connection with your access to and use of our website (the “Site”). GDSVF&H receives information about you from various sources, including but not limited to: (i) if you register to receive emails or publications from us; (ii) your use of the Site generally; and (iii) from third party websites or services. By accessing or using the Site, you are consenting to the collection, transfer, manipulation, storage, disclosure and other uses of your information as described in this Privacy Policy and in our Notices and Terms of Use (the “Notices and Terms”). Any defined terms not defined herein shall have the meaning ascribed to them in the Notices and Terms.

GDSVF&H may amend this Privacy Policy from time to time. Any such amendments will be effective as of the date they are posted on the Site. Each time the Privacy Policy is amended, the “Effective Date” field located above will be updated. GDSVF&H’s use of any information it collects is subject to the Privacy Policy in effect at the time of collection. You agree to be bound by any amendments to the Privacy Policy if you access or use the Site after such amendments have been posted. Thus, we advise you to refer to this Privacy Policy regularly for any amendments.

What this Privacy Policy Covers

This Privacy Policy covers the treatment of Personal Information that we gather when you access or use the Site. “Personal Information” means any information that identifies or relates to a particular individual and also includes information referred to as “personally identifiable information” or “personal data” under applicable data privacy laws, rules or regulations. This Privacy Policy does not apply to the practices of third parties we do not own or control, including any third party services, websites, or applications that you elect to access through the Site (“Linked Third Parties”), or to individuals that we do not manage or employ. We encourage you to carefully review the privacy policies of any Linked Third Parties you choose to access.

Collection and Use of Personal Information by GDSVF&H

Categories of Personal Information We Collect

This chart details the categories of Personal Information that we collect and have collected over the past 12 months.

<u>Category of Personal Information (and Examples)</u>	<u>Business or Commercial Purpose(s) for Collection</u>	<u>Categories of Third Parties With Whom We Disclose this Personal Information:</u>
Profile or Contact Data <ul style="list-style-type: none"> • First and last name • Email • Address 	<ul style="list-style-type: none"> • Providing, customizing and improving the Site • Marketing our services and expertise • Corresponding with you 	<ul style="list-style-type: none"> • Service Providers • Parties You Authorize, Access or Authenticate
Device/IP Data <ul style="list-style-type: none"> • IP address • Device ID • Domain server • MAC address • Type of device/operating system/browser used to access the Services • Mobile network information (if applicable) 	<ul style="list-style-type: none"> • Providing, customizing and improving the Site 	<ul style="list-style-type: none"> • Service Providers • Analytics Partners • Parties You Authorize, Access or Authenticate
Web Analytics <ul style="list-style-type: none"> • Web page interactions • Referring webpage/source 	<ul style="list-style-type: none"> • Providing, customizing and improving the Site 	<ul style="list-style-type: none"> • Service Providers • Parties You Authorize, Access or Authenticate

<p>through which you accessed the Services</p> <ul style="list-style-type: none"> • Non-identifiable request IDs • Statistics associated with the interaction between device or browser and the Services 		
<p>Other Identifying Information that You Voluntarily Choose to Provide</p> <ul style="list-style-type: none"> • Identifying information in emails or letters you send us 	<ul style="list-style-type: none"> • Providing, customizing and improving the Site • Corresponding with you 	<ul style="list-style-type: none"> • Service Providers • Parties You Authorize, Access or Authenticate

Our Commercial or Business Purposes for Collecting or Disclosing Personal Information

- **Providing, Customizing and Improving the Site**
 - Providing you with the products, services or information you request.
 - Meeting or fulfilling the reason you provided the information to us.
 - Providing support and assistance for the Site.
 - Improving the Site, including testing, research, and internal analytics.
 - Personalizing the Site, website content and communications based on your preferences.
 - Doing fraud protection, security and debugging.
 - Carrying out other business purposes stated when collecting your Personal Information or as otherwise set forth in applicable data privacy laws, such as the California Consumer Privacy Act, as amended by the California Privacy

Rights Act of 2020 (the “CCPA”), the Nebraska Data Privacy Act (“NDPA”), the Texas Data Privacy and Security Act, (collectively, the “U.S. Consumer Privacy Laws”).

- **Marketing our Services and Expertise**

- Marketing our legal services and expertise.

- **Corresponding with You**

- Responding to correspondence that we receive from you, contacting you when necessary or requested, and sending you information about GDSVF&H or the Site.
- Sending emails and other communications according to your preferences.

