

May 2, 2022

Stacey D. Schesser
Supervising Deputy Attorney General
State of California, Department of Justice
455 Golden Gate Avenue, Suite 11000
San Francisco, CA 94102-7004

Re: *Apparent CCPA Violations by Providers of Legal Information Services to California Law Schools*

Dear Supervising Deputy Attorney General Stacey Schesser:

Our client Public.Resource.Org (“Public Resource”) requests that the California Department of Justice (“DOJ”) investigate Thomson Reuters’s and LexisNexis’s (“the Companies”) compliance with the CCPA and take any appropriate enforcement action.

We are clinics at Stanford Law School and the University of Southern California Gould School of Law that represent Public Resource. We have prepared the enclosed report, which identifies specific practices that appear to violate the CCPA and calls attention to areas that merit further investigation by the DOJ with respect to law students who use the Companies’ legal research tools and services (e.g., Westlaw and Lexis+). In particular:

1. Thomson Reuters appears to have violated several requirements regarding its duties to (a) respond to users’ requests for data access and (b) provide certain notices to users on its online privacy policy pages.
2. LexisNexis has made unverified claims that some of their practices are exempt from the CCPA requirements.

Based on the information developed by our investigation, Public Resource requests that the DOJ investigate the possible violations we have identified, as well as the Companies’ general compliance with the CCPA, and take any appropriate action based on the results of its investigation.

We are continuing to investigate CCPA compliance regarding additional law student accounts. To the extent this yields additional evidence of possible CCPA noncompliance, we will provide those details in a future communication. If you have any questions about the report, please contact the clinics’ directors.

Sincerely,

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Enclosure: Report to the California Attorney General Regarding Apparent CCPA Violations by Providers of Legal Information Services to California Law Schools.

cc: Ashkan Soltani, Executive Director, California Privacy Protection Agency
Jennifer M. Urban, Chairperson, California Privacy Protection Agency
Lisa B. Kim, Deputy Attorney General, State of California, Department of Justice
Yen P. (TiTi) Nguyen, Deputy Attorney General, State of California, Department of Justice

**Report to the California Attorney General Regarding
Apparent CCPA Violations by Providers of Legal
Information Services to California Law Schools**

Executive Summary

On behalf of our client Public.Resource.Org (Public Resource), a California non-profit organization, we submit this Report to bring to the attention of the California Department of Justice a series of issues affecting the rights and privacy of California law students. The California Constitution grants people in this State the right to privacy. As the digital economy and online interactions have become a ubiquitous part of day-to-day life, sharing of personal information with online services and platforms has become commonplace. The misuse or improper disclosure of such information can be a significant invasion of an individual's privacy.

The California Consumer Privacy Act (CCPA) protects an individual's right to privacy by (a) providing California consumers with certain rights over how their personal information is collected and used by businesses, and (b) imposing restrictions on businesses that collect such data.

Thomson Reuters and LexisNexis provide legal research tools and services that are used throughout the legal community. Law students, in particular, rely on the Westlaw and Lexis+ services to perform legal research as part of their course work and independent scholarly research. Because these two companies are the dominant providers of legal research tools, any failure to comply with the CCPA would harm the privacy rights of law students in California.

This Report summarizes a detailed investigation into the data privacy policies and practices of Thomson Reuters and LexisNexis with respect to law student users who reside in California. This Report identifies specific practices that appear to violate the CCPA and calls attention to areas that merit further investigation by the California Department of Justice to determine if additional violations exist. We have identified multiple CCPA violations in Thomson Reuters's policies and practices, with respect to law students, as well as other practices that may violate the CCPA but require further investigation to verify. LexisNexis has made unverified claims that its practices are exempt from the CCPA, but these claims require further investigation to verify it complies with the CCPA.

The CCPA gives the Attorney General the authority to enforce the CCPA when notified of an alleged violation. Therefore, Public Resource requests that the California Department of Justice investigate Thomson Reuters's and LexisNexis's compliance with the CCPA and take any appropriate action based on your findings.

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I. Introduction

Public.Resource.Org, Inc. (“Public Resource”) is a 501(c)(3) nonprofit corporation based in California whose mission is to make legal and government materials more widely available and useful to the public. Public Resource has asked the Juelsgaard Intellectual Property & Innovation Clinic at Stanford Law School and the IP & Technology Law Clinic at University of Southern California Law School to investigate how Thomson Reuters and LexisNexis may be collecting, using, and disclosing data from its users, in particular users who are California law students, and whether these practices comply with the California Consumer Privacy Act (CCPA).

The California Constitution establishes a right to privacy. As a measure to preserve this right, the legislature enacted the CCPA in 2018 to establish (1) a set of rights for consumers, who reside in California, over their personal information that is collected by businesses and (2) a set of obligations for businesses, which operate in California and collect personal information, to abide by. These rights allow an individual to understand what personal information is being collected, to know how that information is being used, and to exercise some control over that information. Likewise, businesses are required to provide consumers with notice of their policies at or before the point of collection and respond to an individual’s request to access or control their data. Thus, a violation of the CCPA represents both an infringement and an exploitation of an individual’s right to privacy. Given that legal research services offered by Thomson Reuters and LexisNexis (e.g., Westlaw, Lexis+, etc.) are popular tools in the legal community, any policies or practices that violate the CCPA would impact many people.

These concerns are especially heightened in the context of law students who are required to use these services for their course work. Law schools typically contract with Thomson Reuters and LexisNexis to obtain the legal research services these companies offer (e.g., Westlaw, Lexis+, etc.) for their students, faculty, and staff to use. While the law school initially contracts for these services, it is the end user (i.e., law student, staff, or faculty member) who is ultimately the consumer. In addition to providing information about education (e.g., law school, graduation year, etc.), law students may often be sharing information that relates to their course work or independent, scholarly research. In the context of school-sponsored clinic work, students may be sharing information that pertains to specific clients or cases (e.g., identifying projects by clients, searching specific cases or issues, searching for matters relating to specific parties, etc.). Any disclosure of this information not only implicates a student’s privacy, but also raises significant concerns regarding the protection of privileged material.

At the request of Public Resource, we conducted an investigation into Thomson Reuters and LexisNexis to examine their policies and practices with respect to handling consumer data and diagnosed any CCPA violations that result from these practices. We created new law student accounts through our law schools, conducted a scripted set of searches and interactions with these companies’ legal research tools, and then submitted data requests to recover the personal information associated with those accounts that was collected by the companies to determine if their practices complied with the CCPA. In addition, we also reviewed the general privacy policies and CCPA-specific policy pages for the companies to determine if they complied with the CCPA.

Our investigation found evidence that Thomson Reuters appears to be in violation of a number of provisions of the CCPA including Cal. Civ. Code § 1798.110(b) (failure to disclose to consumers

statutorily specified pieces of information upon receipt of a verifiable consumer request), § 1798.130(a)(2) (failure to deliver required personal information to the consumer within 45 days of receiving a verifiable consumer request), § 1798.115(c)(1)-(2) (failure to disclose the categories of personal information sold and disclosed for a business purpose), and § 1798.130(a)(5)(A) (failure to provide notice to consumers of the full scope of their rights under the CCPA).

As such, Public Resource calls upon the California Department of Justice (“DOJ”) to investigate and take appropriate action to address these deficiencies.

While our investigation did not find direct evidence that LexisNexis is violating the CCPA, it did identify a number of claims and practices that warrant further investigation by the DOJ. Specifically, LexisNexis claims that certain provisions of the CCPA exempt it from some of the typical obligations. The application of such exemptions are worthy of further investigation by the DOJ given that Thomson Reuters did not claim such exemptions.

We may gather more information regarding user experiences submitting CCPA requests to Thomson Reuters and LexisNexis, as well as evaluate their compliance with other aspects of the CCPA. We will provide an updated Report in the event new information develops. However, we believe the findings of this Report are substantial enough to merit action at this time. Therefore, Public Resource requests that, as described in Section IV below, the DOJ investigate Thomson Reuters’s and LexisNexis’s compliance with the CCPA and take any appropriate action based on its findings.

II. Overview of the CCPA

The California Consumer Privacy Act of 2018 (CCPA) establishes a set of rights for California consumers and creates obligations for businesses that collect personal information of their consumers and operate within California.

A. *Rights of California Consumers*

The CCPA provides consumers with a set of rights:

1. A consumer has the right to request that a business that collects consumer personal information disclose that information to the consumer by submitting a request. Specifically, a consumer has the right to request that the business disclose:
 - (1) the categories of personal information collected about that consumer
 - (2) categories of sources from which the personal information is collected
 - (3) the business or commercial purpose for collecting or selling personal information,
 - (4) the categories of third parties with whom the business shares personal information, and
 - (5) the specific pieces of personal information it has collected about that consumer.¹

¹ Cal. Civ. Code §§ 1798.100(a), 1798.110(a)(1)-(5).

2. A consumer has the right to direct a business that collects the consumer's personal information to delete any personal information it has collected.²
3. A consumer has the right to direct a business that sells the consumer's personal information to third parties to not sell their information (i.e., opt-out of sale).^{3,4}

These rights are not waivable or able to be limited by contract, and any provision in a contract attempting to do so is deemed contrary to public policy and is void and unenforceable.⁵ Therefore, regardless of the contracting practices or arrangements between California law schools and Thomson Reuters or LexisNexis, law students, who are considered California residents for CCPA purposes, are entitled to these rights under the Act.⁶

B. Obligations on Businesses

i. Notice Obligations

Businesses that collect personal information of consumers must provide certain information on their online privacy policy page (or in a California-specific description page) to comply with the CCPA.⁷

Businesses must, at or before the point of collection, provide specific information about their practices in their privacy policy, such as:

- (1) the categories of information the business will collect,
- (2) the categories of sources from which the personal information is collected,
- (3) the purposes for which the different categories will be used (or sold),
- (4) the categories of third parties with whom the collected personal information is shared,
- (5) as well as the consumer's right to request specific pieces of their personal information that the business has collected.⁸

In addition, the privacy policy must state the consumers' rights to request access to find out what personal information is collected, sold, or shared; their right to have their personal information

² § 1798.105(a).

³ § 1798.120(a).

⁴ Note, there is a provision that is commonly referred to as a consumer's right to no retaliation, but the text of the statute is written as an obligation on the business to not discriminate. § 1798.125.

⁵ § 1798.192.

⁶ Even though law students may only be living in California to attend law school, most law students should be protected by the CCPA given that they will be residing in the State for more than a transitory or temporary purpose. *See* CAL. CODE REGS. tit. 18, § 17014 (2021).

⁷ A business that is subject to the CCPA is defined to be (1) a for-profit entity, (2) that collects personal information from consumers, (3) conducts business in the state of California, and (4) meets one of the three criteria: (A) has annual gross revenue exceeding \$25 million, (B) buys, receives, or shares personal information 100,000 or more consumers, households, or devices, or (C) derives for than 50% of its annual revenues from selling consumers' personal information. Cal. Civ. Code § 1798.140(d). We do not have sufficient information to determine if either company meets these requirements, and it is beyond our capabilities to do so. However, it is likely that they satisfy at least one of the three. Furthermore, both Thomson Reuters and LexisNexis have specific web pages outlining their compliance with the CCPA, indicating that they view themselves as subject to the CCPA. *See* Ex. H; Ex. K; Ex. P.

⁸ §§ 1798.100(b), 1798.110(c).

deleted, their right to opt-out of having their personal information sold, and their right to not be discriminated against by exercising any of their rights under the CCPA.⁹ Even if a business does not sell consumer personal information, it still must disclose that it does not sell any consumer personal information.¹⁰

ii. Obligations to Respond to Request

Businesses also have an obligation to respond to and process requests from consumers who choose to exercise their rights under the CCPA.¹¹ Businesses must respond to consumer requests for no additional cost¹² and are required to deliver to consumers the information regarding personal information that is collected, shared, and/or sold within 45 days of receiving a verifiable consumer request.¹³ The disclosure of data collected, shared, and/or sold need only cover activities from the preceding 12-month period. Businesses are neither required to provide personal information to a consumer more than twice in a 12-month period nor are they required to collect any more data beyond what they would normally collect in ordinary course of business to comply with this statute.

III. Findings

Below are the results of our investigation into Thomson Reuters's and LexisNexis's compliance with the CCPA. Thomson Reuters appears to have violated several CCPA requirements regarding its duties to (a) respond to users' requests for data access and (b) provide certain notices to users on its online privacy policy pages. We have found no apparent CCPA violations in our investigation of LexisNexis. However, LexisNexis has claimed to be exempt from certain CCPA requirements. Given that Thomson Reuters provides an analogous service and does not claim protection under those exemptions, further investigation is merited in order to verify LexisNexis's claims that it is exempt from its CCPA obligations in these instances. At the time of this submission, we have not provided notice to Thomson Reuters nor LexisNexis about our findings.

A. *Thomson Reuters*

i. Failure to Adequately Respond to Users' Requests for Data Access

a. Failure to Comply with Cal. Civ. Code § 1798.110(b)

Per § 1798.110(b), Thomson Reuters must make certain disclosures to the consumer upon receipt of a verifiable request for data access.¹⁴ Section 1798.110(a) lists the required disclosures as follows:

⁹ § 1798.130(a)(5)(A).

¹⁰ § 1798.115(c).

¹¹ §§ 1798.100(c), 1798.105(c), 1798.110(b), 1798.115(b), 1798.120(d).

¹² § 1798.100(d).

¹³ § 1798.130(a)(1)(B)(2). Note, this can be extended for another 45 days when "reasonably necessary" and provided that the consumer is given notice within the first 45-day period. *Id.*

¹⁴ "A business that collects personal information about a consumer shall disclose to the consumer, pursuant to paragraph (3) of subdivision (a) of Section 1798.130, the information specified in subdivision (a) upon receipt of a verifiable consumer request from the consumer." Cal. Civ. Code § 1798.110(b).

- (1) the categories of personal information it has collected about the consumer,
- (2) the categories of sources from which the personal information is collected,
- (3) the business or commercial purpose for collecting or selling personal information,
- (4) the categories of third parties with whom the business shares personal information, and
- (5) the specific pieces of personal information it has collected about that consumer.

Thomson Reuters appears to have violated § 1798.110(b) by failing to make the disclosures required by § 1798.110(a)(1)-(3) and may have also violated this section by failing to make the disclosure required in § 1798.110(a)(4).

Thomson Reuters's response to one student's request for data access can be found in Exhibits C and D. The response included specific pieces of information that Thomson Reuters had collected on the user, and therefore complied with the requirement specified in § 1798.110(a)(5). The results included two types of information: (a) information the company had seemingly acquired from the public record such as addresses and the names of family members,¹⁵ and (b) information acquired from the user's interaction with the company's products, such as search history.¹⁶

The initial results did not include requirements (1)-(4) above.¹⁷ As a business that collects personal information,¹⁸ Thomson Reuters is required to make the disclosures in (1)-(3) above, and thus appears to have violated the CCPA by failing to do so.

Based on an email exchange with Thomson Reuters, it is unclear whether Thomson Reuters must make the disclosure required by (4), i.e., the categories of third parties with whom it shared the consumer's personal information. After receiving the initial request response, the student emailed Thomson Reuters's privacy team, asking whether the information had been sold or disclosed to third parties and—if so—which third parties it had been shared with.¹⁹ Thomson Reuters responded by stating that only the information in the "Public Records report"—not information gathered from user interaction with their products—had been sold or disclosed to third parties.²⁰ In its email response, Thomson Reuters disclosed the categories of third parties to which this information had been shared.²¹

"Publicly available information" is exempt from the CCPA's definition of "personal information."²² Therefore, if the information in the "Public Records report" is truly publicly available, Thomson Reuters need not disclose the categories of third parties with whom it has

¹⁵ Ex. C.

¹⁶ Ex. D.

¹⁷ Ex. B (message in the privacy portal regarding completion of data access request); Ex. C; Ex. D; Ex. T; Ex. U.

¹⁸ See *supra* note 7.

¹⁹ Ex. E.

²⁰ *Id.*

²¹ *Id.*

²² Cal. Civ. Code § 1798.140(v)(2) ("'Personal information' does not include publicly available information or lawfully obtained, truthful information that is a matter of public concern. For purposes of this paragraph, 'publicly available' means: information that is lawfully made available from federal, state, or local government records, or information that a business has a reasonable basis to believe is lawfully made available to the general public by the consumer or from widely distributed media; or information made available by a person to whom the consumer has disclosed the information if the consumer has not restricted the information to a specific audience.")

shared the information. However, because Thomson Reuters failed to make the disclosure required by (2) above, i.e. the categories of sources from which the information was collected, we do not know whether Thomson Reuters has collected the information in the “Public Records report” *solely* from publicly available sources. In fact, Thomson Reuters’s “Public Records privacy statement” implies otherwise, stating: “Thomson Reuters . . . sources Public Records data from various third parties, including government agencies and *private data providers*”²³ If the information found in the “Public Records report” has been collected from private data providers, then Thomson Reuters must also comply with (4). Further investigation is needed to determine whether Thomson Reuters may claim exemption from this requirement and to assess whether it is appropriately classifying its “Public Records” data as publicly available information.

b. Failure to Comply with Cal. Civ. Code § 1798.130(a)(2)

Per § 1798.130(a)(2), Thomson Reuters must “disclose and deliver the required information to a consumer free of charge within 45 days of receiving a verifiable consumer request from the consumer.” One of the student users submitted her request for data access on November 23, 2021²⁴ and did not receive the results of the request until January 10, 2022.²⁵ Thomson Reuters thus took 48 days to respond to the consumer request in apparent violation of § 1798.130(a)(2).²⁶

ii. Failure to Provide Notice to Users on Privacy Policy Webpage

a. Failure to Comply with Cal. Civ. Code § 1798.115(c)(1)-(2)

Per § 1798.115(c)(1), Thomson Reuters must disclose the “categories of consumers’ personal information it has sold” in the previous twelve months (or state that it has not done so) on its webpage. Per § 1798.115(c)(2), Thomson Reuters must also disclose the “categories of consumers’ personal information it has disclosed for a business purpose” in the past twelve months (or a statement that it has not done so). Thomson Reuters does not disclose either a list of categories of personal information sold or disclosed on any of its privacy policy pages, in apparent violation of § 1798.115(c)(1) and § 1798.115(c)(2).²⁷

Thomson Reuters only provides a list of categories of personal information that it collects.²⁸ It provides no statement that it does not sell or disclose information.²⁹ (In fact, it provides a link to opt-out of sale,³⁰ thus implying that it does sell information).³¹

²³ Ex. I (emphasis added).

²⁴ Ex. F.

²⁵ Ex. G.

²⁶ The other student’s request was processed in 34 days, which is in compliance with Cal. Civ. Code § 1798.130(a)(2). Ex. T (showing data access request was made on February 3, 2022, and the results from the request were made available to the user on March 9, 2022).

²⁷ Ex. H; Ex. I; Ex. J; Ex. K.

²⁸ Ex. H.

²⁹ Ex. H; Ex. I; Ex. J; Ex. K.

³⁰ Ex. H; Ex. L.

³¹ Furthermore, Thomson Reuters’s privacy policy pages make it unclear to consumers as to whether or not the business may sell their data at all. Thomson Reuters’s California-specific section of their policy statement states that

b. Failure to Comply with Cal. Civ. Code § 1798.130(a)(5)(A)

Per § 1798.130(a)(5)(A), Thomson Reuters must disclose consumers' CCPA rights, including the right to request the categories of personal information it sold about the consumer.³² Thomson Reuters fails to disclose the consumer's right to request personal information sold in any of its Privacy Policy pages.

Thomson Reuters's privacy policy page states that California residents "have the right to request what information we collect, use, and disclose."³³ It also states that residents "have the right to request that we delete your information."³⁴ Thomson Reuters fails to mention the right to request personal information sold.³⁵

c. Failure to Comply with Cal. Civ. Code § 1798.130(a)(5)

Per § 1798.130(a)(5), Thomson Reuters must update its online privacy statement "at least once every 12 months." Thomson Reuters's privacy policy page and CCPA-specific page both were last updated over 26 months ago on January 1, 2020.³⁶

B. *LexisNexis*

Our investigation found no direct evidence of CCPA violations by LexisNexis, but LexisNexis has claimed to be exempt from certain CCPA requirements.³⁷ These claimed exemptions warrant further investigation to verify them, particularly given that Thomson Reuters did not claim the same exemptions. Because we lack any formal authority to investigate further, we are unable to verify claims or pursue additional questions.

i. Claim to be Exempt from Providing Certain Records

LexisNexis has stated that it is exempt from certain CCPA requirements and thus is not required to provide certain information in two separate instances. Those cases are described below. We believe both cases are areas that need further investigation by the DOJ.

whether or not it sells information depends on the Service a consumer uses. Ex. H. This page then links out to a Service-specific page, which links out to another CCPA-specific page, which lists certain Services that "may" sell data. Ex. H; Ex. J; Ex. K. Even if it does not represent a direct violation of the CCPA, the way Thomson Reuters provides notice to consumers through its privacy policy pages is problematic for many reasons. First, requiring multiple click-throughs from the homepage obscures the information from interested consumers. Second, stating that they "may" sell data from certain Services leaves consumers confused as to whether Thomson Reuters sells their data.. Third, the obfuscation undermines the intention of the CCPA—and exacerbates the impact of the Cal. Civ. Code § 1798.115(c)(1)-(2) violations noted above—by not letting consumers know which data is being sold and disclosed in a reasonably accessible manner.

