

The background features a blue-toned image of the Earth from space, with a network of white lines and dots overlaid, representing a global data network. Numerous white padlock icons are scattered across the globe, symbolizing security and data protection. The text 'GIBSON DUNN' is positioned in the upper left corner in a white, serif font.

GIBSON DUNN

## Complying with New U.S. and EU Privacy Requirements

December 2020

Moderated by Privacy, Cybersecurity, and Consumer Protection practice group co-chairs Alexander H. Southwell and Ahmed Baladi

# Today's Presenters



**Amanda M. Aycock**  
*New York*



**Ahmed Baladi**  
*Paris*



**Ryan T. Bergsieker**  
*Denver*



**Patrick Doris**  
*London*



**Cassandra L.  
Gaedt-Sheckter**  
*Palo Alto*



**Alejandro Guerrero**  
*Brussels*



**Vera Lukic**  
*Paris*

# Agenda

**1 CALIFORNIA  
UPDATES**

---

**2 EUROPEAN  
UPDATES**

---

**3 NEW YORK  
AND OTHER  
STATE UPDATES**

---



GIBSON DUNN

GIBSON DUNN

# California Updates

# California Privacy: Context

---

**June 2018:** CCPA slated for 2018 ballot

---

**June 2018:** CCPA signed in new form by legislature

---

**October 2019:** Flurry of CCPA amendments passed

---

**October 2019:** First draft Attorney General's CCPA regulations

---

**January 2020:** CCPA takes effect

---

**August 2020:** Attorney General regulations take effect

---

**November 2020:** CPRA approved by California voters

# California Privacy: CPRA Timeline

2020



2021



2022



2023



# California Privacy: CPRA Significant Considerations

**Employment & B2B Information.** Included as of January 1, 2023.

**Enforcement Agency.** California Privacy Protection Agency.

• **“Sensitive Personal Information.”** Right to limit use.

• **GDPR-like Rights.** Correction, Minimization, Retention.

• **Sale and Cross-Context Behavioral Advertising.** Opt-out reqs.

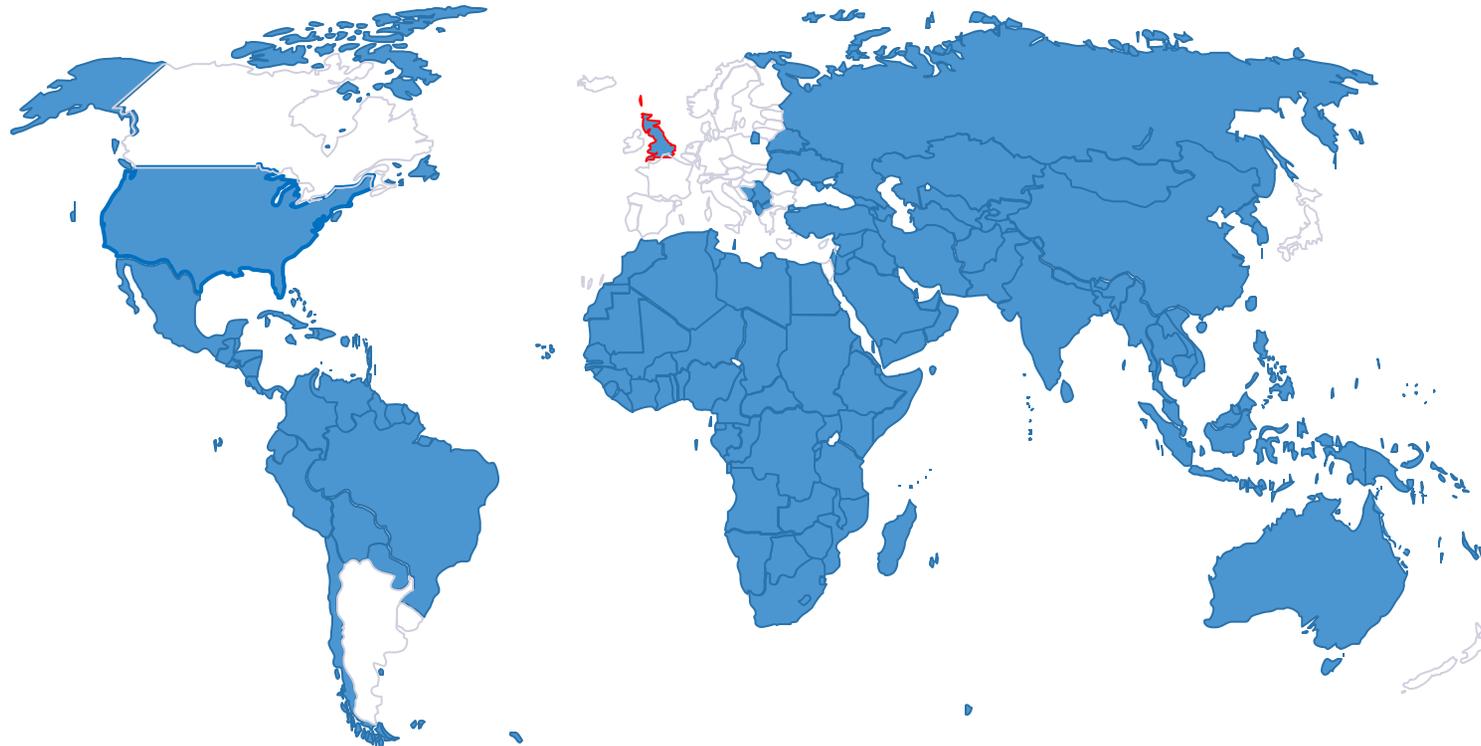
• **“Publicly Available.”** Expanded definition.