Other Permitted Purposes for Processing Personal Information

In addition to the business and commercial purposes listed above, we may collect, use, or disclose your Personal Information with other parties, including government agencies or law enforcement to meet our legal requirements;; fulfil our legal obligations under applicable law, regulation, court order or other legal process; prevent, detect or investigate security incidents or illegal or prohibited activities; protect the rights, property or safety of you, GDSVF&H or another party; enforce legal terms with you or another party; or respond to claims that any posting or other content violates third-party rights; and resolve disputes.

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. GDSVF&H will never ask you through the Site, or in any communications you receive from us in connection with your use of the Site, for any Personal Information other than your name, your email address, and your physical address.

Categories of Sources of Personal Information

We collect Personal Information about you from the following categories of sources:

- **You**

- When you provide such information directly to us.
- When you access and use our Site.

- When you send us an email or otherwise contact us.
- When you use the Site and such information is collected automatically.
 - Through Cookies (defined in the 'Tracking Tools and Opt-Out' section below).
 - If you use a location-enabled browser, we may receive information about your location.
- **Third Parties**
 - Vendors
 - We may use analytics providers to analyze how you interact and engage with the Site, or third parties may help us provide you with customer support.

How We Disclose Your Personal Information

We may disclose your Personal Information to the categories of service providers and other parties listed in this section.

- **Service Providers.** GDSVF&H employs and contracts with people and other entities that perform certain tasks on our behalf. We may need to disclose Personal Information with such Service Providers in order to offer certain features on the Site and content to you. Unless we tell you otherwise, our Service Providers do not have any right to use Personal Information we disclose with them beyond what is necessary to assist us. They may include:
 - Hosting, technology and communication providers.
 - Analytics partners, which provides analytics on web traffic or usage of the Site and have limited use or restricted processing of Personal Information.
 - Security and fraud prevention consultants.
 - Support and customer service vendors.
- **Parties You Authorize, Access or Authenticate**
 - Third parties, including linked parties, you access through the Site.

Legal Obligations

We may disclose any Personal Information that we collect with third parties in conjunction with any of the activities set forth under 'Other Permitted Purposes for Processing Personal Information' section above.

Business Transfer

If GDSVF&H or substantially all of its assets is acquired, or if we undergo a merger, acquisition, reorganization, bankruptcy, or other transaction in which a third party assumes control of our business (in whole or in part), your Personal Information may be one of the assets to be transferred or acquired by a third party. You acknowledge that such transfers may occur, and that any such third party may continue to use your Personal Information as set forth in this policy. Should one of these events occur, we will make reasonable efforts to notify you before your Personal Information becomes subject to different privacy and security policies and practices.

Data that is Not Personal Information

We may create aggregated, de-identified or anonymized data from the Personal Information we collect, including by removing information that makes it personally identifiable to a particular Site visitor. For example, we collect statistical information about how visitors of the Site, collectively, use the Site. While some of this information may possibly be derived from Personal Information, this statistical information is not Personal Information and cannot be tied back to you or your web browser or device. We may use such aggregated, de-identified or anonymized data and disclose it with third parties for or lawful business purposes, including demographic profiling, analytics, or other purposes, provided that we do not disclose such information in a manner that could identify you.

Tracking Tools, Advertising and Opt-Out

The Site uses cookies and similar technologies such as pixel tags, web beacons, clear GIFs and JavaScript (collectively, “Cookies”) to enable our servers to recognize your web browser, tell us how and when you visit and use our Site, analyze trends, learn about our user base and operate and improve our Site. Cookies are small pieces of data — usually text files — placed on your computer, tablet, phone or similar device when you use that device to access our Site. We may also supplement the information we collect from you with information received from third parties, including third parties that have placed their own Cookies on your device(s). Please note that because of our use of Cookies, the Site does not support “Do Not Track” requests sent from a browser at this time.

We use the following types of Cookies:

- Essential Cookies. Essential Cookies are required for providing you with features or services that you have requested. For example, certain Cookies enable you to log into secure areas of our Site. Disabling these Cookies may make certain features and services unavailable.
- Functional/Personalization Cookies. Functional/Personalization Cookies are used to record your choices and settings regarding our Site, maintain your preferences over time and recognize you when you return to our Site. These Cookies help us to personalize our content for you, greet you by name and remember your preferences (for example, your choice of language or region).
- Performance/Analytical Cookies. Performance/Analytical Cookies allow us to understand how visitors use our Site. They do this by collecting information about the number of visitors to the Site, what pages visitors view on our Site and how long visitors are viewing pages on the Site. Performance/Analytical Cookies also help us measure the performance of our advertising campaigns in order to help us improve our campaigns and the Site’s content for those who engage with our advertising. For example, Google LLC (“Google”) uses Cookies in connection with its Google Analytics services. Google’s ability to use and share information collected by Google Analytics about your visits to the Site is subject to the Google Analytics Terms of Use and the Google Privacy Policy. You have the option to opt-out of Google’s use of Cookies by visiting the Google advertising opt-out page at www.google.com/privacy_ads.html or the Google Analytics Opt-out Browser Add-on at <https://tools.google.com/dlpage/gaoptout/>.