³² Cal. Civ. Code § 1798.115(a)(2).

³³ Ex. H.

³⁴ *Id.*

³⁵ Ex. H; Ex. I; Ex. J; Ex. K.

³⁶ Ex. H; Ex. K.

³⁷ LexisNexis's privacy policy pages seemingly comply with the CCPA's notice requirements. Ex. O; Ex. P. If LexisNexis correctly claims that they are exempt from certain CCPA requirements, then we found no clear evidence of violations regarding their response to our requests for data access. Ex. Q; Ex. V.

a. Students' Access to User Interaction Information Collected

Upon receipt of two student users' requests for data access, LexisNexis provided results within the 45-day time period.³⁸ The results included only personal identifiers such as postal addresses, phone numbers, and account information.³⁹ The results did not include any information regarding the users' interactions with LexisNexis products (such as search history). The users emailed the LexisNexis privacy team, asking whether or not other types of information were also collected.⁴⁰ LexisNexis responded by citing Cal. Code Regs. tit. 11 § 999.313 and stating: "[T]he categories of records [the students] requested have not been searched because (a) we do not maintain the personal information in a searchable or reasonably accessible format; (b) we maintain the personal information solely for legal and/or compliance purposes; and (c) we do not sell the personal information or use it for any commercial purpose."⁴¹

In contrast, Thomson Reuters disclosed such user information (e.g., search history, document interactions). This discrepancy raises a question as to whether these two similar businesses maintain records in such different ways that would exempt one but not the other from providing such information. LexisNexis's claim of this exemption thus necessitates further investigation by the DOJ.

b. Law School Employees' Access to Personal Information Collected

As part of our investigation, we spoke with an employee of a public California law school who sent a request for data access to LexisNexis. LexisNexis refused to provide such information. In its response to the employee request, LexisNexis cited Cal. Civ. Code § 1798.145(n)(1) and stated that the statute "exempts information collected in this 'business-to-business' context from the scope of the CCPA."⁴² The email specifically noted that information such as "logins and search inquiry history" were covered by the exemption.⁴³

In contrast, Thomson Reuters complied with her request for data access, thus indicating that it did not believe that her information was covered by this exemption. This discrepancy in each business's interpretation of whether this exemption applies to law school employees indicates the need for further investigation by the DOJ.

IV. Requested DOJ Action

Based on our investigation, Public Resource requests that the DOJ investigate Thomson Reuters's and LexisNexis's compliance with the CCPA and take any appropriate action based on its findings. Our investigation found a number of apparent CCPA violations in Thomson Reuters's practices. LexisNexis has made claims that it is exempt from certain CCPA requirements that remain

³⁸ Ex. R; Ex. X.

³⁹ Ex. Q; Ex. V.

⁴⁰ Ex. S; Ex. W

⁴¹ *Id.*

⁴² Ex. Y.

⁴³ *Id.*

unverified. In order to protect the privacy rights of California consumers as intended by the CCPA, Public Resource requests that the DOJ does the following:

1. Investigate Thomson Reuters's compliance with the CCPA requirements to verify the possible violations noted in this Report:
 - a. Failure to provide all disclosures required by § 1798.110(b) upon receipt of verified consumer requests for data access.
 - b. Failure to respond to consumer requests within 45 days as required by § 1798.130(a)(2).
 - c. Failure to disclose a list of categories of personal information it sold and a list of categories of personal information it disclosed on its online privacy webpage as required by § 1798.115(c)(1) and § 1798.115(c)(2).
 - d. Failure to disclose consumers' right to request the categories of personal information it sold per § 1798.130(a)(5)(A).
 - e. Failure to update its privacy policy every 12 months per § 1798.130(a)(5).
2. For all violations that are verified, notify Thomson Reuters's and request that it bring itself into compliance.
3. Investigate Thomson Reuters's general compliance with the CCPA, particularly regarding required disclosures of personal information that it sold or disclosed to third parties.
4. Investigate LexisNexis's claims that:
 - a. LexisNexis is exempt from providing law student users with personal information collected from their interactions with its products by Cal. Code Regs. tit. 11 § 999.313.
 - b. LexisNexis is exempt from providing law school employees certain personal information it collects on them by Cal. Civ. Code § 1798.145(n)(1).

EXHIBIT A

Methodology

Methodology

We assessed Thomson Reuters' compliance with the CCPA by using two student accounts created in November of 2021 with Stanford University email accounts. Both student users are likely California residents for the purposes of the CCPA.¹

We used these accounts to assess Thomson Reuters' compliance with the CCPA's (a) notice requirements and (b) response to request for data access requirements.

I. Assessing Notice

In order to assess Thomson Reuters' compliance with the CCPA's notice requirements, we looked at the following:

- **Thomson Reuters' privacy policy pages, which include:**
 - General Privacy Policy Page (Exhibit H)
 - California-Specific Policy Section (Exhibit H)
 - Public Records Privacy Statement (Exhibit I)
 - Service-Specific Information Page (Exhibit J)
 - CCPA-Specific Page (Exhibit K)

Thomson Reuters' general privacy policy is housed on a single webpage that contains its general privacy policy as well as its California-specific policy.² The policy can be found by clicking the hyperlink at the bottom of any webpage. Users can access the privacy policy whether or not they are signed into their account. Users are also provided with a hyperlink to the statement during the process of creating an account and must "agree" to the statement before creating the account. The California-specific section of the policy page links out to a "Service-specific" information page.³ The service-specific information page directs users to another CCPA-specific page.⁴ The general privacy policy page also links out to a "Public Records Privacy Statement."⁵

- **Any other relevant notices (such as emails) provided to consumers after creation of an account:** We found no email notices related to Thomson Reuters' privacy policy or CCPA-related updates. (The only relevant emails found were those Thomson Reuters' sent in response to data requests).
- **Any relevant buttons, links, portals, or pages used by consumers to complete CCPA-related requests, which include:**
 - "Do Not Sell" button (Exhibit L)
 - "Do Not Sell" pop up window (Exhibit M)
 - "Do Not Sell" hyperlink on the California-specific section of the policy page (Exhibit H)
 - Data Subject Rights Portal (Exhibit N)

¹ The students are likely California residents as they have been residing in California while they attend law school.

² Ex. H.

³ Ex. H; Ex. J.

⁴ Ex. J; Ex. K.

⁵ Ex. I.

The “Do Not Sell My Personal Information” pop-up button shows up on the Thomson Reuters homepage as well as the privacy page.⁶ The button leads users to a “Do Not Sell My Personal Information” pop up window, through which the user can opt-out of sale.⁷ In addition, the California section of the privacy policy page contains a “Do Not Sell My Personal Information” hyperlink.⁸ The hyperlink directs users to a separate Data Subject Rights Portal, through which users may opt-out of sale and complete other CCPA-related requests.⁹

II. Assessing Request for Data Access

We requested access to the data Thomson Reuters has collected, disclosed, or sold for two law student accounts.¹⁰ We generated usage data after creating the accounts by using a variety of different tools and functions on each database and then requested access to the data. We used Thomson Reuters’ Data Subject Rights Portal to submit all of the requests.

After submitting the initial request for data access, Thomson Reuters emailed to confirm the request and then emailed a link to our “Privacy Portal.”¹¹ We then had to request a one-time passcode in order to login to the portal. The portal provides links for each of the products the user indicated they use in their request. The user must click each link separately in order to initiate the data access request for each separate product. We requested data from the following products:

- Westlaw Edge
- Drafting Assistant
- Law School/TWEN
- OnePass
- Practical Law US

The same day the request was submitted, Thomson Reuters emailed the users to request ID verification. Completing the ID verification process required submitting photos of our drivers licenses as well as a photo of our faces.

Upon completion of the request, Thomson Reuters emailed the users with a link to access their results in the Privacy Portal. We then had to generate a one-time access code to access the portal. The Privacy Portal contained a message explaining that the results would only be available on the portal for ten days and if the user needs to access their results after ten days they will need to re-initiate the process.¹² We were able to download our results. After ten days, we were no longer able to access our results.

⁶ Ex. L.

⁷ Ex. M.

⁸ Ex. H.

⁹ Ex. N.

¹⁰ *E.g.*, Ex. F.

¹¹ Ex. G; Ex. B.

¹² Ex. B.

EXHIBIT B

Thomson Reuters Data Access Request Completion Message in
Privacy Portal Student 1

◀ [Back to Requests](#)

Request Details

Request ID : ██████████

Name: ██████████ Email: ██████████

Subject Type: Customer Request Type: Data Access Request

Day of Birth: ██████ Country: United States

Current Street Address: ██████████ City: ██████

State: California Zip Code (USA Residents): ██████

Telephone: ██████████ Username (Optional): ██████████

Residency (of the data subject this request concerns): USA Resident (California) Product: Drafting Assistant, Law School/TWEN, OnePass, Practical Law US, Westlaw Edge

Student User?: Yes

Request Comments





English (United States) Sign Out

This request has been marked as resolved. Please submit a new request or contact the privacy team if you have additional questions or concerns.

Request Completed 01/10/2022, 11:20 AM PST. Hello, Thank you for submitting a personal data access request. You can access your report in the attachments section of our privacy portal. Please note that, for your protection, your report will be available for (10) days. If you are not able to access the link within that time period it will be necessary to repeat the request. Please note that some personal data may have been redacted to as permitted under applicable law in order to protect the security of your personal information or to protect the rights and freedoms of other individuals whose personal data may have appeared in conjunction with yours. In addition, we have masked sensitive data as required or permitted under local law to protect the data. Regards, The Thomson Reuters Privacy Office

[Redacted signature and contact information]

11/02/2021 00:00

Thomson Reuters takes the privacy of our customers seriously. Therefore, to review your information, you will need to login with your user credentials by following the link(s) for each of the products you indicated you subscribe to and request a Data Privacy Report:

(<https://drafting.westlaw.com/ConsumerPrivacyPage?caseRequestId=6NWPRGAWXA>)

- [Click here](#)

([https://drafting.westlaw.com/ConsumerPrivacyPage?](https://drafting.westlaw.com/ConsumerPrivacyPage?case)

[https://drafting.westlaw.com/ConsumerPrivacyPage?case](#) for Drafting Assistant My Privacy page, _

(<https://lawschool.westlaw.com/dataprivacy/manage/>)

- [Click here](#)

(<https://lawschool.westlaw.com/dataprivacy/manage/>) for Law School/TWEN My Privacy page, _

(<https://onepass.westlaw.com/>)

- [Click here](#)

(<https://onepass.westlaw.com/>) for OnePass My Privacy page, _

([https://next.westlaw.com/ConsumerPrivacy/ConsumerPrivacy.html?](https://next.westlaw.com/ConsumerPrivacy/ConsumerPrivacy.html?transitionType=Default&contextData=(sc.Default)&isplcus=true&caseRequestId)

[transitionType=Default&contextData=\(sc.Default\)&isplcus=true&caseRequestId](#)

- [Click here](#)

([https://next.westlaw.com/ConsumerPrivacy/ConsumerPrivacy.html?](https://next.westlaw.com/ConsumerPrivacy/ConsumerPrivacy.html?transitionType=Default&contextData=(sc.Default)&isplcus=true&caseRequestId)

[transitionType=Default&contextData=\(sc.Default\)&isplcus=true&caseRequestId](#) for Practical Law US My Privacy page, _

([https://next.westlaw.com/ConsumerPrivacy/ConsumerPrivacy.html?](https://next.westlaw.com/ConsumerPrivacy/ConsumerPrivacy.html?transitionType=Default&contextData=(sc.Default)&caseRequestId)

[transitionType=Default&contextData=\(sc.Default\)&caseRequestId](#)

- [Click here](#)


([https://next.westlaw.com/ConsumerPrivacy/ConsumerPrivacy.html?](https://next.westlaw.com/ConsumerPrivacy/ConsumerPrivacy.html?transitionType=Default&contextData=)

[transitionType=Default&contextData="](#)


(sc.Default)&caseRequestId=[REDACTED]
[REDACTED] for Westlaw Edge My Privacy page Sign Out
[REDACTED] Eng (United States)

From [REDACTED] 11/23/2021, 09:19 AM PST >

Attachments

 DRAFTING.WESTLAW_[REDACTED]
[REDACTED]
[REDACTED].zip
Date: 01/10/2022, 11:20 AM PST

 [REDACTED]_Subtask for
Public Records application_[REDACTED]
[REDACTED].csv
Date: 01/10/2022, 11:20 AM PST

 WestlawNext_[REDACTED]
[REDACTED]
[REDACTED].zip
Date: 01/10/2022, 11:20 AM PST



English (United States) ▼

[Sign Out](#)

EXHIBIT C

Thomson Reuters Data Access Request Results – Public
Records Report Student 1

[REDACTED] Subtask for Public Records application [REDACTED]

Data Description	Field	Value
People Household	Document Identifier	I1ba2e9e1804011e28578f7ccc38dcbee
	State	[REDACTED]
	Member/Name/Last Name	[REDACTED]
	Member/Name/First Name	[REDACTED]
	Member/Name/Middle Name	[REDACTED]
	Member/Name/Name Prefix	MR
	Member/Demographic/Gender	MALE
	Member/Demographic/Date of Birth	XX-XX-XXXX
	Member/Demographic/Marital Status	MARRIED
	Member/Name/Last Name	[REDACTED]
	Member/Name/First Name	[REDACTED]
	Member/Name/Middle Name	[REDACTED]
	Member/Name/Name Prefix	MS
	Member/Spouse Indicator	YES
	Member/Demographic/Gender	FEMALE
	Member/Demographic/Date of Birth	XX-XX-XXXX
	Member/Demographic/Marital Status	MARRIED
	Member/Name/Last Name	[REDACTED]
	Member/Name/First Name	[REDACTED]
	Member/Name/Name Prefix	MR
	Member/Demographic/Gender	MALE
	Address Information/Address/Full Street Address	[REDACTED]
	Address Information/Address/City	[REDACTED]
	Address Information/Address/State	[REDACTED]
	Address Information/Address/Zip Code	[REDACTED]
	Address Information/Address/Zip Code Extension	[REDACTED]
	Address Information/County	[REDACTED]
	Address Information/Latitude	[REDACTED]
	Address Information/Longitude	[REDACTED]
	Address Information/Address Type	SINGLE FAMILY DWELLING
	Address Information/Phone/Phone Number/Phone Number	[REDACTED]
People Finder	Document Identifier	I7eda9c00907911ea80afece799150095
	List/Name/First Name	[REDACTED]
	List/Name/Middle Name	[REDACTED]
	List/Name/Last Name	[REDACTED]
	List/Current Address/Address/House Number	[REDACTED]
	List/Current Address/Address/Street Name	[REDACTED]
	List/Current Address/Address/Street Type	[REDACTED]
	List/Current Address/Address/City	[REDACTED]
	List/Current Address/Address/State	[REDACTED]
	List/Current Address/Address/Zip Code	[REDACTED]
	List/Current Address/Address/Zip Code Extension	[REDACTED]
	List/Current Address/Phone Number/Telco Phone Number	[REDACTED]
	List/Current Address/Phone Number/Telco Phone Number	[REDACTED]
Business Profiles	Document Identifier	I89929d56cda011eabea4f0dc9fb69570
	Business Information/Business Name	[REDACTED]

	Business Information/Primary Company Address/Full Street Address	██████████
	Business Information/Primary Company Address/City	██████
	Business Information/Primary Company Address/State	█
	Business Information/Primary Company Address/Primary Company Zip Code/Zip Code	██████████
	Business Information/Primary Company Address/Primary Company Zip Code/Zip Code Extension	████
	Business Information/Primary Country Name	USA
	Business Information/Business Phone Number	██████████
	Business Information/Business Email/Business Email Address	████████████████████
	Business Information/Business Email/Business Email User Name	██████
	Business Information/Business Email/Business Email Domain Name	██████████
	Executive Information/Executive Full Name	██████████
	Executive Information/First Name	██████
	Executive Information/Last Name	████
People Email	Document Identifier	1a5a4f100d54811e598dc8b09b4f043e0
	Name/First Name	████
	Name/Last Name	████
	Date of Birth	XX-XX-XXXX
	Home Address/Full Street Address	██████████████████
	Home Address/City	██████
	Home Address/State	█
	Home Address/Zip Code/Zip Code	██████████
	Email Address/Email Address	██████████████████
	Email Address/User Name	██████████
	Email Address/Domain Name	██████
	Home Phone Number	██████████
	Cell Phone Number	██████████
	Business Phone Number	██████████
	Opt In Date	██████████
	IP Address	██████████

EXHIBIT D

Thomson Reuters Data Access Request Results – User
Interaction Information Student 1

App_Session

ACTION	TIMESTAMP	USER NAME	IP ADDRESS	BROWSER	OPERATING SYSTEM	SESSION SOURCE	REASON SESSION ENDED
Timeout	22-Nov-21 04.03.28.974 PM						NO_ACTIVE_BROWSER
Start	22-Nov-21 02.58.00.279 PM	XXXXXX	XXXXXX	Chrome 93	OS X Puma	Web	

App_Session 2

ACTION	TIMESTAMP	USER NAME	IP ADDRESS	BROWSER	OPERATING SYSTEM	SESSION SOURCE	REASON SESSION ENDED
Timeout	22-Nov-21 04.03.28.974 PM						NO_ACTIVE_BROWSER
Start	22-Nov-21 02.58.00.279 PM	XXXXXXXXXX	XXXXXXXXXX	Chrome 93	OS X Puma	Web	

Alerts

ACTION	TIMESTAMP	REPORTING NAME
Create Docket Alert	22-Nov-21 03.56.16.767 PM	WEB-PARKING

App_Session




ACTION	TIMESTAMP	USER NAME	DELIVERY DESTINATION	IP ADDRESS	BROWSER	OPERATING SYSTEM	SESSION SOURCE	REASON SESSION ENDED
Timeout	22-Nov-21 05.30.27.343 PM							USER_INACTIVITY
Delivery Start	22-Nov-21 02.56.53.515 PM	██████████	Download				Web	
Delivery Start	22-Nov-21 02.42.21.696 PM	██████████	Download				Web	
Delivery Start	22-Nov-21 02.43.26.780 PM	██████████	Email				Web	
Delivery Start	22-Nov-21 02.51.52.458 PM	██████████	Download				Web	
Delivery End	22-Nov-21 02.43.26.832 PM							
Delivery Start	22-Nov-21 02.49.26.742 PM	██████████	Download				Web	
Delivery End	22-Nov-21 02.42.21.700 PM							
Delivery End	22-Nov-21 02.40.12.182 PM							
Delivery End	22-Nov-21 02.51.52.509 PM							
Start	22-Nov-21 01.22.36.827 PM	██████████		██████████	Chrome 93	OS X Puma	Web	
Delivery End	22-Nov-21 02.56.53.606 PM							
Delivery Start	22-Nov-21 02.40.12.081 PM	██████████	Download				Web	
Delivery End	22-Nov-21 02.49.26.813 PM							