• **Service Provider Agreements.** Data security, compliance reqs.

GIBSON DUNN

# European Updates

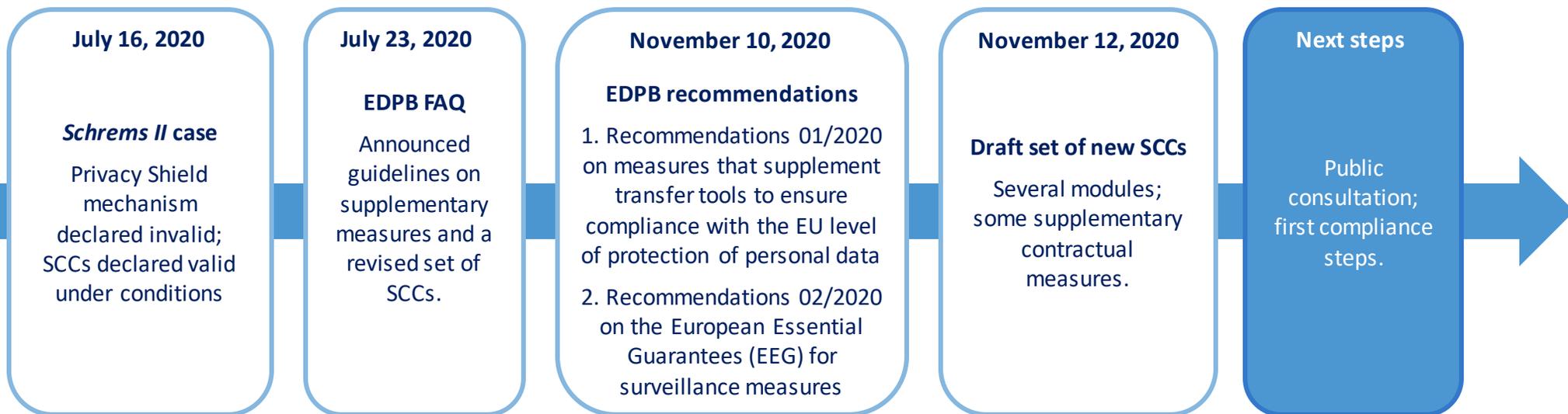
# International Transfers under the GDPR



A transfer of personal data **out of the EEA** may take place if the receiving country ensures an **adequate level of data protection**, as determined by a decision of the European Commission.

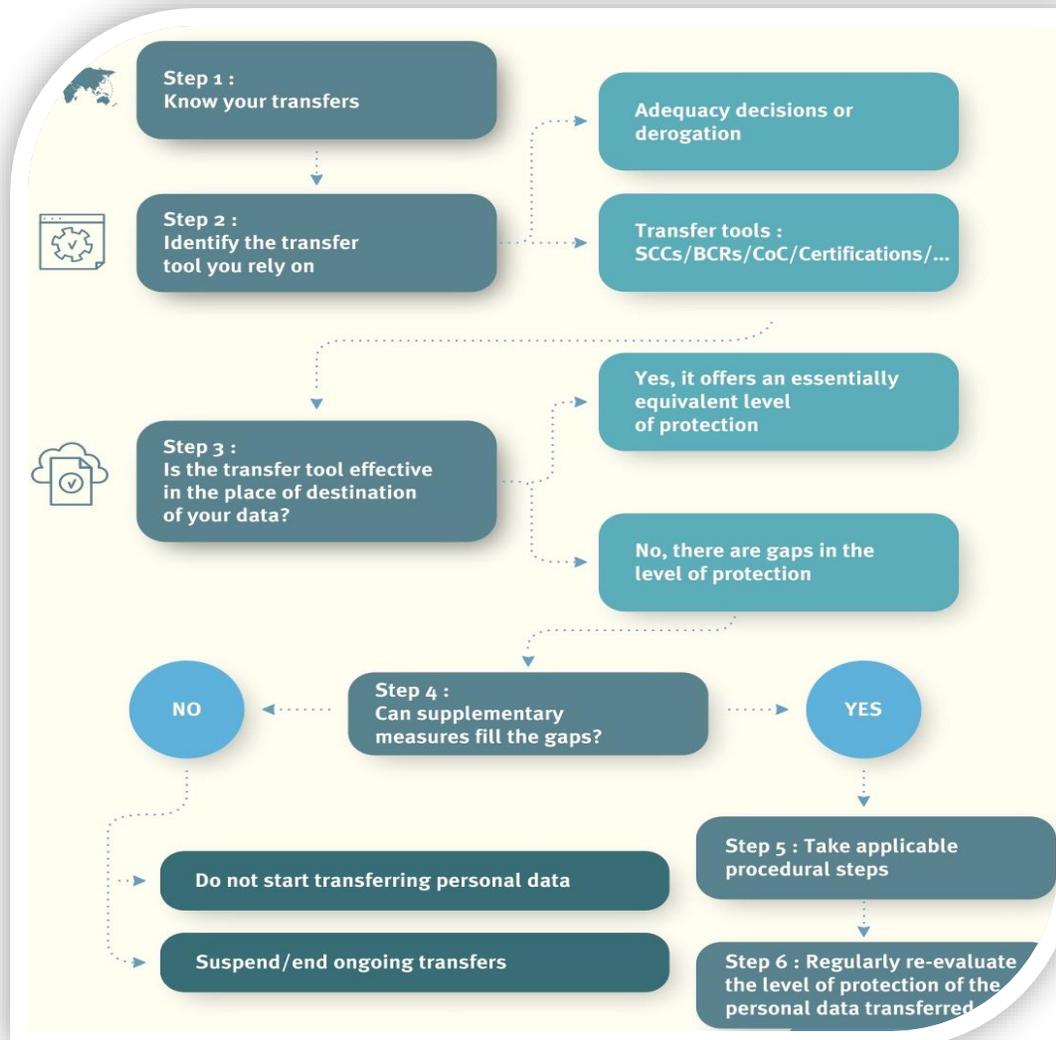
In the absence of such adequacy decision, the exporter may proceed to data transfer only if it has put in place **appropriate safeguards** (incl. standard contractual clauses or binding corporate rules), or if the transfer can benefit from one of the GDPR derogations.

