



Holland & Knight LLP

ROFX Class Action Lawsuit Privacy Notice

This Privacy Notice provides information about how we collect and store Personal Information, and how this information may be used by Holland & Knight LLP (the "Firm"). This Privacy Notice provides you with necessary information regarding your rights and the Firm's obligations, in accordance with applicable data privacy regulations and laws.

Scope

This Privacy Notice applies to all Personal Information and Sensitive Personal Information provided to the Firm with respect to:

- Your potential participation in the lawsuit filed against ROFX Robot Forex Trading ("ROFX"), including rofx.net and the ROFX Company; and/or
- The ROFX Victim Class Certification and/or potential forming of a class.

Responsibilities

The Firm's Office of the General Counsel is responsible for maintaining, reviewing and updating this Privacy Notice.

Definitions

Personal Information: Commonly referred to as Personally Identifiable Information ("PII"), Personal Information ("PI") may be defined under various privacy laws, but, generally, is a fact about an individual which, if combined with one or more other facts about that individual, would enable others to determine the specific person to whom the facts apply.

Sensitive Personal Information: Sensitive Personal Information ("SPI") is a subset of PI that requires greater security protections and standards of care in handling. SPI is defined as information that if lost, compromised, or disclosed could result in substantial harm, embarrassment, inconvenience, or unfairness to an individual.

The Firm: For the purposes of this Notice, we will refer to Holland & Knight LLP and its associated affiliates as "the Firm", and collectively as "we", "our" or "us".

Procedures

1. PURPOSE OF COLLECTION

The Firm may collect PI and SPI associated with ROFX for the following purposes, subject to the terms of our engagement letter with you

- To provide legal representation to you as a client of the Firm or a member of the ROFX Class;
- To identify if you have been a victim of fraud with respect to the ROFX lawsuit;

- To determine the extent of harm and/or financial loss of the potential Class;
- To manage and operate our business; and/or
- To satisfy our legal, regulatory and ethical obligations.

2. PERSONAL INFORMATION WE COLLECT (PI)

The Firm may collect, while providing legal services to you with respect to the ROFX Class Action Lawsuit, the following PI:

- Your full name, date of birth, home address, telephone number and/or email address;
- Other personal information contained in correspondence and documents you may provide to us; and/or
- Any additional information relating to the matter in which you are seeking guidance or representation.

3. SENSITIVE PERSONAL INFORMATION WE COLLECT (SPI)

The Firm may collect, while providing legal services to you with respect to the ROFX Class Action Lawsuit, the following SPI:

- Government-issued identification, such as a driver's license, passport or visa, which may include gender information;
- Financial and account information or statements and similar supporting documentation, including investments and/or banking information;
- Marital status and beneficiary information;
- Criminal complaints you may have filed and/or correspondence with government authorities with respect to ROFX; and/or
- Additional information we may obtain from you that contains SPI through your correspondence or during the course of providing legal services.

If we collect other categories of SPI not described or identified in this Notice, we will seek your explicit consent prior to collection.

4. DISCLOSURE OF INFORMATION

The Firm will not distribute, disseminate or otherwise disclose Personal Information to a third party unless:

- The disclosure is required by local law, municipal ordinance, or any government or public health agency;
- The disclosure is required by order of the Court and/or applicable rules of discovery;
- The disclosure is necessary and justified in the public's interest; or
- The disclosure is required pursuant to a valid warrant or subpoena.

5. DATA STORAGE AND SECURITY

The Firm shall use a reasonable standard of care to store and protect from disclosure any Personal Information collected in a manner that is the same or more protective than the manner in which the Firm stores and protects from disclosure other confidential and sensitive information.

The Firm uses industry-standard technical and organizational security measures to protect your Personal Information that includes limiting access, secured networks, and encryption. The Firm protects Personal Information against unauthorized access, disclosure, or destruction by utilizing practices and controls consistent with security and privacy standards in the industry.

For more information about our privacy and security practices, please refer to the Client Data Protection Policy posted on hklaw.com or contact privacy.compliance@hklaw.com.

6. DATA RETENTION

The Firm shall retain your Personal Information until the initial purpose for collecting and retaining such data has been satisfied. If you subsequently agree to a new or additional purpose, your Personal Information may be retained for that.

7. INDIVIDUAL PRIVACY RIGHTS

Certain data privacy laws and regulations provide you with rights regarding your Personal Information. Such rights may include access to information, or the modification or deletion of Personal Information.

UK or European Union Data Subjects: You may contact gdpr.compliance@hklaw.com or visit the Firm's [GDPR Compliance Portal](#) to exercise your rights.

California Residents: You may contact privacy@hklaw.com, visit the Firm's [California Consumer Privacy Portal](#), or call toll-free 1-800-446-9813 to exercise your rights.

8. INTERNATIONAL DATA TRANSFERS

The Firm and our data centers are based in the United States. Your information may be transferred from the location in which you reside to the United States.

Where Personal Information is transferred to and stored in a country not determined by the European Commission as providing adequate levels of protection for Personal Information, we take steps to provide appropriate safeguards to protect your Personal Information by implementing standard contractual clauses approved by the European Commission.

For more information on international data transfers or SCCs, please contact privacy.compliance@hklaw.com.

9. ACKNOWLEDGMENT/CONSENT

You acknowledge you have read and understand this Privacy Notice, and authorize the Firm to collect and use your Personal Information in the manner described herein. If we materially change anything about how we handle your information, we will seek your consent.

10. CONTACT INFORMATION

The Firm is not required to appoint a formal Data Protection Officer ("DPO"). We have appointed the following contact in the event you have any questions regarding this Notice, or any questions about your rights with respect to your Personal Information.

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11. MODIFICATIONS AND REVISIONS

The Firm reserves the right to modify, revise, or otherwise amend this Notice, as applicable.

Version	Date Reviewed	Date Approved	Document Owner	Description
1	10/14/2021	10/14/2021	Diane Del Re	Original Notice