Document Interactions

ACTION	TIMESTAMP	USERNAME	CLIENT ID	DOCUMENT TYPE	CITATION	TITLE	CATEGORY	DOCUMENT
Document Delivery	22-Nov-21 02:43:26.783 PM				140 S.Ct. 2183	Sela Law LLC v. Consumer Financial Protection Bureau		https://next.westlaw.com/Document/6843d7ab9d11e9a6ac0d477b3669/View/FullText.html
Full Text Display	22-Nov-21 02:41:42.100 PM				140 S.Ct. 2183	Sela Law LLC v. Consumer Financial Protection Bureau		https://next.westlaw.com/Document/6843d7ab9d11e9a6ac0d477b3669/View/FullText.html
Full Text Display	22-Nov-21 02:41:10.651 PM				838 F.3d 476	In re Sealed Case		https://next.westlaw.com/Document/854f359056e11d98d61c0454ca44/View/FullText.html
Full Text Display	22-Nov-21 02:40:39.232 PM				315 F.Supp.3d 602	In re Grand Jury Investigation		https://next.westlaw.com/Document/c0790190779711e8824c4c054ca44/View/FullText.html
Note Add	22-Nov-21 02:40:04.567 PM							https://next.westlaw.com/Document/c09e5898c0611d9936c35cc61aab4a/View/FullText.html
Initiate Delivery	22-Nov-21 02:41:59.719 PM			Pdf				
Full Text Display	22-Nov-21 02:44:19.735 PM				487 U.S. 654	Morrison v. Olson		https://next.westlaw.com/Document/c09e5898c0611d9936c35cc61aab4a/View/FullText.html
Full Text Display	22-Nov-21 02:48:57.760 PM				17 USCA S 1201	S 1201. Circumvention of copyright protection systems		https://next.westlaw.com/Document/N63050A0A06711D868F8FF7D35F9C0V/View/FullText.html
Document Delivery	22-Nov-21 02:49:26.784 PM				17 USCA S 1201	§ 1201. Circumvention of copyright protection systems		https://next.westlaw.com/Document/N63050A0A06711D868F8FF7D35F9C0V/View/FullText.html
Document Delivery	22-Nov-21 02:56:53.560 PM		NO CLIENT ID			Practical Law Practice Note Overview 6-597-4106		https://next.westlaw.com/Document/2b7221d6b39711e498b3809b440/View/FullText.html
Document Delivery	22-Nov-21 02:42:21.698 PM				140 S.Ct. 2183	Sela Law LLC v. Consumer Financial Protection Bureau		https://next.westlaw.com/Document/6843d7ab9d11e9a6ac0d477b3669/View/FullText.html
Initiate Delivery	22-Nov-21 02:40:04.756 PM			Pdf				
Full Text Display	22-Nov-21 02:57:20.463 PM		NO CLIENT ID			Practical Law Standard Document w-017-8754		https://next.westlaw.com/Document/ee73c0d046a11e8b5b3e3d9c247479/View/FullText.html
Show Related Info	22-Nov-21 02:52:01.998 PM				24 Stan. Tech. L. Rev. 55 (2020)	WHY GOOGLE DOMINATES ADVERTISING MARKETS	Citing References	https://next.westlaw.com/Document/973d5d73abf11e8b6a4d0c0b69570/View/FullText.html
Full Text Display	22-Nov-21 02:48:16.905 PM				487 U.S. 654	Morrison v. Olson		https://next.westlaw.com/Document/c09e5898c0611d9936c35cc61aab4a/View/FullText.html
Highlight Add	22-Nov-21 02:39:03.986 PM							https://next.westlaw.com/Document/c09e5898c0611d9936c35cc61aab4a/View/FullText.html
Full Text Display	22-Nov-21 02:51:29.925 PM				24 Stan. Tech. L. Rev. 55 (2020)	WHY GOOGLE DOMINATES ADVERTISING MARKETS		https://next.westlaw.com/Document/973d5d73abf11e8b6a4d0c0b69570/View/FullText.html
Initiate Delivery	22-Nov-21 02:43:21.807 PM			Pdf				
Initiate Delivery	22-Nov-21 02:51:44.196 PM			Pdf				
Get Graphical KeyCite	22-Nov-21 02:41:02.424 PM							
Show Related Info	22-Nov-21 02:41:30.495 PM				487 U.S. 654	Morrison v. Olson	Citing References	https://next.westlaw.com/Document/c09e5898c0611d9936c35cc61aab4a/View/FullText.html
Show Related Info	22-Nov-21 02:40:25.005 PM				487 U.S. 654	Morrison v. Olson	Negative Treatment	https://next.westlaw.com/Document/c09e5898c0611d9936c35cc61aab4a/View/FullText.html
Show Related Info	22-Nov-21 02:44:15.687 PM				487 U.S. 654	Morrison v. Olson	Citing References	https://next.westlaw.com/Document/c09e5898c0611d9936c35cc61aab4a/View/FullText.html
Show Related Info	22-Nov-21 02:41:02.965 PM				487 U.S. 654	Morrison v. Olson	History	https://next.westlaw.com/Document/c09e5898c0611d9936c35cc61aab4a/View/FullText.html
View PDF	22-Nov-21 02:57:30.230 PM							
Document Delivery	22-Nov-21 02:40:12.125 PM				487 U.S. 654	Morrison v. Olson		https://next.westlaw.com/Document/c09e5898c0611d9936c35cc61aab4a/View/FullText.html
Document Delivery	22-Nov-21 02:51:50.488 PM				24 Stan. Tech. L. Rev. 55 (2020)	WHY GOOGLE DOMINATES ADVERTISING MARKETS		https://next.westlaw.com/Document/973d5d73abf11e8b6a4d0c0b69570/View/FullText.html
Full Text Display	22-Nov-21 02:46:00.720 PM				487 U.S. 654	Morrison v. Olson		https://next.westlaw.com/Document/c09e5898c0611d9936c35cc61aab4a/View/FullText.html
Show Related Info	22-Nov-21 02:55:42.102 PM				24 Stan. Tech. L. Rev. 55 (2020)	WHY GOOGLE DOMINATES ADVERTISING MARKETS	Citing References	https://next.westlaw.com/Document/973d5d73abf11e8b6a4d0c0b69570/View/FullText.html
Initiate Delivery	22-Nov-21 02:56:48.724 PM			Pdf				
Full Text Display	22-Nov-21 02:38:16.034 PM				487 U.S. 654	Morrison v. Olson		https://next.westlaw.com/Document/c09e5898c0611d9936c35cc61aab4a/View/FullText.html
Highlight Add	22-Nov-21 02:38:49.047 PM							https://next.westlaw.com/Document/c09e5898c0611d9936c35cc61aab4a/View/FullText.html
Show Related Info	22-Nov-21 02:49:33.149 PM				17 USCA S 1201	S 1201. Circumvention of copyright protection systems	Editor's and Revisor's Notes	https://next.westlaw.com/Document/N63050A0A06711D868F8FF7D35F9C0V/View/FullText.html
Show Related Info	22-Nov-21 02:49:48.829 PM				17 USCA S 1201	S 1201. Circumvention of copyright protection systems	Citing References	https://next.westlaw.com/Document/N63050A0A06711D868F8FF7D35F9C0V/View/FullText.html
Initiate Delivery	22-Nov-21 02:49:17.076 PM			Pdf				
Full Text Display	22-Nov-21 02:56:31.640 PM		NO CLIENT ID			Practical Law Practice Note Overview 6-597-4106		https://next.westlaw.com/Document/2b7221d6b39711e498b3809b440/View/FullText.html
Full Text Display	22-Nov-21 03:02:41.005 PM		NO CLIENT ID			Practical Law Standard Document w-017-8754		https://next.westlaw.com/Document/ee73c0d046a11e8b5b3e3d9c247479/View/FullText.html

ACTION	EMAIL	DELIVERY DESTINATION	CONTENT TYPE	SUB CONTENT TYPE	DELIVERY CONTEXT	DELIVERY TYPE	HIGHLIGHT COLOR	NOTE TYPE	FEATURE	EVENT TYPE
Document Delivery		Email	CASES						docDisplay	
Full Text Display			Cases	Caselaw - NRS						
Full Text Display			Cases	Caselaw - NRS						
Full Text Display			Cases	Caselaw - NRS						
Note Add							yellow	inline		
Initiate Delivery					SingleDocument	FullText				
Full Text Display			Cases	Caselaw - NRS						
Full Text Display			Statutes	Codes - Statutes						
Document Delivery		Download	STATUTES						docDisplay	
Document Delivery		Download	KNOWHOW						docDisplay	
Document Delivery		Download	CASES						docDisplay	
Initiate Delivery					SingleDocument	FullText				
Full Text Display			KnowHow	Know How - Standard Documents						
Show Related Info			LawReviews							KeyCite
Full Text Display			Cases	Caselaw - NRS						
Highlight Add							yellow	inline		
Full Text Display			Secondary Sources	Analytical - Law Review						
Initiate Delivery					SingleDocument	FullText				
Initiate Delivery					SingleDocument	FullText				
Get Graphical KeyCite										
Show Related Info			Caselaw							KeyCite
Show Related Info			Caselaw							KeyCite
Show Related Info			Caselaw							KeyCite
Show Related Info			Caselaw							KeyCite
View PDF									imageDisplay	
Document Delivery		Download	CASES						docDisplay	
Document Delivery		Download	SECONDARY SOURCES						docDisplay	
Full Text Display			Cases	Caselaw - NRS						
Show Related Info			LawReviews							KeyCite
Initiate Delivery					SingleDocument	FullText				
Full Text Display			Cases	Caselaw - NRS						
Highlight Add							yellow	inline		
Show Related Info			CodesKNEX							Related Information
Show Related Info			CodesKNEX							KeyCite
Initiate Delivery					SingleDocument	FullText				
Full Text Display			KnowHow	Know How - Practice Notes						
Full Text Display			KnowHow	Know How - Standard Documents						

Foldering

ACTION	TIMESTAMP	ITEM LIST	ITEM COUNT	CLIENT ID	
Folder Share	22-Nov-21 02.45.54.565 PM				
Folder Create	22-Nov-21 02.46.43.944 PM				
Content Add	22-Nov-21 02.48.26.995 PM	[[{"ct": "Cases", "guid": "lce99e5869c9611d993e6d35cc61aab4a"}]]		1	
Folder Share	22-Nov-21 02.48.13.624 PM				
Folder Share	22-Nov-21 02.44.32.951 PM				
Folder Share	22-Nov-21 02.44.00.881 PM				
Folder Share	22-Nov-21 02.48.28.179 PM				
Folder Share	22-Nov-21 02.48.11.126 PM				
Folder Share	22-Nov-21 02.46.19.007 PM				
Content Add	22-Nov-21 02.44.06.118 PM	[[{"ct": "Cases", "guid": "l68d43d7eb9cf11eaacfacd2d37fb36e9"}]]		1	
Content Add	22-Nov-21 02.44.32.039 PM	[[{"ct": "Cases", "guid": "lce99e5869c9611d993e6d35cc61aab4a"}]]		1	
Folder Share	22-Nov-21 02.46.45.000 PM				
Folder Share	22-Nov-21 02.44.07.099 PM				
Folder Create	22-Nov-21 02.43.59.977 PM				

Search

ACTION	TIMESTAMP	QUERY	HEADERS	RESULT COUNT	SEARCH TYPE	CONTENT TYPE
Search Results	22-Nov-21 02.38.04.174 PM	orrison v. Olson 487 U.S. 654	[Cases\]"	35	Plain Language	topResults
Search Results	22-Nov-21 02.56.12.560 PM	\California privacy and consumer data"		0	Boolean	knowhow
Search Results	22-Nov-21 02.57.10.392 PM	ccpa	[Practical Law\]"	299	Plain Language	knowhow
Search Results	22-Nov-21 02.44.54.086 PM	orrison v. Olson 487 U.S. 654	[Cases\]"	35	Plain Language	topResults
Search Results	22-Nov-21 03.56.07.361 PM	skadden	[Dockets\]"	2790	Plain Language	docket
Search Results	22-Nov-21 02.48.44.776 PM	DMCA 1201	[Cases\]"	428	Plain Language	topResults
Results Filtered by Content Type	22-Nov-21 02.50.25.379 PM	WHY GOOGLE DOMINATES ADVERTISING MARKETS	[Secondary Sources\]"	109	Plain Language	topResults
Search Results	22-Nov-21 02.50.16.360 PM	WHY GOOGLE DOMINATES ADVERTISING MARKETS	[Cases\]"	34	Plain Language	topResults
Results Filtered by Content Type	22-Nov-21 02.48.51.087 PM	DMCA 1201	[Statutes & Court Rules\]"	38	Plain Language	topResults
Search Results	22-Nov-21 02.45.14.781 PM	DMCA 1201	[Cases\]"	428	Plain Language	topResults
Results Filtered by Content Type	22-Nov-21 02.51.24.118 PM	\WHY GOOGLE DOMINATES ADVERTISING MARKETS"	[Secondary Sources\]"	5	Boolean	topResults
Search Results	22-Nov-21 02.56.23.870 PM	California privacy and consumer data	[Practical Law\]"	1496	Plain Language	knowhow
Results Filtered by Content Type	22-Nov-21 02.45.31.631 PM	DMCA 1201	[Statutes & Court Rules\]"	38	Plain Language	topResults

EXHIBIT E

Email Exchange Between Thomson Reuters and Law Student
User 1

RE: Data Access Request Results Inquiry

Enquiries, Privacy <privacy.enquiries@thomsonreuters.com>

Fri 1/21/2022 6:49 PM

[REDACTED]@stanford.edu>; Privacy Issues <Privacy.Issues@thomsonreuters.com>

Hello,

Thank you for contacting the Thomson Reuters Privacy Office. Per the results of your access request (REQUEST ID: [REDACTED]), here are your category results:

Based on your Public Records report:

Categories of third parties to which your data was sold:

- Government Agencies;
- Law Enforcement;
- Corporations;
- Law firms; and
- Educational Institutions

We do not sell information from the products you selected. Information that is shared with 3rd parties as part of a service contract is outlined in the [Thomson Reuters Privacy Statement](#) (see “Information we Collect” to “How We Share Your Information”).

Regards,
Thomson Reuters Privacy Office

From: [REDACTED] [REDACTED]@stanford.edu>
Sent: Monday, January 17, 2022 8:20 PM
To: Privacy Issues <Privacy.Issues@thomsonreuters.com>
Subject: [EXT] Data Access Request Results Inquiry

External Email: Use caution with links and attachments.

Dear Privacy Team.

I recently received the results from a request for data access (REQUEST ID: [REDACTED]). Thank you for completing the request. I am following up because after reading the results and the privacy/CCPA policy on your website (I'm a California resident), I am still uncertain as to whether you all are sharing or selling my personal information with anyone.

Has the personal information that you all have collected (i.e., the information sent in the request results) been shared with or sold to anyone else? If so, can you please tell me who it has been shared with or sold to?

Thank you for your assistance.

Best,

[REDACTED]

EXHIBIT F

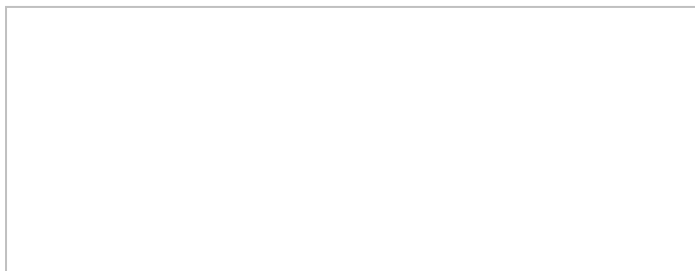
Thomson Reuters Confirmation of Data Access Request
Submission Student 1

(Request ID: [REDACTED]) **Your Privacy Access Request**

Thomson Reuters <noreply@m.onetrust.com>

Tue 11/23/2021 12:19 PM

To: [REDACTED] <[REDACTED]@stanford.edu>



Dear [REDACTED],

Thank you for your request. In order to confirm that you are able to receive the information requested, please confirm your email by clicking on the button below.

Once you have confirmed your email, we will start working on your request.

Your Request ID is [REDACTED], please keep this number because you will need it to follow up with any questions and to retrieve the information requested.

Confirm Email

If you have any questions, please contact a member of the privacy team at privacy.enquiries@tr.com.

EXHIBIT G

Thomson Reuters Data Access Request Completion Notice
Student 1

(Request ID: [REDACTED]) Your Privacy Request has been completed

Thomson Reuters <noreply@m.onetrust.com>

Mon 1/10/2022 2:37 PM

To: [REDACTED]@stanford.edu>



Dear [REDACTED],

Your privacy-related request (Request ID: [REDACTED]) has been completed.

To view your completed request in the privacy portal, click the following link.

[Open Request](#)

If you have any questions, please contact a member of the privacy team.

EXHIBIT H

Thomson Reuters General Privacy Policy Page (and California-Specific Section)

[Global directory](#)



Thomson Reuters Privacy Statement


AVAILABLE IN OTHER LANGUAGES:

[中文 \(简体版\)](#) [中文 \(繁体版\)](#) [Nederlands](#) [Français](#) [Français\(CA\)](#) [Deutsch](#) [Italiano](#) [日本語](#)
[한국어](#) [Português](#) [Русский](#) [Español](#) [Türk](#) [عربي](#)

Effective Date: June 2012

Last Updated: January 1, 2020


Your privacy and trust are important to us. This Privacy Statement explains how Thomson Reuters Holdings Inc. and the Thomson Reuters group of companies (we refer to these as “**Thomson Reuters**”, “**we**”, “**us**”, or “**our**”) collect,

Thomson Reuters 
supplemental Privacy Statement for California consumers under CCPA


use, and share your personal information in connection with the website, application (including a mobile application), product, software, or service that links to this Privacy Statement (we call these our “Services”).

This Privacy Statement, however, does **not** apply to:

**Thomson Reuters
supplemental Privacy
Statement for cookie &
IBA policy**



**Thomson Reuters
supplemental Privacy
Statement for content
distributed with
Thomson Reuters
Services**



- Our customers’ “content” that is inputted/uploaded and processed, stored, or hosted by our customers using our Services in connection with their account with us, in which this personal information is governed by our customers’ respective privacy policies;
- The “content” that is distributed within our Services (including with respect to personal information included in such content), although this is addressed in our [Informational Content Privacy Statement](#); or
- Any website, application, product, software, service, or content that are offered by third parties or that link to their own privacy statement, privacy policy, or privacy notice.

Importantly, some laws (like GDPR) distinguish between a “controller” and a “processor” (or similar terms). We note that we are a “controller” for those Services where we make

decisions on how personal information is used in connection with our Services, and we are a “processor” for those Services where we only use personal information as allowed by our customers.

Where we make decisions on how personal information is used in connection with our Services (where we are acting as a controller), we are responsible for the obligations of a “controller” under applicable laws in connection with the processing of personal information – for example, we use this Privacy Statement and other notices to provide you with information about our use of personal information, as required by law. Where we only use personal information as allowed by our customers (where we are acting as a processor), our customers are similarly responsible for the obligations of a “controller” under applicable laws in connection with the processing of personal information, and, if you are using our Services through one of our customers, you should contact them if you have questions or concerns about the processing of your personal information or compliance with applicable laws.

For **California Consumers**, we have also prepared a *Supplemental Privacy Statement for California Consumers under CCPA* (“**California Statement**”) in compliance with the California Consumer Privacy Act of 2018 (“**CCPA**”). Please review our [California Statement](#) attached below for more information.

For our Public Records Products (such as PeopleMap, Public Records on Westlaw, and CLEAR), please visit our supplemental [Public Records Privacy Statement](#) for more

information about the use of personal information in our Public Records Products.

Who we are & how to contact us

Thomson Reuters Holdings Inc. is a Delaware corporation with an office at Metro Center, One Station Place, Stamford, Connecticut 06902, United States. In addition, the Thomson Reuters group of companies is made up of numerous legal entities with offices located across the globe. If you want to locate a specific Thomson Reuters office and the local contact information for an office, please see our [list of locations here](#).

Any comments, concerns, complaints, or questions regarding our Privacy Statement may be addressed to privacy.issues@thomsonreuters.com or you can write us as follows:

To the Thomson Reuters's global **General Counsel, Privacy**:

General Counsel, Privacy
Thomson Reuters
610 Opperman Drive
Eagan, Minnesota 55123
United States of America

To the Thomson Reuters's **Data Protection Officer** in the EU/EEA:

Data Protection Officer
Thomson Reuters
30 South Colonnade-Canary Wharf
London E14 5EP, United Kingdom

As mentioned above, if you are using our Services through one of our customers, then you should contact them with any privacy-related issues or questions.

Information we collect

The type of personal information we collect depends on how you are specifically interacting with us and which Services you are using. Generally, we collect the following categories of personal information:

- **Contact Information**, such as name, alias, address, phone number, social media user ID, email address, and similar contact data.
- **Organization and Contacts Information**, such as your employer or organizations that you are a member of, information about your colleagues or those within your organization, your status with an organization, and similar data.
- **Account Information**, such as security-related information (including user names and passwords, authentication methods, and roles), service-related information (including purchase history and account profiles), billing-related information (including payment,

shipping, and billing information), and similar data.

- **User Content**, such as content of communications, suggestions, questions, comments, feedback, and other information you send to us, that you provide to us when you contact us, or that you post on our Services (including information in alerts, folders, notes, and shares of content), and similar data.
- **Device & Browser Information**, such as network and connection information (including Internet Service Provider (ISP) and Internet Protocol (IP) addresses), device and browser identifiers and information (including device, application, or browser type, version, plug-in type and version, operating system, user agent, language and time zone settings, and other technical information), advertising identifiers, cookie identifiers and information, and similar data.
- **Usage Information and Browsing History**, such as usage metrics (including usage rates, occurrences of technical errors, diagnostic reports, settings preferences, backup information, API calls, and other logs), content interactions (including searches, views, downloads, prints, shares, streams, and display or playback details), and user journey history (including clickstreams and page navigation, URLs, timestamps, content viewed or searched for, page response times, page interaction information (such as scrolling, clicks, and mouse-overs), and download errors), advertising interactions (including when and how you interact with marketing and advertising materials, click rates, purchases or next steps you may make after seeing an advertisement, and marketing preferences), and similar data.