# New Requirements for International Transfers



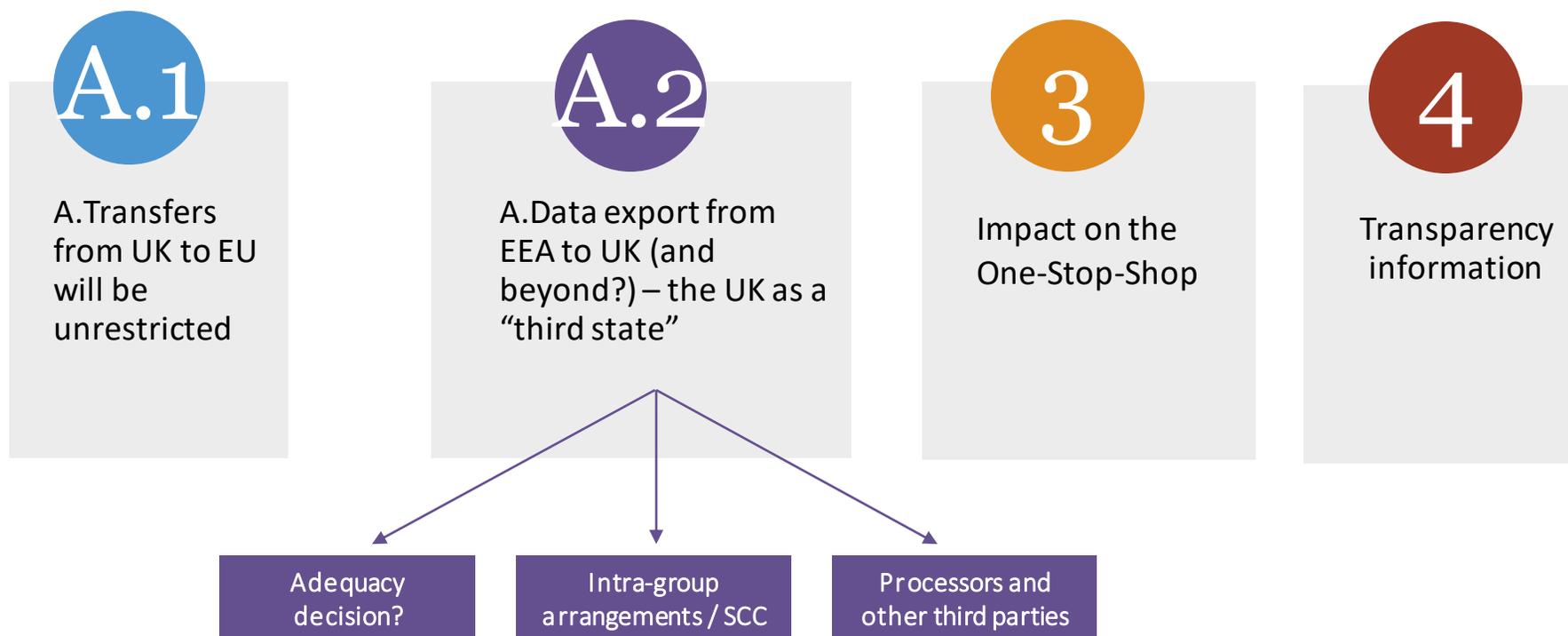
*Remote access by an entity from a third country to data located in the EU is also considered a “transfer”.*

# Identification and Adoption of Supplementary Measures



# GDPR BREXIT Issues

Four key issues for businesses re GDPR BREXIT readiness:



# What's Next?



**Data Exporters:** Document compliance efforts (data mapping, legal and security assessment, data processing agreements' review, implementation of new technical measures where required, etc.)

