

Privacy Policy

Updated 2/23/2024

Beltzer Bangert & Gunnell LLP (“BBG”, “we”, “us” or “our”) welcomes you to the BBG website. Your privacy is important to us and we have prepared this Privacy Policy (“Policy”) to explain how we collect, use, and protect Personal Information (defined below) and Non-Personal Information (defined below) when you use our website located at www.bbglaw.com and any other sites operated by BBG covered by this Policy (each a “Site” and collectively, the “Sites”), and to explain your choices for managing your information preferences. By using any of our Sites, you signify your assent to this Policy.

The BBG website is intended for use by adults, not children, and is not intended for anyone under the age of 13. BBG has no way of determining the age of any person using this website. If we become aware that we have inadvertently received Personal Information from a child under the age of 13, we will delete such information from our records.

A. EFFECTIVE DATE AND NOTIFICATION OF MATERIAL CHANGES

The BBG Policy is effective as of the date it was last updated, stated at the top of this Policy. **We reserve the right to change the provisions of this Policy at any time. We will notify you of any material changes made to the Policy when the Policy is updated from time to time by indicating at the top of the Policy the date it was last updated. We encourage you to review this Policy from time to time to make sure that you fully understand the provisions of our most recently updated Policy, as amended from time to time.**

B. ONLINE TRACKING

1. Personal Information and Non-Personal Information

As used herein, the term “Personal Information” means information that personally identifies an individual (such as a name, address, phone number, social security number, email address, occupation, title or position, credit card number, or any other identifier that permits the physical or online contacting of a specific individual), or other information about that individual that is directly linked to any personally identifying information listed above.

In contrast, as used herein, the term “Non-Personal Information” is general information collected in the aggregate to help us understand how the Sites are being used, from which individual identities or other Personal Information has been removed. This information may include, for example, the time and duration of a visit, type of web browser used, the operating system/platform you are using, your Internet Protocol (IP) address, the websites from which you linked to us, your CPU speed and your general activity on a Site (“Non-Personal Information”). This Policy in no way restricts or limits our collection and use of Non-Personal Information.

2. Categories of Personally Identifying Information That We Collect

Active Collection: We may collect information from you in various ways when you visit the Sites. If you choose to provide us with Personal Information about yourself, either through a form on our Sites or by sending us an email, we may collect and use that information to contact you and send you additional information. From these forms and emails, we may store or collect any or all of the categories of personally identifying information listed above as “Personal Information,” such as your name, address, email, telephone number, other contact information, demographic information and credit card number.

BBG may retain indefinitely any or all of these categories of personally identifying information to enhance the experience of the Sites and, in some cases, the services that BBG provides.

Passive Collection: When you use a Site, some Non-Personal information is also automatically collected, such as the time and duration of a visit, type of web browser used, the operating system/platform you are using, your Internet Protocol (IP) address, the websites from which you linked to us, your CPU speed and your general activity on a Site. We treat this information as Personal Information if we combine it with or link it to any Personal Information. Otherwise, BBG may use it in the aggregate only to research Site traffic, determine areas of interest in our firm, and improve the operation of the Sites.

We may also automatically collect certain information through use of “cookie” technology. A cookie is a small data file that websites can place on computer hard drives to enhance each user’s experience with a website. BBG may use cookies to collect information and improve the content of the web services provided. This information does not identify you personally and it does not read data off your hard drive. If we link cookies to any Personal Information, we will treat this information as Personal Information.

Please note your browser can erase past cookies, warn or block Site cookies if you prefer. Your election to remove or block cookies will not adversely affect your experience on our Sites.

3. Third-Party Online Tracking

BBG does not allow any third parties to collect Personal Information while you are using the Site.

