

PRIVACY POLICY

We take your privacy very seriously. Please read this privacy policy carefully as it contains important information on who we are and our information practices, meaning how and why we collect, use, disclose, sell, share, store, and retain your personal information. It also explains your rights in relation to your personal information and how to contact us or supervisory authorities in the event you have a complaint or request. This privacy policy only applies to information submitted to our site by persons who are not yet clients of the firm. Once you are a client of the firm, i.e. you sign an engagement agreement and provide payment info, then the stricter standards of the Florida Bar are upheld.

We collect, use, and are responsible for certain personal information about you. When we offer goods and services to individuals in the European Economic Area (EEA), we are subject to the EU General Data Protection Regulation (EU GDPR), which applies across the entire European Union. For California consumers, we are subject to the California Consumer Privacy Act of 2018 (CCPA), as amended by the California Privacy Rights Act of 2020 (CPRA). We are responsible as a “controller” of that personal information for the purposes of the GDPR. We are responsible for your personal information as a “business” under the CCPA/CPRA.

1. **Key Terms.** It would be helpful to start by explaining some key terms used in this policy:

We, us, our	Bradley Gies P.A.
Our representative	Bradley Gies, Esq
Our data protection officer	Margarita Pierce 1983 PGA Blvd, ste 104b, Palm Beach Gardens, FL, 33408
Personal information	Any information relating to an identified or identifiable individual.
Special category personal information	Personal information revealing racial or ethnic origin, political opinions, religious beliefs, philosophical beliefs, or trade union membership; genetic and biometric data; and data concerning health, sex life or sexual orientation.
Sensitive Personal Information	Personal information revealing a consumer's social security number, driver's license and passport numbers, account numbers and credentials, precise geolocation, racial or ethnic origin, religious beliefs, or union membership, personal information concerning

	a consumer's health, sex life, or sexual orientation, contents of a consumer's mail, email and text messages where the business is not the intended recipient, genetic data, biometric information, or citizenship and immigration status.
Biometric Information	An individual's physiological, biological, or behavioral characteristics, including information pertaining to an individual's deoxyribonucleic acid (DNA), that is used or is intended to be used singly or in combination with each other or with other identifying data, to establish individual identity. Biometric information includes, but is not limited to, imagery of the iris, retina, fingerprint, face, hand, palm, vein patterns, and voice recordings, from which an identifier template, such as a faceprint, a minutiae template, or a voiceprint, can be extracted, and keystroke patterns or rhythms, gait patterns or rhythms, and sleep, health, or exercise data that contain identifying information.

- 2. Personal Information We Collect About You.** We may collect and use the following personal information, including sensitive personal information, that identifies, relates to, describes, is reasonably capable of being associated with, or could reasonably be linked, directly or indirectly, with a particular consumer or household:

Categories of Personal Information	Specific Types of Personal Information Collected
Identifiers	Name, email address, phone number, and any other information you provide to our site or to a form filled in on an external site to be provided to us.

<p>Information that identifies, relates to, describes, or is capable of being associated with, a particular individual, including, but not limited to, his or her 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.</p>	<p>Name, email address, phone number, and any other information you provide to our site or to a form filled in on an external site to be provided to us.</p>
<p>Account log-in, financial account, debit card, or credit card number in combination with any required security or access code, password, or credentials allowing access to an account</p>	<p>Name, email address, phone number, and any other information you provide to our site or to a form filled in on an external site to be provided to us</p>
<p>Characteristics of protected classifications under California or federal law.</p>	<p>Name, email address, phone number, and any other information you provide to our site or to a form filled in on an external site to be provided to us</p>
<p>Commercial information (e.g., records of personal property, products or services purchased, obtained, or considered, or other purchasing or consuming histories or tendencies)</p>	<p>Name, email address, phone number, and any other information you provide to our site or to a form filled in on an external site to be provided to us</p>
<p>Biometric information</p>	<p>Name, email address, phone number, and any other information you provide to our site or to a form filled in on an external site to be provided to us</p>
<p>Internet or other electronic network activity information (e.g., browsing history, search history, and information regarding a consumer's interaction with an Internet Web site, application, or advertisement)</p>	<p>Name, email address, phone number, and any other information you provide to our site or to a form filled in on an external site to be provided to us</p>