**Data Importers:** Anticipate data exporters' requests for assistance (security measures, organizational measures, etc.)

## **Both Exporters and Importers:**

- Anticipate and manage Brexit consequences
- Monitor local supervisory authorities guidance/enforcement and results of the public consultation of the EDPB recommendations
- Plan for an implementation of the final new set of SCCs (expected early 2021)
- Anticipate consequences of potential transfer suspension and/or termination of cross border services agreement, and transfer back of personal data in the EEA
- Emergence of sovereign clouds like Gaia-X, one of the EU Cloud computing projects

GIBSON DUNN

New York Updates

# New York

## *New York's Legislative Landscape*

### Existing Legislation

- **SHIELD Act:** Stop Hacks and Improve Electronic Data Security Act
- **Part 500:** NY Dep't of Financial Services (DFS) Cybersecurity Regulation, 23 NYCRR Part 500

### Proposed Legislation

- **NYPA:** New York Privacy Act, reintroduced on January 8, 2020
- **IYDA:** It's Your Data Act, introduced on October 28, 2020
- + others



*“Everyone in industry and all the advocates agree: we need one universal bill. . . . But . . . the federal government is asleep at the wheel, and states have to take it into their own hands. California started out . . . and **New York will be next. We lead by example and we will be the standard because it’s a groundbreaking bill.**”*

- NY Senator Kevin Thomas, Chairman of the Committee on Consumer Protection, discussing his bill, the NYPA, in an interview on May 11, 2020

# New York

## New York's Enforcement Landscape



### NY Dep't of Financial Services

*"[W]e must commit to greater regulatory oversight of large social media companies. The integrity of our elections and markets depends on it. **The swift and effective response of DFS-regulated cryptocurrency companies illustrates how effective regulation can foster innovation and growth, while also protecting consumers.**"*

- Linda Lacewell, Superintendent of Financial Services, in announcing report on July 15, 2020 Twitter hack



### NY Attorney General

*"**My office is committed to protecting consumer data and holding all businesses accountable for implementing safe security practices.**"*

- Letitia James, New York Attorney General, September 15, 2020

# Conclusion

- What's to come
- Questions

## MCLE Information

- Most participants should anticipate receiving their certificate of attendance via email approximately four weeks following the webcast.
  - Virginia Bar Association members should anticipate receiving their certificate of attendance six weeks following the webcast.
  - **Please direct all questions regarding MCLE to [CLE@gibsondunn.com](mailto:CLE@gibsondunn.com).**
-

GIBSON DUNN

Attorney Profiles

# Amanda M. Aycock

200 Park Avenue, New York, NY 10166-0193  
Tel +1 212.351.2356  
AAycock@gibsondunn.com



*Amanda M. Aycock is a senior associate in the New York office of Gibson, Dunn & Crutcher. She is a member of the Firm’s Litigation Department, as well as the Privacy, Cybersecurity and Consumer Protection Practice Group, the Crisis Management Practice Group, the Media, Entertainment, and Technology Practice Group, and the White Collar Defense and Investigations Practice Group.*

Ms. Aycock has represented multinational companies and senior executives in a variety of industries (including technology, media, entertainment, and banking/finance) in complex commercial litigation, crisis management, and regulatory and white collar defense and investigations. She has particular expertise helping clients navigate complex legal crises involving a confluence of legal actions and inquiries—for example, from regulators, prosecutors, public representatives, and private plaintiffs—all at once. Substantively, her practice is cross-disciplinary and includes experience in consumer protection, data privacy, contract, employment, constitutional, antitrust, and criminal law. Ms. Aycock co-chairs the Women and Gender Subcommittee of the New York Office’s Diversity Committee.

In 2020, the *Legal 500* recognized Ms. Aycock as a “Rising Star” in corporate investigations and white collar criminal defense, and as a “Name to Note” for white collar matters emanating from the technology, media and entertainment industries. She was also recognized by *The Best Lawyers in America*® as “One to Watch” in Criminal Defense: White-Collar.

From 2014 to 2015, Ms. Aycock served as a law clerk to the Honorable Katherine Polk Failla in the United States District Court for the Southern District of New York. Ms. Aycock graduated from the University of Pennsylvania Law School in 2010 with joint degree, consisting of a Juris Doctor, *cum laude*, and the French equivalent of an LL.M., *cum laude*, sponsored jointly by the Sorbonne and the Institut d’Études Politiques (Sciences Po). While at Penn Law, she was a Levy Scholar and an Associate Editor of the *University of Pennsylvania Journal of International Law*. Ms. Aycock received her Bachelor of Arts in Comparative Literature and French in 2007 from the University of Pennsylvania, where she graduated *magna cum laude* and with distinction in Comparative Literature.