You can decide whether or not to accept Cookies through your internet browser's settings. Most browsers have an option for disabling Cookies, which will prevent your browser from accepting new Cookies, and perhaps (depending on the sophistication of your browser software) allow you to decide on acceptance of each new Cookie in a variety of ways. Please note that if you disable Cookies, you may find that some aspects or features of the Site may not operate properly or be available to you. You can also delete all Cookies that are already on your device. If you do this, however, you may have to manually adjust some preferences every time you visit our Site and some of the services and functionalities may not work.

Additionally, our Site has an integrated Cookie consent tool. The Cookie consent tool can be utilized to customize your Cookie preferences. The tool will record when your preferences related to Cookies and will ask for consent periodically to ensure users stay up-to-date with changes to Privacy Policy. The consent tool specifically controls the Functional/Personalization Cookies, Retargeting/Advertising Cookies, and Performance/Analytical Cookies set by using our Site. Essential cookies cannot be disabled.

To find out more information about Cookies generally, including information about how to manage and delete Cookies, please visit <https://www.allaboutcookies.org/>.

Data Security

GDSVF&H seeks to protect your Personal Information from unauthorized access, use and disclosure using appropriate physical, technical, organizational and administrative security measures, including by using industry-standard techniques. Although we work to protect the security of your information that we hold in our records, please be aware that no method of transmitting information of the internet or storing information is completely secure. We cannot guarantee the security of any such information and do not guarantee or warrant that such techniques will prevent unauthorized access to information about you that we store. Unauthorized entry or use, hardware or software failure, and other factors, may compromise the security of user information at any time. If you have reason to believe that your Personal Information has been compromised in any way, please notify us immediately by contacting website@gunder.com.

Data Retention

We will retain your Personal Information for the period necessary to fulfill the purposes outlined in this Privacy Policy, including to perform our business or commercial purposes for collecting your Personal Information. When establishing a retention period for specific categories of information, we consider who we collected the information from, our need for the Personal Information, why we collected the Personal Information, and the sensitivity of the Personal Information. In some cases we retain Personal Information for longer, if doing so is required or allowed by applicable law, rule or regulation. We may further retain information in an anonymous or aggregated form where that information would not identify you personally.

For example, we retain your device/IP data for as long as we need it to ensure that our systems are working appropriately, effectively and efficiently.

Personal Information of Children

We do not knowingly collect or solicit Personal Information about children under 16 years of age; if you are a child under the age of 16, please do not attempt to access or use the Site or send us any Personal Information. If we learn we have collected Personal Information from a child under 16 years of age, we will delete that information as quickly as possible. If you believe that a child under 16 years of age may have provided Personal Information to us, please contact us at website@gunder.com.

U.S. Consumer Privacy Rights

If you reside in certain U.S. states such as California, Nebraska, and Texas, you may have certain rights afforded to you (as described below) depending on your state of residence. Please see the ‘[Exercising Your Rights under U.S. Consumer Privacy Laws](#)’ section below for instructions regarding how to exercise these rights. Please note that we may process Personal Information of our customers’ end users or employees in connection with our provision of certain services to our customers. If we are processing your Personal Information as a service provider, you should contact the entity that collected your Personal Information in the first instance to address your rights with respect to such data. Please note that your rights may be subject to certain conditions or exceptions in accordance with applicable U.S. Consumer Privacy Laws.

If you have any questions about this section or whether any of the following rights apply to you, please contact us at website@gunder.com.

- Access: You may have the right to request confirmation of or access to the Personal Information that we process about you. You can also request access to a portable copy of your Personal Information. If you are an Oregon resident, you also have the right to request a list of specific third parties, other than natural persons, to which we have disclosed your Personal Information.
- Deletion: You may have the right to request that we delete the Personal Information that we have collected about you.
- Correction: You may have the right to request that we correct any inaccurate Personal Information we have collected about you.
- Portability: You may have the right to request a copy of your Personal Information in a machine-readable format, to the extent technically feasible.

