
California Privacy Policy

This California privacy policy is part of the privacy policy located on our Website. If you are a California resident, please review this section of the privacy policy together with our privacy policy on our Website. Capitalized terms used, but not defined, herein have the meanings ascribed to them in the privacy policy on our Website. This section of the privacy policy applies solely to California residents and discusses our data handling practices with respect to California residents only.

We adopt this section of the privacy policy in order to comply with the California Consumer Privacy Act of 2018 (“CCPA”) as amended by the California Privacy Rights Act of 2020 (“CPRA”).

Please note that certain terms used in this California-specific section of the privacy policy, such as “**Personal Information**,” “**Sale**,” “**Share**” and “**Sensitive Personal Information**” have the meanings given to such terms in the CCPA/CPRA, and not the common meanings of these terms in conversational English.

California Residents

California Civil Code Section § 1798.83, known as the “Shine The Light” law, permits users of our Website who are California residents to request and obtain from us a list of what Personal Information (if any) we disclosed to third parties for direct marketing purposes in the preceding year, and the names and addresses of those third parties. You may request this information from us no more than once a year, but such request will be handled by us free of charge to you. To make such a request, please send an email to California_Privacy_Requests@morrisoncohen.com.

Do Not Track

Please see the DNT disclosure set forth in the privacy policy located on our Website.

If you choose not to be tracked while visiting our Website, you can visit your browser privacy settings to make the selection, and specifically turn on a “do not track” or other global privacy control (“GPC”) setting made available, to send signals that you wish not to have your information collected as you browse. This election is often available under the cookies related privacy settings for your browser. Please note, however, that not all browsers have GPC extensions currently. Please visit the website for the company that offers your browser to see if they have a GPC extension and to learn how to download it.

We will try to honor your selections. However, even if you do set your DNT or GPC options to send signals that you do not wish to be tracked, given the state of the industry, and lack of a universally accepted or consistent functionality among available technologies, it will be difficult for us to ensure no tracking occurs even if such opt-out signals are sent.

Notice of Financial Incentives

We do not currently offer any financial incentives or benefits in exchange for any Personal Information.

Data Collection

We have collected the following categories of Personal Information for the following purposes within the last twelve (12) months:

Category of Personal Information Collected	Categories of Sources of Collection	Business or Commercial Purpose for Collection
A. Identifiers.	<p>Employees.</p> <p>Prospective employees.</p> <p>Website users.</p> <p>Clients/Prospective Clients and each of their representatives, beneficiaries, family members, service providers, trustees, lenders, and advisors.</p> <p>Referral sources.</p> <p>Opposing parties and their representatives, beneficiaries, family members, lenders, advisors, and service providers.</p> <p>Opposing counsel and their representatives.</p> <p>Other counsel and their representatives.</p> <p>State and federal government representatives, and online interfaces maintained by same.</p> <p>Service providers, including recruiters.</p> <p>Contractors.</p> <p>Organizations, including for fundraising and educational purposes.</p> <p>Cookies and analytics providers.</p>	<p>To provide our services.</p> <p>To make the Website available and maintain it.</p> <p>To identify potential clients.</p> <p>To market our services and for business development.</p> <p>To provide insurance and benefits to employees' beneficiaries.</p> <p>To manage our business and facilities.</p> <p>To provide training, educational materials, and other benefits to our personnel.</p> <p>To manage network access and security.</p> <p>To comply with laws.</p> <p>To participate in philanthropy, fundraising, and educational pursuits.</p> <p>To understand our Website traffic, and for Website analytics, functionality, and security.</p>

Category of Personal Information Collected	Categories of Sources of Collection	Business or Commercial Purpose for Collection
B. Personal Information categories listed in the California Customer Records statute (Cal. Civ. Code § 1798.80(e)).	<p>Employees.</p> <p>Prospective employees.</p> <p>Website users.</p> <p>Clients/Prospective Clients and each of their representatives, beneficiaries, family members, service providers, trustees, lenders, and advisors.</p> <p>Referral sources.</p> <p>Opposing parties and their representatives, beneficiaries, family members, lenders, advisors, and service providers.</p> <p>Opposing counsel and their representatives.</p> <p>Other counsel and their representatives.</p> <p>State and federal government representatives, and online interfaces maintained by same.</p> <p>Service providers, including recruiters.</p> <p>Contractors.</p> <p>Organizations, including for fundraising and educational purposes.</p> <p>Cookies and analytics providers.</p>	<p>To provide our services.</p> <p>To make the Website available and maintain it.</p> <p>To identify potential clients.</p> <p>To market our services and for business development.</p> <p>To provide insurance and benefits to employees' beneficiaries.</p> <p>To manage our business and facilities.</p> <p>To provide training, educational materials, and other benefits to our personnel.</p> <p>To manage network access and security.</p> <p>To comply with laws.</p> <p>To participate in philanthropy, fundraising, and educational pursuits.</p> <p>To understand our Website traffic, and for Website analytics, functionality, and security.</p>

