

1. PARKER GALLINI LLP IMMIGRATION CLIENT PRIVACY NOTICE

- 1.1 Parker Gallini LLP (“our”, “us”, “we” or “Parker Gallini”) respects your privacy, and we value our relationship with you. Please read this Client Privacy Notice carefully to understand our practices regarding your personal data.
- 1.2 This Client Privacy Notice applies to individuals who are (a) clients receiving immigration services from Parker Gallini LLP, or (b) employees or prospective employees of an organization, which is our client, communicating with Parker Gallini either on behalf of such organization or in order to receive immigration services from us required in connection with their employment or prospective employment by the organization. If you access our website at www.parkergallini.com (“our website”) or contact us for any other reason, our General Privacy Policy will apply. A copy of our General Privacy Policy can be found here: <https://parkergallini.com/privacy-statement.html>. In the event of a conflict between this Client Privacy Notice and our General Privacy Policy, to the extent that this affects you as a client (or employees or prospective employees of a client) of Parker Gallini, the terms of this Client Privacy Notice will apply.
- 1.3 This Client Privacy Notice sets out our privacy practices in relation to personal data held by us in connection with you or your organization’s immigration matters.
- 1.4 To the extent that we hold personal data relating to of our clients or employees or prospective employees of our clients located in the European Economic Area (“EEA”) and the United Kingdom (“UK”) we are bound by and must act in compliance with the General Data Protection Regulation (EU) 2016/679 (“GDPR”). This Client Privacy Notice sets out our practices and how we will process your personal data in accordance with the GDPR.
- 1.5 This Client Privacy Notice does not cover personal data that has been made anonymous such that you can no longer be identified from it. We may use anonymous data for any purpose we choose and without further reference to you.

2. Personal data

- 2.1 As referred to in this Client Privacy Notice, “personal data” means any information relating to an identified or identifiable natural person. An identifiable natural person is one who can be identified, directly or indirectly, in particular by reference to an identifier such as a name, an identification number, location data, an online identifier or to one or more factors specific to the physical, physiological, genetic, mental, economic, cultural or social identity of that natural person.

2.2 This Client Privacy Notice also refers to “**special categories of personal data**”. This is personal data which is to be treated with particular sensitivity, and includes information revealing racial or ethnic origin, political opinions, religious or philosophical beliefs, or trade union membership, genetic data, biometric data, data concerning health or data concerning a natural person’s sex life or sexual orientation.

3. Types of personal data we process

3.1 We may collect and process:

- (a) **Information you give to us.** This is information you provide to us via Parker Gallini’s online submission processes, or by email, telephone or paper submission to Parker Gallini. It also includes information you provide to us at any face to face meeting.
- (b) **Information we collect about you from third parties.** We may collect information about you from third parties, for example from third parties whose details you have given us in order that we can contact them. If your organization is our client, we may collect information about you from others in your organization.

3.2 We may collect and process the following categories of personal data of our clients or employees or prospective employees of our clients, as appropriate:

- (a) Contact information, including your full name, address, telephone number(s) and email address;
- (b) Employment status;
- (c) Employment details including without limitation work history/job data;
- (d) Prior education and training details;
- (e) Compensation and benefit information history (possibly including copies of tax documents and pay stubs);
- (f) Compensation and benefit payment details;
- (g) Previous addresses or names;
- (h) Gender;
- (i) Immigration-related information (e.g., birth country, citizenship; passport number; visa status; criminal history; present and past membership in or affiliation with any organization, association, fund, foundation, party, club, society or similar group in the U.S. or abroad since sixteenth birthday);
- (j) Immediate family information including relationship, contact information, work history, birth information, criminal history, and immigration information as listed above;
- (k) Travel schedules;
- (l) Social Security or National ID Number;
- (m) Race or ethnicity;
- (n) Physical attributes (e.g., hair color, eye color, height and weight);
- (o) Summaries of meetings, correspondence, actions, and progress relating to immigration;

and/or

(p) Bank account details.

4. How we use your personal data

4.1 We will only use your personal data to the extent that the applicable law allows us to do so. To the extent that we hold personal data relating to our clients or employees or prospective employees of our clients located in the EEA and/or the UK, we rely on the following lawful bases for processing under the GDPR:

- (a) Where the processing is necessary to perform a contract we have entered into or are about to enter into with you. We rely on this lawful basis when you (as an individual) are our client.
- (b) Where the processing is necessary for the purposes of our legitimate interests (or those of a third party) and your interests or fundamental rights and freedoms do not override those interests. We rely on this lawful basis when processing personal data of employees or prospective employees working for or connected to our client when our client is an organization of which you are an employee or from whom you have received an offer of employment. It is necessary for us to process this personal data for the purposes of our legitimate interests, in order to carry out our instructions and provide advice and representation to our client.
- (c) Where you have given us your consent. Sometimes we may ask you for your consent in order to process your personal data. You may withdraw your consent at any time.
- (d) Where the processing is necessary in order to comply with a legal obligation to which we are subject.

4.2 We may use your personal data in order to:

- (a) carry out your instructions and provide you or your organization with the advice and representation required;
- (b) contact you regarding your immigration matters;
- (c) provide you with information on our firm, our activities and relevant legal updates or matters which we think may affect you; and/or
- (d) to notify you of any changes at Parker Gallini or the terms on which we provide our services.

4.3 Some of the types of personal data listed in 3.2(a) to 3.2(p) above will include special categories of personal data. We will only process special categories of personal data where it is necessary to do so for the establishment, exercise or defense of legal claims (including legal claims made on your or your organization's behalf concerning immigration status) or where we have obtained your consent to do so.

