

# “K” Line America Privacy Policy

*Last Updated: July 1, 2023*

## Overview

This Privacy Policy (“Policy”) is designed to help you understand how we at “K” Line America, Inc. (hereinafter referred to as KAM, “us”, “we”, or “our”) collect, use, and share your personal information, and the rights and choices you have with respects to such information. It also explains how we communicate with you and how you can make requests or submit inquiries to us about your personal information. We appreciate you taking the time to read this Policy and understand our data and privacy related practices.

This Privacy Policy applies to all personal information that we collect during any written, electronic, and oral communications online or offline, including when you:

- interact with our website located at: <https://www.kline.com/>, and any other websites, pages, features or content we own or operate (collectively, the “Site(s)”);
- attend one of our events or interact with us at an event; or
- interact with other products or services that direct you to this Policy (collectively, the “Services”).

If you are applying for a job with us, please refer to our Job Applicant Privacy Policy for more information about how we process your personal information in connection with your application.

By continuing to use our Services, you acknowledge that your personal information will be used in accordance with this Privacy Policy. If you are not comfortable with any part of this Policy, please immediately discontinue access or use of our Services.

We may make changes to this Policy from time to time. We will notify you of any material changes to this Policy and will update the Last Updated date at the beginning of this Policy. We encourage you to look for updates and changes to this Policy when you access our Services.

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## 1. Personal Information We Collect

KAM collects certain personal information about you and your use of our Services. The personal information that we collect depends on your interaction with us, and the choices you make. Personal information is typically data that identifies an individual or relates to an identifiable individual. The definition of personal information (used interchangeably with “personal data”) depends on the applicable law based on your physical location. Only the definition that applies to your physical location will apply to you under this Policy.

**Information You Voluntarily Provide to Us.** We may collect your email address, name, phone number, employment information, commercial information, or any other information you choose to provide when you use our Site(s), engage our services, or fill any forms available on our Site(s.)

**Information We Automatically Collect.** To the extent permitted under the applicable law, we may collect certain types of information automatically, such as when you interact with the Site(s) or use the Services. We may collect the following types of information automatically from you:

- **Usage Data.** When you browse our Site(s), we may automatically collect log data such as your web request, Internet Protocol (“IP”) address, browser type, domain names, referring and exit pages and URLs, pages viewed and the order of these page views, the date and time you access our servers, and other diagnostic data.
- **Device information.** When you browse your desktop or mobile devices to access our Services, we may be able to identify your device’s unique device identifier, MAC address, and operating system.
- **Location Information.** When you use our Services, we may infer the approximate physical location and geographic regions of your device from your IP address.

## 2. How We Use Your Personal Information

We use your personal information for the following business and commercial purposes, unless restricted by applicable law:

- a. **To Provide Our Services.** We may use your personal information to provide you with our Services.
- b. **To Maintain Legal and Regulatory Compliance.** Our Services are subject to certain laws and regulations which may require us to process your personal information. For example, we process your personal information to fulfill our business obligations, to manage risk as required or permitted under applicable laws and regulations, or to respond to requests by judicial process or governmental agency.
- c. **To Enforce Compliance with Our Agreements and Policies.** We may process your personal information for compliance purposes, such as carrying out our obligations and enforcing our agreements or other legal rights.

- d. **To Detect and Prevent Fraud and Security Risks.** We may process your personal information to help monitor, prevent and detect fraud and abusive use of our Services, monitor unauthorized access, enhance system security, and combat spam, malware, malicious activities or other security risks.
- e. **To Research and Develop Our Services.** We may process your personal information and derive analytical and statistical data to better understand the way you use and interact with our Services. For instance, analyzing where, on which types of devices and how our Site(s) are used, how many visitors we receive and where they click on our Site(s) may help us improve our existing Services and to build new Services. Please see the “Cookies and Other Tracking Technologies” Section for more information.
- f. **To Facilitate Corporate Acquisitions, Mergers, and Transactions.** We may process any information regarding your account and your use of our Services as is necessary in the context of corporate acquisitions, mergers, or other corporate transactions.
- g. **To Personalize Your Experience.** We may process your information to personalize your experience by personalization, we enable you to more easily interact with our Services across platforms and devices.
- h. **With Your Consent.** For any other purpose disclosed to you prior to you providing us your personal information or which is reasonably necessary to provide the services or other related services requested, with your permission or upon your direction.