Category of Personal Information Collected	Categories of Sources of Collection	Business or Commercial Purpose for Collection
C. Protected classification characteristics under California or federal law.	<p>Employees.</p> <p>Contractors.</p> <p>Clients and their representatives, beneficiaries, family members, service providers, trustees, lenders, and advisors.</p> <p>Service providers, including recruiters.</p> <p>Opposing parties and their representatives, beneficiaries, family members, lenders, advisors, and service providers.</p>	<p>To provide our services.</p> <p>To provide insurance and benefits to employees' beneficiaries.</p> <p>To manage our business.</p>
D. Commercial information.	<p>Clients/Prospective Clients and their representatives, beneficiaries, family members, service providers, trustees, lenders, and advisors.</p> <p>Opposing parties and their representatives, beneficiaries, family members, lenders, advisors, and service providers, investors, debtors, and creditors.</p> <p>Opposing counsel and their representatives.</p>	<p>To provide our services.</p> <p>To manage our business.</p>
E. Biometric information.	None.	None.
F. Internet or other similar network activity.	<p>Website users.</p> <p>Service providers, including cookies and analytics providers.</p>	<p>To make the Website available and maintain it.</p> <p>To manage network access and security.</p> <p>To understand our Website traffic, and for Website analytics, functionality, and security.</p>

Category of Personal Information Collected	Categories of Sources of Collection	Business or Commercial Purpose for Collection
G. Geolocation data.	<p>Website users.</p> <p>Contractors.</p> <p>Service providers, including cookies and analytics providers.</p>	<p>To manage network access and security.</p> <p>To obtain technology services necessary for our business.</p> <p>To understand our Website traffic, and for Website analytics, functionality, and security.</p>
H. Sensory data.	None.	None.
I. Professional or employment-related information.	<p>Clients/Prospective clients and each of their representatives, beneficiaries, family members, service providers, trustees, lenders, and advisors.</p> <p>Prospective employees.</p> <p>Referral sources.</p> <p>Opposing parties and their representatives, beneficiaries, family members, lenders, advisors, and service providers.</p> <p>Opposing counsel and their representatives.</p> <p>Other counsel and their representatives.</p> <p>Service providers, including recruiters.</p> <p>Contractors.</p> <p>Organizations, including for fundraising and educational purposes.</p>	<p>To provide our services.</p> <p>To market our services and for business development.</p> <p>To identify potential clients.</p> <p>To manage our business.</p> <p>To participate in philanthropy, fundraising, and educational pursuits.</p> <p>To comply with laws.</p>
J. Non-public education information (per the Family Educational Rights and Privacy Act (20 U.S.C. Section 1232g, 34 C.F.R. Part 99)).	None.	None.
K. Inferences drawn from other Personal Information.	None.	None.

Category of Personal Information Collected	Categories of Sources of Collection	Business or Commercial Purpose for Collection
L. Sensitive Personal Information.	<p>Employees.</p> <p>Clients and their representatives, beneficiaries, family members, service providers, trustees, lenders, and advisors.</p> <p>Opposing parties and their representatives, beneficiaries, family members, lenders, advisors, and service providers.</p> <p>Contractors.</p> <p>Service providers, including recruiters.</p>	<p>To provide our services.</p> <p>To provide insurance and benefits to employees' beneficiaries.</p> <p>To manage our business.</p> <p>To comply with laws.</p>

Data about Minors

We do not knowingly collect any Personal Information of persons under the age of 16, except solely as necessary to provide legal services, or if such persons are beneficiaries of employee benefits.

Third Parties Controlling Data Collection

We use third party analytics and cookie service providers who control the collection of certain Personal Information of Website users as such persons visit and use our Website.