C. DATA SHARING

1. Categories of Third Parties with Whom BBG May Share Personally Information and How Such Info Is Used

We do not sell any Personal Information to any third party. We may, however, share Personal Information with third parties as described in this Policy or on the Sites. For example, we may share Personal Information with third parties as follows:

With vendors, consultants, and other service providers (“Service Providers”) who are engaged by or working with us in connection with the operation of the Sites or the

services we provide and who need access to such information to carry out their work for us;

With Service Providers in an aggregated or anonymized form that does not directly identify you;

With Service Providers and other necessary third parties when we believe in good faith that we are lawfully authorized or required to do so or that doing so is reasonably necessary or appropriate to provide you with a service or there is an emergency;

With civil dispute parties or the court adjudicating the dispute, or with the corresponding parties and court adjudicating a criminal case when we believe in good faith that we are lawfully authorized or required to do so or that doing so is reasonably necessary or appropriate to comply with the law or legal processes or respond to lawful requests or legal authorities, including responding to lawful subpoenas, warrants, or court orders;

Generally when we believe in good faith that we are lawfully authorized or required to do so or that doing so is reasonably necessary or appropriate to protect the rights, property, or safety of BBG, our clients, users, employees, the Sites, copyright owners, third parties or the public, including without limitation to protect BBG or our clients or users from fraudulent, abusive, inappropriate, or unlawful use of our Sites;

With our legal representatives or the proper authorities to enforce or apply this Policy, our Terms of Use, or our other policies or agreements; and

With a prospective buyer, seller, or merging entity (or its related entities) in connection with, or during negotiations of, any merger, sale of company assets, financing or acquisition, or in any other situations where Personal Information may be disclosed or transferred as one of the business assets of BBG.

We are not responsible for the actions of Service Providers or other third parties, nor are we responsible for any additional information you provide directly to any third parties, and we encourage you to become familiar with their privacy practices and policies before disclosing Personal Information directly to any such parties. Nothing herein restricts the sharing of aggregated or anonymized information, which may be shared with third parties without your consent.

2. Links to Other Websites

Our Sites may contain links to other websites. Any Personal Information you provide on the linked pages is provided directly to that third party and is subject to that third party's privacy policy. This Policy does not apply to such linked sites, and we are not responsible for the content, privacy policies or security practices of these websites or any other sites that are linked to and from the Sites. We encourage you to learn about their privacy policies and security practices before providing them with Personal Information.

Any third-party website link provided is not an endorsement of the content, viewpoint, policies, services, or products provided on the linked websites.

D. SECURITY SAFEGUARDS: HOW WE PROTECT COLLECTED INFORMATION

Personal Information and Non-Personal Information that we collect, if any, may be stored on servers that we manage, using standard security procedures and practices appropriate to the nature of the information in an effort to protect information from unauthorized access, destruction, use, modification, or disclosure. Please be aware, however, that despite our efforts, no security measures are impenetrable and no method of data transmission over the Internet can be guaranteed to be 100% secure. As a result, while we strive to protect information transmitted on or through our Sites, we cannot and do not guarantee or warrant the security of any information you transmit on or through the Sites, and you do so at your own risk.

E. INDIVIDUAL CHOICES REGARDING THE USE OF YOUR INFORMATION

If you do not want us to further use information previously given by you on or through the Sites to contact you, or if you wish to correct such information, you may do so by contacting BBG by email at office@bbglaw.com.

F. HOW WE RESPOND TO DO-NOT-TRACK SIGNALS

Currently, BBG does not respond to Do-Not-Track signals that your browser may allow you to send to BBG when you visit the Sites. Do-Not-Track signals or other similar mechanisms allow you to exercise choice regarding the collection of your Personal Information.

However, as mentioned above, if you do not want us to further use information previously given by you on or through this website to contact you, or if you wish to correct such information, you may do so by contacting BBG by email at office@bbglaw.com.

G. ACCOUNTABILITY: QUESTIONS

If you have any questions about this Policy or our privacy practices, please contact our Head of Marketing, Theresa Wheeler, at theresa@bbglaw.com.