

Privacy Policy

1. Purpose

“CA” refers to Chapman Associates LLC is sometimes referred to as “we,” “us,” or “our,” depending on the context.

CA has developed this Privacy Policy to explain how we collect, retain, process, share and transfer your personal information offline or when you visit www.clarkhill.com (“Site”) and to help you in making informed decisions when using our Site. Supplementary information can be found in our Cookie Policy and Legal Disclaimer. By using this Site, you consent to this Privacy Policy.

2. Information We Collect About You

When you visit our Site, you may provide us with two types of information: Basic information identifiable to you as an individual (“Personal Information”) that you knowingly choose to disclose that is collected on an individual basis and Site Use Information collected automatically (for example via cookies) basis as you and others browse our Site. That automatically collected will be considered personal information to the extent it is identifiable to you.

Personal Information: If you choose to provide us with Personal Information, such as your name, organizational affiliation, and contact information, then we may use it to identify you in order to enable you use of particular services that we offer. For example, when you send us a request from our “contact us” page or submit your resume or other information to apply for a job with CA, we may ask you to provide information about yourself, including your name, mailing address, telephone number, email address, and other Personal Information. If you choose not to provide such information, you may not be able to receive the information you requested. If you are a client or employee of CA, you may provide us with additional information when using certain pages and resources on the Site, including login information (user name and password), IP address, or billing information (credit card number or other payment information and billing address).

Site Use Information: Like many organizations, we place a “cookie” (a small data file) on your computer when you connect to our Site. This allows us to recognize your computer’s IP address on return visits, helps us understand traffic patterns on our Site and improve our Site. For more information about cookies and guidance about how to refuse cookies, see Section 11 “Cookies” and our Cookie Policy. We may also collect information about your use of the Site, such as your IP address, browser type, internet service provider, pages visited, dates and times of visits, operating system, and other similar information.

3. How we use your information

Generally, we use the information we collect on our Site in one or more of the following ways:

- to administer our Site,
- for marketing,
- in relation to client service purposes.

We may also use or disclose your personal information in accordance with your consent, when required by law to do so, or if it is necessary for a corporate transaction (such as a merger or acquisition). Other than as described in this Privacy Policy, we do not sell, distribute, lease or transfer the information we collect. For more details, including how and when we destroy personal information and about your individual rights, see Section 9, “How you control your information and individual rights.”

4. How we share your information

We may share the information we collect for the following reasons:

With employees, contractors and agents that provide services to us: We may share information we collect with our employees, contractors, and agents, including third-party service providers, that perform services and functions at our direction and on our behalf, but their use of such information shall be limited to the performance of their duties and is consistent with our purposes for using such information. Third-party service providers to whom we may transfer information include, but are not limited to: marketing, legal, software, cloud, hosting and other technology service providers.

With other third parties for our business purposes or as permitted or required by law: We may share information about you with other parties for our business purposes or as permitted or required by law, including:

- to comply with a law, legal process or regulations;
- responding to or cooperating with law enforcement authorities, other government officials or other third parties pursuant to a subpoena, a court order or other legal process;
- to protect the vital interests of a person;
- to protect our property, services and legal rights;
- to our affiliates, or to companies we merge with, acquire, or are acquired by; and
- to support our audit, compliance, and governance functions.

5. Security

We maintain reasonable physical, technical and administrative safeguards for our Site designed to protect against the loss, misuse, unauthorized access, disclosure, alteration, or destruction of the information we collect through our Site. However, we cannot ensure or warrant the security of any information you transmit to us or from our Site. For the processing of payment information, we ensure our payment processing vendors are PCI compliant.

6. Sale of Personal Information

CA does not sell your Personal Information, as it is defined in the California Consumer Privacy Act (“CCPA”). More for information, please see the “Your California Privacy Rights” section.