Once we have received your information, we will use commercially reasonable technical and organizational measures intended to protect your personal data against unauthorized or unlawful processing and against accidental loss, destruction or damage.

5. Sharing of Data

5.1 Parker Gallini will share the personal data we collect about you with selected third parties, including:

- (a) government agencies as necessary to provide immigration services on your or your organization's behalf; and
- (b) our business partners, suppliers, independent contractors, and subcontractors who provide goods and services that may relate to you or your organization, or to the services which we provide to you or your organization.

5.2 Parker Gallini uses reasonable efforts to ensure that its third-party service providers are capable of (1) protecting the privacy of your personal data consistent with this Client Privacy Notice, and (2) not using or disclosing your personal data for any purpose other than providing us with the products or services for which we contracted or as required by law.

5.3 We may also disclose your personal data to a third party:

- (a) in the event of a sale, merger or other transfer of all or substantially all of the assets of Parker Gallini, or that portion of Parker Gallini to which our services relate, or in the event that we discontinue our business or file a petition or have filed against us a petition in bankruptcy, reorganization or similar proceeding, provided that the third party agrees to adhere to the terms of this Client Privacy Notice;
- (b) that is one of our Affiliates. For purposes of this Client Privacy Notice: "**Affiliate**" means any person or entity which directly or indirectly controls, is controlled by or is under common control with Parker Gallini, whether by ownership or otherwise; and "**control**" means possessing, directly or indirectly, the power to direct or cause the direction of the management, policies or operations of an entity, whether through ownership of fifty percent (50%) or more of the voting securities, by contract or otherwise. Any information relating to you that we provide to our Affiliates will be treated by those Affiliates in accordance with the terms of this Client Privacy Notice;
- (c) if we believe in good faith that we are under a duty to disclose or share your personal data in order to comply with any legal obligation, including an applicable statute, regulation, rule or law, a subpoena, a search warrant, a court or regulatory order, lawful requests by public authorities, including to meet national security or law

enforcement requirements, or other valid legal process, or in order to enforce or apply our terms of business and other agreements, or to protect the rights, property or safety of Parker Gallini, our clients, or others. This includes exchanging information with other companies and organizations for the purposes of fraud protection and credit risk reduction or assistance with a delinquent account.

6. International Transfer, Storage, and Retention

6.1 To the extent that we process personal data of our clients or employees or prospective employees of our clients located in the EEA or the UK:

(a) **Where you (as an individual) are our client:** the transfer of your personal data to the United States is necessary for the performance of our contract with you, so that we can carry out your instructions and provide you with advice and representation concerning your immigration matters. Furthermore, without limitation of the foregoing, you hereby expressly grant consent to Parker Gallini to: (a) process and disclose such information (including special categories of personal data) in accordance with this Client Privacy Notice; (b) transfer such information (including special categories of personal data) throughout the world, including to the United States of America or other countries that do not ensure adequate protection for personally identifiable information (as determined by the European Commission); and (c) disclose such information (including special categories of personal data) to comply with lawful requests by public authorities, including to meet national security or law enforcement requirements.

(b) **Where you are communicating with us on behalf of your organization, which is our client:** In certain circumstances, we may ask for your consent to transfer your personal data outside of the EEA and/or the UK. For further information regarding the transfer of your personal data, please contact us using the contact details below.

6.2 Parker Gallini will retain personal data only for so long as is necessary to fulfill the purposes for which we collected it. To determine the appropriate retention period, we consider the amount, nature and sensitivity of that personal data, the purposes for which we process it and whether we can achieve those purposes through other means, and any applicable legal requirements. Notwithstanding the foregoing, and for the avoidance of doubt, we reserve the right to destroy any personal data within a reasonable period after the last action contemplated to be taken in connection with the purposes for which the personal data was provided.

7. Your Rights

7.1 In certain circumstances, in accordance with the GDPR you have the right to:

(a) **Request access** to your personal data. This enables you to receive a copy of the personal data we hold about you.

(b) **Request correction** of the personal data that we hold about you. This enables you to have any incomplete or inaccurate information we hold about you corrected.

- (c) **Request erasure** of your personal data. This enables you to ask us to delete or remove personal data where there is no good reason for us continuing to process it. You also have the right to ask us to delete or remove your personal data in certain circumstances.
- (d) **Object to processing** of your personal data where we are relying on a legitimate interest (or those of a third party) and there is something about your particular situation which makes you want to object to processing on this ground.
- (e) **Request the restriction of processing** of your personal data. This enables you to ask us to suspend the processing of personal data about you, for example, if you want us to establish its accuracy or the reason for processing it.
- (f) **Request the transfer** of your personal data to another party.
- (g) **Lodge a complaint** with the relevant supervisory authority (as defined in the GDPR). If you have any complaints about the way we process your personal data, please do contact us. Alternatively, you may lodge a complaint with the supervisory authority which is established in your country.
- (h) **Withdraw consent.** If we are relying on your consent to process your personal data, you have the right to withdraw your consent at any time. Please note that, if you do withdraw your consent, you may not be able to benefit from our services.

7.2 If you wish to exercise any of these rights, please contact us using the details in paragraph 9, below.

8 Changes to our Client Privacy Notice

We may update or make changes to this Client Privacy Notice at any time. If we do so, any changes we make will be posted on our website or we may notify you and provide you with a copy of the updated notice. Unless your consent is required (in which case we will seek this from you), your continued correspondence with, and/or receipt of services or representation from, us will indicate your understanding and acceptance of the revised Client Privacy Notice.

9 Contact Us

If you have any comments, questions or requests regarding our Client Privacy Notice and how we handle personal data, please contact our Firm Administrator: privacy@parkergallini.com.

This Client Privacy Notice was last updated on: 7/16/2019