

California Employee Privacy Notice

Vorys, Sater, Seymour and Pease LLP (“**Vorys**”, “**we**”, “**us**”, or “**our**”) respects our employees’ concerns about privacy. This California Employee Privacy Notice (“**Notice**”) addresses what information we collect about employees, contractors, and personnel of Vorys (“**you**”), the sources of that information, and how we use that information.

WHAT CATEGORIES OF INFORMATION DO WE COLLECT ABOUT YOU?

We may collect or obtain the following categories of personal information about you (“**Employee Information**”):

- Basic personal information such as name, address, phone number, email address, emergency contact information, ID information, such as driver’s license or state ID card information, social security number, and tax information.
- Any information you choose to provide on your application materials, resume, or curriculum vitae (“**CV**”), such as educational information, past employment experiences, background, references, personal statements, skills, hobbies, and languages.
- Basic information related to your employment, such as application, hiring, and termination dates, office location, job title and description, certifications and admitted jurisdictions, performance reviews including any disciplinary actions or proceedings, details related to your training and/or job-related education, information regarding fitness for work, attendance details such as paid time off or leaves of absence, alcohol or drug testing information (if permissible under law), and information regarding work eligibility, such as immigration status.
- Photographs, and video and audio recordings.
- Information about your use of our resources, such your use of IT and telecommunications resources, timestamp information, IP address, internet activity, call logs, and the content of communications and activities conducted on or over our IT and telecommunications resources.
- Information related to your benefits and compensation details such as present and past compensation, benefits, payroll information, including bank account details, payment card information, and tax-related information.
- Information related to participation in insurance policies or benefits plans, such as insurance policy number, medical information, and health insurance information.
- We will only collect information about criminal convictions if it is appropriate given the nature of the role and where we are legally able to do so. Where appropriate, we will collect information about criminal convictions as part of the recruitment process, or we may be notified of such information directly by you in the course of you working for us.
- We may automatically collect certain information when you visit our websites, including details about the device you use to access the site, your operating system, browser type, domain, system settings, language, country, time zone, IP address, and information about the website you visited before and after visiting a Vorys website.
- We may collect any information directly from Vorys-owned devices and, where applicable, from non-firm-owned mobile devices that access Vorys platforms and applications, including but not limited to information about your device, system, usage, communications, and other data, as further described in the Firm Policy Manual.

If the personal information you provide contains details of your job evaluations or educational records, you authorize us to handle such details for the purposes of your job application.

The above information may include identifiers, characteristics of protected classifications, biometric information, internet or other electronic network activity information, geolocation data, audio, electronic, visual, thermal, olfactory, or similar information, professional or employment-related information, education information, inferences, and sensitive personal information, as such terms are defined under California law. This information may be disclosed as described in: *HOW AND WHEN DO WE DISCLOSE EMPLOYEE INFORMATION TO OTHERS?*

For Applicants: If you do not provide sufficient information, we may be unable to consider your employment application. Any information you submit to us must be true, complete, and not misleading. It is your responsibility to ensure that information you submit does not violate any third party's rights.

HOW DO WE COLLECT EMPLOYEE/APPLICANT INFORMATION?

We may collect your information from the following sources:

- **You:** We collect the information you provide when you express interest in or apply for employment or otherwise over the course of your employment with us. If you are employed by Vorys, we will collect information over the course of your employment directly from you. We may incorporate information from your job application, resume, or CV directly into your personnel file. We may also ask you for additional Employee Information over the course of your employment and may collect Employee Information in the course of job-related activities. We may collect information through our internal systems (HRIS, payroll, timekeeping, benefits) and IT and security systems, through company-issued devices, from performance records, training, and internal investigations, and from regulatory and compliance documentation.
- **Third Parties:** While most Employee Information will be collected directly from you, we may also collect Employee Information from other parties in connection with background checks, changes in responsibilities, and/or the onboarding and application process. For instance, we may contact your references, recruiters, and staffing agencies and seek additional information as part of the application process.
- **Automated Means:** We may collect certain information by automated means, such as cookies, pixel tags, or web beacons when you visit our websites or employee portals or open our communications. Cookies are small text files that websites send to your computer or other internet-connected device to uniquely identify your browser or to store information or settings in your browser. Cookies allow us to recognize you when you return to our websites. They also help us provide a customized experience and enable us to detect certain kinds of fraud. In many cases, you can manage cookie preferences and opt-out of having cookies and other data collection technologies used by adjusting the settings on your browser. All browsers are different, so visit the "help" section of your browser to learn about cookie preferences and other privacy settings that may be available.
- **Legal Means:** We may collect and use information about you as reasonably necessary for our legitimate legal purposes, including to pursue, establish, respond to, or defend against legal claims, investigations, or proceedings.