7. Children’s Information

Our Site is not directed to children under the age of majority. We do not knowingly collect information from children or other individuals who are not legally able to use our services. If we obtain actual knowledge that we have collected information from a child under the age of majority, we will promptly destroy that information, unless we are legally obligated to retain the information. If you believe we have mistakenly or unintentionally collected information from a child under the age of majority, please contact us at compliance@chapmantraining.com.

8. Retention of Personal Information

We keep your information only for as long as is necessary to complete the purpose for which the information was collected, or to satisfy any legal, accounting, or reporting obligations, or if consent has been provided to retain such information. The length of time we retain your Personal Information is determined by operational and legal considerations.

We may anonymize your personal information (so that it can be no longer associated with you), in which case we may use this information indefinitely without further notice to you.

9. How you control your information and individual rights

Any Personal Information collected by or through our Site or Offline will be used only for the purpose it was provided and as described in this Privacy Policy. Once Personal Information is no longer necessary, we will destroy the Personal Information in accordance with its record retention and destruction policy.

10. How you opt-in and opt-out of marketing materials

CA may send marketing and informational materials to individuals who interact with CA or to those that have affirmatively indicated they want to receive marketing and informational materials by providing their contact information and/or selecting the appropriate boxes to confirm an election to receive the marketing or informational materials.

For EU residents, CA will send marketing and informational materials only to those individuals who have affirmatively indicated they want to receive marketing and informational materials by providing their contact information and/or selecting the appropriate boxes to confirm an election to receive the marketing or informational materials.

Individuals can opt-out of future marketing and informational materials at any time by (a) contacting us at marketing@clarkhill.com and indicating your changed preference or (b) clicking on the unsubscribe or opt-out feature at the bottom of electronic marketing and informational materials.

11. Cookies

Cookies: When you visit our Site, we may send a cookie to your computer. A cookie is a small data file stored by your computer to help improve functionality or tailor information to provide visitors with more relevant information. We also analyze Site traffic to identify what visitors visit so we can tailor our Site accordingly. For details about the cookies we use, please see our [Cookie Policy](#), which is part of this Privacy Policy.

Do not track signals and requests: Do not track signals and requests are sent from your browser to websites you visit indicating you do not want to be tracked or monitored. Websites are not required to accept these requests and many do not. At this time, our Site does not honor do not track signals or requests.

To learn more and for a detailed cookie policy, please visit the [Cookie Policy](#).

12. European Economic Area

The following section, in conjunction with the information above, describes CA's data practices in accordance with the EU General Data Protection Regulation ("GDPR").

Legal Basis of Processing

We will only process the Personal Information subject to the GDPR as it is described in this Privacy Policy if we have a lawful basis for doing so.

- Individuals have given their consent for one or more specific purposes. Note: Under some jurisdictions, Personal Information may be processed until the individual objects to such processing ("opt-out"), without having to rely on consent or any other of the following legal bases. This, however, does not apply, whenever the processing of Personal Data is subject to European data protection laws;
- Provision of Personal Information is necessary for the performance of an agreement and/or for any pre-contractual obligations thereof;
- Processing is necessary for compliance with a legal obligation;

- Processing is related to a task that is carried out in the public interest or in the exercise of official authority vested in CA; and
- Processing is necessary for the purposes of the legitimate interests pursued by CA or by a third party.

International transfer of Personal Information

We store information received through or by our Site in the United States. If you are providing the information from another country, you agree to and understand that the information will be transferred, stored, and used in the United States.

Access to Information and Your Rights

For EU residents subject to the GDPR, you have certain rights relating to your Personal Information, subject to local data protection laws. These rights may include:

- To access your Personal Information held by us (right to access);
- To rectify inaccurate Personal Information and, taking into account the purpose of processing the Personal Information, ensure it is complete (right to rectification);
- To erase/delete your Personal Information, to the extent permitted by applicable data protection laws (right to erasure; right to be forgotten);
- To restrict our processing of your Personal Information to the extent permitted by law (right to restriction of processing);
- To transfer your Personal Information to another controller or processor, to the extent possible (right to data portability);
- To object to any processing of your Personal Information carried out on the basis of our legitimate interests (right to object). Where we process your Personal Information for direct marketing purposes or share it with third parties for their own direct marketing purposes, you can exercise your right to object at any time to such processing without having to provide any specific reason for such objection;
- To the extent we base the collection, processing, and sharing of your Personal Information on your consent, to withdraw your consent at any time, without affecting the lawfulness of the processing based on such consent before its withdrawal.

