

## Privacy Policy

Your privacy is important to us. Jaffe is committed to maintaining the highest ethical standards and appropriate internal controls. This privacy policy explains our online information practices and the choices you can make about the way Your information is used at our Site (defined below). This privacy policy is specifically addressed to parties outside of Jaffe who (i) provide personal information to Jaffe through the Site, or (ii) visit or use the Site.

### 1. Definitions

1. 'You' and 'Your' mean the individual or entity visiting or using the Site.
2. 'We,' 'Us' and 'Our' mean Jaffe.
3. 'Site' refers to Jaffe's website, [www.jaffelaw.com](http://www.jaffelaw.com), and other related websites, blogs, domains, and mobile sites maintained by Jaffe, including blogs available at [www.electronicpaymentslaw.com](http://www.electronicpaymentslaw.com) and [www.michigangreenlaw.com](http://www.michigangreenlaw.com).
4. 'Jaffe' means Jaffe Raitt Heuer & Weiss, Professional Corporation, a Michigan professional corporation.
5. 'Non-Personal Information' is any information that is not Personally Identifiable Information.
6. 'Personally Identifiable Information' is non-public information We receive from Your use of the Site that can be used, alone or in combination with other information in Our possession, to identify a particular individual. It may include information such as name, address, telephone number and other personal information you provide us.

### 2. Information Collected

#### A. Information Automatically Collected

Because of the internet communications standards, when you visit the Site, We automatically receive certain information from your browser or mobile devices, such as Your browser type, the operating system of Your device, the URL of the site from which You came and the URL of the site you visit when leaving the Site. We also receive your IP address and the name of Your ISP or Your mobile carrier. Depending on your device's settings, We may also receive location data and other types of information sent from third-party services or GPS-enabled devices. you use the Site, We may also collect information about such usage and Your actions on our Site, such as pages you viewed, access times, and how long you spent on a page. We may use cookies to collect such information, as described in more detail below.

We may use automatic data collection technology to record other information that identifies Your device and tracks

Your behavior on the Site. We may automatically receive and record information on our server logs from Your browser, including your IP address, the pages you request, the pages you visited from our partner and affiliate websites and the products you viewed.

This information is considered Non-Personal Information we can use for any purpose, including to help us improve the Site and to enhance Your and other users' experience. However, we will treat as Personally Identifiable Information any item that, either alone or with other information, we could use to identify an individual. For example, without Your permission, we will not share with third parties the link between Your IP address and Your Personally Identifiable Information, except as described in Section 6.B. ('Compliance with Legal Process') below.

## B. Information You Provide

You do not have to provide any Personally Identifiable Information to browse the Site. However, You may voluntarily send Us information from the Site, including Personally Identifiable Information. Accordingly, with Your consent, We may collect Personally Identifiable Information about you from the following sources:

- Information You Give Us through a contact page or other forms on the Site; or
- Information You provide us when you sign up for an RSS (rich site summary) feed on the Site; or
- Information You Send Us by any medium, including texts, mail, telephone, and social media interaction; or
- If you use a mobile device platform to access the Site or to communicate with Us, information transmitted from Your mobile device.

Jaffe collects and processes certain voluntarily submitted Personally Identifiable Information for or to enhance Jaffe's educational, networking, marketing, social, and recruiting activities, and for other similar business purposes. We may also use Personally Identifiable Information to provide You information regarding legal developments We believe may interest you. We do not share such Personally Identifiable Information with entities outside of Jaffe other than service providers who assist Jaffe in carrying out these business functions.

We may also use the information You send Us, including Personally Identifiable Information You have submitted, to provide You legal services, if you are or become a client of Jaffe, or We deal with any requests or inquiries you make.

## C. Use of Cookies

The Site may send a 'cookie' to Your computer. A cookie is a small piece of data sent to Your browser from a web server and stored on Your computer's hard drive. A cookie cannot read data off Your hard disk or read cookie files created by other sites. Cookies do not damage your system. Cookies allow us to recognize you as a user when you return to the Site using the same computer and web browser. We use cookies to identify which areas of Our site You have visited. We also may use this information to better personalize the content you see on the Site. Jaffe does not store unencrypted Personally Identifiable Information in the cookies. We also do not link Non-Personal Information from cookies to Your Personally Identifiable Information.

To help us optimize the Site, We may allow other authorized third parties to place or recognize unique cookies on your browser. Any information provided to third parties through cookies will not be Personally Identifiable Information but may provide general segment information to enhance your user experience by providing more relevant marketing.