Ms. Aycock is admitted to practice in the State of New York, and before the United States District Courts for the Southern and Eastern Districts of New York.

# Ahmed Baladi

16, avenue Matignon, 75008 Paris  
Tel +33 (0)1 56 43 13 50  
ABaladi@gibsondunn.com



*Ahmed Baladi is a French qualified partner in the Paris office of Gibson, Dunn & Crutcher and the co-Chair of the firm's Privacy, Cybersecurity and Consumer Protection Practice Group. His practice focuses in two main areas: first Data Privacy and Cybersecurity and second Technology & Digital Transactions.*

Ahmed Baladi has developed renowned experience in a wide range of privacy and cybersecurity matters including compliance and governance programs in light of the GDPR. He regularly represents companies and corporate executives on investigations and procedures before the French data protection authority and other national DPAs as well as administrative courts. Ahmed Baladi also advises a variety of clients on data breach and national security matters including handling investigations, enforcement defense and crisis management. He has also advised various multinational companies in the banking, insurance, automotive, aerospace, retail, and luxury sectors on their GDPR compliance programs.

*Legal 500 EMEA 2020* has named Ahmed Baladi a Leading Individual for Data Protection (Tier 1): "Ahmed Baladi gives you great comfort when dealing with complex legal topics (whether at national level or on cross-border issues) or difficult business situations, and when having to navigate in grey areas. These are situations where you need to challenge yourself, share views and take decisions taking into account the regulations, but also, and equally importantly for a business, matching with the business interests. Ahmed's legal expertise, deep business experience, hard-working capacity and humility at work make him a highly valued asset for our legal team." Other sources designated him as "the senior name to note at Gibson Dunn." The directory also ranks him Tier 1 in the France Industry focus: IT and the internet category, praising him for being "always very available, [he] demonstrate a very business-oriented approach." ; "He is also a strong negotiator." Previous editions noticed an "excellent team" that is "very available and provides an in-depth knowledge of the IT sector". *Chambers Europe 2020* ranks him Band 2 in the France TMT: Information Technology category, and for a third year in a row in the Spotlight Table for Data Protection. Clients report that he is "efficient and reactive."; "very smart and bright." Other sources praise his negotiation skills, saying: "He is patient and always tries to find intelligent compromises." Previous editions already underlined his "reactivity and availability," his "great judgement [...] source of clear, calm advice under pressure" and the fact that he is "very patient, reactive, calm and balanced, especially in negotiations." Sources consistently underline the "strong commercial and technical skills" of "an adept negotiator, pragmatic and practical", as well as his ability to "understand complex and innovative projects very quickly, and to build a proposal that explores different legal areas but remains simple and clear.". *Best Lawyers in France 2020* recommends Ahmed Baladi for Information Technology Law, Privacy and Data Security Law as well as Telecommunications Law. He was also named "Information Technology Lawyer of the Year" 2019 in that directory.

Admitted to the Paris bar in 2001, Mr. Baladi graduated in 1998 from University of Lyon III Jean Moulin, where he received a DJCE (Legal counsel diploma) in Commercial Law and a post graduate degree in Business and Tax Laws. Through an exchange program, he spent two years in the US, at the University of Georgia in 1999, and the University of North Carolina, Chapel Hill in 1997.

He speaks English fluently.

# Ryan T. Bergsieker

1801 California Street, Suite 4200, Denver, CO 80202-2642  
Tel +1 303.298.5774  
RBergsieker@gibsondunn.com



*Ryan Bergsieker is a partner in Gibson, Dunn & Crutcher's Denver office. He is a former federal cybercrimes prosecutor who has tried more than 45 civil and criminal cases to verdict. Mr. Bergsieker's practice is focused in three areas: government investigations, complex civil litigation, and cybersecurity/data privacy counseling. In ranking Mr. Bergsieker as one of the top white collar defense and government investigations lawyers in Colorado, Chambers & Partners highlights client reports that Mr. Bergsieker "demonstrates good judgment and produces an excellent work product," is "prompt, responsive and dependable," "draws on strong expertise in government investigations and cybersecurity," and is "very strong on tech and hacking." He has been recognized as a Colorado "Rising Star" and a "Complete Lawyer" who "excel[s] in the courtroom, in the boardroom, in client meetings and out in the community." He has particular experience with Department of Justice, Federal Trade Commission ("FTC"), Department of Health and Human Services, and State Attorney General investigations, and substantive expertise regarding the False Claims Act ("FCA"), the European Union's General Data Protection Regulation ("GDPR"), HIPAA, and a wide range of other federal, state, and international privacy/cybersecurity laws, regulations, and standards.*

Before joining Gibson Dunn, Mr. Bergsieker served as an Assistant United States Attorney in the District of Colorado. He coordinated the District's computer hacking prosecutions, served as its subject matter expert on electronic surveillance law, and investigated and prosecuted a wide range of crimes, including computer intrusions, denial of service attacks, theft of proprietary business information, identity theft, pharmaceutical misbranding, wire fraud, mail fraud, and murder. In addition to trying cases before nearly every judge in the District, he led dozens of criminal investigations and argued multiple appeals before the United States Court of Appeals for the Tenth Circuit. As a result of Mr. Bergsieker's work, the United States Attorney awarded him the District's Distinguished Service Award and the U.S. Attorney's Award of Excellence.