Geolocation data	Name, email address, phone number, and any other information you provide to our site or to a form filled in on an external site to be provided to us
Audio, electronic, visual, thermal, olfactory, or similar information	Name, email address, phone number, and any other information you provide to our site or to a form filled in on an external site to be provided to us
Professional or employment-related information	Name, email address, phone number, and any other information you provide to our site or to a form filled in on an external site to be provided to us
Education information, defined as information that is not publicly available personally identifiable information as defined in the Family Educational Rights and Privacy Act (FERPA)	Name, email address, phone number, and any other information you provide to our site or to a form filled in on an external site to be provided to us.
Inferences drawn from any of the information identified above to create a profile about a consumer reflecting the consumer's preferences, characteristics, psychological trends, predispositions, behavior, attitudes, intelligence, abilities, and aptitudes	Name, email address, phone number, and any other information you provide to our site or to a form filled in on an external site to be provided to us
Racial or ethnic origin, religious or philosophical beliefs, union membership, or citizenship or immigration status	Name, email address, phone number, and any other information you provide to our site or to a form filled in on an external site to be provided to us
Contents of a consumer's mail, email, and text messages unless the business is the intended recipient of the communication	Name, email address, phone number, and any other information you provide to our site or to a form filled in on an external site to be provided to us
Genetic data	Name, email address, phone number, and any other information you provide to our site or to a form filled in on an external site to be provided to us

Processing of biometric information for the purpose of uniquely identifying a consumer	Name, email address, phone number, and any other information you provide to our site or to a form filled in on an external site to be provided to us
Health information	Name, email address, phone number, and any other information you provide to our site or to a form filled in on an external site to be provided to us
Sex life or sexual orientation	Name, email address, phone number, and any other information you provide to our site or to a form filled in on an external site to be provided to us

If you do not provide the personal information required to provide products and/or services to you, it may delay or prevent us from providing products and/or services to you.

3. How Your Personal Information is Collected. We collect personal information from the following categories of sources:

- You, directly in person, by telephone, text, or email and/or via our website.
- Third party with your consent (e.g., your bank)
- Advertising networks
- Social networks
- Cookies on our website
- Our IT and security systems, including:
 - Door entry systems and reception logs
 - Automated monitoring of our websites and other technical systems, such as our computer networks and connections, CCTV and access control systems, communications systems, email, and instant messaging systems –and–

4. How and Why We Use Your Personal Information. Under data protection laws, we can only use your personal information if we have a proper reason for doing so, for example:

- To comply with our legal and regulatory obligations
- For the performance of our contract with you or to take steps at your request before entering into a contract
- For our legitimate interests or those of a third party –or–
- Where you have given consent

A legitimate interest is when we have a business or commercial reason to use your information, so long as this is not overridden by your own rights and interests.

The table below explains what we use (process) your personal information for and our reasons for doing so:

What we use your personal information for	Our reasons
To provide services to you	For the performance of our contract with you or to take steps at your request before entering into a contract
To prevent and detect fraud against you or Bradley Gies P.A.	For our legitimate interests or those of a third party, i.e., to minimize fraud that could be damaging for us and for you
<p>Conducting checks to identify our customers and verify their identity.</p> <p>Screening for financial and other sanctions or embargoes</p> <p>Other processing necessary to comply with professional, legal, and regulatory obligations that apply to our business, e.g., under health and safety regulation or rules issued by our professional regulator]</p>	To comply with our legal and regulatory obligations.
Ensuring business policies are adhered to, e.g., policies covering security and internet use	For our legitimate interests or those of a third party, i.e., to make sure we are following our own internal procedures so we can deliver the best service to you
Operational reasons, such as improving efficiency, training, and quality control	For our legitimate interests or those of a third party, i.e., to be as efficient as we can so we can deliver the best service for you at the best price
Ensuring the confidentiality of commercially sensitive information	<p>For our legitimate interests or those of a third party, i.e., to protect trade secrets and other commercially valuable information.</p> <p>To comply with our legal and regulatory obligations</p>