Third-party services and tools We use and which may send cookies to users of the Site, and to collect certain information from users, include:

*Google Analytics:* Google Analytics collects information such as how often users visit the Site, what pages they visit when they do so, and what other sites they used before coming to the Site. We use the information We get from Google Analytics only to improve the Site. Google Analytics collects only the IP address assigned to You on the date You visit the Site, rather than Your name or other identifying information. You can review Google's privacy policy at <https://www.google.com/policies/privacy/>. We do not combine the information collected through Google Analytics with Personally Identifiable Information. Although Google Analytics plants a permanent cookie on Your web browser to identify you as a unique user the next time you visit the Site, the cookie cannot be used by anyone but Google. The Google Analytics Terms of Use and Google Privacy Policy restrict Google's ability to use and share information collected by Google Analytics about Your visits to this Site. You can prevent Google Analytics from recognizing you on return visits to the Site by disabling cookies on Your browser (see below).

*Google+ Platform:* Google Plus operates Google+ Platform. Google+ Platform collects anonymous data (ad views, analytics, browser information, cookie data, date/time, demographic data, hardware/software type, internet service provider, interaction data, page views, and serving domains), pseudonymous data (IP Address (EU PII), Device ID (EU PII), PII (name, address, phone number, email address, login, EU- IP address, EU-unique device ID ), sensitive (financial information). Google Plus shares with 3rd parties Aggregate data, anonymous data, PII data, and sensitive data. Google Plus's privacy policy can be found at <http://www.google.com/intl/en/policies/privacy/>.

*Siteimprove:* We also use a tool called Siteimprove to collect information about how you arrive at the Site and about how you use the Site. Siteimprove collects no personally identifiable information related to your use of the Site. Instead, Siteimprove collects information such as what page(s) You visit and what interactions You make on a web page. You can review Siteimprove's privacy policy at <https://siteimprove.com/privacy-policy/>. We do not combine the information collected through Siteimprove with Personally Identifiable Information. Siteimprove's Privacy Policy limits its ability to use and share information collected about Your visits to this Site.

Besides these site analytic tools, Our blogs may use these social media tools:

*Gravatar:* Automattic, Inc. operates Gravatar, through which it collects your internet usage across multiple sites, tracks Your email address when you post to websites, location, demographic data, and collects Your email address when provided. Gravatar's privacy policy can be found at <https://en.gravatar.com/site/privacy> and <http://automattic.com/privacy/>.

*LinkedIn Widgets:* LinkedIn Widgets is subject to LinkedIn Corporation's privacy policy when you reside in the United States and by Slideshare and Pulse when You reside outside the United States. LinkedIn's privacy policy, which includes the terms of Slideshare's and Pulse's privacy policy, can be found at <https://www.linkedin.com/legal/privacy-policy>. The data that LinkedIn may receive includes ad views, browser information, cookie data, hardware type, software on your computer, internet service provider, interactions with data, page views, serving domains, location, device ID, name, address, phone number, email address, and log in. LinkedIn shares Your aggregate data with third-parties and retains Your data as long as necessary to fulfill a business need or as required by law.

*Twitter Button and Twitter Syndication:* Twitter Button and Twitter Syndication are subject to the privacy policy at <https://twitter.com/privacy?lang=en>

. When you interact with a Twitter Button or widget, Twitter may receive information about you. The data that Twitter may receive includes IP address, browser type, operating system, hardware type, internet service provider, search history, the referring web page, pages visited, location, your mobile carrier, device information (including device and application IDs), search terms, or cookie information. Twitter also receives log data when you click on, view or interact with links on Twitter's website or through its services, including links to third-party applications. Twitter uses this information to customize and market content Twitter shows You, including targeting ads. Twitter also uses the data for the purposes described in its privacy policy, which include selling aggregate data to third-parties.

*Facebook Connect:* Facebook Connect, operated by Facebook Inc., collects anonymous data (ad views, analytics, browser information, cookie data, date/time, demographic data, hardware/software type, internet service provider, interaction data, page views, and serving domains), pseudonymous data (IP Address (EU PII), Device ID (EU PII), PII (name, address, phone number, email address, login, EU- IP address, EU-unique device ID ), sensitive (financial information). You can find Facebook Connect's privacy policy at <https://www.facebook.com/about/privacy/>.