California Consumer Rights Pursuant to the CCPA/CPRA

California consumers have specific rights regarding how their Personal Information is collected and used. For additional information, please click on our "My California Privacy Rights" link located in the footer of our Website.

- With some exceptions as provided in the CCPA or as otherwise permitted by law, you have the right to request that we disclose to you or your authorized agent acting on your behalf the following information covering the past twelve (12) months:
 - Specific pieces of Personal Information that we have collected;
 - The categories of Personal Information collected;
 - The categories of sources from which Personal Information is collected;
 - The categories of Personal Information we have "Sold" (as this term is defined in the CCPA/CPRA), or "Shared" for cross context behavioral advertising, or disclosed for a business purpose;
 - The categories of third parties to whom we "Sold" Personal Information (as this term is defined in the CCPA);
 - The categories of third parties with whom we have "Shared" Personal Information for cross-context behavioral advertising, if any;

- The categories of third parties to whom we have disclosed Personal Information for a business purpose;
 - Our business purpose for collecting (or “Selling” or “Sharing”) Personal Information;
 - The categories of Sensitive Personal Information we have collected and the purposes for collection, and whether such information is “Sold” or “Shared”.
- You have the right to request correction of any inaccurate Personal Information that we maintain about you;
- You have the right to request deletion of your Personal Information that we hold (with exceptions noted by law – more on this below);
- You have the right to request that your Personal Information not be “Sold” to or “Shared” with third parties;
- You have the right not to be discriminated or retaliated against because you exercised these rights; and
- You have the right to request that we limit our use and disclosure of your Sensitive Personal Information.

Data Deletion

As permitted by the CCPA/CPRA, in the event you request deletion of Personal Information that we have collected about you, we, our service providers, and our contractors may be unable to comply with such a request if your Personal Information is necessary to:

- Complete the purpose for which the Personal Information was collected, provide a service requested by you, or reasonably anticipated within the context of our ongoing business relationship with you;
- Prevent, detect, and investigate security incidents, protect against malicious deceptive, fraudulent, or illegal activity, or prosecute those responsible for that activity;
- Debug to identify and repair errors that impair existing intended functionality;
- Exercise free speech, ensure the right of another Consumer to exercise his or her right of free speech, or exercise another right provided for by law;
- Comply with the California Electronic Communications Privacy Act pursuant to Chapter 3.6 (commencing with section 1546) of Title 12 of Part 2 of the Penal Code;
- Engage in public or peer-reviewed scientific, historical, or statistical research in the public interest that adheres to all other applicable ethics and privacy laws, when our deletion of that information is likely to render impossible or seriously impair the achievement to such research, if you have provided informed consent;
- Enable solely internal uses that are reasonably aligned with your expectations based on your relationship with us;
- Comply with a legal obligation; or
- Otherwise use your Personal Information, internally, in a lawful manner that is compatible with the context in which the information was provided to us.

Non-Discrimination

We will not discriminate against you or retaliate for exercising any of your CCPA/CPRA rights. Specifically, we will not do any of the following unless permitted by the CCPA/CPRA:

- Deny you goods or services;
- Charge you different prices or rates for goods or services, including through granting discounts or other benefits, or imposing penalties;
- Provide you a different level or quality of goods or services;

- Engage in any retaliatory employment practices; or
- Suggest that you may receive a different price or rate for goods or services or a different level or quality of goods or services.

However, we may offer you certain financial incentives permitted by the CCPA/CPRA that can result in different prices, rates, or quality levels. Any CCPA/CPRA-permitted financial incentive we offer will reasonably relate to your Personal Information's value. Participation in a financial incentive program requires your prior opt-in consent, which you may revoke at any time.

Do Not Sell or Share My Personal Information

As a California consumer, you have the right to opt out of the Sale or Sharing of your Personal Information to third parties. We do not sell Personal Information in exchange for monetary compensation. We may, however, use analytics and cookies on our Website to help us understand Website traffic, engagement and effectiveness, and some of the third parties we use for this purpose may collect data about you as part of their service to us. Because we do not control this data collection, and the vendors retain the information for themselves, this data collection may be considered a Sale under the CCPA. Also, because we do not know your identity when you navigate our Website, we cannot act upon a request not to Sell your information by asking who you are. However, we have coded our website to honor GPC signals available as of the posting of this policy. Therefore, if you download and implement your browser's GPC software plugin, absent changes to the software used for this since our initial coding efforts, the signal sent by the GPC will be detected by our Website, which should disable third party tracking.