- **Location Data**, such as the location of your device, your household, and similar location data.
- **Demographic Information**, such as country, preferred language, age and date of birth, marriage status, gender, physical characteristics, personal or household/familial financial status and metrics, military status, and similar data.
- **Your Image**, such as still pictures, video, voice, and other similar data.
- **Identity Information**, such as government-issued identification information, tax identifiers, social security numbers, other government-issued identifiers, and similar data.
- **Financial Information**, such as billing address, credit card information, billing contact details, and similar data.
- **Social Media and Online Content**, such as information in social media and online profiles, online posts, and similar data.
- **Career, Education, and Employment Related Information**, such as job preferences or interests, work performance and history, salary history, status as a veteran, nationality and immigration status, demographic data, disability-related information, application information, professional licensure information and related compliance activities, accreditations and other accolades, education history (including schools attended, academic degrees or areas of study, academic performance, and rankings), and similar

data.

Sources of information

We collect personal information about you either directly from you, from certain third parties (such as your employer or the subscriber providing access to our Services), or from other sources (such as publicly available sources) as follows:

You provide personal information to us when you:

- Search for, subscribe to, or purchase our Services.
- Use our Services or otherwise interact with us.
- Create or maintain a profile or account with us.
- Purchase, use, or otherwise interact with content, products, or services from third party providers who have a relationship with us.
- Create, post, or submit user content on our Services.
- Register for or attend one of our events or locations.
- Request or sign up for information.
- Communicate with us by phone, email, chat, in person, or otherwise.

- Complete a questionnaire, survey, support ticket, or other information request form.
- When you express an interest in working with us or apply for a job or position with us.

We collect personal information automatically when you:

- Search for, visit, interact with, or use our Services (including through a device).
- Access, use, or download content from us.
- Open emails or click on links in emails or advertisements from us.
- Otherwise interact or communicate with us (such as when you attend one of our events or locations, when you request support or send us information, or when you mention or post to our social media accounts).

We also collect personal information about you from third parties, such as:

- Your organization and others with whom you have a relationship that provide or publish personal information related to you, such as from our customers when they arrange access to our Services for you or from others when they create, post, or submit user content on our Services that may include your personal information.
- Professional or industry organizations and certification / licensure agencies that provide or publish personal information related to you.

- Third parties and affiliates who resell or integrate with our Services.
- Service providers and business partners who work with us in relation to our Services and that we may utilize to deliver certain content, products, or services or to enhance your experience.
- Marketing, sales generation, and recruiting business partners.
- Credit bureaus and other similar agencies.
- Government agencies and others who release or publish public records.
- Other publicly or generally available sources, such as social media sites, public and online websites, open databases, and data in the public domain.

How we use information

This section includes details of the purposes for which we use personal information and the different legal reasons for processing that personal information.

Lawful Basis

First, some laws require us to explain the **lawful basis** upon which we process your personal information. With respect to these laws, we process personal information about you for one or more of the following basis:

- **To Perform a Contract.** Where the processing is necessary for the performance of contract.
- **Legitimate Interests.** Where the processing is necessary for legitimate interests pursued by us or by a third party, except where such interests are overridden by your interests or fundamental rights and freedoms which require protection of personal information.
- **Your Consent.** Where you have given us consent to process your personal information for specified purposes, such as to provide our Service and other items requested by you.
- **Comply with the Law.** Where the processing is necessary for compliance with a legal obligation.

Processing of Personal Information

We process your personal information in connection with our Services and for other business purposes, including to:

- Provide, deliver, analyze, and administer our Services (including in connection with the performance of a contract).
- For internal research and development purposes for new content, products, and services, and to improve, test, and enhance the features and functions of our current

Services.

- Process transactions related to our Services and administer accounts or profiles related to you or your organization (including registrations, subscriptions, purchases, billing events, royalty calculations, and payments).
- Personalize and make recommendations related to our Services and other offerings.
- Contact and communicate with you in connection with our Services or other notifications, programs, events, or updates that you may have registered for.
- Send you offers, advertising, and marketing materials, including to provide personalized advertising to you.
- Conduct and communicate with you regarding recruiting and human resources administration.
- Comply with your instructions or to fulfill other, specified purposes for which you have given your consent.
- Detect and prevent fraud and abuse to ensure the security and protection of all customers and others, as well as to identify and authenticate your access to our Service or to identify and authenticate you before we provide you with certain information.
- Exercise our rights and to protect our and others' rights and/or property, including to

take action against those that seek to violate or abuse our Services.

- Comply with the law and our legal obligations, including to respond to a request or order from a court, regulator, or authority, as well as to fulfill our contractual obligations with our customers when they arrange access to our Services for you.
- Effectuate the sale, merger, acquisition, or other disposition of our business (including in connection with any bankruptcy or similar proceedings).

How we share information

We share personal information for the purposes set out in this Privacy Statement and with the following categories of recipients:

- **The Thomson Reuters Group.** We may share your personal information amongst the companies within the Thomson Reuters group of companies.
- **Your Organization and Contacts.** We may share your personal information with your organization and others with whom you have a relationship in order to fulfill or perform a contract or other legal obligation, including with our customer that arranges access to our Services for you and pays us in connection with your access. We may also share your personal information with your contacts if you are in the same organization or to facilitate the exchange of information between you and the contact(s).
- **Business Partners.** We may share your personal information with our business

partners to jointly offer, provide, deliver, analyze, administer, improve, and personalize products or services (including these Services) or to host events. We may also pass certain requests from you or your organization to these business providers.

- **Third Party Content Providers.** We may share your personal information with our third party content providers to perform tasks on our behalf and to assist us in providing, delivering, analyzing, administering, improving, and personalizing content that are delivered as part of our Services. We may also pass certain requests from you or your organization to these content providers.
- **Social Media Services.** We may work with certain third party social media providers to offer you their social networking services through our Services. These social networking services may be able to collect information about you, including your activity on our Services. These third party social networking services also may notify your friends, both on our Services and on the social networking services themselves, that you are a user of our Services or about your use of our Services, in accordance with applicable law and their own privacy policies.
- **Third Party Service Providers.** We may share your personal information with our third party service providers to perform tasks on our behalf and to assist us in offering, providing, delivering, analyzing, administering, improving, and personalizing our Services. For example, service providers who assist us in performing, delivering, or enhancing certain products and services related to our delivery and operation of our Services, who provide technical and/or customer support on our behalf, who provide

application or software development and quality assurance, who provide tracking and reporting functions, research on user demographics, interests, and behavior, and other products or services. These third party service providers may also collect personal information about or from you in performing their services and/or functions on our Services. We may also pass certain requests from you or your organization to these third party service providers.

- **Advertisers.** We may share your personal information with advertisers, advertising exchanges, and marketing agencies that we engage for advertising services, to deliver advertising on some of our Services, and to assist us in advertising our brand and products and services. Those advertising services may also target advertisements on third party websites based on cookies or other information indicating previous interaction with us and/or our Services.
- **Users.** For some of our Services, we aggregate information from public records, phone books, social networks, marketing surveys, business websites, and other sources made available to us to create listings and profiles that become a part of our content in these Services, such as attorney and legal professional directories. These listings and profiles may be made available to all users of these Services. As described above, we may also share your personal information with other users who are your contacts if you are in the same organization or to facilitate the exchange of information between you and the contact(s). Additionally, if you choose to include your personal information in any reviews, comments, or other posts that you create, then that personal information may be displayed other users as part of your posting.

- **In the Event of Merger, Sale, or Change of Control.** We may transfer this Privacy Statement and your personal information to a third party entity that acquires or is merged with us as part of a merger, acquisition, sale, or other change of control (such as the result of a bankruptcy proceeding).
- **Other Disclosures.** We may disclose your personal information to third parties if we reasonably believe that disclosure of such information is helpful or reasonably necessary to comply with any applicable law or regulation, to comply with or respond to a legal process or law enforcement or governmental request, to enforce our terms and conditions or other rights (including investigations of potential violations of our rights), to detect, prevent, or address fraud or security issues, or to protect against harm to the rights, property, or safety of Thomson Reuters, our users, or the public.

Location of information

Thomson Reuters Holdings Inc. is located in the United States and the affiliated entities within the Thomson Reuters group of companies are located throughout the world. During your use of our Services and your interactions with us, your personal information may be transferred outside of your home country and may be stored in and accessed from multiple countries.

Whenever we transfer personal information to other jurisdictions, we will ensure that the information is transferred in accordance with this Privacy Statement and as permitted by applicable data protection laws.

Security of information

The security of your personal information is important to us. Taking into account the nature, scope, context, and purposes of processing personal information, as well as the risks to individuals of varying likelihood and severity, we have implemented technical and organizational measures designed to protect the security of personal information.

However, please note that no method of transmission over the Internet or method of electronic storage is 100% secure. Therefore, while we strive to use commercially acceptable measures designed to protect personal information, we cannot guarantee its absolute security.

Our security procedures also means that we may request proof of identity before we disclose personal information to you or before we process your other requests.

Retention of information

We retain personal information in accordance with our enterprise records retention schedule, which varies by Service, business function, record classes, and record types.

We calculate retention periods based upon and reserve the right to retain personal information for the periods that the personal information is needed to: (a) fulfill the purposes described in this Privacy Statement, (b) meet the timelines determined or recommended by regulators, professional bodies, or associations, (c) comply with

applicable laws, legal holds, and other legal obligations (including contractual obligations), and (d) comply with your requests.

Children's privacy

Our Services generally provide information solutions and, as such, our Services are intended for professionals and/or individuals over eighteen (18) years of age. We do not target children and do not knowingly collect any personal information from children under the age of thirteen (13). When a user discloses personal information on our Services, that user is representing to us that he or she is at least eighteen (18) years of age.

Marketing choices

We deliver advertising and marketing across various platforms, such as on our Services or via email, telephone, text messaging, direct mail, and various online channels. Our Services and marketing materials may also include third party advertising and links to other websites and applications. Third party advertising partners may collect information about you when you interact with their content, advertising, or services.

You can control cookies and tracking tools. To learn how to manage how we and our partners use cookies and other tracking tools, and to read our [Cookie & IBA Policy](#) here.

Your rights

In certain circumstances, local data protection laws (such as the GDPR) may give you rights with respect to personal information if you are located in or are a resident of that country, state, or territory (including if you are located in the EU/EEA). As discussed above, we have also prepared a *Supplemental Privacy Statement for California Consumers under CCPA* (“**California Statement**”) in compliance with the California Consumer Privacy Act of 2018 (“**CCPA**”). Please review our [California Statement](#) below for more information.

IMPORTANT: WE ARE ONLY REQUIRED TO HONOR RIGHTS TO THE EXTENT THAT THESE RIGHTS HAVE BEEN GRANTED TO YOU AND APPLY TO YOU UNDER APPLICABLE DATA PROTECTION LAWS. PLEASE CONSULT YOUR LOCAL DATA PROTECTION LAWS TO DETERMINE WHAT RIGHTS MAY BE AVAILABLE TO YOU AND WHEN ACCESS TO THESE RIGHTS ARE LIMITED.

What rights may be available to me?

These rights differ based upon local data protection laws in your country, state, or territory, but these rights **may** include one or more of the following:

- **Access to Personal Information.** You may have the right to obtain confirmation from us that we process your personal information and, if so, you may have the right to request access to your personal information. Please note that, to the extent permitted by law, we may charge a reasonable fee based on administrative costs for the first or further copies of your personal information requested by you.

- **Rectification.** You may have the right to request that we rectify inaccurate personal information concerning you and, depending on the purposes of the processing, you may have the right to have incomplete personal information completed.
- **Erasure/Deletion.** You may have the right to require us to erase some or all of the personal information concerning you.
- **Restriction of Processing.** You may have the right to require us to restrict the further processing your personal information. In such cases, the respective information will be marked as restricted, and may only be processed by us for certain purposes.
- **Object.** You may have the right to object, on grounds relating to your particular situation, to the processing of your personal information by us, and we may be required to no longer process some or all of your personal information.
- **Data Portability.** You may have the right to receive a copy of your personal information which you have provided to us, in a structured, commonly used, and machine-readable format, and you may have the right to transmit that personal information to another entity without hindrance from us.
- **Withdraw Consent.** You may have the right to withdraw consent you have provided to us where we rely solely on your consent to process your personal information. You can always provide your consent to us again at a later time.
- **Right to Complain.** You may have the right to lodge a complaint to an applicable

supervisory authority or other regulator if you are not satisfied with our responses to your requests or how we manage your personal information. For example, if you are located in the EU/EEA, a list of and more information about the EU/EEA Data Protection Authorities can be found here: http://ec.europa.eu/justice/data-protection/bodies/authorities/index_en.htm. We encourage you to first or also reach out to us at privacy.issues@thomsonreuters.com, so we have an opportunity to address your concerns directly.

- If you are a **California resident**, California Civil Code Section 1798.83 may permit you the right to request information regarding the disclosure of personal information about you by us to third parties for the third parties' direct marketing purposes.
- If you are a **Nevada resident**, Nevada residents may also have certain rights regarding the sale of personal information. Nevada residents may opt out of the future sale of their information to a third party so that they may license or sell information by clicking the following link "[Do Not Sell My Personal Information](#)" or by emailing us at: privacy.issues@thomsonreuters.com.

Importantly, these rights are **not** absolutely guaranteed and there are several exceptions where we may not have an obligation to fulfill your request. PLEASE CONSULT YOUR LOCAL DATA PROTECTION LAWS TO DETERMINE WHAT RIGHTS MAY BE AVAILABLE TO YOU AND WHICH EXCEPTIONS MAY APPLY.

How do I submit a request?

To make a request or exercise your rights, please visit our [Data Subject Rights Portal](#).

If you are making a request with respect to our **Public Records Products**, please visit our supplemental [Public Records Privacy Statement](#) for more information about submitting a request or exercising your rights for these Public Records products.

When you make a request, we ask that you help us with the following:

- ***Tell Us Which Right You Are Exercising:*** Please specify which right you want to exercise and the personal information to which your request relates (if not to you). If you are acting on behalf of another individual, please clearly indicate this fact and your authority to act on such person's behalf.
- ***Tell Us More about Your Relationship with Us:*** Please let us know how you are associated with us, such as that you use certain Services of ours or that you were a former employee.
- ***Help Us Verify Your Identity:*** As mentioned above, our security procedures mean that we may request proof of identity before we disclose personal information to you or before we process your other requests. Provide us enough information to verify your identity. If we cannot initially verify your identity, we may request additional information to complete the verification process (such information may include your picture, a copy of your driver's license or other government-issued ID and/or a recent utility or credit card bill). Please note that if we cannot verify your identity, we may not

be able to fulfill your request. Any personal information you disclose to us for purposes of verifying your identity may be shared with our third party service providers and/or third parties (like your phone carrier) or government agencies for the purpose of verification.

- ***Direct Our Response Delivery:*** Depending on your request, we will provide a response to you via email or through a link to access certain information. If you prefer to receive our response in another way, then please let us know your preferred delivery mechanism to receive our response. You may specify, for example, email, mail, or through your account (if you have one with us).

Changes to this Privacy Statement

As our organization changes over time, this Privacy Statement is expected to change as well. We reserve the right to amend the Privacy Statement at any time, for any reason, and without notice to you other than the posting of the updated Privacy Statement on our Services. We may e-mail periodic reminders of our notices and terms and conditions, but you should check our Services frequently to see the current Privacy Statement that is in effect and any changes that may have been made to it.

Conflicts

Depending on the specific Service you are using or specific interactions you have with us, we may provide different or supplemental privacy statements that describe and govern how

we use your personal information. When we do so, those different or supplemental privacy statements apply to that specific Service you are using or those specific interactions you have with us.

If there is any conflict between the English version of our Privacy Statement and a version translated in another language, the English version controls.

Thomson Reuters supplemental Privacy Statement for California consumers under CCPA

DO NOT SELL MY PERSONAL INFORMATION →

Introduction

As a global company, our business proudly serves certain natural persons residing in the State of California (each, a “**consumer**”). This *Supplemental Privacy Statement for California Consumers under CCPA* (“**California Statement**”) explains rights that California consumers may have under the California Consumer Privacy Act of 2018 (“**CCPA**”).

When we use the term “**personal information**” in this supplemental California Statement, we are using that term as CCPA defines it, which CCPA generally defines “**personal information**” to mean information that identifies, relates to, describes, is capable of being

associated with, or could reasonably be linked, directly or indirectly, with a particular consumer or household. However, personal information does not include publicly available, deidentified, or aggregate consumer information (which are all defined in CCPA). Notably, the definition of “**personal information**” also does not apply to the collection of personal information from job applicants, employees – whether you are our employee or any employee of the entity arranging access to our Services for you, business owners, directors, officers, medical staff, or contractors.

Categories of personal information we collect, the sources of that information, purposes for why we collect it, who we share it with, and whether we sell that personal information

Where we act as a “business” under CCPA (meaning we determine the manner and reasons for why we process your personal information), we may be required to disclose additional information regarding the categories of personal information we collect, the sources where we obtain that information, the purposes for why we collect that information, who we share that information with, as well as whether we sell that personal information – all of which depends on the specific Service. Accordingly, we’ve provided additional Service-specific information for subject Services on our website located at tr.com/privacy-information.

Your privacy rights

If you are a resident of California and are not a job applicant, employee/contractor, or employee/contractor of another company interacting with us in your job role, you have the right to request what information we collect, use, and disclose. You also have the right to request that we delete your information.

To make a request, you can contact us through our [Data Subject Rights Portal](#) or at 1-866-633-7656. Provide us enough information to verify your identify. We will use information you provide to us to verify your request. If we cannot initially verify your identity, we may request additional information to complete the verification process, such as, for example, a copy of your driver's license and/or a recent utility or credit card bill. You can designate an agent to make a request on your behalf by either: (1) having your agent send us a letter, signed by you, certifying that the agent is acting on your behalf and showing proof that they are registered with the California Secretary of State; or (2) by you and the agent executing and sending us a notarized power of attorney stating that the agent is authorized to act on your behalf. Please note that we may still require you to verify your identity before we process a request submitted by your agent.

California residents also have certain rights regarding the sale of personal information. California residents have the right to opt out of the sale of their personal information by clicking the following link "[Do Not Sell My Personal Information](#)" or by clicking the button above.

We will not discriminate against you because you have exercised any of your privacy rights

under the CCPA.

[CCPA Consumer Request Metrics for 2020](#)

Thomson Reuters supplemental Privacy Statement for cookie & IBA policy

Our [Privacy Statement](#) explains our principles when it comes to the collection, processing, and storage of your personal information. This Cookie & IBA Policy supplements the above Privacy Statement and specifically explains how we, our partners, and users of our Services deploy cookies and other tracking technologies, including for Interest-Based Advertising (IBA), as well as the options you have to control them.

Cookie policy

What are Cookies?

Cookies are small pieces of data, stored in text files, that are stored on your computer or other device when websites are loaded in a browser. They are widely used to “remember” you and your preferences, either for a single visit (through a “**session cookie**”) or for multiple repeat visits (using a “**persistent cookie**”). They ensure a consistent and efficient experience for visitors, and perform essential functions such as allowing users to register

and remain logged in. Cookies may be set by the site that you are visiting (known as “**first party cookies**”), or by third parties, such as those who serve content or provide advertising or analytics services on the website (“**third party cookies**”).

Both websites and HTML emails may also contain other tracking technologies such as “**web beacons**” or “**pixels**.” These are typically small transparent images that provide us with statistics, for similar purposes as cookies. They are often used in conjunction with cookies, though they are not stored on your computer in the same way as cookies. As a result, if you disable cookies, web beacons may still load, but their functionality will be restricted.

Flash cookies, also known as **local shared objects**, are designed to support browser content supported by Adobe® Flash. They are usually used to enable ads and video content on websites. Like other cookies, they will store information on your device, some of which will be specific to the Flash-enabled content. Flash cookies can only be deleted within Adobe Flash rather than via your browser. Please refer to the following help page for information on how to manage your privacy settings and deletion of Flash cookies:

http://www.macromedia.com/support/documentation/en/flashplayer/help/settings_manager.html.

How We Use Cookies

We use cookies for several different purposes. Some cookies are necessary for technical reasons; some enable a personalized experience for both visitors and registered users; and

some allow the display of advertising from selected third party networks. Some of these cookies may be set when a page is loaded, or when a user takes a particular action on one of our Services. Many of the cookies we use are only set if you are a registered user, while others are set whenever you visit or use one of our Services (irrespective of whether you have an account). For more information on the choices you have about the cookies we use, please see Section entitled [Controlling Cookies](#) below.