Drawing on his experience, Mr. Bergsieker has written and lectured extensively on cybercrime, electronic surveillance, and other cybersecurity and criminal law topics. He serves on the Board of Directors of the Faculty of Federal Advocates, and has been appointed to the Magistrate Judge Merit Selection Panel for the District of Colorado.

Mr. Bergsieker graduated *summa cum laude* and Phi Beta Kappa from Princeton University with an A.B. from the Woodrow Wilson School of Public and International Affairs. He received his J.D. from Yale Law School, where he served on the Board of the *Yale Law Journal* and was selected as a civil procedure teaching assistant. After graduating from law school, Mr. Bergsieker clerked for the Honorable David M. Ebel on the United States Court of Appeals for the Tenth Circuit.

# Patrick Doris

Telephone House, 2-4 Temple Avenue, London EC4Y 0HB  
Tel +44 (0)20 7071 4276  
PDoris@gibsondunn.com



*Patrick Doris is a partner in the Dispute Resolution Group of Gibson Dunn & Crutcher's London office, where he specialises in global white-collar investigations and commercial litigation.*

Mr. Doris' practice covers a wide range of disputes, including white-collar crime, internal and regulatory investigations, contentious antitrust matters, multi-jurisdictional commercial litigation, administrative law challenges against governmental decision-making before the UK and EU courts, public international law and commercial human rights law matters.

In the field of investigations, Mr. Doris is particularly experienced in handling bribery and corruption matters, sanctions, money laundering, insider dealing, financial sector wrongdoing, accounting violations and major cross-border tax investigations.

Mr. Doris' recent commercial disputes experience has extended to advising corporations, UK public and regulatory bodies and sovereign states in claims before a range of domestic courts and tribunals in the UK, the General Court and the Court of Justice of the European Union, the European Court of Human Rights and international arbitral tribunals.

He is recognised by *Legal 500 UK 2021* in the fields of Regulatory Investigations and Corporate Crime, Administrative and Public Law and Commercial Litigation, in which clients are noted as having described him as: *"totally committed, a great manager and really goes the extra mile"* and *"outstanding, has tremendous judgment, works exceptionally hard and always gives the impression that he is 100% dedicated to and focused on your case."*

Before entering private practice, Mr. Doris taught law at the University of Warwick and worked in the Criminal Division of the Law Commission of England & Wales, the UK government's primary law reform body. Mr. Doris earned his LL. M. (first class) in European Law in 1996; and received his BA in Law in 1994 from Trinity Hall, Cambridge University. Mr. Doris speaks English, Spanish, French and Catalan, with recent experience of conducting investigations in each of those languages.

# Cassandra L. Gaedt-Sheckter

1881 Page Mill Road, Palo Alto, CA 94304-1211  
Tel +1 650.849.5203  
CGaedt-Sheckter@gibsondunn.com



*Cassandra Gaedt-Sheckter is a senior associate in the Palo Alto office of Gibson, Dunn & Crutcher. She practices in the firm's Litigation Department, with a focus on data privacy and cybersecurity litigation and counseling, patent litigation, and trade secret disputes.*

Ms. Gaedt-Sheckter has substantial experience advising companies on privacy and cybersecurity issues, including relating to legal and regulatory compliance with the California Consumer Privacy Act (CCPA), General Data Protection Regulation (GDPR), Children's Online Privacy Protection Rules (COPPA), and other federal, state, and international laws and regulations. She also has extensive experience counseling on data breach response management and notification concerns, and privacy and cybersecurity compliance risk assessments. Ms. Gaedt-Sheckter further represents clients across industries—including consumer product, software, manufacturing, home appliance service, and healthcare companies—in the context of product and program development, merger and acquisition privacy and cybersecurity due diligence, and pre-litigation negotiation.

Ms. Gaedt-Sheckter also represents leading technology companies in federal and state courts throughout the country, on a variety of technologies, including relating to social media, medical devices, pharmaceuticals, mobile gaming, telecommunications, enterprise software, and consumer electronics. She has significant experience in all aspects of litigation—particularly relating to privacy, cybersecurity, and patent claims—serving as lead associate on expert and fact discovery and pre-trial hearings and briefing, and participating in multiple bench and jury trials. Ms. Gaedt-Sheckter is licensed to practice before the U.S. Patent and Trademark Office as a patent attorney, and is a Certified Information Privacy Professional (CIPP/US).

Ms. Gaedt-Sheckter maintains a significant pro bono practice as well, including successfully obtaining asylum for a Chinese immigrant, representing families in conservatorship proceedings, and advising non-profit and research companies on privacy programs and policies.

Ms. Gaedt-Sheckter received her law degree from the University of California, Los Angeles, in 2011, where she was elected to the Order of the Coif. While in law school, she served as President of the Health Law Society and was selected to the Moot Court Honors Program. In 2008, Ms. Gaedt-Sheckter graduated *cum laude* from University of California, Los Angeles with a Bachelor of Science degree in Anthropology, and a minor in Political Science.

