

## Privacy Policy

This policy describes how the Kentucky Bar Association collects, uses, and shares personal information. You can jump to particular topics by going to the headings below:

**Types Of Information We Collect.**

**Use And Processing Of Information.**

**Sharing Of Information.**

**Your Choices.**

**How We Protect Personal Information.**

**Miscellaneous.**

**Contact Information.**

**Types Of Information We Collect.**

The following provides examples of the type of information that we collect about you and how we use that information.

Context	Types of Data	Primary Purpose for Collection and Use of Data
Bar Complaints	If you submit a complaint to the Office of Bar Counsel, we may need to collect your information as well as information about the individual who may be the subject of the complaint.	We have a legitimate interest in receiving, and investigating bar complaints.
Business Contacts	We collect information from companies that we do business with. This includes, for example, business contacts, billing contacts, vendor information, and references.	We use this information to fulfill our contractual obligations with our business partners to, for example, pay invoices. We also have a legitimate interest in collecting this information for accounting and record keeping purposes.
CLE Accreditation	We collect personal information as part of our Continuing Legal Education accreditation process. This includes, for example, the names, contact information, and experience of CLE presenters.	We have a legitimate interest in evaluating CLE programs for accreditation, and we need this information in order to perform contractual obligations with CLE presenters and with CLE attendees.
CLE Courses	If you register to receive a CLE course we may need to collect personal information about you. For example, this may include your contact information, your member number, and the last four digits of your Social Security Number.	We use your information to fulfill our contractual obligation to provide CLEs to registrants. We also have a legitimate interest in using this information to maintain CLE records and send you information and notices about CLE events.
Client Security Fund	We collect information when a request is submitted to the Client Security Fund operated by the Office of Bar Counsel.	We have a legitimate interest in operating the Client Security Fund.

Committees and Commissions	If you choose to serve on a committee or a commission, we may collect additional information from you relevant to that service.	We have a legitimate interest in helping our committees and commissions function, and communicate with their members.
Conferences, Conventions, and Events	We collect information from you when you register for a conference, convention, or event. For example, we may collect your contact information, billing information, and preferences. If you are a speaker we may collect presentation materials, a biography and other information.	We use this information to perform our contractual obligations in relation to a conference, convention, or event. We also have a legitimate interest in using your information to create directories of attendees.
Contests	When you participate in a contest, such as a student writing contest, we collect information about you which includes contact information to notify you if you are selected.	We have a legitimate interest in operating contests. In some contexts we are also required by law to collect information about those that enter our contests, and we have a legitimate interest in complying with those laws.
Cookies and first party tracking	We use cookies and clear GIFs. “Cookies” are small pieces of information that a website sends to a computer’s hard drive while a web site is viewed. We may use both session cookies (which expire once a web browser is closed) and persistent cookies (which stay on a device until deleted). Among other things, cookies allow us to provide a more personal and interactive experience and to improve. Persistent cookies may be removed by following instructions provided by your browser. If you choose to disable cookies some areas or features of our websites may not work properly.	We have a legitimate interest in making our website operate efficiently.
Cookies and third party tracking	We use cookies to collect information about your use of our website. This includes obtaining analytics from third parties regarding the total numbers of users to our sites. The third parties that deploy cookies on our behalf may be able to track you across time and across websites.	We have a legitimate interest in monitoring our networks and the visitors to our websites. Among other things, it helps us understand which of our services is the most popular.
Dispute Resolution	We collect information when an individual engages in dispute resolution with a member of the bar. This may include the nature of their dispute, their contact information, and the alleged activities of a bar member.	We have a legitimate interest in facilitating dispute resolution with our bar members. We also have a contractual obligation to provide certain services to our members.