Where We Place Cookies

We set cookies in a number of different locations across our services. These locations may include:

- Our websites (including tr.com and reuters.com) and other Services;
- Our mobile apps;
- The emails we send.

Types of Cookies

The bullet points below outline the types of cookies we use on our Services and why we use them. We also provide explanations of their purpose(s).

- **Strictly Necessary.** These cookies are essential for our Services to perform their basic

functions. These include cookies that are required to allow registered users to authenticate and perform account related functions, as well as to save the contents of virtual “carts” for e-commerce functionality.

- **Analytics and Performance.** Performance cookies collect information on how users interact with our Services, including what pages are visited most, as well as other analytical data. We use these details to improve how our Services function and to understand how users interact with our Services.
- **Functionality.** These cookies are used to store preferences set by users such as account name, language, and location.
- **Security.** We use these cookies to help identify and prevent potential security risks.
- **Advertising.** These cookies are used to display relevant advertising to users who use our Services, as well as to understand and report on the efficacy of ads served on our Services. They track details such as the number of unique visitors, the number of times particular ads have been displayed, and the number of clicks the ads have received. They are also used to build user profiles, including showing you ads based on products or services you’ve viewed or acts you have taken on our (and other) websites and services. These are set by us and trusted third party networks, and are generally persistent in nature.
- **Third Party / Embedded Content.** Services hosted by us make use of different third party applications and services to enhance the experience of Service visitors. These

include social media platforms such as Facebook and Twitter (through the use of sharing buttons). As a result, cookies may be set by these third parties, and used by them to track your online activity. We have no direct control over the information that is collected by these cookies.

Controlling Cookies

You may wish to restrict the use of cookies or completely prevent them from being set. Most modern browsers allow you to change your cookie settings. You can usually find these settings in the options or preferences menu of your browser. To understand these settings, the following links for commonly used browsers may be helpful, or you can use the help option in your browser for more details:

- [Cookie settings in Internet Explorer](#)
- [Cookie settings in Firefox](#)
- [Cookie settings in Chrome](#)
- [Cookie settings in Safari web](#) and [iOS](#)

If you disable cookies, please be aware that some of the features of our Services may not function correctly.

For more details on your choices regarding use of your web browsing activity for interest-

based advertising you may visit the following sites:

- networkadvertising.org
- optout.aboutads.info
- youradchoices.com
- youronlinechoices.eu

On a mobile device, you may also be to adjust your settings to limit ad tracking.

You can opt out of Google Analytics by installing [Google's opt-out browser add-on](#).

Do Not Track Signals

Generally, we do not currently respond to, or take any action with respect to web browser "do not track" signals or other mechanisms that provide consumers the ability to exercise choice regarding the collection of personal information about an individual's online activities over time and across third party websites or online services. **However**, in some instances our third party service providers who integrate within our Services do honor Do Not Track signals.

Consent for Advertising Cookies on Our Sites

You may see a “cookie banner” on our websites. If you are visiting one of our Services from the EU/EEA, then we do not set, or allow our ad partners to set, cookies that are used to show you targeted ads before you click to accept. When you consent in this manner, we and our advertising partners may set advertising cookies on the site or other Service you are visiting and on other of our websites, dashboards, and services. We’ll display the banner to you periodically, just in case you change your mind.

Interest-based advertising (IBA) policy

Opt-Out of Email Marketing

You may choose not to receive future marketing or advertising emails from us by clicking the unsubscribe link at the bottom of each marketing or advertising email that you receive from us. Alternatively, you may send us an opt-out request specifying your communications preferences to privacy.issues@thomsonreuters.com.

Please note that, even if you opt-out of receiving marketing or advertising emails, we may still send you transactional emails related to the performance of our Services or your account with us, including administrative emails, maintenance emails, operational emails (for example, in connection with a password reset request), and responses to any “contact” request you initiate.

We may also restart sending you marketing or advertising emails if you later opt-in.

Interest-Based Advertising Notice

What is Interest-Based Advertising?

Interest-based advertising, sometimes referred to as “targeted advertising”, “online behavioral advertising”, and “personalized advertising”, allows us to deliver personalized and/or targeted advertising to individuals that are tailored to individual interests, as well as to provide advertising-related services such as ad delivery, reporting, attribution, analytics, and market research. We serve interest-based advertising using information you make available to us when you interact with our Services and other sites, content, or products or services, which may be supplemented by third parties as discussed below. We deliver interest-based advertising on Thomson Reuters’s owned and operated sites, on unaffiliated sites, and through our Services.

Like other online advertising networks, we use cookies, web beacons, and other technologies to enable us to learn about what ads you are served, what ads you click, and other actions you take on our sites, on other sites, and sometimes offline (collectively, “**Ad Stats**”). This allows us to provide you with more useful and relevant ads.

We allow third party companies to collect certain information when you visit our websites or use our Services. Third party advertisers and other third parties (including ad networks, ad delivery or ad serving companies, and other service providers they may use) may also collect information about your Ad Stats, in which they may use that information to assume

that users who interact with or click on a personalized ad or content are part of the group that the ad or content is directed towards. Also, some third parties may provide us with information about you (such as the sites where you have been shown ads, your Ad Stats, and/or demographic information) from offline and online sources that we may use to provide you more relevant and useful advertising.

Advertisers or ad companies working on their behalf sometimes use technology to serve the ads that appear on our sites or Services directly to your browser. They automatically receive your IP address and/or information from cookies when this happens. They may also use third party cookies to measure the effectiveness of their ads and to personalize ad content. We do not have access to or control over third party cookies or other features that advertisers and third party sites may use, and the privacy practices of these advertisers and third party websites are not covered by this Privacy Statement. Please contact them directly for more information about their privacy practices.

How do I Opt-out of Interest-Based Advertising?

You may choose not to receive interest-based advertising. Please note that, even if you opt-out of receiving interest-based advertising, you will still receive advertisements and marketing materials, but they will not be personalized to you specifically.

For some of our vendors that participate in the Digital Advertising Alliance (DAA), you can exercise your online advertising choices for those vendors to opt-out of interest-based

advertising at <http://optout.aboutads.info>. You may also opt out of receiving interest-based ads from many sites through the Network Advertising Initiative's (NAI) Opt Out Tool (<http://www.networkadvertising.org/choices>) and in the EU at <http://www.youronlinechoices.com/>.

How Do I Opt-Out of Advertising on Mobile Devices?

Mobile devices have an advertising identifier that gives companies the ability to serve targeted ads to a specific mobile device. Depending on your specific device, you may be able to limit advertising or reset the advertising identifier within your mobile device privacy settings. Another tool you can use to control advertising on your mobile device is the AppChoices App: <http://youradchoices.com/appchoices>. You may also choose to turn off the device's location tracking on your mobile device depending on your specific device.

Please note that some of the options described in the paragraphs above that you select are browser-specific or device-specific, so you may need to opt-out again if you delete cookies, use a different device, or change browsers.

Contact us

If you have any questions about our use of cookies or about IBA, you can find the most recent contact details in our [Privacy Statement](#).

Thomson Reuters supplemental Privacy Statement for content distributed with Thomson Reuters Services

1. Introduction

As a global business information services company, our business proudly distributes informational content within our Services. This Supplemental *Privacy Statement for Content Distributed with Thomson Reuters Services* (“**Informational Content Privacy Statement**”) supplements the above [Privacy Statement](#) and further explains how we distribute and curate this informational content.

2. Why does Thomson Reuters publish informational content?

Thomson Reuters publishes various types of content, such as statutes, laws, regulations, rules, court cases, opinions, expert analysis, articles, forms, public records, treatise, dictionaries, and many other types of information, that we believe have professional and jurisprudential value for our customers or the general public.

3. How does Thomson Reuters obtain informational content?

Thomson Reuters obtains informational content in a number of ways – sometimes we purchase or license the content from others, sometimes we receive the content pursuant to a contract where we are required to curate and distribute the content, sometimes we commission the content ourselves, and sometimes the content is collected from a number of public sources, like public records, journalistic sources, and information in the public domain. Any personal information contained in informational content that is subsequently distributed by Thomson Reuters originates from the original text of the informational content.

4. How does Thomson Reuters curate informational content?

In addition to distributing the informational content, Thomson Reuters curates the content – in other words, Thomson Reuters prepares and provides summaries, metadata, or other related information concerning the original content. For example, reported cases in our legal products might include a headnote, key cite, and other metadata, as well as the full-text court case. In many cases, Thomson Reuters prepares the curation of the content. Any personal information contained in the curation is derived from personal information included in the original information content supplied by the source of that content.

5. Does Thomson Reuters edit or change the substances of the original information content?

Except for clerical/typographical errors and format changes in compliance with editorial house styles and except as directed by source of the original information content, Thomson Reuters does not edit or change the substance of the original information content in most cases.

6. What if I want to change or delete my personal information contained in the information content or just want the informational content removed?

In many cases, we are not the source of the information content and Thomson Reuters is not obliged to change or delete the substance of the original content including any personal information unless we receive a verified request from the source of the information content, such as, for example, a court order from the court that issued the court case in the first place.

If you have any questions or concerns regarding the substance of any informational content or your personal information as contained in that information content, please contact the source of the informational content and work with them directly to resolve your questions or concerns.

EXHIBIT I

Thomson Reuters Public Records Privacy Statement

LEGAL

LEGAL NOTICES

Public records privacy statement

This Public Records Privacy Statement (“PR Privacy Statement”) provides information about our data collection and processing practices related to Westlaw Public Records and CLEAR (collectively, the “Public Records Products”). This PR Privacy Statement supplements the [Thomson Reuters Privacy Statement](#).

Thomson Reuters (including its affiliates and subsidiaries, collectively, “Thomson Reuters”) sources Public Records data from various third-parties, including government agencies and private data providers (collectively, “Providers”). The nature of the data and the collection processes limit our ability to independently verify or validate the accuracy and completeness of the data and data is subject to change at any time without notice. All data is provided “AS IS” without any warranty of any kind.

Personal information that we may collect from individuals through their use of our products and services is never added to our Public Records Products. We make our Public Records Products available only to authorized businesses and government organizations for their legitimate internal business uses. All use must comply with applicable laws including the U.S. Gramm-Leach-Bliley Act (15 U.S.C. §§6801 et seq.) (“GLB”) and the U.S. Driver's Privacy

Protection Act (18 U.S.C. §§2721 et seq.) ("DPPA"). If we reasonably believe that data has been misused, abused, or compromised, we may suspend or terminate access without additional notice.

THOMSON REUTERS IS NOT A CONSUMER REPORTING AGENCY AND NONE OF THE INFORMATION PROVIDED THROUGH ANY OF ITS SERVICES CONSTITUTES A "CONSUMER REPORT" AS SUCH TERM IS DEFINED IN THE FEDERAL FAIR CREDIT REPORTING ACT (15 U.S.C.A. §§1681 ET SEQ) ("FCRA").

BY ACCESSING A PUBLIC RECORDS PRODUCT, YOU AGREE THAT YOU WILL NOT UTILIZE THE DATA (I) AS A FACTOR IN ESTABLISHING AN INDIVIDUAL'S ELIGIBILITY FOR CREDIT OR INSURANCE, (II) IN CONNECTION WITH UNDERWRITING INDIVIDUAL INSURANCE, (III) IN EVALUATING AN INDIVIDUAL FOR EMPLOYMENT PURPOSES, (IV) IN CONNECTION WITH A DETERMINATION OF AN INDIVIDUAL'S ELIGIBILITY FOR A LICENSE OR OTHER BENEFIT GRANTED BY A GOVERNMENTAL AUTHORITY, (V) IN CONNECTION WITH ANY PERMISSIBLE PURPOSE (AS DEFINED BY THE FCRA), OR (VI) IN ANY OTHER MANNER THAT WOULD CAUSE SUCH USE OF THE SERVICE TO BE CONSTRUED AS A CONSUMER REPORT BY ANY AUTHORITY HAVING JURISDICTION OVER ANY OF THE PARTIES. MOREOVER, YOU AGREE NOT TO TAKE ANY ADVERSE ACTION, WHICH IS BASED IN WHOLE OR IN PART ON THE DATA, AGAINST ANY CONSUMER. THE TERMS "ADVERSE ACTION" AND "CONSUMER" SHALL HAVE THE SAME RESPECTIVE MEANING, AS THOSE TERMS ARE DEFINED IN THE FCRA.

DATA MAY NOT BE USED FOR COMMERCIAL SOLICITATIONS, MARKETING, FUNDRAISING OR OTHER SIMILAR ACTIVITIES OR PURPOSES.

FREQUENTLY ASKED QUESTIONS

DOES THOMSON REUTERS DISTRIBUTE DATA TO THE GENERAL PUBLIC?

Public Records Products are not accessible by the general public. They are only available to authorized, credentialed customers.

CAN I FIND OUT WHAT INFORMATION THOMSON REUTERS HAS ABOUT ME IN ITS PUBLIC RECORDS PRODUCTS?

Yes. You may request a copy of the information concerning you in our Public Records Products. However, please be advised that we are only able to provide a copy of the records referring unambiguously to you. To request a copy of the information we have in our Public Records Products concerning you, please submit your request via the [Public Records Data Subject Portal](#). To ensure your privacy, we will require you to verify your identity before providing any information.

HOW DOES THOMSON REUTERS COORDINATE DATA CORRECTION REQUESTS WITH ITS DATA PROVIDERS?

If you believe that information we have associated with you in our Public Records Products is incorrect, you are encouraged to submit a correction request via the [Public Records Data Subject Portal](#). If the error is with the source of the data, we will notify you if there is any documentation that you may need to submit in order for the Provider to review the requested change or correction. Please be aware that inquiries are managed by the individual Provider—not Thomson Reuters—and each Provider has sole discretion as to what types of documentation it may request to address requests for modification or correction of data.

HOW DO I REQUEST TO HAVE MY PERSONAL INFORMATION REMOVED?

You may request that your personal information be suppressed from our Public Records Products if you are able to demonstrate one of the following circumstances:



- You are a judge, public official or member of law enforcement
- You can provide evidence that the availability of your personal information on our Public Records Products exposes you to risk of physical harm
- You are a victim of identity theft as substantiated by a police report

We will require a written explanation substantiating the request and depending on the nature of the request, you may be required to provide:

- Copies of credentials verifying your position in law enforcement or public office
- Letters from supervisors verifying that you are a member of law enforcement or a public official
- Police reports or court orders regarding potential physical harm
- Police reports or letters from credit reporting companies regarding identity theft

Removal requests should be submitted via the [Public Records Data Subject Portal](#). All requests are subject to Thomson Reuters review and approval.

Even if we approve your removal request, we are unable to remove records from (1) databases comprising information made available by governmental agency such as court dockets, real estate records, liens, and judgments, lawsuits, death records, or motor vehicle registration, or (2) information coming through one of our live gateways.

Finally, if you change your name, address or use slight variations of either after a request has been granted, you will likely reappear in our databases because they are refreshed and updated regularly. You will need to resubmit your request.

DO YOU ACCEPT REQUESTS FROM THIRD PARTIES?

No. In the spirit of consumer privacy and to prevent unauthorized requests from being submitted, we provide an online portal for individuals to directly submit requests to Thomson Reuters. This online process has been implemented across all request types and ensures that requests are handled in a secure, timely, and uniform manner. As has always been the case, Thomson Reuters does not charge or collect any fees to facilitate a consumer request.

WHO SHOULD I CONTACT IF I HAVE QUESTIONS?

For any concerns or questions regarding our PR Privacy Statement or data subject requests related to our Public Records Products, you may email us at

westlaw.privacypolicy@thomsonreuters.com or you can write us as follows:

Thomson Reuters

Westlaw and CLEAR Public Records

ATTN: Personal Information Request

610 Opperman Drive

Eagan, MN 55123

WORLD-CHECK DATA

DATA USE. This information was obtained from the External Source(s) listed in the specific record and should be verified with that entity prior to any decisions being made. Neither Thomson Reuters nor World-Check has verified or validated the accuracy or completeness of

this information and any negative allegations or correlation should be assumed denied by the subject. If you are using this data to determine whether to enter into or maintain a business relationship with an individual, you must direct or provide the individual you are searching with a copy of the World-Check Privacy Statement located at

<https://risk.thomsonreuters.com/en/terms-of-business/world-check-privacy-statement.html>

DATA INQUIRIES. If you believe the information is incorrect or inaccurate, please click here to contact World-Check. If you believe this information has been incorrectly correlated in the search results, please contact Thomson Reuters at westlaw.privacypolicy@thomsonreuters.com.

NOTICE

This PR Privacy Statement may be revised without notice. If our information practices change in a material way, we will post the changes here. This Privacy Statement was last updated on March 3, 2021.

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LEGAL PRODUCTS

SOLUTIONS

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Feedback



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EXHIBIT J

Thomson Reuters Service-Specific Privacy Page



DATA PRIVACY

Thomson Reuters data privacy information

Thomson Reuters places a high priority on meeting our customers' expectations of privacy. To meet these expectations we are constantly monitoring legislative developments and incorporating changes into our privacy framework.

To learn more about our collection and use of personal information, please visit our [Privacy Statement](#).

- If you are **California** resident, please find more information about the California Consumer Privacy Act of 2018 (CCPA) [here](#).
- If you are located in the **EU/EEA**, please find more information about the General Data Protection Regulation [here](#).

[Back to Trust Center](#) →

Resources

GDPR



CCPA



Customer Data Processing Addendum



Data Security



Note: The Financial & Risk business of Thomson Reuters is now Refinitiv. [Learn more about data privacy at Refinitiv.](#)

Search



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PRODUCTS & SERVICES

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EXHIBIT K

Thomson Reuters CCPA Privacy Page



Thomson Reuters Privacy Information (CCPA)

The Financial & Risk business of Thomson Reuters is now [Refinitiv](#).

As a provider of trusted answers, Thomson Reuters has long been committed to honoring privacy and keeping personal data safe. The California Consumer Privacy Act of 2018 (CCPA), which took effect in January 1, 2020 is consistent with these values.

To learn more about our collection and use of personal information, please visit our [Privacy Statement](#).

If you are a California resident, you may have the right to opt out of the sale of your personal information to third parties under the CCPA. You may submit your request to opt out through our [Data Subject Rights Portal](#) or at 1-866-633-7656.

Download the CCPA Consumer Request Metrics for 2020 

As of January 1, 2020, these products may “sell” personal information under CCPA:

- Public Records Products (such as PeopleMap, Public Records on Westlaw, and CLEAR).

See our supplemental [Public Records Privacy Statement](#).

- Some Legal Professional Authority and Authorities powered products.
- FindLaw (including associated properties, like Abogado, SuperLawyers, LawInfo).
- Reuters Consumer (with respect to Interest-Based Advertising). See our [Cookie & IBA Policy](#).

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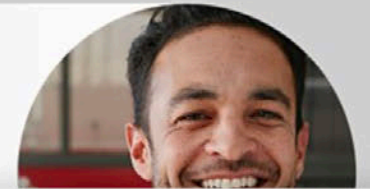
EXHIBIT L

Thomson Reuters Do Not Sell Button

UNVEILING OUR PURPOSE

Inform the way forward

Our role at Thomson Reuters is to serve our customers, pursuing justice, truth, and transparency



Our Privacy Statement & Cookie Policy

All Thomson Reuters websites use cookies to improve your online experience. They were placed on your computer when you launched this website. You can change your cookie settings through your browser.

[Privacy Statement](#)

[Cookie Policy](#)

[Do Not Sell My Personal Information](#)

[Do Not Sell My Personal Information](#)

Okay to continue



EXHIBIT M

Thomson Reuters Do Not Sell Pop-Up Window

Do Not Sell My Personal Information

When you visit our website, we store cookies on your browser to collect information. The information collected might relate to you, your preferences or your device, and is mostly used to make the site work as you expect it to and to provide a more personalized web experience. However, you can choose not to allow certain types of cookies, which may impact your experience of the site and the services we are able to offer. Click on the different category headings to find out more and change our default settings according to your preference. You cannot opt-out of our First Party Strictly Necessary Cookies as they are deployed in order to ensure the proper functioning of our website (such as prompting the cookie banner and remembering your settings, to log into your account, to redirect you when you log out, etc.). For more information about the First and Third Party Cookies used please follow this link.

[More information](#)

Manage Consent Preferences

Strictly Necessary Cookies

Always Active

These cookies are necessary for the website to function and cannot be switched off in our systems. They are usually only set in response to actions made by you which amount to a request for services, such as setting your privacy preferences, logging in or filling in forms. You can set your browser to block or alert you about these cookies, but some parts of the site will not then work. These cookies do not store any personally identifiable information.