To exercise these rights, please submit your specific request by using the information in the CA “Contacting Us” section below.

Timeframe for Responding to Requests

CA will respond to your request within thirty (30) days of receipt.

The period of response may be extended to forty-five (45) or sixty (60) days if more time is required. In that event, we will inform you of the reason and extension period in writing.

Fee

We do not charge a fee to process or respond to your verifiable consumer request unless it is excessive, repetitive, or manifestly unfounded.

13. Your California Privacy Rights

If you are a California resident, California law may provide you with additional rights regarding our use of your Personal Information. To learn more about your California privacy rights, visit the California Privacy Notice.

14. Links to Other Sites

We provide links to other websites for informational purposes, for your convenience, or to offer additional services through separate websites and, depending on your device and settings, applications (commonly referred to as “apps”) linked to our Site (“Linked Websites”). Linked Websites are independent from our Site and are not governed by this Privacy Policy. We do not review, have control over their content, or endorse Linked Websites or the information, software, products or services available on the Linked Websites. We also have no control over the privacy practices used by Linked Websites. If you decide to access any of the Linked Websites, you do so at your own risk.

15. Updates to this Privacy Policy

We may update or change this Privacy Policy. The effective date at the top of this page states when this Privacy Policy was last revised. Any change to this Privacy Policy will become effective when we post the revised Privacy Policy on our Site. Your use of our Site means you accept our Privacy Policy. If any change may materially and negatively affect the privacy of your Personal Information, we will use reasonable efforts to notify you in advance and give you a reasonable time to object to any changes. We encourage you to periodically review this Privacy Policy to stay informed about how we collect, use, and share Personal Information.

16. Contacting Us

If you have any questions about the Privacy Policy or our privacy practices, please contact us at:

Use the contact information below if you (a) would like to exercise any individual rights you may have about your Personal Information under the GDPR, (b) have questions, concerns or complaints about this Privacy Policy or our privacy practices or (c) would like additional information about CA privacy practices.

You may email us at compliance@chapmantraining.com, or contact us at: Chapman Associates LLC, 130 East Randolph Street, Suite 3900, Chicago, IL 60601, 312.403.7500 (Direct).

Cookie Policy

We (including our service providers working on our behalf) utilize cookies to collect information about your activity, or activity on devices associated with you, on our Site and applications.

Use of cookies

A cookie is a text file which is stored on your computer or another device that allows us to distinguish you from other users of this Site. Session-based cookies last only while your browser is open and are automatically deleted when you close your browser. Persistent cookies last until you or your browser delete them or until they expire.

Cookies can help us to provide you with a more relevant experience when you browse the Site. Additionally, we utilize cookies to compile anonymous, aggregated statistics that allow us to understand how you and other users interact with the Site, and to improve the functionality and performance of the Site.

Some cookies are set by us (first-party cookies); some cookies are set by another party's website (third party cookies). However, we do not allow the third party to use the cookies for any purpose other than those listed above.

How to manage cookies or opt-out of interest-based targeting

Some people prefer not to allow cookies, which is why most browsers give you the ability to manage cookies to suit you. In some browsers you can set up rules to manage cookies on a site-by-site basis, giving you more fine-grained control over your privacy. What this means is that you can disallow cookies from all sites except those that you trust.

Web browser manufacturers provide help pages relating to cookie management in their products. Please see below for more information.