<p>Statistical analysis to help us manage our business, e.g., in relation to our financial performance, customer base, product range or other efficiency measures.</p>	<p>For our legitimate interests or those of a third party, i.e., to be as efficient as we can so we can deliver the best service for you at the best price</p>
<p>Preventing unauthorized access and modifications to systems</p>	<p>For our legitimate interests or those of a third party, i.e., to prevent and detect criminal activity that could be damaging for us and for you</p> <p>To comply with our legal and regulatory obligations</p>
<p>Updating and enhancing customer records</p>	<p>For the performance of our contract with you or to take steps at your request before entering into a contract</p> <p>To comply with our legal and regulatory obligations</p> <p>For our legitimate interests or those of a third party, e.g., making sure that we can keep in touch with our customers about existing orders and new products</p>
<p>Statutory returns</p>	<p>To comply with our legal and regulatory obligations</p>
<p>Ensuring safe working practices, staff administration and assessments</p>	<p>To comply with our legal and regulatory obligations</p> <p>For our legitimate interests or those of a third party, e.g., to make sure we are following our own internal procedures and working efficiently so we can deliver the best service to you</p>
<p>Marketing our services to:</p> <ul style="list-style-type: none"> • Existing and former customers • Third parties who have previously expressed an interest in our services • Third parties with whom we have had no previous dealings 	<p>For our legitimate interests or those of a third party, i.e., to promote our business to existing and former customers</p>

<p>External audits and quality checks, e.g., for ISO or Investors in People accreditation and the audit of our accounts</p>	<p>For our legitimate interests or a those of a third party, i.e., to maintain our accreditations so we can demonstrate we operate at the highest standards</p> <p>To comply with our legal and regulatory obligations</p>
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For EEA Data Subjects: The above table does not apply to special category personal information, which we will only process with your explicit consent.

- 5. EEA Data Subjects: Promotional Communications.** We may use your personal information to send you updates (by email, text message, telephone, or post) about our products and/or services, including exclusive offers, promotions or new products and/or services.

We have a legitimate interest in processing your personal information for promotional purposes (see above “How and why we use your personal information”). This means we do not usually need your consent to send you promotional communications. However, where consent is needed, we will ask for this consent separately and clearly.

We will always treat your personal information with the utmost respect and never sell or share it with other organizations outside the Bradley Gies P.A. organization for marketing purposes.

You have the right to opt out of receiving promotional communications at any time by:

- Contacting us at office@gieslaw.com
- Using the “unsubscribe” link in emails or “STOP” number in texts or

We may ask you to confirm or update your marketing preferences if you instruct us to provide further products and/or services in the future, or if there are changes in the law, regulation, or structure of our business.

- 6. Who We Share Your Personal Information With.** We routinely share personal information with:

- We do not routinely share your personal information

We only allow our service providers to handle your personal information if we are satisfied they take appropriate measures to protect your personal information. We also impose contractual obligations on service providers to ensure they can only use your personal information to provide services to us and to you. We may also share personal information with external auditors.

We may disclose and exchange information with law enforcement agencies and regulatory bodies to comply with our legal and regulatory obligations.

We may also need to share some personal information with other parties, such as potential buyers of some or all of our business or during a re-structuring. We will typically anonymize information, but this may not always be possible. The recipient of the information will be bound by confidentiality obligations.

7. How Long Your Personal Information Will Be Kept. We will keep your personal information while you have an account with us or while we are providing products and/or services to you. Thereafter, we will keep your personal information for as long as is necessary:

- To respond to any questions, complaints or claims made by you or on your behalf.
- To show that we treated you fairly –or–
- To keep records required by law.

We will not retain your personal information for longer than necessary for the purposes set out in this policy.

When it is no longer necessary to retain your personal information, we will delete or anonymize it.

8. California Consumers: Your Rights Under the CCPA/CPRA. You have the right under the California Consumer Privacy Act of 2018 (CCPA), as amended by the California Privacy Rights Act of 2020 (CPRA), and certain other privacy and data protection laws, as applicable, to exercise free of charge:

<p>Disclosure of Personal Information We Collect About You</p>	<p>You have the right to know, and request disclosure of:</p> <ul style="list-style-type: none"> • The categories of personal information we have collected about you, including sensitive personal information. • The categories of sources from which personal information is collected. • The categories of third parties to whom we disclose personal information, if any –and– • The specific pieces of personal information we have collected about you. <p>Please note that we are not required to:</p> <ul style="list-style-type: none"> • Retain any personal information about you that was collected for a single one-time transaction if, in the ordinary
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	<p>course of business, that information about you is not retained!</p> <ul style="list-style-type: none"> • Reidentify or otherwise link any data that, in the ordinary course of business, is not maintained in a manner that would be considered personal information –or– • Provide the personal information to you more than twice in a 12-month period
<p>Disclosure of Personal Information Sold, Shared, or Disclosed for a Business Purpose</p>	<p>In connection with any personal information we may sell, share, or disclose to a third party for a business purpose, you have the right to know:</p> <ul style="list-style-type: none"> • The categories of personal information about you that we sold or shared and the categories of third parties to whom the personal information was sold or shared –and– • The categories of personal information that we disclosed about you for a business purpose and the categories of persons to whom the personal information was disclosed for a business purpose. <p>You have the right to opt-out of the sale of your personal information or sharing of your personal information for the purpose of targeted behavioral advertising. If you exercise your right to opt-out of the sale or sharing of your personal information, we will refrain from selling or sharing your personal information, unless you subsequently provide express authorization for the sale or sharing of your personal information.</p> <p>To opt-out of the sale or sharing of your personal information, email us at office@gieslaw.com</p>

<p>Right to Limit Use of Sensitive Personal Information</p>	<p>You have the right to limit the use and disclosure of your sensitive personal information to the use which is necessary to:</p> <ul style="list-style-type: none"> • Perform the services or provide the goods reasonably expected by an average consumer who requests those goods or services. • To perform the following services: (1) Helping to ensure security and integrity to the extent the use of the consumer's personal information is reasonably necessary and proportionate for these purposes; (2) Short-term, transient use, including, but not limited to, non-personalized advertising shown as part of a consumer's current interaction with the business, provided that the consumer's personal information is not disclosed to another third party and is not used to build a profile about the consumer or otherwise alter the consumer's experience outside the current interaction with the business; (3) Performing services on behalf of the business, including maintaining or servicing accounts, providing customer service, processing or fulfilling orders and transactions, verifying customer information, processing payments, providing financing, providing analytic services, providing storage, or providing similar services on behalf of the business; and (4) Undertaking activities to verify or maintain the quality or safety of a service or device that is owned, manufactured, manufactured for, or controlled by the business, and to improve, upgrade, or enhance the service or device that is owned, manufactured, manufactured for, or controlled by the business –and– • As authorized by further regulations
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	<p>You have a right to know if your sensitive personal information may be used, or disclosed to a service provider or contractor, for additional, specified purposes.</p> <p>To limit the use of your sensitive personal information, email us at office@gieslaw.com</p>
<p>Right to Deletion</p>	<p>Subject to certain exceptions set out below, on receipt of a verifiable request from you, we will:</p> <ul style="list-style-type: none"> • Delete your personal information from our records –and– • Delete your personal information from our records –and– • Direct third parties to whom the business has sold or shared your personal information to delete your personal information unless this proves impossible or involves disproportionate effort. <p>Please note that we may not delete your personal information if it is reasonably necessary to:</p> <ul style="list-style-type: none"> • Complete the transaction for which the personal information was collected, fulfill the terms of a written warranty or product recall conducted in accordance with federal law, provide a good or service requested by you, or reasonably anticipated within the context of our ongoing business relationship with you, or otherwise perform a contract between you and us. • Help to ensure security and integrity to the extent the use of the consumer's personal information is reasonably necessary and proportionate for those purposes.

	<ul style="list-style-type: none"> • Debug to identify and repair errors that impair existing intended functionality. • Exercise free speech, ensure the right of another consumer to exercise his or her right of free speech, or exercise another right provided for by law. • Comply with the California Electronic Communications Privacy Act • Engage in public or peer-reviewed scientific, historical, or statistical research in the public interest that adheres to all other applicable ethics and privacy laws, when our deletion of the information is likely to render impossible or seriously impair the achievement of such research, provided we have obtained your informed consent. • Enable solely internal uses that are reasonably aligned with your expectations based on your relationship with us • Comply with an existing legal obligation –or– • Otherwise use your personal information, internally, in a lawful manner that is compatible with the context in which you provided the information
Right of Correction	<p>If we maintain inaccurate personal information about you, you have the right to request us to correct that inaccurate personal information. Upon receipt of a verifiable request from you, we will use commercially reasonable efforts to correct the inaccurate personal information.</p>
Protection Against Retaliation	<p>You have the right to not be retaliated against by us because you exercised any of your rights under the CCPA/CPRA. This means we cannot, among other things:</p>

	<ul style="list-style-type: none"> • Deny goods or services to you. • Charge different prices or rates for goods or services, including through the use of discounts or other benefits or imposing penalties. • Provide a different level or quality of goods or services to you –or– • Suggest that you will receive a different price or rate for goods or services or a different level or quality of goods or services. <p>Please note that we may charge a different price or rate or provide a different level or quality of goods and/or services to you, if that difference is reasonably related to the value provided to our business by your personal information. We may also offer loyalty, rewards, premium features, discounts, or club card programs consistent with these rights or payments as compensation, for the collection of personal information, the sale of personal information, or the retention of personal information.</p>
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9. EEA Data Subjects: Your Rights Under the EU GDPR.