### 3. How We Disclose Your Personal Information

We may disclose personal information about you with third parties in the following circumstances:

- a. **Within Our Corporate Organization.** We may disclose your personal information within our organization, such as with our subsidiaries, corporate affiliates, joint venturers or other companies under common control with us, to provide you with the Services and to take actions based on your request.
- b. **With Our Service Providers.** We may disclose your personal information with third-party service providers acting on our behalf to help us operate our Services. Service providers provide us with support services such as website hosting, data analytics and network maintenance. These third-party service providers may have access to or process your personal information for the purpose of providing services for us.
- c. **During Business Transactions or Other Asset Transfers.** We may disclose and transfer information about you to buyers, service providers, advisors, potential transactional partners or other third parties in connection with the advisors, potential transactional partners or other third parties of a corporate transaction in which we are acquired by or merged with another company, or we sell, liquidate, or transfer all or a portion of our business or assets. By engaging with us or using our Services, you understand and agree to our assignment or transfer of rights to your personal information.

- d. **For Legal Compliance & Safety.** We may access, preserve, and disclose information about you if we believe doing so is required or appropriate to (a) comply with law enforcement requests, such as a court order or subpoena; (b) comply with requests from auditors, examiners or other regulators; (c) exercise, establish or defend our legal rights; (d) respond to infringement notification in accordance with process set forth in our Terms and Conditions in order to investigate and address the potential infringement, or (e) protect your, our, or others' rights, property or safety.
- e. **With Your Consent.** We may disclose your personal information with other companies if you give us permission or direct us to share your information.

## 4. Cookies and Other Tracking Technologies

We and third parties on our behalf, may use cookies or other similar tracking technologies, such as cookies and other similar technologies (collectively, "cookies") to collect personal information automatically as you interact with our Site(s), to help us customize your experience, and better manage content on our Site(s), including to:

- Analyze our web traffic using an analytics package
- Identify whether you already visited our Site(s)
- Store information about your preferences
- To recognize when you return to our Site(s)

**Categories of Cookies.** Some cookies are deleted when you close down your browser. These are known as session cookies. Others remain on your device until they expire or you delete them from your cache. These are known as persistent cookies and these types enable us to remember things about you as a returning visitor. To find out more about cookies, including how to see what cookies have been set and how to manage and delete them, visit [www.allaboutcookies.org](http://www.allaboutcookies.org). The main categories of cookies we may use include:

- **Strictly Necessary.** These cookies are essential to enable you to move around the online services and use its features and ensuring the security of your online transactions with us and online access to our website. Without these cookies, services you have asked for, such as completing a transaction, cannot be provided. These cookies don't gather information about you for the purposes of marketing.
- **Performance.** These cookies allow us to count the number of visitors and collect information about how visitors use a web site, for instance which pages visitors go to most often, and if they get error messages from web pages. All information these cookies collect is used to improve how a website works and the user experience. By using our Services you agree that we can place these types of cookies on your device, however you can block these cookies using your browser settings (please see the "Managing Cookies" section below). Example: cookies that count page visits, bounce rates, or load times.
- **Functionality.** These cookies allow us to recognize you when you return to our website and allows the website to remember choices you make (such as your user name). They may also be used to provide services you have requested such as watching a video. The information these cookies collect is de-identified (i.e., it does not contain your name, address, account

details, etc.) and they do not track your browsing activity across other websites. By using our online services, you agree that we can place these types of cookies on your device, however you can block these cookies using your browser settings (please see the "Managing Cookies" section below).

**Managing Cookies.** You can decide whether to accept cookies. If you do not want us to deploy cookies in your browser, you may modify your web browser setting to either refuse some or all cookies or to notify you and ask for your permission when a website tries to set a cookie. If you want to learn the correct way to modify your browser settings, please use the "Help," "Tools" or "Edit" menu in your browser or review the instructions provided by the following browsers: [Internet Explorer](#), [Google Chrome](#), [Mozilla Firefox](#), [Safari Desktop](#), [Safari Mobile](#); and [Android](#) browser. If you block or delete strictly necessary and/or functionality cookies used by our Site(s), the Site(s) may become impossible to browse, certain services or functions of the Site(s) may become unavailable, or other malfunctions may occur.

**Analytics.** We may use third-party service providers to monitor and analyze the use of our career websites, such as Google Analytics. Google Analytics is a web analytics service offered by Google LLC ("Google") that tracks and reports website traffic. For more information on the privacy practices of Google, please visit the Google Privacy & Terms web page: <https://policies.google.com/privacy?hl=en> Google Analytics Opt-out Browser Add-on provides visitors with the ability to prevent their data from being collected and used by Google Analytics, available at: <https://tools.google.com/dlpage/gaoptout>

**Do Not Track.** Some Internet browsers, such as Internet Explorer, Firefox, and Safari, include the ability to transmit "Do Not Track" or "DNT" signals. Since uniform standards for "DNT" signals have not been adopted, our Site does not currently process or respond to "DNT" signals.