- [Google Chrome](#)
- [Internet Explorer](#)
- [Microsoft Edge](#)
- [Mozilla Firefox](#)
- [Safari \(Desktop\)](#)
- [Safari \(Mobile\)](#)
- [Android Browser](#)
- [Opera](#)
- [Opera Mobile](#)

For other browsers, please consult the documentation that your browser manufacturer provides.

You can opt-out of interest-based targeting provided by participating ad servers through the Digital Advertising Alliance (<http://youradchoices.com>). In addition, on your iPhone, iPad, or Android, you can change your device settings to control whether you see online interest-based ads.

If you limit the ability of websites and applications to set cookies, you may worsen your overall user experience and/or lose the ability to access the services, since it will no longer be personalized to you. It may also stop you from saving customized settings, like login information.

Contacting Us

If there are any questions regarding this Cookie Policy or the information that we collect about you, you may contact us at compliance@chapmantraining.com.

California Privacy Notice

This California Privacy Notice (the “California Privacy Notice”) supplements the information contained in the Privacy Policy, located on Chapman Associates LLC’s (“CA”) Website (the “Site”). We adopt this notice to comply with the California Consumer Privacy Act (“CCPA”) and other California privacy laws. Any terms defined in the CCPA have the same meaning when used in this California Privacy Notice.

Information we collect

When you visit our Site, you may provide us with two types of information: Basic information identifying you as an individual (“Personal Information”) that you knowingly choose to disclose that is collected on an individual basis and Site Use Information collected on an aggregate basis as you and others browse our Site.

Personal Information: If you choose to provide us with Personal Information, such as your name, organizational affiliation, and contact information, then we may use it to identify you in order to enable you to use of particular services that we offer. For example, when you send us a request from our “contact us” page or submit your resume or other information to apply for a job with CA, we may ask you to provide information about yourself, including your name, mailing address, telephone number, email address, and other Personal Information. If you choose not to provide such information, you may not be able to receive the services or information you requested. If you are a client or employee of CA, you may provide us with additional information when using certain pages and resources on the Site, including login information (user name and password) or billing information (credit card number or other payment information and billing address).

Site Use Information: Like many organizations, we place a “cookie” (a small data file) on your computer when you connect to our Site. This allows us to recognize your computer’s IP address on return visits, helps us understand traffic patterns on our Site and improve our Site.

We have collected the following categories of Personal Information from consumers within the last twelve (12) months:

Categories	Examples	Collection
Identifiers	A real name, Internet Protocol address, email address, or other similar identifiers.	Yes
Personal Information categories listed in the California Customer Records statute (Cal. Civ. Code § 1798.80(e))	A name, signature, Social Security number, physical characteristics or description, address, telephone number, passport number, driver's license or state identification card number, insurance policy number, education, employment, employment history, bank account number, credit card number, debit card number, or any other financial information, medical information, or health insurance information. Some personal information included in this category may overlap with other categories.	Yes
Protected classification characteristics under California or federal law	Age (40 years or older), race, color, ancestry, national origin, citizenship, religion or creed, marital status, medical condition, physical or mental disability, sex (including gender, gender identity, gender expression, pregnancy or childbirth, and related medical conditions), sexual orientation, veteran or military status, genetic information (including familial genetic information).	Yes
Commercial information	Records of personal property, products or services purchased, obtained, or considered, or other purchasing or consuming histories or tendencies.	Yes
Biometric information	Genetic, physiological, behavioral, and biological characteristics or activity patterns used to extract a template or other identifier or identifying information, such as fingerprints, faceprints, and voiceprints, iris or retina scans, keystroke, gait, or other physical patterns, and sleep, health, or exercise data.	No
Internet or other similar network activity	Browsing history, search history, information on a consumer's interaction with a website, application, or advertisement.	No
Geolocation data	Physical location or movements.	No
Sensory data	Audio, electronic, visual, thermal, olfactory, or similar information.	No
Professional or employment-related information	Current or past job history or performance evaluations.	Yes
Non-public education information (per the Family Educational Rights and Privacy Act (20 U.S.C. Section 1232g, 34 C.F.R. Part 99))	Education records directly related to a student maintained by an educational institution or party acting on its behalf, such as grades, transcripts, class lists, student schedules, student identification codes, student financial information, or student disciplinary records.	No
Inferences drawn from other Personal Information	Profile reflecting a person's preferences, characteristics, psychological trends, predispositions, behavior, attitudes, intelligence, abilities, and aptitudes.	No