*Pinterest/Pinterest Conversion Tracker:* Pinterest/Pinterest Conversion Tracker, operated by Pinterest, collects anonymous data (browser information, cookie data, date/time, demographic data, hardware/software type, page views), pseudonymous (IP Address (EU PII), location-based data, device ID (EU PII)) (name, phone number, email address, login, EU-IP address, EU-unique device ID ) Sensitive (financial information)

These third-party services share with undisclosed third-parties: aggregate data, anonymous data, PII data, and sensitive data. Their data retention policy is undisclosed.

Each service and tool is governed by the privacy policy established by the respective third-party provider. We encourage you to refer to such policies; links are provided above in the description of each service.

Some browsers may allow you to manage the storage of cookies on your device. If supported by Your browser, You may set your browser to refuse all cookies (or, sometimes all third-party cookies) or to alert you when a cookie is set. However, if you select these settings, you may be unable to access certain parts of the Site. Unless you have adjusted your browser setting to refuse cookies, our system will issue cookies. For more information about how to manage your cookies preferences, use the [?](#) menu of your web browser or explore the customer support sections of Your web browser. To opt-out of all cookies or certain advertising cookies, visit the company website for your browser.

Here are links to some browsers' websites:

- Google Chrome: [www.google.com](http://www.google.com)
- Internet Explorer: [support.microsoft.com](http://support.microsoft.com)
- Mozilla Firefox: [support.mozilla.org](http://support.mozilla.org)
- Safari: [support.apple.com](http://support.apple.com)
- Opera: [www.opera.com](http://www.opera.com)

#### D. Do Not Track Notice.

Your browser may provide you with the option to send a 'Do Not Track' signal to websites you visit. This signal is used to request that websites not send the requesting device cookies, but websites have no obligation to respond to such

signal or to modify their operation. At the current time, the Site is not programmed to recognize Do Not Track signals, so the Site will not treat you differently if we receive such signals from Your browser and We may not comply with Do Not Track settings on Your browser.

### 3. Exemptions from Privacy Policy

Our Privacy Policy does not apply to any information you may send to Jaffe or any attorney by email or instant messaging programs (e.g., AOL, Yahoo, etc.), or through social media networks, even if you open such programs or services by clicking a link displayed on the Site (for example, on an attorney's bio page). Email, social media, and instant messages are not secure communication forms. Please do not send information You consider private to Us by email or instant message or through social media sites (e.g., Twitter, Facebook, etc.) due to the public nature of such postings.

### 4. Links to Other Sites

The Site may contain links to other websites. Jaffe is not responsible for the actions, practices, or content of websites linked to or from the Site. You understand such websites may require you to agree to their terms of use and that We have no control over these terms. As always, You understand it is Your responsibility to verify Your legal use of a website and the information you find on the website with the corresponding website owner

### 5. Use of Aggregate Data

Jaffe may combine Non-Personal Information You provide through the Site with information from other users to create aggregate data. Aggregate data does not (i) contain any information that could identify you, or (ii) include Your personal contact information. Jaffe will not disclose Your Personally-Identifiable Information to any third party without your prior permission, except as otherwise permitted by this Privacy Policy. We require parties with whom We share aggregate data to agree they will not attempt by any means or use of other parties to transform such information into Personally Identifiable Information.

### 6. When We May Disclose Your Information

Except as set forth below or as specifically agreed to by You, Jaffe will disclose no Personally Identifiable Information gathered from You on the Site.

1. We may share Personally Identifiable Information in a limited fashion to Our contractors, consultants and service providers that perform services on our behalf, including operating the Site technology, marketing services, and other related services. Unless You opt-out (see Section 6.C. below) of such sharing, these contractors, consultants, and service providers also may have access to Your email address to send newsletters or other information to You on Our behalf. Access to Your Personally Identifiable Information by such contractors, consultants and service providers is limited to the information reasonably necessary for the contractor, consultant or service provider to perform its limited function for Jaffe. We also contractually require that such contractors, consultants and service providers: (i) protect the privacy of Your Personally Identifiable Information consistent with this Privacy Policy, and (ii) not use or disclose Your Personally Identifiable Information for any purpose other than providing us with products and services as required by law.
2. We may share Personally Identifiable Information We collect (i) when required or advised to do so in response to a valid legal requirement, such as a state or federal law, regulation, search warrant, subpoena, or court order; or (ii) in special cases, such as in response to a physical threat to you or others, to protect property, or assert legal rights or defend ourselves in litigation. If We are legally compelled to disclose Your

Personally Identifiable Information to a third party, We will attempt to notify you unless doing so would violate the law or court order.