Do Not Track Signals: At present, our websites and systems do not respond to Do Not Track signals. To learn more about browser tracking signals and Do Not Track please visit <http://www.allaboutdnt.org/>.

INFORMATION ABOUT THIRD PARTIES

In the course of your dealings with us you may provide us with personal information relating to third parties, including but not limited to details of your next of kin and emergency contact(s) (as applicable), beneficiaries (stated on an expression of wishes form), and employment references.

We will use this personal information in accordance with this Notice. If you are providing personal information to us relating to a third party, you must have the permission of the third party to share such personal information with us and you must make this Notice available to the third party.

HOW DO WE USE YOUR EMPLOYEE INFORMATION?

We may use your Employee Information for the following purposes:

- **For processing applications:** Processing your application, assessing your capabilities and qualifications for a job, conducting reference checks, responding to your inquiries and communicating with you about your application, complying with or monitor compliance with any applicable law or regulation, conducting background checks if we offer you a position, and for our administrative purposes, aggregating management reporting, internal training, and as generally required to conduct our business and comply with applicable law. The information about you will be added to our candidate database. If we hire you, personal information we collect in connection with your application may be incorporated into our human resources system and may be used to manage the new-hire process. Any such information may become part of your employee file and may be used for other employment-related purposes.
- **For managing our employees:** Managing work activities and employees, including recruiting and employee on-boarding; scheduling; performing background checks; determining physical and/or mental fitness for work; reviewing and evaluating performance; determining eligibility for and processing salary increases, bonuses, and other incentive-based compensation; providing employee discounts; providing references; administering payroll, compensation, and benefits programs; training; facilitating travel arrangements; securing immigration statuses; monitoring staff; creating directories; investigating misconduct or non-performance; managing disciplinary matters; internal investigations, grievances, and terminations; reviewing hiring and staffing decisions; and providing access to facilities.
- **For managing our operations:** Operating and managing our IT, communications systems, and facilities, and monitoring use of these resources; providing technical support; performing analytics; improving our services and/or business; evaluating our business efficiencies and deficiencies; allocating and managing company assets and human resources; producing promotional videos; project management; event planning; audit activities; maintaining business activities records; conducting or managing any sale, acquisition, merger, or reorganization.

- For ensuring a safe and secure environment: Protecting the health and safety of our employees, customers, visitors, and facilities; protecting and securing our IT infrastructure, telecommunications network, and other property; detecting and preventing fraud or theft; conducting internal investigations; for compliance purposes; and contacting the appropriate individuals in the event of an emergency.
- For compliance: Complying with any legal requirements or obligations; complying with requests from government or public authorities; responding to the legal process; pursuing legal rights and remedies; managing internal complaints or claims; complying with internal policies and procedures.
- For marketing purposes: To include your attorney profile on Vorys websites, to communicate your participation in awards, speaking engagements, webinars or attendance at conferences, to engage new clients who may be interested in your expertise, and for advertising Vorys' services in content on social media (e.g. LinkedIn) and in other marketing content.

HOW AND WHEN DO WE DISCLOSE EMPLOYEE INFORMATION TO OTHERS?