Right to Be Informed	The right to know or be notified about the collection and use of your personal information.
Right to Access	The right to be provided with a copy of your personal information (the right of access)
Right to Rectification	The right to require us to correct any mistakes in your personal information
Right to be Forgotten	The right to require us to delete your personal information—in certain situations
Right to Restriction of Processing	The right to require us to restrict processing of your personal information—in certain

	circumstances, e.g., if you contest the accuracy of the data
Right to Data Portability	The right to receive the personal information you provided to us, in a structured, commonly used, and machine-readable format and/or transmit that data to a third party—in certain situations
Right to Object	The right to object: <ul style="list-style-type: none"> • At any time to your personal information being processed for direct marketing (including profiling) • In certain other situations to our continued processing of your personal information, e.g., processing carried out for the purpose of our legitimate interests
Right Not to be Subject to Automated Individual Decision-Making	The right not to be subject to a decision based solely on automated processing (including profiling) that produces legal effects concerning you or similarly significantly affects you

For further information on each of those rights, including the circumstances in which they apply, see the guidance from the UK Information Commissioner's Office (ICO) on individual rights under the EU General Data Protection Regulation.

10. How to Exercise Your Rights. If you would like to exercise any of your rights as described in this Privacy Policy, you can email us at: office@gieslaw.com.

- Please note that you may only make a CCPA/CPRA-related data access or data portability disclosure request twice within a 12-month period.
- If you choose to contact us directly by website or email, you will need to provide us with:
 - Enough information to identify you (e.g., your full name, address and customer or matter reference number)
 - Proof of your identity and address (e.g., a copy of your driving license or passport and a recent utility or credit card bill) –and–
 - A description of what right you want to exercise and the information to which your request relates.

- We are not obligated to make a data access or data portability disclosure if we cannot verify that the person making the request is the person about whom we collected information or is someone authorized to act on such person's behalf.
- Any personal information we collect from you to verify your identity in connection with your request will be used solely for the purposes of verification.

11. EEA Data Subjects: Where Your Personal Information is Held. Information may be held at our offices and those of Bradley Gies P.A., third party agencies, service providers, representatives and agents as described above (see above: “Who We Share Your Personal Information with”).

Some of these third parties may be based outside the European Economic Area. For more information, including on how we safeguard your personal information when this occurs, see below: “Transferring Your Personal Information Out of the EEA.”

12. Keeping Your Personal Information Secure. We have appropriate security measures in place to prevent personal information from being accidentally lost or used or accessed in an unauthorized way. We limit access to your personal information to those who have a genuine business need to access it. Those processing your information will do so only in an authorized manner and are subject to a duty of confidentiality. We also have procedures in place to deal with any suspected data security breach. We will notify you and any applicable regulator of a suspected data security breach where we are legally required to do so.

13. EEA Data Subjects: How to File a GDPR Complaint. We hope that we can resolve any query or concern you raise about our use of your information.

The General Data Protection Regulation also gives you right to lodge a complaint with a supervisory authority, in the European Union (or European Economic Area) state where you work, normally live, or where any alleged infringement of data protection laws occurred.

14. Changes to This Privacy Notice. This privacy notice was published on 12/05/2023 and last updated on 12/05/2023.

We may change this privacy notice from time to time—when we do, we will inform you via our website.

15. How to Contact Us. Please contact us by post, email or telephone if you have any questions about this privacy policy or the information we hold about you.

Our contact details are shown below:

Our contact details	Our Data Protection Officer's contact details
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contact address	1983 PGA Blvd, ste 104b Palm Beach Gardens, FL 33408
contact email address	office@gieslaw.com

16. Do You Need Extra Help? If you would like this notice in another format (for example: audio, large print, braille) please contact us (see “How to contact us” above).