3. If you do not want us to share your information with Our contractors and service provider, You can direct us not to share that information by contacting us. An opt-out of information sharing will not apply to information sharing arrangements described Section 6.B.

Finally, Jaffe may provide content and services to You through websites other than Our own. Jaffe will not disclose Your Personally Identifiable Information to these 3rd party websites without Your consent but know that any information you disclose on such sites is NOT subject to this Privacy Policy.

## 7. CAN-SPAM Compliance Notice

Jaffe complies with the federal CAN-SPAM Act. You can always opt-out of receipt of further email correspondence from us.

## 8. Transfer of Ownership

If the ownership of the Site changes, whether in whole or in part, information collected through the Site about You may be transferred to the new owner so the Site and any service provided through or related to the Site can continue. In that case, Your user information would remain subject to the terms of Our then-current Privacy Policy.

## 9. Notice to Residents of Countries outside of the United States of America

Jaffe is headquartered in the United States of America. Personally, Identifiable Information may be accessed by us or transferred to us in the United States or to Our affiliates, business partners, merchants, or service providers elsewhere in the world. By providing us with Personally Identifiable Information, You consent to this transfer. We will protect the privacy and security of Personally Identifiable Information according to Our Privacy Policy, regardless of where it is processed or stored.

## 10. California Privacy Rights

Under Section 1798.83 of the California Civil Code, residents of California can obtain certain information from companies with whom they have an established business relationship. That information is about the Personally Identifiable Information those companies have shared with third parties for direct marketing purposes during the preceding calendar year. The law requires companies to inform consumers about the categories of Personally Identifiable Information shared with third parties, the names and addresses of those third parties, and examples of the services or products marketed by those third parties. To request a copy of the information disclosure provided by Jaffe under Section 1798.83 of the California Civil Code, please contact us via email to [privacy@jaffelaw.com](mailto:privacy@jaffelaw.com). Please allow 60 days for a response.

## 11. Children's Privacy Protection.

Jaffe takes special care to protect the privacy needs of children under the age of 13 and Jaffe encourages parents to be an active participant in their child's online activities. Jaffe abides by the Children's Online Privacy Protection Act (COPPA) and other relevant laws. The Site does not target and is not intended for children under the age of 13, and Jaffe will not knowingly collect Personally Identifiable Information from them. If Jaffe discovers personal data from a child gathered through the Site, Jaffe will eliminate that data. This Site is not intended for persons under the age of 18.

If you are under 18 you must ask a parent or legal guardian for permission before submitting any information to this Site.

## 12. Access

If you are an individual, you may have certain rights under data protection legislation, including the right to review and correct the personal data We hold about you. Unless you reside in California or another jurisdiction that requires us to provide the information without charge, We may charge you a fee to receive a copy of this data. For a copy of or reasonable access to your personal data please contact us.

## 13. Your Acceptance of This Privacy Policy

This is Our entire Privacy Policy for the Site and it supersedes any earlier version. You agree to it every time you use the Site.

If We materially change this Privacy Policy, We will notify You by email or by posting a prominent notice on the Site before the change becomes effective. We encourage you to periodically review this page for the latest information on Our privacy practices. Your continued use of the Site or Service constitutes Your agreement to be bound by any changes to this Policy. Your only remedy, if you do not accept this Policy, is to discontinue using the Site and service.

## 14. Security Measures

Jaffe provides appropriate and reasonable physical, procedural and electronic information security measures to protect the personal information submitted to it. Jaffe, consistent with its professional obligations, exercises the utmost discretion regarding the information our clients entrust to us. Jaffe accepts and processes client information always subject to the client's direction and control, and Jaffe maintains reasonable and appropriate, although not infallible, security precautions. Please raise any questions, concerns or specific directions you may have regarding the privacy and security of your information with the attorney handling your matter.

## 15. European Union Disclosure

Personal information voluntarily submitted to Jaffe online, via electronic communication, or otherwise, may be maintained or accessed in servers or files in the United States of America, which the European Union has not deemed to provide 'adequate' privacy protection. If you do not consent to have your information processed and stored in the United States of America, please do not provide it to Jaffe.

## 16. Questions About This Privacy Policy

If you have a privacy question about the Site or software, please email Our customer service department.