



Federal Bar Association

PRIVACY POLICY

Last revised on May 25, 2018.

This Privacy Policy (“Policy”) describes the Federal Bar Association’s (“FBA”) practices for collecting, using, sharing, and protecting information relating to identifiable people.

Collection and Processing of Information

Personal data means information that identifies you as an individual or from which you may be identified. Non-personal information means information that does not directly identify you. We collect both types of information about you. The following provides some examples of the type of information that we collect and what we use that information for:

Context	Types of Data, Purpose for Collection, and Use of Data
Business Contact Information	We collect business contact information, and billing information, from our members and our potential members for a legitimate business purpose. We use this information in order to provide membership services, products, services, or related information.
Email Interconnectivity	If you receive email from us, we may use certain tools to capture data related to when you open our message or click on any links or banners it. We may also take the information in your emails and add it to our contacts.
Employment	If you apply for an FBA job posting, or become an employee at the FBA, we collect information necessary to process your application or to further the employment relationship. This may include, among other things, your Social Security Number.
Feedback/Support	If you provide us feedback or contact us we will collect your name and e-mail address, as well as any other content that you send to us, in order to reply.
Mailing List	When you sign up for one of our mailing lists we collect your email address or postal address.
Mobile Devices	We collect information from mobile devices such as unique identifying information broadcast from devices when visiting our website.
Profile	We collect your name and other information in order to allow you to create a profile. To the extent that you engage in discussion groups or forums information relating to your profile (and other information that you insert in those forums) may be viewed by others.
Surveys	With survey participation, we collect information provided through the survey. If the survey is provided by a third-party service provider, the third party’s privacy policy applies to the collection, use, and disclosure of information.
Web logs	We collect your browser type, operating system, Internet Protocol (IP) address (a number that is automatically assigned to a computer when using the Internet), domain name, click-activity, referring website, and/or a date/time stamp for visits.

Cookies and first party tracking	We use cookies and clear GIFs. “Cookies” are small pieces of information that a website sends to a computer’s hard drive while a website is viewed. We use both session cookies (which expire once a web browser is closed) and persistent cookies (which stay on a device until deleted). Among other things, cookies allow us to provide a more personal and interactive experience and to improve our marketing efforts. Persistent cookies may be removed by following instructions provided by the browser. If cookies are disabled some areas or features of our websites may not work properly.
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We collect personal information about you from a variety of sources, including when you visit our website, when you voluntarily provide information to us, when information is publicly posted (e.g., Google, Facebook, Twitter, etc.), or when we receive it from third parties such as our members.

There may be instances in which the information that we collect is considered sensitive personal data under the laws of the country or state in which you reside. For example, if you apply for employment with us we may collect your racial or ethnic origin as doing so is required within certain jurisdictions. As a general matter, we only collect sensitive personal data when it is necessary for us to do so.

Use of Information.

In addition to the purposes and uses described above, we may use personal information in the following ways:

- To provide service communications such as membership and bill reminders, program registrations, order confirmations, and customer service messages.
- To identify you when you visit our websites.
- To respond to your inquiries related to support, services, employment opportunities, or other requests.
- To provide the products and services you request.
- To improve our services and product offerings.
- To conduct analytics.
- To send marketing and promotional materials, including information relating to our goods, services, sales, or promotions.
- For internal administrative purposes, as well as to manage our relationship with you.
- To publish membership directories and registration lists.
- To share with third parties as required by law or to protect the FBA.

As discussed in the sections above, our collection and processing of your information is based in different contexts upon your consent, our need to perform a contract, our obligations under law, and/or our legitimate interest in conducting our business.

Sharing of Information

In addition to the specific situations discussed elsewhere in this policy, we disclose information in the following situations:

1. **Affiliates and Acquisitions.** Companies affiliated with the FBA may use the information in connection with processing your inquiries, providing services, and improving our products and services. In limited situations we may also share Business Contact Information that we collect with one of our affiliated companies so that they can provide you with information concerning the products or services that they provide. We may also share your information if another company acquires our company, business, or our assets.
2. **Other Disclosures with Your Consent.** We may ask if you would like us to share your information with other unaffiliated third parties who are not described elsewhere in this policy.
3. **Other Disclosures without Your Consent.** We may disclose information in response to subpoenas, warrants, or court orders, or in connection with any legal process, or to comply with relevant laws. We may also share

your information in order to establish or exercise our rights, to defend against a legal claim, to investigate, prevent, or take action regarding possible illegal activities, suspected fraud, safety of person or property, or a violation of our policies, or to comply with a request.