We do not Share Personal Information as this term is defined in the CCPA (i.e., for purposes of cross-context behavioral advertising).

In the twelve (12) months prior to the posting of this policy, we have Sold to or Shared with third parties the categories of Personal Information about California residents set forth below, and for the purposes set forth below:

Categories of Personal Information Sold or Shared	Categories of Third Party to Which Personal Information Was Sold	Reason for Selling	Categories of Third Party with Whom Personal Information Was Shared	Reason for Sharing
A. Identifiers.	Analytics and cookie providers	To understand our Website traffic, and for analytics	None.	N/A
B. Personal Information categories listed in the California Customer Records statute (Cal. Civ. Code § 1798.80(e)).	None.	N/A	None.	N/A
C. Protected classification characteristics under California or federal law.	None.	N/A	None.	N/A

Categories of Personal Information Sold or Shared	Categories of Third Party to Which Personal Information Was Sold	Reason for Selling	Categories of Third Party with Whom Personal Information Was Shared	Reason for Sharing
D. Commercial information.	None.	N/A	None.	N/A
E. Biometric information.	None.	N/A	None.	N/A
F. Internet or other similar network activity.	Analytics and cookie providers	To make the Website available To understand our Website traffic, and for analytics	None.	N/A
G. Geolocation data.	Analytics and cookie providers	To understand our Website traffic, and for analytics	None.	N/A
H. Sensory data.	None.	N/A	None.	N/A
I. Professional or employment-related information.	None.	N/A	None.	N/A
J. Non-public education information (per the Family Educational Rights and Privacy Act (20 U.S.C. Section 1232g, 34 C.F.R. Part 99)).	None.	N/A	None.	N/A
K. Inferences drawn from other Personal Information.	None.	N/A	None.	N/A
L. Sensitive Personal Information.	None.	N/A	None.	N/A

We do not knowingly Sell or Share any Personal Information of children under the age of 16.

Data Disclosure

In the twelve (12) months prior to the posting of this policy, we have disclosed for a business purpose the categories of Personal Information about California residents set forth below, for the reasons set forth below:

Category of Personal Information Disclosed for a Business Purpose	Category of Persons to Whom Personal Information Was Disclosed	Purpose for Disclosing for a Business Purpose
A. Identifiers.	<p>Our service providers, including healthcare and benefits providers; financial analytics providers; shipping and mailing providers; service of process, court filing and other legal service providers; agents; and information technology providers.</p> <p>Contractors.</p> <p>Our landlord and its service providers (to allow access to the building).</p> <p>Our accountants and advisors.</p> <p>Financial institutions and payment processors.</p> <p>Opposing parties and their representatives, lenders, advisors, and service providers.</p> <p>Opposing counsel and their representatives.</p> <p>Other counsel and their representatives.</p> <p>State and federal government representatives, and online interfaces maintained by same.</p> <p>Organizations that help us promote our business.</p> <p>Analytics and cookie providers.</p>	<p>To provide our services.</p> <p>To make the Website available and maintain it.</p> <p>To identify potential clients.</p> <p>To market our services and for business development.</p> <p>To provide insurance and benefits to employees' beneficiaries.</p> <p>To manage our business.</p> <p>To provide training, educational materials, and other benefits to our personnel.</p> <p>To manage network access and security.</p> <p>To comply with laws.</p> <p>To participate in philanthropy, fundraising, and educational pursuits.</p> <p>To understand our Website traffic, and for Website analytics, functionality, and security.</p>

Category of Personal Information Disclosed for a Business Purpose	Category of Persons to Whom Personal Information Was Disclosed	Purpose for Disclosing for a Business Purpose
<p>B. Personal Information categories listed in the California Customer Records statute (Cal. Civ. Code § 1798.80(e)).</p>	<p>Our service providers, including healthcare and benefits providers; financial analytics providers; shipping and mailing providers; service of process, court filing and other legal service providers; agents; and information technology providers.</p> <p>Contractors.</p> <p>Our landlord and its service providers (to allow access to the building).</p> <p>Our accountants and advisors.</p> <p>Financial institutions and payment processors.</p> <p>Opposing parties and their representatives, lenders, advisors, and service providers.</p> <p>Opposing counsel and their representatives.</p> <p>Other counsel and their representatives.</p> <p>State and federal government representatives, and online interfaces maintained by same.</p> <p>Organizations that help us promote our business.</p> <p>Analytics and cookie providers.</p>	<p>To provide our services.</p> <p>To make the Website available and maintain it.</p> <p>To identify potential clients.</p> <p>To market our services and for business development.</p> <p>To provide insurance and benefits to employees' beneficiaries.</p> <p>To manage our business.</p> <p>To provide training, educational materials, and other benefits to our personnel.</p> <p>To manage network access and security.</p> <p>To comply with laws.</p> <p>To participate in philanthropy, fundraising, and educational pursuits.</p> <p>To understand our Website traffic, and for Website analytics, functionality, and security.</p>