Sale of Personal Data



Under the California Consumer Privacy Act, you have the right to opt-out of the sale of your personal information to third parties. These cookies collect information for analytics and to personalize your experience with targeted ads. You may exercise your right to opt out of the sale of personal information by using this toggle switch. If you opt out we will not be able to offer you personalised ads and will not hand over your personal information to any third parties. Additionally, you may contact our legal department for further clarification about your rights as a California consumer by using this Exercise My Rights link. If you have enabled privacy controls on your browser (such as a plugin), we have to take that as a valid request to opt-out. Therefore we would not be able to track your activity through the web. This may affect our ability to personalize ads according to your preferences.

Performance Cookies

Do Not Sell My Personal Information

When you visit our website, we store cookies on your browser to collect information. The information collected might relate to you, your preferences or your device, and is mostly used to make the site work as you expect it to and to provide a more personalized web experience. However, you can choose not to allow certain types of cookies, which may impact your experience of the site and the services we are able to offer. Click on the different category headings to find out more and change our default settings according to your preference. You cannot opt-out of our First Party Strictly Necessary Cookies as they are deployed in order to ensure the proper functioning of our website (such as prompting the cookie banner and remembering your settings, to log into your account, to redirect you when you log out, etc.). For more information about the First and Third Party Cookies used please follow this link.

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[More information](#)

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Sale of Personal Data



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Strictly Necessary Cookies

Always Active

These cookies are necessary for the website to function and cannot be switched off in our systems. They are usually only set in response to actions made by you which amount to a request for services, such as setting your privacy preferences, logging in or filling in forms. You can set your browser to block or alert you about these cookies, but some parts of the site will not then work. These cookies do not store any personally identifiable information.

Sale of Personal Data



Under the California Consumer Privacy Act, you have the right to opt-out of the sale of your personal information to third parties. These cookies collect information for analytics and to personalize your experience with targeted ads. You may exercise your right to opt out of the sale of personal information by using this toggle switch. If you opt out we will not be able to offer you personalised ads and will not hand over your personal information to any third parties. Additionally, you may contact our legal department for further clarification about your rights as a California consumer by using this Exercise My Rights link. If you have enabled privacy controls on your browser (such as a plugin), we have to take that as a valid request to opt-out. Therefore we would not be able to track your activity through the web. This may affect our ability to personalize ads according to your preferences.

Performance Cookies

Do Not Sell My Personal Information

When you visit our website, we store cookies on your browser to collect information. The information collected might relate to you, your preferences or your device, and is mostly used to make the site work as you expect it to and to provide a more personalized web experience. However, you can choose not to allow certain types of cookies, which may impact your experience of the site and the services we are able to offer. Click on the different category headings to find out more and change our default settings according to your preference. You cannot opt-out of our First Party Strictly Necessary Cookies as they are deployed in order to ensure the proper functioning of our website (such as prompting the cookie banner and remembering your settings, to log into your account, to redirect you when you log out, etc.). For more information about the First and Third Party Cookies used please follow this link.

[More information](#)

Manage Consent Preferences

Strictly Necessary Cookies

Always Active

These cookies are necessary for the website to function and cannot be switched off in our systems. They are usually only set in response to actions made by you which amount to a request for services, such as setting your privacy preferences, logging in or filling in forms. You can set your browser to block or alert you about these cookies, but some parts of the site will not then work. These cookies do not store any personally identifiable information.

Sale of Personal Data



Under the California Consumer Privacy Act, you have the right to opt-out of the sale of your personal information to third parties. These cookies collect information for analytics and to personalize your experience with targeted ads. You may exercise your right to opt out of the sale of personal information by using this toggle switch. If you opt out we will not be able to offer you personalised ads and will not hand over your personal information to any third parties. Additionally, you may contact our legal department for further clarification about your rights as a California consumer by using this Exercise My Rights link. If you have enabled privacy controls on your browser (such as a plugin), we have to take that as a valid request to opt-out. Therefore we would not be able to track your activity through the web. This may affect our ability to personalize ads according to your preferences.

Performance Cookies

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[More information](#)

Manage Consent Preferences

Strictly Necessary Cookies

Always Active

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Sale of Personal Data



Under the California Consumer Privacy Act, you have the right to opt-out of the sale of your personal information to third parties. These cookies collect information for analytics and to personalize your experience with targeted ads. You may exercise your right to opt out of the sale of personal information by using this toggle switch. If you opt out we will not be able to offer you personalised ads and will not hand over your personal information to any third parties. Additionally, you may contact our legal department for further clarification about your rights as a California consumer by using this Exercise My Rights link. If you have enabled privacy controls on your browser (such as a plugin), we have to take that as a valid request to opt-out. Therefore we would not be able to track your activity through the web. This may affect our ability to personalize ads according to your preferences.

Performance Cookies

EXHIBIT N

Thomson Reuters Data Subject Rights Portal



Welcome to the Thomson Reuters personal information request portal.
To enable us to address your request, please complete this form and follow all instructions.

Please take care to provide all information accurately to ensure the most accurate results.

The information supplied by you and others in connection with this request may be used both to address your request and for purposes permitted Thomson Reuters under applicable law. For further information on your rights, please review our Privacy Notice at: <https://www.thomsonreuters.com/en/privacy-statement.html> (<https://www.thomsonreuters.com/en/privacy-statement.html>).

If you are a California resident, you have the right to opt out of the sale of your personal information to third parties. You may exercise your right to opt out immediately by completing the form below and selecting the "Opt of sale of my personal information" request type. You do not have to create an account to exercise this right. Please note that if you exercise your right to opt-out of the sale of your personal information, we will refrain from selling your personal information for at least twelve (12) months before we request that you authorize the sale of your personal information again. However, if you decide at any time that we may sell your personal information, you may write to us at privacy.enquiries@thomsonreuters.com (<mailto:privacy.enquiries@thomsonreuters.com>), providing express authorization for us to do so.

The request options below relate to your Personal Information ("PI"). While PI is defined differently in various jurisdictions, laws, and regulations, generally the definition of PI is any information that identifies or could be used to identify an individual with a reasonable degree of certainty.

*** I am a (an)**

*** Residency (of the data subject this request concerns)**

*** First Name**

First Name of data subject this request concerns

* **Last Name**

Last Name of data subject this request concerns

* **Your Email**

For correspondence related to this request

* **Day of Birth**

Enter Day and Month of birth in format MM/DD

* **Country**

United States ×

* **Current Street Address**

Address of data subject this request concerns

* **State**

* **Telephone**

US residents please use format (XXX) XXX-XXXX

Username (Optional)

Username for any Thomson Reuters system, if known.

I'm not a robot reCAPTCHA
Privacy - Terms

Submit

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If you have further requests or comments, complaints or questions please contact us at privacy.enquiries@thomsonreuters.com (<mailto:privacy.enquiries@thomsonreuters.com>). You can also call us on +1 (866) 633-7656 or write us as follows:

To the Thomson Reuters's Global Chief Privacy Officer:
Chief Privacy Officer
Thomson Reuters
610 Opperman Drive
Eagan, Minnesota 55123
United States of America

To the Thomson Reuters's Data Protection Officer in the EU/EEA:

Data Protection Officer
Thomson Reuters
30 South Colonnade-Canary Wharf
London E14 5EP
United Kingdom

To the extent your request relates to World-Check information, note that World-Check is not a Thomson Reuters product and therefore we are unable to address your request. For more information regarding the privacy practices of World-Check, please visit the [World-Check privacy statement](https://www.refinitiv.com/en/products/world-check-kyc-screening/privacy-statement) (<https://www.refinitiv.com/en/products/world-check-kyc-screening/privacy-statement>).

EXHIBIT O

LexisNexis General Privacy Policy Statement



(/en-

us/home.page)

Privacy Policy

1. About This Privacy Policy
2. Information We Collect
3. How We Use Your information
4. Sharing of Your Information
5. Grounds for Processing
6. Data Retention
7. Locations of Processing
8. Data Security
9. Children's Privacy
10. Your Communications Preferences
11. Accessing and Updating Your Information
12. Changes
13. Contact
14. Supplementary Notices
15. LexisNexis Fair Processing Statement

At LexisNexis Legal & Professional, we take your privacy and your trust in us very seriously. This privacy policy provides you with information about how we collect, use and disclose your personal information.

1. About This Privacy Policy

This privacy policy applies when you visit or use our websites, apps and other services, including events, that refer or link to this privacy policy (each, a "Service"). This privacy policy may be supplemented by additional privacy statements, terms or notices provided to you.

The LexisNexis company that owns or administers the Service, as identified therein, is the primary controller of your personal information provide to, or collected by or for, the Servi  **TOP**

We will indicate within the registration processes of our products and services and other registration forms what types of personal information are required and those that are requested. You may choose not to submit the requested information, but that may limit or

prohibit the services that LexisNexis is able to provide to you.

For information about the handling of personal information contained in our service content, such as in case law, please read our Fair Processing Statement.

2. Information We Collect

We collect information about you in three ways: directly from your input, from third-party sources, and through automated technologies.

2.1 Data You Provide to Us

The types of personal information that we collect directly from you depends on how you interact with us and the Service, which may include:

- Contact details, such as your name, email address, postal address, social media handle, and phone number;
- Account login credentials, such as usernames and passwords, password hints and similar security information;
- Other account registration and profile information, such as job title, educational and professional background and qualifications, and photo;
- Payment information, such as a credit or debit card number;
- Comments, feedback and other information you provide to us, including search query data and questions or information you send to customer support; and/or
- Interests and communication preferences, including preferred language.

2.2 Data from Your Organization

We may obtain personal information about you from the organization with which you are employed or affiliated in order to activate and manage your access to and use of the organization's subscription to the Service, including:

- Contact details, such as your name and organizational email address, postal address, and phone number;
- Other account registration information such as job title; and/or
- Organizational user ID

2.3 Data from Other Sources

We also may obtain contact details and other information about you from our affiliates and from other third parties, including:

- Social networks when you grant permission to the Service to access your data on one more networks;
- Service providers that help us determine a location in order to customize certain products to your location;



- Businesses with which we offer co-branded services or engage in joint marketing activities; and/or
- Publicly available sources and data suppliers from which we obtain data to validate or supplement the information we hold.

2.4 Data from Service Use, Including Cookies

The Service may automatically collect information about how you and your device interact with the Service, including:

- Computer, device and connection information, such as IP address, browser type and version, operating system and other software installed on your device, mobile platform and unique device identifier and other technical identifiers, error reports and performance data;
- Usage data, such as the features you used, the settings you selected, your URL click stream data, including date and time stamp and referring and exit pages, search terms you used, and pages you visited or searched for on the Service;
- For educational Services, the course modules and test questions you view, answer or complete; and/or
- For location-aware Services, the region, city or town where your device is located to provide you with more relevant content for where you are in the world.

We collect this data through our servers and the use of cookies and other technologies.

Cookies are small text files that can be read by a web server in the domain that put the cookie on your hard drive. We may use cookies and other technologies to store your preferences and settings, help you with signing in, provide targeted ads and analyze site operations. You can control cookies through your browser's settings and other tools. However, if you block certain cookies, you may not be able to register, login, or access certain parts or make full use of the Service. For more details, see the cookie policy of the Service.

3. How We Use Your information

Depending on how you interact with us and the Service, we use your personal information to:

- Provide, activate and manage your access to and use of the Service;
- Process and fulfill a request, order, download, subscription or other transaction;
- Provide technical, product and other support and to help keep the Service working, safe and secure;
- Enhance and improve the Service and our other products, events, and services and to develop new products, services and benefits;
- Offer you customized content and other personalization to make the Service more relevant to your interests and geography;



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- Respond to your requests, inquiries, comments and concerns;
- Notify you about changes, updates and other announcements related to the Service and our other products and services;
- Deliver targeted advertisements, promotional messages, notices and other information related to the Service and your interests;
- Provide you with promotional messages and other information about products, events and services of ours, our affiliates and third parties such as sponsors;
- Invite you to participate in user testing and surveys as well as drawings, sweepstakes, competitions and similar promotions;
- Identify usage trends and develop data analysis, including for purposes of research, audit, reporting and other business operations, including determining the effectiveness of our promotional campaigns and evaluating our business performance, or in other ways pursuant to a customer agreement; and/or
- Comply with our legal obligations, resolve disputes, and enforce our agreements.

If you are an administrator of an organization with a subscription to the Service, we will use your details to communicate with you about your organisation's subscription and related services. If you supply us contact information of your colleagues, we may contact those individuals with communications about the Service that may include reference to you.

4. Sharing of Your Information

4.1 Your Organization

If you access the Service through a subscription administered by your organization, your personal information and certain usage data gathered through the Service may be accessed by or shared with the administrators authorised by your organization for the purposes of usage analysis, subscription management and compliance, training course progress, performance and remediation, cost attribution and departmental budgeting.

4.2 Application Licensor

If you access a third-party application on the Service through a license agreement with the licensor of that application, personal information relevant that third-party application may be shared with the licensor so that it can provide you access to the application, subject to the terms of its license agreement and privacy policy.

4.3 Our Group Companies and Service Providers

Dependent upon the Services provided, we share information with:

- Our affiliates, trading names and divisions within the LexisNexis group of companies worldwide and certain RELX Group companies that provide technology, customer service and other shared services functions; and/or



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- Our service providers, suppliers, agents and representatives, including but not limited to, payment processors, customer support, email service providers, event venues and service providers, IT service providers, marketing service providers, research providers, mailing houses and shipping agents;

to process the information as necessary to provide the Service, complete a transaction or fulfill your request or otherwise on our behalf based on our instructions and in compliance with this privacy policy and any other appropriate confidentiality and security measures.

4.4 Your Choices

We may share your personal information with our affiliates and with sponsors, joint venture entities and other third parties, including entities for which we are acting as an agent, licensee, application host or publisher, that wish to send you information about their products and services that may be of interest to you, as determined by your choices in managing your communications preferences and other settings.

The Service may let you post and share personal information, comments, materials and other content. Any such contributions that you disclose publicly may be collected and used by others. Please be careful when disclosing personal information in these public areas.

4.5 For Legal Reasons

We also will disclose your personal information if we have a good faith belief that such disclosure is necessary to:

- meet any applicable law, regulation, legal process or other legal obligation;
- detect, investigate and help prevent security, fraud or technical issues; and/or
- protect the rights, property or safety of LexisNexis, our users, employees or others; and
- as part of a corporate transaction, such as a transfer of assets to or an acquisition by or merger with another company.

5. Grounds for Processing

When we collect or otherwise process any personal information within the scope of applicable data protection laws, we do so:

- where necessary to provide the Service, fulfill a transaction or otherwise perform a contract with you or at your request prior to entering into a contract;
- where necessary for our compliance with applicable law or other legal obligation;
- where necessary for the performance of a task carried out in the public interest;
- where necessary to enable our customers to comply with their legal obligations;
- where applicable, with your consent; and/or
- where necessary to operate our business, protect the security of our systems, customers and users, detect or prevent fraud, or fulfill our other legitimate interests as described in



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sections 2-4 above, except where our interests are overridden by your privacy rights.

Where we rely on your consent to process personal information, you have the right to withdraw your consent at any time, and where we rely on legitimate interests, you may have the right to object to our processing.

6. Data Retention

We retain your personal information for as long as necessary to provide the Service and fulfill the transactions you have requested, or for other essential purposes such as complying with our legal obligations, maintaining business and financial records, resolving disputes, maintaining security, detecting and preventing fraud and abuse, and enforcing our agreements. If you access the Service through a subscription administered or sponsored by your organization, we retain your organizational contact details after the termination of your organization's subscription to continue to communicate with you.

7. Locations of Processing

Your personal information may be stored and processed in your region or another country where LexisNexis, its affiliates and their service providers maintain servers and facilities, including Australia, China, France, Germany, Hong Kong, India, Ireland, Mauritius, the Netherlands, the Philippines, Singapore, the United Kingdom and the United States. We take steps, including through contracts, intended to ensure that the information continues to be protected wherever it is located in a manner consistent with the standards of protection required under applicable law.

Certain U.S. entities within the LexisNexis group of companies have certified certain of their services to the EU-U.S. and Swiss-U.S. Privacy Shield Frameworks as set forth by the U.S. Department of Commerce. Please view these entities' Privacy Shield Notice here (<https://www.relx.com/~media/Files/R/RELX-Group/documents/privacy-shield-notice.pdf>). To learn more about the Privacy Shield program, and to view these entities' certification, please visit www.privacyshield.gov (<https://www.privacyshield.gov>).

8. Data Security

We implement technical and organizational measures to seek to ensure a level of security appropriate to the risk to the personal information we process. These measures are aimed at ensuring the integrity, confidentiality, and availability of personal information.



9. Children's Privacy

We do not knowingly collect information from children under the age of 13 or target the Service to children under 13.

([us/home.page](#))

10. Your Communications Preferences

You can customise and manage your communications preferences and other settings when you register with the Service, by updating your account features and preferences, by using the "opt-out" mechanisms such as "unsubscribe" or other means provided within the communications that you receive, or by contacting us. We reserve the right to notify you of changes or updates to the Service whenever necessary.

11. Accessing and Updating Your Information

11.1 Your Account

The Service may allow registered users to directly access and review their account information and make corrections or updates upon login at any time. Keeping such information up to date is the responsibility of the user. Registered users may also close their account directly through the Service or by contacting the Service's customer support.

11.2 Your Rights

You may have the right under applicable privacy and data protection laws to request free of charge:

- access to your personal information;
- rectification or erasure of your personal information;
- restriction of our processing of your personal information, or to object to our processing;
- and
- portability of your personal information.

If you wish to exercise these rights, please submit your request in writing via our privacy centre ([/sites/global/privacy/en/privacy-center-us.page](#)). We will respond to your request consistent with applicable laws. To protect your privacy and security, we may require you to verify your identity.

12. Changes

We will update this privacy policy from time to time. Any changes will be posted on this page with an updated revision date. If we make any material changes, we will provide notice through the Service or by other means.



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13. Contact

If you have any questions, comments, complaints or requests regarding this privacy policy or our processing of your information, please contact us via our privacy centre (<https://www.lexisnexis.com/global/privacy/privacy-center-hub.page>).

The data protection representative for our businesses that are processing personal data within the scope of European Union data protection laws and established outside of the European Economic Area (EEA) and Switzerland is LexisNexis Business Information Solutions B.V., Radarweg 29, Amsterdam 1043 NX, The Netherlands.

The data protection representative for our businesses that are processing personal data within the scope of United Kingdom (UK) data protection laws and established outside of the UK is RELX (UK) Limited, trading as LexisNexis, Lexis House, 30 Farringdon Street, London EC4A 4HH, United Kingdom.

You may also lodge a complaint to a data protection authority in the applicable jurisdiction.

14. Supplementary Notices

14.1 Authors / Contributors

Where we contract with you to produce content for any of our services, such as to write books, legal analysis, reviews, guidance or legal opinion for dissemination to our subscribers, we will process some personal information about you. Such information includes:

- name, organization, and contact details;
- professional experience, role, practice area, affiliations and subject expertise;
- professional biography or profile produced or approved by you, including your image, likeness or voice, which may be published within our services and made available to our subscribers alongside any content produced by you for LexisNexis;
- financial information in order to facilitate payments for works produced;
- editorial and reviewer commentary and feedback as part of peer review; and
- administration information such as author work progress updates.

The above information is processed in order to facilitate the publication of the work and to administer, manage and fulfill our contract with you.

You may choose not to be contacted by LexisNexis to produce content for us by contacting via the communications that you receive from our content development teams, or via the contact details provided within this policy.

Please refer to the main section of this privacy policy for details on your rights, retention, locations of processing, and contact details for any privacy and data protection inquiries.



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14.2 California Privacy Rights

If you are a California resident, please see our California Consumer Privacy Act Notice (</en-us/terms/CCPA-notice.page>).

LexisNexis Fair Processing Statement

Some of the content that we provide within our database services, by its very nature, includes personal information. This fair processing statement provides details about the personal information contained in our service content.

Case Law, Legal Analysis and Reviews

For where local legislation or court embargos apply, the case law and legal analysis that reference to this case law which we provide as part of our Services may include personal information.

It should be stressed that such personal information is a matter of official court / public record. This information has been supplied to LexisNexis for publication to our clients by the public bodies concerned in the interests of upholding and protecting the rule of law. Further, it is important to the effectiveness of legal systems globally that our users can draw on a body of historical case law, including through understanding the circumstances of the individuals referred to therein.

While the authors of the papers, journals and case commentary that we provide via our Services may refer to such records, we have no power over what is reported within the court records themselves. It is for the court to decide what personal information is to remain within the records that they disclose, and the balance to be struck between the public interests in disclosure and the privacy rights of individuals.