Not included in the definition of Personal Information is information that is publicly available, information that has been de-identified or aggregated, or information exempt from the purview of the CCPA, such as:

- Protected Health Information (“PHI”) governed and protected by the Health Insurance Portability and Accountability Act of 1996 (“HIPAA”), and the California Confidentiality of Medical Information Act (“CMIA”) or clinical trial data; and
- Personal Information regulated by certain industry-specific privacy laws, such as the Fair Credit Reporting Act (FRCA), the Gramm-Leach-Bliley Act (GLBA), California Financial Information Privacy Act (FIPA), and the Driver’s Privacy Protection Act of 1994.

How we use your information

Generally, we use the information we collect on our Site in one or more of the following ways: (a) to administer our Site, (b) for marketing, (c) for recruiting and/or (d) in relation to client service purposes. We may also use or disclose your personal information in accordance with your consent, when required by law to do so, or if it is necessary for a corporate transaction (such as a merger or acquisition).

We may use your personal data in the following ways:

- To improve our Site to ensure that content is presented in the most effective manner for you and your device through which you access the Site.
- To provide relevant marketing such as providing you with information about events or services that may be of interest to you including legal services, legal updates, client conferences or networking events, and groups of specific interest.
- To provide you with information and services that you request from us.
- To address compliance and legal obligations, such as checking the identity of new clients and to prevent money laundering and/or fraud.
- For the administration of our general business, accounting, record keeping, and legal functions.
- To perform or enforce our contract entered into with you or your organization.
- To provide legal and other services.
- To notify you about changes to our services or our Standard Engagement Terms for legal services.
- For the purposes of recruitment and onboarding, and for complying with legal obligations to which we are subject.
- For the administration of our internal Human Resources functions.

We will not collect additional categories of personal information or use personal information for materially different, unrelated, or incompatible purposes without providing you additional notice.

How we share your information

We may share the information we collect as described in this section of the Privacy Notice. We may share this information for the following reasons:

With employees, contractors and agents that provide services to us: We may share information we collect with our employees, contractors and agents, including third-party service providers, that perform services and functions at our direction and on our behalf, but their use of such information shall be limited to the performance of their duties and is consistent with our purposes for using such information. Third-party service providers to whom we may transfer information include, but are not limited to legal, software, cloud, hosting, and other technology service providers.

With other third parties for our business purposes or as permitted or required by law: We may share information about you with other parties for our business purposes or as permitted or required by law, including: (a) to comply with a law, legal process or regulations; (b) responding to or cooperating with law enforcement authorities, other government officials or other third parties pursuant to a subpoena, a court order or other legal process; (c) to protect the vital interests of a person; (d) to protect our property, services and legal rights; (e) to companies we merge with, acquire, or are acquired by; and (f) to support our audit, compliance and governance functions.

California Resident Rights and Choices

The CCPA provides California consumers and residents with certain rights regarding their Personal Information. The following section describes your CCPA rights and explains how to exercise those rights.

Right to Access and Portability

California residents have the right to request that we disclose certain information about our collection and use of Personal Information over the last twelve (12) months. Once we receive and confirm your verifiable consumer request, in which we may have to gather further identifiable information in order to confirm your identity, we will disclose to you the following:

- The categories of Personal Information we collected about you;
- The categories of sources for the personal information we collected about you;
- Our business or commercial purpose for collecting or selling that Personal Information;
- The categories of third parties with whom we share that Personal Information;
- The specific pieces of Personal Information we collected about you (also called a data portability request); and
- If we disclose your Personal Information for a business purpose, identifying the Personal Information categories disclosed.

