

Hickey Smith Website Privacy Policy

Hickey Smith LLP (collectively, "Hickey Smith" the "firm," "we," "us" or "our") is committed to safeguarding your privacy. By using this website, including by providing us with any personally identifiable information, you are accepting and consenting to the practices described in this policy.

1. Collection and Use of Personal Information

a. Collection of Personal Information

Visiting the public areas of our website does not require you to provide any personally identifiable information, such as your name, address, email address, or phone number ("Personal Information"). The cookies used on the public areas of this website do not gather Personal Information, although your computer's browser may automatically provide us with certain other information, such as the date and time of your visit, your computer's browser type, operating system and IP, and any referring and exiting URLs.

You may choose, however, to provide us Personal Information in order to contact us.

b. Legally Required Disclosure

We may disclose any information, including Personal Information, we deem necessary, in our sole discretion, to comply with any applicable law, regulation, legal process or governmental request.

c. Third Parties

Except as otherwise disclosed in this Privacy Policy, we will not sell, rent or transfer your Personal Information to third parties without your consent. We may, however, use the information you provide in aggregate form for internal business purposes, such as generating statistics and developing marketing plans. We may also collect, store or accumulate certain non-personally identifiable information concerning use of the website, such as information regarding which of our webpages are most visited.

We may retain other companies and individuals to perform functions on our behalf. Examples include data analysis firms, webhosting companies, storage facilities, and parties that may assist in our hiring process. Such third parties may be provided with access to Personal Information needed to perform their functions for us, but may not use such information for any other purpose. Such third parties may be located in countries that may not be subject to data protection laws similar to those prevailing in the jurisdiction in which such Personal Information is provided to or received by us. However, we require these third parties to adhere to procedures that are at least as

restrictive as the procedures we follow ourselves with respect to your Personal Information, including this Privacy Policy.

d. Links

The Hickey Smith website may contain links to or from other websites. Please be aware that we are not responsible for the privacy practices of other websites. We encourage you to read the privacy policies of other websites you link to from the Hickey Smith website or otherwise visit. Third parties that have content embedded on Hickey Smith's website such as a social feature may set cookies on a user's browser and/or obtain information about the fact that a web browser visited the Hickey Smith website from a certain IP address. Third parties cannot collect any other personally identifiable information from Hickey Smith's website unless you provide it to them directly.

e. Business Transfers

As we continue to develop our business, we might sell or otherwise transfer certain of our assets. In such transactions, user information, including Personal Information, is generally one of the transferred business assets, and by providing your Personal Information to us you agree that your data may be transferred to such parties in these circumstances.

f. Retention or Correction of Personal Information

We retain Personal Information for as long as the information remains valid and as long as necessary to comply with our legal obligations, maintain accurate financial and other records, resolve disputes, and enforce our agreements. If you want us to remove or correct your Personal Information, please contact us at info@hickeysmith.com. We may decline to process requests that are frivolous/vexatious, jeopardize the privacy of others, are extremely impractical, or for which access is not otherwise required by local law.

g. Do Not Track

Hickey Smith does not track visitors to its website over time and across third party websites to provide targeted advertising and therefore does not respond to Do Not Track (DNT) signals.

2. Data Sharing and Transfer

Hickey Smith has operations or otherwise has work performed outside of the United States. Any information received by us through this website, including Personal Information, may be transferred to or shared to members of the firm or third parties performing work on behalf of the firm located in other countries that may not be subject to data protections laws similar to those prevailing in the jurisdiction in which such information is provided to or received by us. However, all of members of the firm or third

parties who provide work on behalf of the firm adhere to the same procedures with respect to your Personal Information, including this Privacy Policy.

3. Changes to this Privacy Policy

We may revise this Privacy Policy from time to time. If we make changes to our Privacy Policy, we will post the revised policy here. The revised policy will also apply retroactively to all data we have collected through the website.

4. Effective Date

March 19, 2018

5. Comments

If you have any questions, comments or concerns about our privacy policy or practices, please contact us by email at info@hickeysmith.com.