Ms. Gaedt-Sheckter is a member of the State Bar of California.

# Alejandro Guerrero

Avenue Louise 480, 1050 Brussels  
Tel +32 2 554 72 18  
AGuerrero@gibsondunn.com



*Alejandro Guerrero is a Spanish qualified Of Counsel in the Brussels office of Gibson, Dunn & Crutcher.*

Mr. Guerrero has broad experience in general EU antitrust (and its interaction with Intellectual Property), cartel enforcement, vertical agreements, abuse of dominance and antitrust private litigation. He has advised a variety of clients active in the luxury, financial, technology, energy, consumer goods and telecommunications sectors, including working as secondee for some clients. His practice encompasses, amongst others, assisting clients in developing and implementing compliance programs, assessing business practices (e.g., distribution, pricing) and providing advice regarding complex agreements (e.g., co-operation, partnership). He is also the co-editor of the book *“EU Law of Competition and Trade in the Pharmaceutical Sector”*, published in 2019, in which leading practitioners, economists and authorities have synthesized the application of competition and trade law to the pharmaceutical industry.

Mr. Guerrero has extensive experience in merger control, having trained in a merger unit of the European Commission and intervened in complex EU-wide transactions. He has broad experience in global multi-jurisdictional filings in a broad array of sectors.

Mr. Guerrero advises on EU privacy and data protection rules, both at national level and from a U.S.-EU standpoint. Mr. Guerrero is a CIPP/E certified under the IAPP certification scheme for privacy professionals with regard to European data privacy laws. He has assisted numerous clients in their GDPR compliance projects, including the review of their data processing activities, contractual arrangements and privacy policies, and has also represented clients in proceedings followed before authorities and courts in the EU. He also follows closely the developments of the Digital Agenda and related policy initiatives and legislation, and its impact on EU antitrust and data protection regulations.

Mr. Guerrero also has experience in planning and conducting FCPA investigations in Europe, assisting clients with the analysis of conduct and carrying out onsite investigations and interviews. He has acted for clients before the EU’s General Court and the Court of Justice, as well as the European Court of Human Rights.

Prior to joining Gibson Dunn, Mr. Guerrero trained at the Brussels office of a major Spanish law firm and at the DG for Competition of the European Commission.

Mr. Guerrero is expected to receive a MBA from the Booth School of Business of the University of Chicago in 2021. He graduated in 2010 from the Institut d’Etudes Européennes-ULB (Brussels) with a LL.M. in European Legal Studies, and received a Law degree from Universidad de Valencia in 2009.

A native Spanish speaker, Mr. Guerrero is fluent in English and French.

# Vera Lukic

16, avenue Matignon, 75008 Paris  
Tel +33 (0)1 56 43 13 61  
VLukic@gibsondunn.com



*Vera Lukic is a French qualified Of Counsel attorney in the Paris office of Gibson, Dunn & Crutcher. She specializes in Information Technology, Digital Transactions and Data Privacy.*

Ms. Lukic has developed an extensive expertise in a broad range of technology and digital matters, including in relation to complex technology transactions (e.g., outsourcing projects), data privacy and GDPR compliance programs, cybersecurity, and various other digital related-projects (e.g., Internet of Things, Big Data, Cloud based solutions, IaaS/PaaS). She assists clients across jurisdictions and sectors.

She also regularly advises on IT and data privacy aspects of M&A deals, including carve-out and transition issues.

Ms. Lukic is recommended as a "Rising Star" by *Legal 500 EMEA 2020* for her practice in IT, telecoms and the internet. Clients describe her as "always very available" with "a very business-oriented approach." Previous editions already recognized she was "very involved." *Best Lawyers in France 2020* also recommends Ms. Lukic for Information technology law.

Admitted to the Paris bar since 2007, Ms. Lukic graduated from Paris XI University in 2004 with a Post Graduate Degree (DESS) in IT law, and in 2003 with a Graduate Degree in Business Law. Prior to joining Gibson Dunn in 2017, she spent five years working in a leading English law firm and another five years in a major French law firm.

She speaks French, English and Serbo-Croatian fluently.

# Alexander H. Southwell

200 Park Avenue, New York, NY 10166-0193  
Tel +1 212.351.3981  
ASouthwell@gibsondunn.com



*Alexander H. Southwell is a partner in Gibson, Dunn & Crutcher's New York office and is Co-Chair of Gibson Dunn's Privacy, Cybersecurity, and Consumer Protection Practice Group. His practice focuses on counseling a variety of clients on privacy, information technology, data breach, theft of trade secrets and intellectual property, computer fraud, national security, and network and data security issues, including handling investigations, enforcement defense, and litigation. In particular, Mr. Southwell regularly advises companies victimized by cyber-crimes and counsels on issues under the Computer Fraud and Abuse Act, the Economic Espionage Act, the Electronic Communications Privacy Act, and related federal and state statutes. Mr. Southwell additionally handles a range of white-collar criminal and regulatory enforcement defense, internal investigation, compliance, and complex civil litigation matters. An experienced trial and appellate attorney, prior to joining Gibson Dunn, Mr. Southwell served as an Assistant United States Attorney in the United States Attorney's Office for the Southern District of New York.*

Mr. Southwell is also an Adjunct Professor of Law at Fordham University School of Law where he teaches a seminar on cyber-crimes, covering computer misuse crimes, intellectual property offenses, the Fourth Amendment in cyber-space, computer evidence at trial, data breach and privacy issues, and information security, among other areas.