4. **Public.** We may provide the opportunity to post comments, or reviews, in a public, or semi-public, forums. If you decide to submit information on these pages, that information may be publicly available.
5. **Service Providers.** The FBA may provide personal data to third parties that act as agents, consultants or contractors to perform tasks on behalf of and under the FBA's instructions. Such recipients must agree to abide by confidentiality obligations, and are not permitted to use your personal data except for the limited purpose that we request.
6. **Third Party Tracking Companies.** We may share your information with our advertising and analytics partners. These third parties may also collect information directly from you as described in this Privacy Policy over time and across different websites. The privacy policy of these third-party companies applies to their collection, use and disclosure of your information.

Retention of Information

- We retain personal information for the period necessary to fulfill the purposes outlined in this policy, unless a longer retention period is required or permitted by law, or an individual requests that we delete information about them. If you would like additional information concerning how long we keep a specific type of information you can contact us using the contact information provided below.

Protecting Information

The FBA uses industry-standard security technologies and procedures to ensure data security and integrity for personal data. The FBA also uses reasonable organizational, technical and administrative measures to protect against unauthorized access, misuse, loss, disclosure, alteration and destruction of personal information (under its control) about users of its online client services. Unfortunately, data transmission over the Internet cannot be guaranteed as 100% secure. Therefore, while the FBA strives to protect your personal data, the FBA cannot guarantee the security of personal information. In the event that the FBA is required to notify you about a situation involving your data, the FBA may do so by email, telephone, or mail to the extent permitted by law.

Your Choices

You can make the following choices regarding your personal information:

1. **Access, Correction, and/or Deletion Of Your Personal Information.** You may request to access, correct, or delete the personal information that the FBA has collected about you by writing to the contact listed below under the section titled "Contact Information." When we delete personal information it will be removed from our active database, but it may remain in archives where it is not practical or possible to delete it.
2. **Ability to object to processing.** You may object to our continued processing of your personal data. If we receive an objection, we will evaluate whether we are required by law to discontinue such processing.
3. **California Residents.** California residents may be entitled to ask us for a notice describing what categories of personal information (if any) we share with third parties or affiliates for direct marketing. If you are a California resident and would like a copy of such notice, please submit a written request to us using the information in the "Contact Information" section below.
4. **Online Tracking.** We do not currently recognize automated browser signals regarding tracking mechanisms, which may include "Do Not Track" instructions.
5. **Promotional Emails.** You may choose to provide us with your email address for the purpose of allowing us to send free newsletters, surveys, offers, and other promotional materials to you, as well as targeted offers from third parties. You can stop receiving promotional emails by following the unsubscribe instructions in e-mails that you receive or contacting us using the information below. If you decide not to receive promotional emails, we may still send you service related communications.
6. **Opt-Out / Revocation Of Consent.** If we rely on your consent to process personal information you may revoke that consent by writing to the contact listed below under the section titled "Contact

Information.” Note that in some situations we may no longer be able to provide you services if you revoke your consent; we may also limit or deny your request to revoke consent if the law permits or requires us to do so, or if we are unable to adequately verify your identity.

7. **Different Purposes.** If we use your information for a materially different purpose than it was collected, we will offer you the ability to either opt-in or opt-out of such a use, as required by law.

Transmitting Information to Other Countries

Personal information may be processed in a country where you do not reside that has privacy laws that may be less stringent than the laws in your country. Where possible we take steps to treat personal information using the same privacy principles that apply pursuant to the law of the country in which we first received your information. By submitting your personal information to us you agree to the transfer, storage and processing of your information in a country other than your country of residence including, but not necessarily limited to, the United States. If you would like more information concerning our attempts to apply the privacy principles applicable in one jurisdiction to data when it goes to another jurisdiction you can contact us using the contact information below.

Contact Information

If you have any questions or concerns related to this Privacy Policy, please contact the Federal Bar Association at:

Federal Bar Association
1220 North Fillmore Street, Suite 444
Arlington, Virginia 22201
ATTN: Privacy Officer
(571) 481-9100
fba@fedbar.org

BRYAN CAVE LEIGHTON PAISNER LLP
Adelaide House
London Bridge
London, United Kingdom
EC4R 9HA
44 (0) 20 3207 1100

If you are not satisfied with our response, and are in the European Union, you may have a right to lodge a complaint with your local supervisory authority.

Miscellaneous

- **Modifications to Policy.** We may change our privacy policy and practices over time. To the extent that our policy changes in a material way, the policy that was in place at the time that you submitted personal information to us will generally govern that information. You will be provided with notice of material changes to the Policy.
- **Affiliated Companies.** Some FBA affiliates, programs and/or sites may have their own, possibly different, privacy policies. The FBA encourages you to read the privacy policies of any of the FBA’s affiliate websites that you may visit.

Effective Date: May 25, 2018