We may disclose your Employee Information with the following:

- Service Providers: We may share your Employee Information with companies that provide us with services that we use to run our business. These providers help us do things like monitor activities, verify your information, provide analysis and analytics, maintain databases, administer and monitor our systems such as IT and telecommunication systems, consult employment needs and efficiencies, conduct background checks, process applications, and administer pay and benefits.
- Our Ancillary Businesses: We may share your Employee Information with our ancillary businesses as necessary to connect you with resources and provide services to our clients.
- Legal Process and Emergency Response: We may also disclose Employee Information: if required or permitted to do so by law; in response to a request from government or public authority, to pursue, establish, or defend our legal rights; to prevent harm, fraud, theft, or financial loss; or with your consent.
- Sale or Restructuring: We may transfer Employee Information in the event that we sell or transfer all or a portion of our firm, such as in a merger, acquisition, reorganization, or dissolution.

We do not sell Employee Information (as "sell" is defined under the California Consumer Privacy Act of 2018 as amended by the California Privacy Rights Act) or share Employee Information about you for purposes of cross-context behavioral advertising, profiling, or targeted advertising. We will only process or disclose your sensitive personal information with your consent, and only for those purposes specified herein.

We may disclose your Employee Information for the following business purposes, which are not a sale: (i) for reasons mentioned above; (ii) if you direct us to share Employee Information; (iii) to comply with your requests under applicable law; and (iv) as otherwise required or permitted by applicable law.

HOW LONG DO WE STORE EMPLOYEE INFORMATION?

It is our policy to retain your Employee Information for the length of time required for the specific purpose or purposes for which it was collected (e.g., for the fulfilment of an agreement with you, during the course of your employment, and for the length of time following such employment as reasonably necessary for tax and other legal purposes). However, we may be obliged to store some Employee Information for a longer time, taking into account factors including:

- legal obligation(s) under applicable law to retain data for a certain period of time (e.g. compliance with tax and accountancy requirements)
- the establishment, exercise or defense of legal claims (e.g., for the purposes of a potential dispute)

If you would like to find out how long we keep your Employee Information for a particular purpose, you can contact us.

HOW DO WE SECURE YOUR EMPLOYEE INFORMATION?

We use various physical, electronic, and procedural measures designed to protect your Employee Information from unauthorized access, disclosure, or misuse. Where appropriate, we use strong encryption when transmitting your Employee Information. However, because no data security systems are completely secure, we do not warrant that any Employee Information will be secure and safe from unauthorized access.

WHAT ARE MY CHOICES?

California law grants you the following rights: (i) the right to know what personal information we collect about you; (ii) the right to delete personal information we have collected about you (subject to limitations under applicable law); (iii) the right to correct inaccuracies in your personal information; (iv) the right to limit the use or disclosure of your sensitive personal information; and (v) the right not to receive discriminatory treatment for the exercise of these rights. If you are a resident of California, you may exercise these rights by emailing us at info@vorys.com with any such requests, by calling 1-833-525-2097, or by contacting HR.

For your protection, we may only implement requests with respect to the information associated with the particular email address that you use to email us your request, and we may need to verify your identity before implementing your request. We will try to comply with your request as soon as reasonably practicable. Please note that certain personal information may be exempt from access or deletion rights.

SECURITY

We use reasonable organizational, technical and administrative measures to protect personal information within our organization. Unfortunately, no data transmission or storage system can be guaranteed to be 100% secure. If you have reason to believe that your interaction with us is no longer secure (for example, if you feel that the security of any account you might have with us has been compromised), please immediately notify us of the problem by contacting us in accordance with the *QUESTIONS?* section below.

CHANGES TO THE NOTICE

We reserve the right to amend this Notice at any time. We will amend the Notice by providing you with the new notice and requiring your acknowledgement via ADP. You can determine when the Notice was revised by referring to the “Last Updated” date at the bottom of this Notice. Any changes will become effective upon your acknowledgement of the revised Notice.

QUESTIONS?

If you have questions or comments about this Notice or other privacy-related matters, you may contact us at info@vorys.com.

Last Updated: June 7, 2026