Category of Personal Information Disclosed for a Business Purpose	Category of Persons to Whom Personal Information Was Disclosed	Purpose for Disclosing for a Business Purpose
C. Protected classification characteristics under California or federal law.	<p>Our service providers, including healthcare and benefits providers; service of process, court filing and other legal service providers; agents; and information technology providers.</p> <p>Contractors.</p> <p>Our accountants and advisors.</p> <p>Clients and their representatives.</p> <p>Opposing parties and their representatives.</p> <p>Opposing counsel and their representatives.</p> <p>Other counsel and their representatives.</p> <p>State and federal government representatives, and online interfaces maintained by same.</p> <p>Our landlord and its service providers (for building accessibility purposes).</p>	<p>To provide our services.</p> <p>To provide insurance and benefits to employees' beneficiaries.</p> <p>To manage our business.</p> <p>To comply with laws.</p>
D. Commercial information.	<p>Our service providers, including: agents; legal services providers; and information technology providers.</p> <p>Contractors.</p> <p>Our accountants and advisors.</p> <p>Clients and their representatives.</p> <p>Opposing parties and their representatives.</p> <p>Opposing counsel and their representatives.</p> <p>Other counsel and their representatives.</p> <p>State and federal government representatives, and online interfaces maintained by same.</p> <p>Financial institutions and payment processors.</p>	<p>To provide our services.</p> <p>To manage our business.</p> <p>To comply with laws.</p>

Category of Personal Information Disclosed for a Business Purpose	Category of Persons to Whom Personal Information Was Disclosed	Purpose for Disclosing for a Business Purpose
E. Biometric information.	None.	None.
F. Internet or other similar network activity.	<p>Our service providers, including information technology providers; e-discovery providers; and legal services providers.</p> <p>Analytics and cookie providers.</p>	<p>To provide our services.</p> <p>To manage network access and security.</p> <p>To make the Website available and maintain it.</p> <p>To understand our Website traffic, and for Website analytics, functionality, and security.</p>
G. Geolocation data.	<p>Our service providers, including information technology providers.</p> <p>Analytics and cookie providers.</p>	<p>To make the Website available and maintain it.</p> <p>To manage network access and security.</p> <p>To understand our Website traffic, and for Website analytics, functionality, and security.</p>
H. Sensory data.	None.	None.
I. Professional or employment-related information.	<p>Our service providers, including: service of process, court filing and other legal service providers; shipping and mailing providers; agents; and information technology providers.</p> <p>Our accountants and advisors.</p> <p>Contractors.</p> <p>State and federal government representatives, and online interfaces maintained by same.</p> <p>Organizations that help us promote our business (from this category, only job title and company name are shared with such organizations).</p>	<p>To provide our services.</p> <p>To manage our business.</p> <p>To market our services and for business development.</p>

Category of Personal Information Disclosed for a Business Purpose	Category of Persons to Whom Personal Information Was Disclosed	Purpose for Disclosing for a Business Purpose
J. Non-public education information (per the Family Educational Rights and Privacy Act (20 U.S.C. Section 1232g, 34 C.F.R. Part 99)).	None.	None.
K. Inferences drawn from other Personal Information.	None.	None.
L. Sensitive Personal Information.	<p>Our service providers, including: service of process, court filing and other legal service providers; agents; and information technology providers.</p> <p>Clients and their representatives.</p> <p>Opposing parties and their representatives.</p> <p>Contractors (only as needed to provide services).</p> <p>Opposing counsel and their representatives.</p> <p>Our accountants and advisors.</p> <p>Other counsel and their representatives.</p> <p>State and federal government representatives, and online interfaces maintained by same.</p>	<p>To provide our services.</p> <p>To manage our business.</p> <p>To provide insurance and benefits to employees' beneficiaries.</p>

Limit the Processing of Sensitive Personal Information

As a part of our services, we may collect Sensitive Personal Information, as set forth above, and use it for the purposes described above.