Mr. Southwell earned his undergraduate degree, *magna cum laude*, from Princeton University and his Juris Doctor, *magna cum laude*, from New York University School of Law. Following law school, Mr. Southwell was a Law Clerk for the Honorable Naomi Reice Buchwald of the United States District Court for the Southern District of New York.

Mr. Southwell was named a *Law360* "MVP" in Privacy in both 2016 and 2015 – one of five "elite attorneys" recognized – for his "successes in high-stakes litigation." He is one of four attorneys ranked nationwide in Band 2 for Privacy & Data Security Litigation by *Chambers USA: America's Leading Lawyers for Business*. He is also ranked in White Collar Litigation by *Chambers*, which notes his "keen eye for attention to detail, client service and navigating a complex legal and regulatory landscape." Mr. Southwell was also selected as a Cybersecurity and Data Privacy Trailblazer by *The National Law Journal*, and has been recognized as one of the top 30 Data Protection Lawyers in Legal Media Group's Expert Guides *Best of the Best USA*, and named as one of the 30 best and brightest data breach response lawyers in Cybersecurity Docket's "Incident Response 30." In addition, he is recognized by *The Legal 500 United States, Benchmark Litigation* as a "Litigation Star," *The Best Lawyers in America*® as a leading lawyer in the area of Criminal Defense: White Collar, and by *Who's Who Legal: Investigations* as one of the world's leading investigations lawyers.

Mr. Southwell serves on Gibson Dunn's Technology Committee and Firmwide Diversity Committee and is active with the Federal Bar Council and the Association of the Bar of the City of New York, having previously served on the Committee on Information Technology Law, Professional Responsibility Committee and the Government Ethics Committee. In addition, Mr. Southwell serves on the Board of Advisors of the Center on Law and Information Policy at Fordham Law School, one of the nation's leading academic centers contributing to the development of the law and policy in the area of information technology, and serves on the Advisory Board of the Cybersecurity Law Institute at Georgetown University Law Center and the Cybersecurity Research Institute at University of California, Irvine School of Law.

# Our Offices

## Beijing

Unit 1301, Tower 1  
China Central Place  
No. 81 Jianguo Road  
Chaoyang District  
Beijing 100025, P.R.C.  
+86 10 6502 8500

## Brussels

Avenue Louise 480  
1050 Brussels  
Belgium  
+32 (0)2 554 70 00

## Century City

2029 Century Park East  
Los Angeles, CA 90067-3026  
+1 310.552.8500

## Dallas

2001 Ross Avenue  
Dallas, TX 75201  
+1 214.698.3100

## Denver

1801 California Street  
Denver, CO 80202-2642  
+1 303.298.5700

## Dubai

Building 5, Level 4  
Dubai International Finance Centre  
P.O. Box 506654  
Dubai, United Arab Emirates  
+971 (0)4 318 4600

## Frankfurt

TaunusTurm  
Taunustor 1  
60310 Frankfurt  
Germany  
+49 69 247 411 500

## Hong Kong

32/F Gloucester Tower, The Landmark  
15 Queen's Road Central  
Hong Kong  
+852 2214 3700

## Houston

811 Main Street  
Houston, TX 77002  
+1 346.718.6600

## London

Telephone House  
2-4 Temple Avenue  
London EC4Y 0HB  
England  
+44 (0) 20 7071 4000

## Los Angeles

333 South Grand Avenue  
Los Angeles, CA 90071-3197  
+1 213.229.7000

## Munich

Hofgarten Palais  
Marstallstrasse 11  
80539 Munich  
Germany  
+49 89 189 33-0

## New York

200 Park Avenue  
New York, NY 10166-0193  
+1 212.351.4000

## Orange County

3161 Michelson Drive  
Irvine, CA 92612-4412  
+1 949.451.3800

## Palo Alto

1881 Page Mill Road  
Palo Alto, CA 94304-1125  
+1 650.849.5300

## Paris

16, avenue Matignon  
75008 Paris  
France  
+33 (0)1 56 43 13 00

## San Francisco

555 Mission Street  
San Francisco, CA 94105-0921  
+1 415.393.8200

## São Paulo

Rua Funchal, 418, 35°andar  
Sao Paulo 04551-060  
Brazil  
+55 (11)3521.7160

## Singapore

One Raffles Quay  
Level #37-01, North Tower  
Singapore 048583  
+65.6507.3600

## Washington, D.C.

1050 Connecticut Avenue, N.W.  
Washington, D.C. 20036-5306  
+1 202.955.8500