Email Interconnectivity	If you receive email from us we use certain tools to capture data related to when you open our message, click on any links or banners it contains and make purchases.	We have a legitimate interest in understanding how you interact with our communications to you.
Employment	If you become an employee we collect information necessary to retain you as an employee. This may include, among other things, your Social Security Number. Providing this information is required for employment.	We use information about current employees to perform our contract of employment. In some contexts, we are also required by law to collect information about our employees and we have a legitimate interest in complying with those laws. We also have a legitimate interest in using your information to have efficient staffing and work force operations.
Feedback/Support	If you provide us feedback or contact us for support we will collect your name and e-mail address, as well as any other content that you send to us, in order to reply.	We have a legitimate interest in receiving, and acting upon, your feedback or issues.
Health related information	In a limited number of situations we may collect health information about you. For example, this information may be needed to processes a request for accommodations or an extension of time to renew your membership.	We have a legitimate interest in assisting our members with health related request and dispensations. We do not disclose this information outside of our organization unless a member has consented, or unless we need to retain a service provider to assist in providing an accommodation.
IOLTA	If you create an IOLTA account, we collect personal information in order to receive interest on the account. This may include, among other things, your name, firm name, and bank account number. This information may be provided to us from you or from your financial institution.	We use your information for our legitimate interest in administering the Kentucky IOLTA Fund pursuant to SCR 3.830.
Kentucky Lawyer Assistance Program	We collect information as part of the Kentucky Lawyer Assistance Program (“KYLAP”). For example, if a lawyer contacts KYLAP about a problem involving alcoholism, substance abuse, or addictive behaviors, we will receive the information that is sent to us. All communications to KYLAP, all information gathered, records maintained and actions taken by KYLAP are kept confidential by KYLAP’s staff and volunteers, and are not disclosed to any person or entity, except where we receive written permission to make such a disclosure.	We collect information to protect the vital interest of our members, to perform our contractual obligations to members, and to further our legitimate interest in protecting our members, the bar, and the public.
Mailing List	When you sign up for one of our mailing lists we collect your email address or postal address.	We have a legitimate interest in sharing information about our products or services, and providing you with information that you request.

Membership database	We receive information from the Office of Bar Admissions concerning individuals that are eligible to join the Kentucky Bar, or members of the Kentucky Bar. This information may include, for example, your name and address. We also receive information from the Supreme Court and/or Administrative Office of the Courts about members that have been subjected to disciplinary action. Our members may choose to provide us with additional demographic, educational, and work related information. In addition they may provide us other information when they ask us to take certain actions or participate in membership functions. For example, we may collect additional information necessary to seek dues waivers, withdraw from membership, vote for judicial nominations, or seek reinstatement.	<p>We use your name and contact information as part of performing our contract with you, such as to invoice you for membership renewals.</p> <p>We have a legitimate interest in collecting additional information for the purpose of providing membership related directories, creating public directories of our members, responding to requests for information about our members, and responding to requests for certificates of good standing and/or membership verification.</p>
Order Placement	We collect your name, billing address, shipping address, e-mail address, phone number, and credit card number when you place an order.	We use your information to perform our contract to provide you with products or services.
Prospective Employment	If you apply for a job posting we collect information necessary to process your application or to retain you as an employee. This may include, among other things, your Social Security Number. Providing this information is required to be considered for employment.	We use information about prospective employees in anticipation of a contractual relationship. In some contexts, we are also required by law to collect information about our applicants. We also have a legitimate interest in using your information for statistical purposes.
Publications	We collect information about the authors that submit material for publication, or the people that appear in our publications. This may include, among other things, photographs and biographical material. In addition, members may submit information that will be published in the Who, What, When & Where section of the Bench & Bar Magazine.	We have a legitimate interest in keeping a record of submissions for publication and in understanding the background and experience of authors and prospective authors that are accepted for publication. We also have a legitimate interest in recording information about those that appear in our publications including, for example, maintaining waivers and releases where appropriate for use of photographs.
Surveys	When you participate in a survey we collect information that you provide through the survey. If the survey is provided by a third party service provider, the third party's privacy policy applies to the collection, use, and disclosure of your information.	We have a legitimate interest in understanding your opinions, and collecting information relevant to our organization.
Web logs	We collect information, including your browser type, operating system,	We have a legitimate interest in monitoring our networks and the visitors to our websites.