You have the right to request that we limit our use and disclosure of your Sensitive Personal Information such that we use such information solely to provide our services or provide you with employment opportunities and related benefits, as applicable. We process and disclose Sensitive Personal Information of individuals only to provide our services (e.g., to help clients manage benefit plans, if a fact in a litigation, etc.), and for identification of beneficiaries of our employees under medical, benefits and insurance plans. This information is necessary for us to meet our obligations to our clients, who have provided this information to us, and for human resources and benefits processing functions. Therefore, at this time, we cannot limit the processing of any Sensitive Personal Information.

If you believe that your Sensitive Personal Information was given to us in error, we encourage you to discuss this with the business that originally made the information available to us so that they can provide us instructions with respect to its handling.

Data Retention Periods

We will not retain your Personal Information for longer than is permissible pursuant to applicable law.

How to Exercise Your CCPA/CPRA Rights

You can find instructions on how to exercise all of your rights granted to you pursuant to the CCPA/CPRA by visiting our “My California Privacy Rights” link located in the footer of our Website, emailing us at California_Privacy_Requests@morrisoncohen.com, or calling us at 1-866-745-6626.

California law requires us to verify your identity before processing your request. In order to make a request pursuant to the CCPA/CPRA, you must provide us with your: first and last name; email address; phone number; the first and last name of your most recent (or main) point of contact at our Company, if any, and the last service we provided to you (or an explanation of how else you believe we acquired your data, if we did not collect it to provide you a service). If you are requesting specific pieces of Personal Information that we have collected about you, you will also be required to email us at California_Privacy_Requests@morrisoncohen.com a signed declaration under penalty of perjury that you are a California resident and that you are the consumer whose Personal Information is the subject of the request. Note that we will not process your request to disclose specific pieces of information we have about you until we receive this signed declaration, and your request will not be considered timely submitted until we have this document in our possession. Please email us to request a copy of the signed declaration we prefer to use.

We will review the information you have provided against the information in our databases, and attempt to verify your identity. However, please note that under certain circumstances, we may require you to provide additional information in order to allow us to confirm your identity and your residency before we can process your requests. Also note that you are only entitled to make a Personal Information request up to twice in a 12-month period.

You can learn how to exercise all of your rights granted to you pursuant to the CCPA/CPRA by clicking on our “My California Privacy Rights” link located at the footer of our Website, emailing us at California_Privacy_Requests@morrisoncohen.com, or calling us at 1-866-745-6626. If you submit your CCPA/CPRA request by email, please include “California Privacy Rights” as the subject line. If you make a request to exercise your rights under the CCPA/CPRA by telephone, we may ask you to provide the request in writing so that we may verify your identity.

We will acknowledge your request within 10 days and respond to your request within 45 days or let you know if we need additional time or information to verify your identity (and if so, why).

Using an Authorized Agent

A California resident may use an authorized agent to submit a right to know request, a request to delete, a request to correct, a request for us to limit our processing of Sensitive Personal Information, or a request to opt-out of the Sale or Sharing of Personal Information. You can find additional instructions and information regarding how to submit requests through an authorized agent by clicking on our “My California Privacy Rights” link, located in the footer of the Website, emailing us at California_Privacy_Requests@morrisoncohen.com, or calling us at 1-866-745-6626.

To use an authorized agent for these purposes, both the California resident and the agent will be required to verify their identities with us. For this purpose, the agent will be required to submit a request with their own first and last name, email address, the company the agent works for (as agent), and the following information about the consumer on whose behalf they are making the request: first and last name; email address; phone number; the first and last name of the consumer’s

most recent (or main) point of contact at our Company, if any, and the last service we provided to the consumer (or an explanation of how else the consumer believes we acquired their data, if we did not collect it to provide them a service).

In addition, the consumer will be required to provide confirmation via email that they have authorized the agent to act on their behalf in making these requests. If we cannot authenticate the identity of the agent making the request, we may also require that the consumer and/or agent provide further confirmations directly to us. We may deny a request if the foregoing requirements are not met. If the agent has provided us with a validly executed power of attorney pursuant to Cal. Prob. Code Sections 4121 to 4130, then a separate verification that the consumer has authorized the agent to act on their behalf will not be necessary.