We will deliver a verifiable access request and the accompanying information to a California resident in a portable, easily readable electronic format.

Right to Deletion

The CCPA allows California residents the right to request that we delete any Personal Information about you that we collect and retain, subject to certain exceptions. Once we receive and confirm your verifiable consumer request, in which we may have to gather further identifiable information in order to confirm your identity, we will delete (and in turn direct our service providers to delete, if applicable) your Personal Information from our records, unless an exception applies.

We may deny a deletion request if retaining the information is necessary to:

- Complete the transaction for which we collected the Personal Information, provide a good or service that you requested, take actions reasonably anticipated within the context of our ongoing business relationship with you, or otherwise perform our contract with you;
- Detect security incidents, protect against malicious, deceptive, fraudulent, or illegal activity;
- Debug products to identify and repair errors that impair existing intended functionality;
- Comply with the California Electronic Communications Privacy Act (Cal. Penal Code § 1546 seq.);
- Enable solely internal uses that are reasonably aligned with consumer expectations;
- Comply with a legal obligation and requests from law enforcement agencies; and
- Make other internal and lawful uses of that information that are compatible with the context in which you provided it.

Right to Opt-Out of the Sale of Your Information

CA does not sell data, as it is defined in the CCPA, will not sell Personal Information in the future, and in the preceding twelve (12) months, has not sold any Personal Information.

Request Submissions

To exercise the access and deletion rights under the CCPA as described above, please submit a verifiable consumer request by contacting us at compliance@chapmantraining.com or calling 312.403.7500.

Verifiable Requests

A verifiable request may be submitted by a California resident or a person registered with the California Secretary of State that is authorized to act on your behalf. These requests for access and deletion may only be made twice during a twelve (12) month period and must:

- Detail sufficient information that allows us to reasonably verify you are the person about whom we collected Personal Information or an authorized representative; and

- Describe your request with sufficient detail that allows us to properly understand, evaluate, and respond to it.

Timeframe for Responding to Requests and Format

CA will respond to your request within thirty (30) days of receipt. The period of response may be extended to forty-five (45) or sixty (60) days if more time is required. In that event, we will inform you of the reason and extension period in writing.

Fee

We do not charge a fee to process or respond to your verifiable consumer request unless it is excessive, repetitive, or manifestly unfounded.

No Discrimination

The CCPA prohibits a business from discriminating against California consumers for exercising the rights outlined above. We will not discriminate against you for submitting such requests by:

- Denying goods or services to you;
- Charging different prices or rates for goods or services, including through the use of discounts, benefits, or other penalties;
- Providing a different level or quality of goods or services; and
- Suggesting a different price or quality of goods or services will apply if rights are exercised.

No Financial Incentive

We do not offer any financial incentives or price or service difference in an attempt to influence a consumer's decision whether or not to exercise a right afforded to the consumer under the CCPA.

Updates to this Privacy Notice

We may update or change this Privacy Notice. The effective date at the top of this page states when this Privacy Notice was last revised. Any change to this Privacy Notice will become effective when we post the revised Privacy Notice on our Site. Your use of our Site means you accept our Privacy Notice.

If any change may materially and negatively affect the privacy of your Personal Information, we will use reasonable efforts to notify you in advance and give you a reasonable time to object to any changes.

We encourage you to periodically review this Privacy Notice to stay informed about how we collect, use, and share Personal Information.

Contacting Us

Use the contact information below if you have questions, concerns or complaints about this Privacy Notice or our privacy practices or would like additional information about CA privacy practices.

You may email us at compliance@chapmantraining.com, or contact us at: Chapman Associates LLC, 130 East Randolph Street, Suite 3900, Chicago, IL 60601, 312.403.7500 (Direct).