Please refer to the main section of this privacy policy for details on your rights, retention, locations of processing, and contact details for any privacy and data protection inquiries.

Effective date : May 25th 2018

Last Updated : August 18th 2021



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Cookies (<https://www.lexisnexis.com/global/privacy/privacy-cookies/?locale=en-us>) |
Processing Notice (<https://www.lexisnexis.com/global/privacy/en/article-14-bis.page>)



(<https://www.relx.com/>)



EXHIBIT P

LexisNexis CCPA Privacy Policy Statement



(/en-us/home.page)

California Consumer Privacy Act Notice

1. About This Privacy Notice
2. Personal Information Collected and Disclosed
3. Consumer Rights
4. How to Make a Request
5. Changes

1. About this Privacy Notice

Pursuant to the California Consumer Privacy Act of 2018 (“CCPA”), LexisNexis, a division of RELX Inc., and the LexisNexis Legal & Professional group of companies in scope of the CCPA (“LNLP,” “we,” “us” or “our”) are providing this California Consumer Privacy Act Notice (“CCPA Notice”). This CCPA Notice supplements our Privacy Policy (</en-us/terms/privacy-policy.page>) and applies solely to California consumers, effective January 1, 2020. Terms used but not defined shall have the meaning ascribed to them in the CCPA. This CCPA Notice does not apply to personal information that we process as a service provider on behalf of our customers or that we collect from job applicants, contractors, or employees.

2. Personal Information Collected and Disclosed

We collected and disclosed the following categories of personal information in the preceding 12 months as indicated with a check mark below:

	Collected	Disclosed

<p>A. Identifiers such as a real name, alias, postal address, telephone or mobile contact number, unique personal identifier, online identifier, Internet Protocol address, email address and account name..</p>	✓	✓
<p>B. Personal information as defined in the California customer records law, such as name, contact information, education, employment, employment history and financial information.</p>	✓	✓
<p>C. Characteristics of protected classifications under California or federal law, such as gender and date of birth.</p>	✓	✓
<p>D. Commercial information, such as transaction information, purchase history, financial details, and payment information.</p>	✓	✓
<p>E. Biometric information, such as fingerprints and voiceprints.</p>	✗	✗
<p>F. Internet or other electronic network activity information, such as browsing history, search history, online behavior, interest data, and interactions with our and other websites, applications, systems, and advertisements.</p>	✓	✓
<p>G. Geolocation data, such as device location.</p>	✓	✓
<p>H. Audio, electronic, visual, and similar information, such as images and audio, video or call recordings created in connection with our business activities.</p>	✓	✓
<p>I. Professional or employment-related information, such as job title as well as work history and experience.</p>	✓	✓
<p>J. Education information subject to the federal Family Educational Rights and Privacy Act, such as student records.</p>	✗	✗
<p>K. Inferences drawn from any of the personal information listed above to create a profile or summary about, for example, an individual's preferences and characteristics.</p>	✓	✓

We collect this personal information from you and from other categories of sources such as: our affiliates; our customers; public and publicly available sources; our third-party resellers and referral partners, data suppliers and service providers; partners with which we offer co-branded services or engage in joint event or marketing activities; social networks; news outlets and related media; and the organization with which you are employed or affiliated.

We share this personal information with: our affiliates; our customers; our service providers, agents and representatives; joint venture partners; distributors, referral partners and integrators; the administrators authorized by your organization (if you access our services through a subscription administered by your organization); licensors of third-party applications (if you access a third-party application on our services through a license agreement with the licensor); and other parties where required by law or to protect our rights.

We may use this personal information to: operate, manage, and maintain our business, to provide our products and services, to communicate with you, for our vendor management purposes, and to accomplish our business purposes and objectives, including, for example, using personal information to: develop, improve, repair, and maintain our products and services; process or fulfill a request or other transactions submitted to us; personalize, advertise, and market our products and services; conduct research, analytics, and data analysis; maintain our facilities and infrastructure; undertake quality and safety assurance measures; conduct risk and security control and monitoring; detect and prevent fraud; perform identity verification; perform accounting, audit, and other internal functions; comply with law, legal process, and internal policies; maintain records; exercise and defend legal claims; and fulfill legal obligations.

We disclose the above categories of personal information to: our affiliates; our customers; our service providers, agents and representatives; joint venture partners; distributors, referral partners and integrators; the administrators authorized by your organization (if you access our services through a subscription administered by your organization); licensors of third-party applications (if you access a third-party application on our services through a license agreement with the licensor); and other parties where required by law or to protect our rights.

LNLP does not sell personal information to third parties within the scope of the application of the CCPA.

3. Consumer Rights

You have the right to request that we disclose to you (i) the categories of personal information we collected about you and the categories of sources from which we collected such information; (ii) the specific pieces of personal information we collected about you; (iii) the business or commercial purpose for collecting personal information about you; and (iv) the

categories of personal information about you that we shared or disclosed for a business purpose and the categories of third parties with whom we shared or to whom we disclosed such information in the preceding 12 months.

You also have the right to request that we delete personal information we collected from you subject to certain exceptions.

You also have the right to not be discriminated against in pricing and services because you exercise any of your rights under the CCPA. LNLN does not offer financial incentives or price or service differences to consumers in exchange for the retention or sale of a consumer's personal information.

4. How to Make a Request

You may make a request for the disclosures or deletion described above through our Privacy Center (</global/privacy/en/privacy-center-us.page>).

You may be required to submit proof of your identity for these requests to be processed as a verifiable consumer request. Such information may include your name, home address, social security number or driver's license. This information will be used only for the purposes of verifying your identity and processing your request. We may not be able to comply with your request if we are unable to confirm your identity or to connect the information you submit in your request with personal information in our possession. You may designate an authorized agent to make a request on your behalf subject to proof of identity and authorization.

Requests made through an authorized agent should be made to our Privacy Center (</global/privacy/en/privacy-center-us.page>).

We will respond to your request consistent with the CCPA, which does not apply to certain information, such as information made available from government records, certain data subject to the Fair Credit Reporting Act (FCRA), Gramm-Leach-Bliley Act (GLBA) and certain other laws, and where its application is preempted by, or in conflict with, federal law or the United States or California Constitution.

5. Changes

We will update this CCPA Notice from time to time. Any changes will be posted on this page with an updated revision date.

Last Updated: March 22, 2021



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Contact Us (<https://www.lexisnexis.com/en-us/contact-us/contact-us.page>) |
Consumer Access (<http://www.lexisnexis.com/privacy/>) |
Privacy Policy (<https://www.lexisnexis.com/en-us/terms/privacy-policy.page>) |
Cookies (<https://www.lexisnexis.com/global/privacy/privacy-cookies/?locale=en-us>) |
Processing Notice (<https://www.lexisnexis.com/global/privacy/en/article-14-bis.page>)



(<https://www.relx.com/>)

EXHIBIT Q

LexisNexis Data Access Request Results – Student 1

Data Subject Access Request Results**Report Date:** Dec 07 2021**Name:** [REDACTED]**Email:** [REDACTED]@stanford.edu**Type of Request:** Access to your personal information**Request Number:** [REDACTED]**Address:** California (CA), [REDACTED]**Notes:**

Findings

SL#	Results	
1	First Name	[REDACTED]
	Last Name	[REDACTED]
	Phone	
	Alternate Phone	
	Email Address	
	Alternate Email Address	
	Preferred Email Address	
	Address Line 1	[REDACTED]
	Address Line 2	
	City	[REDACTED]
	State	California (CA)
	Zip	
	Account ID	[REDACTED]
	Contact ID	[REDACTED]
	User ID	
	User Status	Active
	Contact Status	
	Notes	
2	First Name	[REDACTED]
	Last Name	[REDACTED]
	Phone	
	Alternate Phone	
	Email Address	
	Alternate Email Address	
	Preferred Email Address	
	Address Line 1	
	Address Line 2	
	City	
	State	
	Zip	
	Account ID	
	Contact ID	
	User ID	
	User Status	
	Contact Status	
	Notes	

3	First Name	██████████
	Last Name	██████
	Phone	
	Alternate Phone	
	Email Address	██████████@stanford.edu
	Alternate Email Address	
	Preferred Email Address	
	Address Line 1	
	Address Line 2	
	City	
	State	
	Zip	
	Account ID	██████████
	Contact ID	██████████
	User ID	
	User Status	
	Contact Status	
	Notes	LN_CUST_CONTACT
4	First Name	██████████
	Last Name	██████
	Phone	
	Alternate Phone	
	Email Address	
	Alternate Email Address	
	Preferred Email Address	██████████@stanford.edu
	Address Line 1	
	Address Line 2	
	City	
	State	
	Zip	
	Account ID	
	Contact ID	
	User ID	██████████
	User Status	
	Contact Status	
	Notes	
5	First Name	██████████
	Last Name	██████
	Phone	
	Alternate Phone	

	Email Address	
	Alternate Email Address	
	Preferred Email Address	██████████ stanford.edu
	Address Line 1	
	Address Line 2	
	City	
	State	
	Zip	
	Account ID	
	Contact ID	
	User ID	██████████
	User Status	
	Contact Status	
	Notes	



Overview of the personal information we hold on you

Why we process your information?

To provide you with access to our products and services that you have purchased from us.

What information do we process?

We process the following information:

- User ID
- User Status
- Account ID
- Last Name
- First Name
- Address
- City
- State
- Email Address

Where have we obtained your information?

From your firm or you personally to provide you access to our products/services

Who do we share your information with anyone and are they outside of the US?

We do not share your personal information with any third parties.



Date and Time: Tuesday, December 7, 2021 7:23:00 AM EST

Job Number: [REDACTED]

Document (1)

1. [REDACTED] [Zoom People Information](#)

Client/Matter: -None-

December 2020

Personal Information

***** PERSONAL INFORMATION *****

E-MAIL:  stanford.edu

Career Information

***** CAREER INFORMATION *****

EMPLOYMENT HISTORY:

11/12/2020 to 11/12/2020



Email:  stanford.edu

Zoom People Information

Copyright 2020 Zoom Information, Inc. All Rights

Reserved



Overview of the personal information we hold on you

Why we process your information?

To provide you with access to our products and services that you have purchased from us.

What information do we process?

We process the following information:

- User ID
- User Status
- Account ID
- Last Name
- First Name
- Address
- City
- State
- Email Address

Where have we obtained your information?

From your firm or you personally to provide you access to our products/services

Who do we share your information with anyone and are they outside of the US?

We do not share your personal information with any third parties.

EXHIBIT R

LexisNexis Data Access Request Confirmation of Initial
Request and Completion – Student 1

Acknowledgement of Receipt Request: [REDACTED]

lexisnexisprivacyteam@lexisnexis.com <lexisnexisprivacyteam@lexisnexis.com>

Tue 11/23/2021 12:54 PM

To: [REDACTED]@stanford.edu <[REDACTED]@stanford.edu>



Dear [REDACTED],

This is to acknowledge receipt of your privacy inquiry. We are currently reviewing the details that you provided and will be in touch once our investigations are complete.

Reference #: [REDACTED]

Date Created: November 23, 2021

Status: (In Review)

Kind Regards,

Privacy Team

LexisNexis Legal & Professional

View our [Privacy Policy](#)

Subject Access Results: [REDACTED]

lexisnexusprivacyteam@lexisnexus.com <lexisnexusprivacyteam@lexisnexus.com>

Tue 12/7/2021 7:40 AM

To: [REDACTED]@stanford.edu>

📎 2 attachments (90 KB)

 LexisNexis Logo

Dear [REDACTED]

Thank you for your recent Subject Access Request regarding the personal information that LexisNexis holds on you. I am writing to inform you of the result of the investigations into your inquiry.

Results:

We have concluded our searches, and we can confirm that we do hold personal information on you. Please find enclosed a copy of the information to which you have requested. For more details see our [Processing Notice](#)

I hope the above satisfies your request, however, please do not hesitate in contacting us should you have any further questions regarding this matter.

Kind Regards,

Privacy Team

LexisNexis Legal & Professional

View our [Privacy Policy](#)

EXHIBIT S

Email Exchange Between LexisNexis and Law Student User 1

[REDACTED]
lexisnexusprivacyteam@lexisnexus.com <lexisnexusprivacyteam@lexisnexus.com>

Mon 1/24/2022 7:36 AM

To: [REDACTED]@stanford.edu>



Dear [REDACTED]:

We have received your further request of January 18, 2022 for your search history and other online interactions with the LexisNexis services provided by your law school.

The CCPA Regulations limit when businesses are required to search for personal information in response to a CCPA access request. Cal. Code Regs. tit. 11 § 999.313(c)(3).

The categories of records that you have requested have not been searched because (a) we do not maintain the personal information in a searchable or reasonably accessible format; (b) we maintain the personal information solely for legal and/or compliance purposes; and (c) we do not sell the personal information or use it for any commercial purpose.

Sincerely,

Privacy Team

LexisNexis Legal & Professional

View our [Privacy Policy](#).

Re: Subject Access – Results: [redacted]
[redacted]@stanford.edu>

To: lexisnexusprivacyteam@lexisnexus.com <lexisnexusprivacyteam@lexisnexus.com>

Dear Privacy Team,

Thank you for sending this information. As a resident of California, I noticed that your CCPA page indicates you collect internet activity information such as search history and interactions with your website. However, the results you all sent do not contain information such as my search history on Lexis, interaction with documents (saving, highlighting, downloading, etc.), creation of alerts, etc. Does this mean you all have not collected such information from my account (i.e., the only personal information collected is what was sent to me already)? The account is a student account set up through my law school.

If you have collected such information, please send the additional collected personal information.

- my search history
- my interactions with documents (opening, saving, highlighting, downloading, etc.)
- my creation of alerts
- other interactions I may have had with LexisNexis that you all have collected
- geolocation data, such as my device location
- any other information you may have collected that is associated with my account

Thank you for your assistance.

Best,

[redacted]

From: lexisnexusprivacyteam@lexisnexus.com <lexisnexusprivacyteam@lexisnexus.com>
Sent: Tuesday, December 7, 2021 7:40 AM
To: [redacted] <[redacted]@stanford.edu>
Subject: Subject Access – Results: [redacted]



Dear [redacted],

Thank you for your recent Subject Access Request regarding the personal information that LexisNexis holds on you. I am writing to inform you of the result of the investigations into your inquiry.

Results:

We have concluded our searches, and we can confirm that we do hold personal information on you. Please find enclosed a copy of the information to which you have requested. For more details see our [Processing Notice](#)

I hope the above satisfies your request, however, please do not hesitate in contacting us should you have any further questions regarding this matter.

Kind Regards,

Privacy Team

LexisNexis Legal & Professional

View our [Privacy Policy](#).

EXHIBIT T

Thomson Reuters Data Access Request Completion Message in
Privacy Portal – Student 2



Requests

[← Back to Requests](#)

Request Details

Request ID : [REDACTED]

Name: [REDACTED] Email: [REDACTED]

Subject Type: Customer Request Type: Data Access Request

Day of Birth: [REDACTED] Country: United States

Current Street Address: [REDACTED] City: [REDACTED]

State: California Zip Code: [REDACTED] (USA Residents):

Telephone: [REDACTED] Username: [REDACTED] (Optional):

Product: Drafting Assistant, Law School/TWEN Student User?: Yes

OnePass English (United States) Practical Law US, Westlaw Edge Sign Out

Residence: USA Resident



y (of the (California)
data
subject
this
request
concerns)
:

Request Comments



This request has been marked as resolved. Please submit a new request or contact the privacy team if you have additional questions or concerns.



**Request
Completed**

03/09/2022,
02:38 PM PST



Hello,

Thank you for submitting a personal data access request.

You can access your report in the attachments section of our privacy portal. Please note that, for your protection, your report will be available for (10) days. If you are not able to access the link within that time period it will be necessary to repeat the request.

Please note that some personal data may have been redacted to as permitted under applicable law in order to protect the security of your personal information or to protect the rights and freedoms of other

individuals whose personal data may have appeared in conjunction with yours. In addition, we have masked sensitive data as required or permitted under local law to protect the data.

Regards,
The Thomson Reuters Privacy Office

 DRAFTING.WESTLAW [redacted]

[redacted]

 WestlawNext [redacted]



[redacted]

 [redacted] ubtask for Application component of Drafting Assistant Product

[redacted]

 ccpa- [redacted]

[redacted].txt

 **From Privacy Team** 02/03/2022, 02:51 PM PST 

Thomson Reuters takes the privacy of our customers seriously. Therefore, to review your information, you will need to login with your user credentials by following the link(s) for each of the products you indicated you subscribe to and request a Data Privacy Report:

-
(<https://drafting.westlaw.com/ConsumerPrivacyPage?>

[redacted].

- [Click here](#)
(<https://drafting.westlaw.com/ConsumerPrivacyPage?>

[redacted]) for Drafting Assistant My Privacy page, (<https://lawschool.westlaw.com/data>

[redacted].



- [Click here](#)
([https://lawschool.westlaw.com/data/\[REDACTED\]](https://lawschool.westlaw.com/data/[REDACTED])) for Law School/TWEN My Privacy page, _ ([https://onepass.westlaw.com/\[REDACTED\]](https://onepass.westlaw.com/[REDACTED]))
- [Click here](#)
([https://onepass.westlaw.com/\[REDACTED\]](https://onepass.westlaw.com/[REDACTED])) for OnePass My Privacy page, _ ([https://next.westlaw.com/ConsumerPrivacy/ConsumerPrivacy.html?transitionType=Default&contextData=\(sc.Default\)&isplcus=true&caseReque\[REDACTED\]](https://next.westlaw.com/ConsumerPrivacy/ConsumerPrivacy.html?transitionType=Default&contextData=(sc.Default)&isplcus=true&caseReque[REDACTED]))
- [Click here](#)
([https://next.westlaw.com/ConsumerPrivacy/ConsumerPrivacy.html?transitionType=Default&contextData=\(sc.Default\)&isplcus=true&caseReque\[REDACTED\]](https://next.westlaw.com/ConsumerPrivacy/ConsumerPrivacy.html?transitionType=Default&contextData=(sc.Default)&isplcus=true&caseReque[REDACTED])) for Practical Law US My Privacy page, _ ([https://next.westlaw.com/ConsumerPrivacy/ConsumerPrivacy.html?transitionType=Default&contextData=\(sc.Default\)&caseRequestId=\[REDACTED\]](https://next.westlaw.com/ConsumerPrivacy/ConsumerPrivacy.html?transitionType=Default&contextData=(sc.Default)&caseRequestId=[REDACTED]))
- [Click here](#)
([https://next.westlaw.com/ConsumerPrivacy/ConsumerPrivacy.html?transitionType=Default&contextData=\(sc.Default\)&caseRequestId=\[REDACTED\]](https://next.westlaw.com/ConsumerPrivacy/ConsumerPrivacy.html?transitionType=Default&contextData=(sc.Default)&caseRequestId=[REDACTED])) for Westlaw Edge My Privacy page




From

[REDACTED]


02/03/2022,
02:49 PM PST




Attachments

 **DRAFTING.WESTLAW_** [REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]

Date: 03/09/2022, 02:38 PM PST

 **WestlawNext_** [REDACTED]
[REDACTED]
[REDACTED]

Date: 03/09/2022, 02:38 PM PST

 [REDACTED] **Subtask for Applicati**
on component of Drafting Assistan
t Product_ [REDACTED] **.txt**

Date: 03/09/2022, 02:38 PM PST

 **ccpa-** [REDACTED] **4**
[REDACTED] **.txt**

Date: 03/09/2022, 02:38 PM PST



EXHIBIT U

Thomson Reuters Data Access Request Results – User
Interaction Information – Student 2

App_Session copy

ACTION	TIMESTAMP	USER NAME	IP ADDRESS	BROWSER	OPERATING SYSTEM	SESSION SOURCE	REASON SESSION ENDED
Timeout	19-Jan-22 12.59.24.466 AM						NO_ACTIVE_BROWSER
Start	18-Jan-22 11.47.19.016 PM	XXXXXXXXXX	XXXXXXXXXX	Chrome 97	OS X Puma	Web	

Alerts

ACTION	TIMESTAMP	FREQUENCY	DESTINATION TYPE	REPORTING NAME
Alert Triggered	30-Jan-22 06.24.01.387 AM	M	Email	ALERT-DOCKETALERT
Create Docket Alert	21-Jan-22 05.42.20.894 PM			WEB-PARKING