Targeted Advertising, “Sharing,” and “Selling”

We will not sell, share, or process your Personal Data for the purposes of targeted advertising, and have not done so over the last 12 months. To our knowledge, we do not sell, share, or process the Personal Data of any minors under the age of 16 for the purposes of targeted advertising.

Opt-In and/or Opt-Out of Certain Processing Activities

We have and will not (1) collect Sensitive Personal Information or Personal Information from a known child under 13 years of age; (2) process Personal Information for a purpose not described in this Privacy Policy without your consent; or (3) process your Personal Information for the purposes of profiling in furtherance of decisions that produce legal or similarly significant effects to you.

Anti-Discrimination

We will not discriminate against you for exercising your rights under U.S. Consumer Privacy Laws. We will not deny you our goods or services, charge you different prices or rates, or provide you a lower quality of goods and services if you exercise your rights under applicable privacy laws. However, we may offer different tiers of our services as allowed by applicable data privacy laws with varying prices, rates or levels of quality of the goods or services you receive related to the value of Personal Information that we receive from you.

Exercising Your Rights Under U.S. Consumer Privacy Rights

To exercise the rights described in this Privacy Policy, you or, if you are a California, Nebraska, or Texas resident, your Authorized Agent (defined below) must send us a request that (1) provides sufficient information to allow us to verify that you are the person about whom we have collected Personal Information (such as your Contact or Profile Information), and (2) describes your request in sufficient detail to allow us to understand, evaluate and respond to it. Each request that meets both of these criteria will be considered a “Valid Request.” We may not respond to requests that do not meet these criteria. We will only use Personal Information provided in a Valid Request to verify your identity and complete your request. You do not need an account to submit a Valid Request.

We will work to respond to your Valid Request within the time period required by applicable privacy laws. We will not charge you a fee for making a Valid Request unless your Valid Request(s) is excessive, repetitive or manifestly unfounded. If we determine that your Valid Request warrants a fee, we will notify you of the fee and explain that decision before completing your request.

Request to Access, Delete, or Correct

You may submit a Valid Request using the following methods:

- Email us at: website@gunder.com
- Call us at: 650-321-2400

If you are a California, Nebraska, or Texas resident, you may also authorize an agent (an “Authorized Agent”) to exercise your rights on your behalf. To do this, you must provide your Authorized Agent with written permission to exercise your rights on your behalf, and we may request a copy of this written permission from your Authorized Agent when they make a request on your behalf.

Appealing a Denial

Under applicable privacy laws in Nebraska and Texas, if we refuse to take action on a request within a reasonable period of time after receiving your request in accordance with this section, you may appeal our decision. In such appeal, you must (1) provide sufficient information to allow us to verify that you are the person about whom the original request pertains and to identify the original

request, (2) specify a qualifying state of residence and (3) provide a description of the basis of your appeal.

You may appeal a decision by us using the following methods:

- Email us at: website@gunder.com (title must include “[STATE OF RESIDENCE] Appeal”)
- Call us at: 650-321-2400

If we deny your appeal, you have the right to contact the Attorney General of your State, including by the following links: [Nebraska](#) and [Texas](#).

Other State Law Privacy Rights

California Resident Rights

If you are a California resident, California Civil Code sections 1798.83-1798.84 entitles you to contact us to prevent the disclosure of your Personal Information to third parties for such third parties’ direct marketing purposes. If you are a California resident and would like a copy of this notice to submit such a request, please contact us at: website@gunder.com.

Your browser may offer you a “Do Not Track” option, which allows you to signal to operators of websites and web applications and services that you do not wish such operators to track certain of your online activities over time and across different websites. Our Services do not support Do Not Track requests at this time. To find out more about “Do Not Track,” you can visit www.allaboutdnt.com.

Nevada Resident Rights

If you are a resident of Nevada, you have the right to opt-out of the sale of certain Personal Information to third parties who intend to license or sell that Personal Information. You can exercise this right by contacting us at website@gunder.com with the subject line “Nevada Do Not Sell Request” and providing us with your name. Please note that we do not currently sell your Personal Information as sales are defined in Nevada Revised Statutes Chapter 603A.

Contact Information

If you have any questions or comments about this Privacy Policy, the ways in which we collect and use your Personal Information or your choices and rights regarding such collection and use, please do not hesitate to contact us at:

- Email us at: website@gunder.com
- Call us at: 650-321-2400

California Applicant and Worker Privacy Notice

[Click here.](#)