	Internet Protocol (IP) address (a number that is automatically assigned to a computer when the Internet is used), domain name, click-activity, referring website, and/or a date/time stamp for visitors.	Among other things, it helps us understand which of our services is the most popular.
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In addition to the information that we collect from you directly, we may also receive information about you from other sources, including third parties, business partners, our affiliates, or publicly available sources. For example, if you submit a job application, or become an employee, we may conduct a background check.

### **Use And Processing Of Information.**

In addition to the purposes and uses described above, we use information in the following ways:

- To identify you when you visit our websites.
- To provide products and services.
- To improve our services and product offerings.
- To streamline the checkout process.
- To conduct analytics.
- To respond to inquiries related to support, employment opportunities, or other requests.
- To send marketing and promotional materials, including information relating to our products or services.
- For internal administrative purposes, as well as to manage our relationships.

Although the sections above describe our primary purpose in collecting your information, in many situations we have more than one purpose. As a result, our collection and processing of your information is based in different contexts upon your consent, our need to perform a contract, our obligations under law, and/or our legitimate interest in conducting our business.

### **Sharing Of Information.**

In addition to the specific situations discussed elsewhere in this policy, we disclose information in the following situations:

1. **Affiliates and Acquisitions.** We may share information with our affiliates (*e.g.*, parent organizations, sister organizations, subsidiaries, joint ventures, or other organizations under common control). If another organization succeeds us we will also share information with that organization.
2. **Kentucky Bar Foundation.** We share information with the Kentucky Bar Foundation. This includes information relating to donors, or prospective donors.
3. **Supreme Court and/or Administrative Office of the Courts.** We share our membership database with the Kentucky Supreme Court and the Administrative Office of the Courts.
4. **Other Organizations.** We may provide a mailing list that contains information about our members, such as a member's demographic information, to providers of Kentucky approved CLE credit, non-partisan judicial campaigns, the KBA Board of Governors, volunteer lawyer groups for recruitment, local bar associations, and KBA endorsed companies and law schools. Recipients of our mailing list are prohibited from transferring the list to third parties, are required to sign a non-disclosure agreement, and can only use it for specific purposes that we think would be relevant to our members.
5. **Other Disclosures with Your Consent.** We may ask if you would like us to share your information with other unaffiliated third parties who are not described elsewhere in this policy.

6. **Other Disclosures without Your Consent.** We may disclose information in response to subpoenas, warrants, or court orders, or in connection with any legal process, or to comply with relevant laws. We may also share your information in order to establish or exercise our rights, to defend against a legal claim, to investigate, prevent, or take action regarding possible illegal activities, suspected fraud, safety of person or property, or a violation of our policies, or to comply with your request for the shipment of products to or the provision of services by a third party intermediary.
7. **Public.** We offer a lawyer directory service in which information concerning our members and former members is provided to the public.
8. **Partner Contests or Programs.** We may offer contests or programs with third party partners. If you decide to enter a contest that is sponsored by a third party partner, or register for a program that is provided by a third party, the information that you provide will be shared with us and with them. Their use of your information is not governed by this privacy policy.
9. **Service Providers.** We share your information with service providers. Among other things service providers help us to administer our website, conduct surveys, provide technical support, process payments, and assist in the fulfillment of orders.

### **Your Choices.**

You can make the following choices regarding your personal information:

1. **Access To Your Personal Information.** If required by law, upon request, we will grant you with reasonable access to the personal information that we have about you. You may request access to your personal information by contacting us at the address described below.
2. **California Residents.** California residents may be entitled to ask us for a notice describing what categories of personal information (if any) we share with third parties or affiliates for direct marketing. If you are a California resident and would like a copy of such notice, please submit a written request to us using the information in the "Contact Information" section below.
3. **Changes To Your Personal Information.** We rely on you to update and correct your personal information. Some of our websites allow you to modify your member profile. Note that we may keep historical information in our backup files as permitted by law. If our website does not permit you to update or correct certain information contact us at the address described below.
4. **Deletion Of Your Personal Information.** Typically we retain your personal information for the period necessary to fulfill the purposes outlined in this policy, unless a longer retention period is required or permitted by law. You may, however, request information about how long we keep a specific type of information, or request that we delete your personal information by contacting us at the address described below. In addition, we may keep your personal information as needed to comply with our legal obligations, resolve disputes, and/or enforce any of our agreements.
5. **Online Tracking.** We do not currently recognize automated browser signals regarding tracking mechanisms, which may include "Do Not Track" instructions.
6. **Promotional Emails.** You may choose to provide us with your email address for the purpose of allowing us to send free newsletters, surveys, offers, and other promotional materials to you, as well as to provide your information to third parties that may send information that we believe may be relevant to you. You can stop receiving promotional emails by following the unsubscribe instructions in e-mails that you receive. If you decide not to receive promotional emails, we may still send you service related communications.
7. **Promotional Mailings.** If at any time you do not want to receive offers and/or circulars from us, or would like for us not to share your information with third parties who may send you offers and/or circulars that we think may be relevant to you, you can remove yourself from our mailing lists by emailing us (our contact information is below) with "NO SNAIL MAIL" in the subject line along with your name, address and zip code. Please note that our mailings are prepared in advance of their being

sent. Although we will remove your name from our mailing list after receiving your request, you may still receive mailings from us that had been initiated prior to your name being removed.

8. **Revocation Of Consent or Objection to Processing.** If you revoke your consent for the processing of personal information, or object to our processing of your personal information, then we may no longer be able to provide you services. In some cases, we may limit or deny your request to revoke consent or object if the law permits or requires us to do so, or if we are unable to adequately verify your identity. You may revoke consent to processing (where such processing is based upon consent) or object to processing (where such processing is based upon our interests in your data) by contacting us at the address described below.

#### **How We Protect Personal Information.**

No method of transmission over the Internet, or method of electronic storage, is fully secure. While we use reasonable efforts to protect your personal information from unauthorized access, use, or disclosure, we cannot guarantee the security of your personal information. In the event that we are required by law to inform you of any unauthorized access to your personal information we may notify you electronically, in writing, or by telephone, if permitted to do so by law.

Some of our websites permit you to create an account. When you do you will be prompted to create a password. You are responsible for maintaining the confidentiality of your password, and you are responsible for any access to or use of your account by someone else that has obtained your password, whether or not such access or use has been authorized by you. You should notify us of any unauthorized use of your password or account.

#### **Miscellaneous.**

The following additional information relates to our privacy practices:

- **Transmission Of Information To Other Countries.** We are located within the United States. If you are a resident of a foreign country, by submitting your personal information to us you agree to the transfer, storage and processing of your information in a country other than your country of residence including the United States; in doing so you should be aware that United States laws may provide different, and in some situations less, protections than the laws of your own country. If you would like more information concerning our attempts to apply the privacy principles applicable in one jurisdiction to data when it goes to another jurisdiction you can contact us using the contact information below.
- **Third Party Applications/Websites.** We have no control over the privacy practices of websites or applications that we do not own.
- **Changes To This Privacy Policy.** We may change our privacy policy and practices over time. To the extent that our policy changes in a material way, the policy that was in place at the time that you submitted personal information to us will generally govern that information unless we receive your consent to the new privacy policy.

**Contact Information.** If you have any questions, comments, or complaints concerning our privacy practices please contact us at the appropriate address below. We will attempt to respond to your requests and to provide you with additional privacy-related information.

Machell D. Smith  
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514 W Main St  
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(502) 564-3795, ext. 267

Kentucky Bar Association  
c/o Bryan Cave Leighton Pasiner LLP  
Attn: David Zetoony & Marcus Pearl  
Adelaide House London Bridge  
London, United Kingdom  
EC4R 9HA  
(Representative legal entity which can accept communications on behalf of the Kentucky Bar Association in Europe)

If you are not satisfied with our response, and are in the European Union, you may have a right to lodge a complaint with your local supervisory authority.

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