App_Session

ACTION	TIMESTAMP	USER NAME	DELIVERY DESTINATION	IP ADDRESS	BROWSER	OPERATING SYSTEM	SESSION SOURCE	REASON SESSION ENDED
Timeout	19-Jan-22 01.25.52.059 AM							USER_INACTIVITY
Delivery Start	18-Jan-22 11.21.36.528 PM	██████	Download				Web	
Delivery Start	18-Jan-22 11.39.26.788 PM	██████	Download				Web	
Delivery End	18-Jan-22 11.37.38.755 PM							
Delivery Start	30-Jan-22 06.23.57.232 AM	██████	Email				DocketAlert	
Delivery End	18-Jan-22 11.39.26.793 PM							
Delivery End	18-Jan-22 11.45.28.182 PM							
Delivery End	18-Jan-22 11.25.45.364 PM							
Start	21-Jan-22 05.41.39.881 PM	██████		██████	Chrome 97	OS X Puma	Web	
Delivery Start	18-Jan-22 11.37.38.459 PM	██████	Download				Web	
Timeout	21-Jan-22 07.16.13.701 PM							USER_INACTIVITY
Delivery End	18-Jan-22 11.26.35.626 PM							
Delivery Start	18-Jan-22 11.26.35.622 PM	██████	Email				Web	
Delivery End	18-Jan-22 11.21.36.581 PM							
Delivery Start	18-Jan-22 11.45.28.130 PM	██████	Download				Web	
Delivery Start	18-Jan-22 11.25.45.304 PM	██████	Download				Web	
Delivery End	30-Jan-22 06.23.57.318 AM							
Start	18-Jan-22 11.16.06.618 PM	██████		██████	Chrome 97	OS X Puma	Web	

Document_Interactions

ACTION	TIMESTAMP	USERNAME	CLIENT ID	DOCUMENT TYPE	CITATION	TITLE	CATEGORY	DOCUMENT	EMAIL	DELIVERY DESTINATION
Full Text Display	18-Jan-22 11:32:50 (38) PM				140 S.Ct. 2183	Sella Law LLC v. Consumer Financial Protection Bureau		https://next.assef.com/Document/988434746d47188ac4e4b073b36d4View/FullText.html		
Show Related Info	18-Jan-22 11:33:29 (43) PM				487 U.S. 654	Morison v. Olson	Citing References	https://next.assef.com/Document/988434746d47188ac4e4b073b36d4View/FullText.html		
Document Delivery	18-Jan-22 11:33:38 (52) PM				487 U.S. 654	Morison v. Olson		https://next.assef.com/Document/988434746d47188ac4e4b073b36d4View/FullText.html		Download
Initiate Delivery	18-Jan-22 11:41:43 (55) PM			Pdf						
Highlight Add	18-Jan-22 11:38:29 (46) PM							https://next.assef.com/Document/988434746d47188ac4e4b073b36d4View/FullText.html		
Full Text Display	18-Jan-22 11:39:05 (48) PM				24 Stan. Tech. L. Rev. 55 (2020)	WHY GOOGLE DOMINATES ADVERTISING MARKETS		https://next.assef.com/Document/973648736d47188ac4e4b073b36d4View/FullText.html		
Show Related Info	18-Jan-22 11:37:46 (50) PM				17 USCA 5 1201	S 1201. Circumvention of copyright protection systems	Validity	https://next.assef.com/Document/973648736d47188ac4e4b073b36d4View/FullText.html		
View Pdf	18-Jan-22 11:45:35 (56) PM							https://next.assef.com/Document/988434746d47188ac4e4b073b36d4View/FullText.html		
Full Text Display	18-Jan-22 11:33:33 (36) PM				487 U.S. 654	Morison v. Olson		https://next.assef.com/Document/988434746d47188ac4e4b073b36d4View/FullText.html		
Show Related Info	18-Jan-22 11:33:35 (38) PM				24 Stan. Tech. L. Rev. 55 (2020)	WHY GOOGLE DOMINATES ADVERTISING MARKETS	Citing References	https://next.assef.com/Document/973648736d47188ac4e4b073b36d4View/FullText.html		
Show Related Info	18-Jan-22 11:43:01 (52) PM				24 Stan. Tech. L. Rev. 55 (2020)	WHY GOOGLE DOMINATES ADVERTISING MARKETS	Citing References	https://next.assef.com/Document/973648736d47188ac4e4b073b36d4View/FullText.html		
Document Delivery	18-Jan-22 11:39:26 (51) PM				24 Stan. Tech. L. Rev. 55 (2020)	WHY GOOGLE DOMINATES ADVERTISING MARKETS		https://next.assef.com/Document/973648736d47188ac4e4b073b36d4View/FullText.html		Download
Highlight Add	18-Jan-22 11:38:03 (54) PM							https://next.assef.com/Document/988434746d47188ac4e4b073b36d4View/FullText.html		
Show Related Info	18-Jan-22 11:37:56 (53) PM				17 USCA 5 1201	S 1201. Circumvention of copyright protection systems	Editor's and Revisor's Notes	https://next.assef.com/Document/988434746d47188ac4e4b073b36d4View/FullText.html		
Full Text Display	18-Jan-22 11:25:15 (70) PM				140 S.Ct. 2183	Sella Law LLC v. Consumer Financial Protection Bureau		https://next.assef.com/Document/988434746d47188ac4e4b073b36d4View/FullText.html		
Document Delivery	18-Jan-22 11:45:28 (57) PM		NO CLIENT ID		Practical Law Practice Note Overview 6-597-4106	California Privacy and Data Security Law: Overview		https://next.assef.com/Document/988434746d47188ac4e4b073b36d4View/FullText.html		Download
Initiate Delivery	18-Jan-22 11:21:26 (83) PM			Pdf						
Note Add	18-Jan-22 11:35:59 (77) PM							https://next.assef.com/Document/988434746d47188ac4e4b073b36d4View/FullText.html		
Get Graphical KeyCh	18-Jan-22 11:24:56 (170) PM									
Initiate Delivery	18-Jan-22 11:37:33 (129) PM			Pdf						
Full Text Display	18-Jan-22 11:30:10 (129) PM				487 U.S. 654	Morison v. Olson		https://next.assef.com/Document/988434746d47188ac4e4b073b36d4View/FullText.html		
Show Related Info	18-Jan-22 11:30:43 (138) PM				24 Stan. Tech. L. Rev. 55 (2020)	WHY GOOGLE DOMINATES ADVERTISING MARKETS	Citing References	https://next.assef.com/Document/973648736d47188ac4e4b073b36d4View/FullText.html		
Full Text Display	18-Jan-22 11:37:29 (179) PM				487 U.S. 654	Morison v. Olson		https://next.assef.com/Document/988434746d47188ac4e4b073b36d4View/FullText.html		
Full Text Display	18-Jan-22 11:37:17 (222) PM				17 USCA 5 1201	S 1201. Circumvention of copyright protection systems		https://next.assef.com/Document/988434746d47188ac4e4b073b36d4View/FullText.html		
Show Related Info	18-Jan-22 11:38:53 (148) PM				24 Stan. Tech. L. Rev. 55 (2020)	WHY GOOGLE DOMINATES ADVERTISING MARKETS	Citing References	https://next.assef.com/Document/973648736d47188ac4e4b073b36d4View/FullText.html		
Full Text Display	18-Jan-22 11:44:02 (148) PM		NO CLIENT ID		Practical Law Practice Note Overview 6-597-4106	California Privacy and Data Security Law: Overview		https://next.assef.com/Document/988434746d47188ac4e4b073b36d4View/FullText.html		
Highlight Add	18-Jan-22 11:38:08 (178) PM							https://next.assef.com/Document/988434746d47188ac4e4b073b36d4View/FullText.html		Download
Document Delivery	18-Jan-22 11:38:45 (233) PM				140 S.Ct. 2183	Sella Law LLC v. Consumer Financial Protection Bureau		https://next.assef.com/Document/988434746d47188ac4e4b073b36d4View/FullText.html		
Initiate Delivery	18-Jan-22 11:26:26 (358) PM			Pdf						
Document Delivery	18-Jan-22 11:26:35 (364) PM				140 S.Ct. 2183	Sella Law LLC v. Consumer Financial Protection Bureau		https://next.assef.com/Document/988434746d47188ac4e4b073b36d4View/FullText.html		Email
Initiate Delivery	18-Jan-22 11:26:34 (357) PM			Pdf						
Show Related Info	18-Jan-22 11:38:07 (495) PM				17 USCA 5 1201	S 1201. Circumvention of copyright protection systems	Citing References	https://next.assef.com/Document/988434746d47188ac4e4b073b36d4View/FullText.html		
Initiate Delivery	18-Jan-22 11:38:20 (517) PM			Pdf						
Full Text Display	18-Jan-22 11:40:28 (765) PM		NO CLIENT ID		Practical Law Standard Document w-017-8754	CCPA Privacy Policy for California Residents		https://next.assef.com/Document/988434746d47188ac4e4b073b36d4View/FullText.html		
Full Text Display	18-Jan-22 11:40:09 (851) PM		NO CLIENT ID		Practical Law Standard Document w-017-8754	CCPA Privacy Policy for California Residents	Negative Treatment	https://next.assef.com/Document/988434746d47188ac4e4b073b36d4View/FullText.html		
Show Related Info	18-Jan-22 11:24:43 (902) PM				487 U.S. 654	Morison v. Olson	Negative Treatment	https://next.assef.com/Document/988434746d47188ac4e4b073b36d4View/FullText.html		
Show Related Info	18-Jan-22 11:24:56 (915) PM				487 U.S. 654	Morison v. Olson	History	https://next.assef.com/Document/988434746d47188ac4e4b073b36d4View/FullText.html		
Full Text Display	18-Jan-22 11:26:38 (924) PM				140 S.Ct. 2183	Sella Law LLC v. Consumer Financial Protection Bureau		https://next.assef.com/Document/988434746d47188ac4e4b073b36d4View/FullText.html		
Show Related Info	18-Jan-22 11:25:05 (107) PM				487 U.S. 654	Morison v. Olson	Citing References	https://next.assef.com/Document/988434746d47188ac4e4b073b36d4View/FullText.html		
Document Delivery	18-Jan-22 11:37:38 (491) PM				17 USCA 5 1201	S 1201. Circumvention of copyright protection systems		https://next.assef.com/Document/988434746d47188ac4e4b073b36d4View/FullText.html		Download
Show Related Info	18-Jan-22 11:38:38 (419) PM				140 S.Ct. 2183	Sella Law LLC v. Consumer Financial Protection Bureau	Negative Treatment	https://next.assef.com/Document/988434746d47188ac4e4b073b36d4View/FullText.html		

ACTION	CONTENT TYPE	SUB CONTENT TYPE	DELIVERY CONTEXT	DELIVERY TYPE	HIGHLIGHT COLOR	NOTE TYPE	FEATURE	EVENT TYPE
Full Text Display	Cases	Caselaw - NRS						
Show Related Info	Caselaw							KeyCite
Document Delivery	CASES						docDisplay	
Initiate Delivery			SingleDocument	FullText				
Highlight Add					yellow	inline		
Full Text Display	Secondary Sources	Analytical - Law Review						
Show Related Info	CodexNEX							KeyCite
View PDF							imageDisplay	
Full Text Display	Cases	Caselaw - NRS						
Show Related Info	LawReviews							KeyCite
Show Related Info	LawReviews							KeyCite
Document Delivery	SECONDARY SOURCES						docDisplay	
Highlight Add					yellow	inline		
Show Related Info	CodexNEX							Related Information
Full Text Display	Cases	Caselaw - NRS						
Document Delivery	KNOWHOW						docDisplay	
Initiate Delivery			SingleDocument	FullText				
Note Add					yellow	inline		
Get Graphical KeyCite								
Initiate Delivery			SingleDocument	FullText				
Full Text Display	Cases	Caselaw - NRS						
Show Related Info	LawReviews							KeyCite
Full Text Display	Cases	Caselaw - NRS						
Full Text Display	Statutes	Codex - Statutes						
Show Related Info	LawReviews							KeyCite
Full Text Display	KnowHow	Know How - Practice Notes						
Highlight Add					yellow	inline		
Document Delivery	CASES						docDisplay	
Initiate Delivery			SingleDocument	FullText				
Document Delivery	CASES						docDisplay	
Initiate Delivery			SingleDocument	FullText				
Show Related Info	CodexNEX							KeyCite
Initiate Delivery			SingleDocument	FullText				
Full Text Display	KnowHow	Know How - Standard Documents						
Full Text Display	KnowHow	Know How - Standard Documents						
Show Related Info	Caselaw							KeyCite
Show Related Info	Caselaw							KeyCite
Full Text Display	Cases	Caselaw - NRS						KeyCite
Show Related Info	Caselaw							KeyCite
Document Delivery	STATUTES						docDisplay	
Show Related Info	Caselaw							KeyCite

Foldering

ACTION	TIMESTAMP	ITEM LIST	ITEM COUNT	CLIENT ID	
Folder Create	18-Jan-22 11.24.17.771 PM				
Folder Create	18-Jan-22 11.28.17.599 PM				
Folder Share	18-Jan-22 11.24.25.366 PM				
Content Add	18-Jan-22 11.25.53.327 PM	[[\ct\":"Cases\" \"guid\":"l68d43d7eb9cf11eaacfacd2d37fb36e9\"]]"		1	XXXX
Folder Share	18-Jan-22 11.31.18.662 PM				
Folder Share	18-Jan-22 11.25.54.750 PM				
Folder Share	18-Jan-22 11.36.13.362 PM				
Folder Share	18-Jan-22 11.35.52.651 PM				
Content Add	18-Jan-22 11.31.27.380 PM	[[\ct\":"Cases\" \"guid\":"l68d43d7eb9cf11eaacfacd2d37fb36e9\"]]"		1	XXXX
Folder Share	18-Jan-22 11.35.38.458 PM				
Folder Share	18-Jan-22 11.28.18.924 PM				
Folder Share	18-Jan-22 11.24.18.958 PM				
Content Add	18-Jan-22 11.24.24.174 PM	[[\ct\":"Cases\" \"guid\":"lce99e5869c9611d993e6d35cc61aab4a\"]]"		1	XXXX
Folder Share	18-Jan-22 11.26.59.605 PM				
Folder Share	18-Jan-22 11.26.56.685 PM				
Folder Share	18-Jan-22 11.31.28.951 PM				

Search

ACTION	TIMESTAMP	QUERY	HEADERS	RESULT COUNT	SEARCH TYPE	CONTENT TYPE	APPLIED FACETS
Results Autonom	18-Jan-22 11:38:35:896 PM			0	Plain Language	commentary/Library	{Facet:"MetaData\FavoritesFacet"} {Favorites:"1"} {TDA:GDGR-RKAZVZFJULMIGMhztzBbRtZ6Jm1GappYUv9FUx6JY1YwVVWVdGR-RKZVFP2Y21aMfgYThzDZV5ZEPFRPRVLE_EIQ"} }
Search Results	18-Jan-22 11:37:07:635 PM	DMCA 1201	{Statutes & Court Rules} }	38	Plain Language	statute	
Search Results	18-Jan-22 11:38:54:359 PM	WHY GOOGLE DOMINATES ADVERTISING MARKETS	{Secondary Sources} }	112	Plain Language	analytical	
Search Results	18-Jan-22 11:43:49:203 PM	California privacy and consumer data	{Practical Law} }	1486	Plain Language	knowhow	
Search Results	18-Jan-22 11:45:43:808 PM	CCPA	{Practical Law} }	298	Plain Language	knowhow	
Search Results	18-Jan-22 11:17:15:520 PM	Morrison v. Olson 487 U.S. 654	{Cases} }	452	Plain Language	topResults	

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EXHIBIT V

LexisNexis Data Access Request Results - Student User 2

Data Subject Access Request Results**Report Date:** Jan 10 2022**Name:** [REDACTED]**Email:** [REDACTED].edu**Type of Request:** Access to your personal information**Request Number:** [REDACTED]**Address:** California (CA) [REDACTED]**Notes:**

Findings

SL#	Results	
1	First Name	[REDACTED]
	Last Name	[REDACTED]
	Phone	
	Alternate Phone	
	Email Address	
	Alternate Email Address	
	Preferred Email Address	
	Address Line 1	[REDACTED]
	Address Line 2	
	City	[REDACTED]
	State	California (CA)
	Zip	
	Account ID	[REDACTED]
	Contact ID	[REDACTED]
	User ID	
	User Status	Active
	Contact Status	
	Notes	



Overview of the personal information we hold on you

Why we process your information?

To provide you with access to our products and services that you have purchased from us.

What information do we process?

We process the following information:

- User ID
- User Status
- Account ID
- Last Name
- First Name
- Address
- City
- State
- Email Address

Where have we obtained your information?

From your firm or you personally to provide you access to our products/services

Who do we share your information with anyone and are they outside of the US?

We do not share your personal information with any third parties.

EXHIBIT W

Email Exchange Between LexisNexis and Law Student 2

Subject: [REDACTED]

Date: Monday, January 24, 2022 at 4:42:44 AM Pacific Standard Time

From: lexisnexusprivacyteam@lexisnexus.com

To: [REDACTED]



Dear [REDACTED]

We have received your further request of January 18, 2022 for your search history and other online interactions with the LexisNexis services provided by your law school.

The CCPA Regulations limit when businesses are required to search for personal information in response to a CCPA access request. Cal. Code Regs. tit. 11 § 999.313(c)(3).

The categories of records that you have requested have not been searched because (a) we do not maintain the personal information in a searchable or reasonably accessible format; (b) we maintain the personal information solely for legal and/or compliance purposes; and (c) we do not sell the personal information or use it for any commercial purpose.

Sincerely,

Privacy Team

LexisNexis Legal & Professional

View our [Privacy Policy](#)

EXHIBIT X

LexisNexis Data Access Request Confirmation of Initial
Request and Completion – Student 2

Subject: Acknowledgement of Receipt Request: [REDACTED]

Date: Monday, December 27, 2021 at 11:52:52 AM Pacific Standard Time

From: lexisnexusprivacyteam@lexisnexus.com

To: [REDACTED]



Dear [REDACTED],

This is to acknowledge receipt of your privacy inquiry. We are currently reviewing the details that you provided and will be in touch once our investigations are complete.

Reference #: [REDACTED]

Date Created: December 27, 2021

Status: (In Review)

Kind Regards,

Privacy Team

LexisNexis Legal & Professional

View our [Privacy Policy](#).

Subject: Proof of Identity Receipt: [REDACTED]

Date: Tuesday, December 28, 2021 at 9:35:33 PM Pacific Standard Time

From: lexisnexusprivacyteam@lexisnexus.com

To: [REDACTED]



Dear [REDACTED]

This is to acknowledge receipt of your identification details. We are currently reviewing the details that you provided and will be in touch once our investigations are complete.

Reference # [REDACTED]

Status: (In Review)

Kind Regards,

Privacy Team

LexisNexis Legal & Professional

View our [Privacy Policy](#).

Subject: Subject Access – Results: [REDACTED]
Date: Monday, January 10, 2022 at 4:43:51 AM Pacific Standard Time
From: lexisnexusprivacyteam@lexisnexus.com
To: [REDACTED]
Attachments: Findings for Request _ [REDACTED].pdf



Dear [REDACTED],

Thank you for your recent Subject Access Request regarding the personal information that LexisNexis holds on you. I am writing to inform you of the result of the investigations into your inquiry.

Results:

We have concluded our searches, and we can confirm that we do hold personal information on you. Please find enclosed a copy of the information to which you have requested. For more details see our [Processing Notice](#)

I hope the above satisfies your request, however, please do not hesitate in contacting us should you have any further questions regarding this matter.

Kind Regards,

Privacy Team

LexisNexis Legal & Professional

View our [Privacy Policy](#)

EXHIBIT Y

Email Exchange Between LexisNexis and Public California Law
School Employee

Subject: Fwd: Subject Access – [REDACTED]
Date: Tuesday, March 15, 2022 at 11:25:10 AM Pacific Daylight Time
From: [REDACTED]
To: [REDACTED]

----- Forwarded message -----

From: <lexisnexisprivacyteam@lexisnexis.com>
Date: Tue, Mar 30, 2021 at 1:05 PM
Subject: Subject Access [REDACTED]
To: [REDACTED]



Dear [REDACTED]:

Thank you for your privacy request dated March 8, 2021, which followed your initial request submitted on September 2, 2020. Unfortunately, we are unable to provide the information requested because the subject matter is subject to certain exemptions under the California Consumer Privacy Act of 2018 ("CCPA"). Specifically, the information requested is collected in the context of providing products and services to your employer, namely [REDACTED] Cal. Civ. Code § 1798.145(n)(1) exempts information collected in this "business-to-business" context from the scope of the CCPA.

This exemption is especially important in this context because we know how sensitive certain information, such as logins and search inquiry history, can be to our customers.

Please be assured that LexisNexis Legal & Professional is committed to following good privacy practices and meeting its privacy obligations. We believe we have fully addressed your inquiry, but if any issues remain please email our North American Data Protection Officer at: privacy.inquiries@lexisnexis.com.

Kind Regards,

The Privacy Team
LexisNexis Legal & Professional
View our [Privacy Policy](#)