## 5. How We Protect Your Personal Information

We follow generally accepted standards to protect the personal information submitted to us, both during transmission and once it is received. We maintain our services and all associated information with technical, administrative, and physical safeguards to protect against the loss, unauthorized access, destruction, misuse, modification and improper disclosure of your personal information. Unfortunately, no data transmission or storage system can be guaranteed to be 100% secure. We cannot guarantee the security of our databases or the databases of the third parties with which we may disclose such information, now can we guarantee that the information you supply will not be intercepted while being transmitted over the internet. If you feel that the security of any account you might have with us has been compromised, you should contact us immediately as described in the "Contact Us" Section.

## 6. Retention of Your Personal Information

We will retain your information for as long as needed to provide you Services or for other purposes stated in this Policy. We will cease to retain your personal information or remove the means by which the personal information can be associated with you as soon as it is reasonable to assume that such retention no longer serves the purpose for which the personal information was collected and is no longer necessary for legal or business purposes. If you wish to request that we no longer use your

information to provide your services, please contact us as described in the “Contact Us” section below.

## 7. Children’s Privacy

Our services are not directed to, and we do not knowingly collect personal information from, children under the age of 18. If you are under 18, please do not attempt to send any personal information about yourself to us. If you are a parent or guardian and you suspect that they have provided their information, you may contact us via the link or number identified under the “Contact Us” section below so that we may delete their information. If we become aware that a child has provided us with personal information, we will terminate the user’s access to our service and take steps to delete such information from our systems, unless we have a legal obligation to keep it.

## 8. Third Party Links

This Privacy Policy does not cover the privacy practices of third parties. Our Site may include links to websites and/or applications operated and maintained by third parties. We have no control over the privacy practices of websites or applications that we do not own and cannot guarantee that such third parties will adhere to the same privacy practices as us. We encourage you to review the privacy policies of those third parties.

## 9. Additional Information for California Residents

The California Consumer Privacy Act, as amended by the California Privacy Rights Act (“California Privacy Laws”) requires us to disclose the following additional information related to our privacy practices. If you are a California resident, this section applies to you in addition to the rest of this Privacy Policy.

### **Categories of Personal Information Collected, Used, and Disclosed**

In the preceding 12 months, depending how you interact with our services, we may have collected the following categories of personal information (as defined under Cal. Civ. Code §1798.140(v)(1):

- **Identifiers**, such as your name, unique personal identifier, phone number, or similar identifiers.
- **Internet or other electronic network activity information**, such as technical information, including the Internet protocol (IP) address used to connect your computer to the Internet, browser type and version, time zone setting, browser plug-in types and versions, operating system and platform, and information about your visit, including your browsing history, search history, the webpage visited before you came to our Site(s), length of visit and number of page views, click-stream data, locale preferences, you mobile carrier, and system configuration information.
- **Geolocation information**, to the extent such information can be inferred from your IP address.

- **Commercial Information**, including records of personal property, products or services purchased, obtained, or considered, or other purchasing or consuming histories or tendencies.
- **Additional data subject to the California customer records law**, which includes any categories of personal information described in subdivision (e) of Cal. Civ. Code §1798.80, such as telephone number, mobile phone number, and facsimile.

For more information about the personal information new collect and how we collect it, please refer to Section 1 above, “Personal Information We Collect.”

For more information about the business purposes for which we collect your personal information, please refer to Section 2 above, “How We Use Your Personal Information.”

For more information about the categories of third parties with whom we may share your personal information, please refer to Section 3 above, “How We Disclose Your Personal Information.”

### **Your Rights**

If you are a California resident, you may assert certain rights identified below regarding your personal information. Please note, your rights in relation to your personal information are not absolute. Under applicable law, access to your rights under the applicable law may be denied: (a) when denial of the request is required or authorized by law; (b) when granting the request would have a negative impact on another’s privacy; (c) to protect our rights and properties; or (d) where the request is frivolous or vexatious, or for other reasons.

- a. Right to Know/Access.** You have the right to obtain a copy, or a list of categories of the personal information that we hold about you, as well as other supplementary information, such as the purposes of processing, and the entities to whom we disclose your personal information.
- b. Right to Correct/Rectification.** You have the right to correct any of your personal information in our records and systems. You may request us to rectify, correct, or update any of your personal information held by us that is inaccurate.
- c. Right to Delete/Erasure.** Under certain circumstances, you have the right to request that we delete the personal information that we hold about you. This right is not absolute, and we may refuse your right to delete if it is reasonably necessary for us to provide a service requested by you; to perform a contract between us; to maintain functionality and ensure security of our systems; to enable solely expected internal uses of your personal information; to exercise a right provided by law; to comply with a legal obligation, or if there are compelling legitimate grounds for keeping your personal information.
- d. Right to Portability.** Under certain circumstances, you may have the right to receive personal information we hold about you in a structured, commonly used, and machine-readable format so that you can provide that personal information to another entity.

- e. **Right to Opt-out of Selling and Sharing for Targeted Advertising.** You have the right to opt-out of: (i) the sale of your personal information; and (ii) the sharing of your personal information for targeted advertising. We do not sell or share your personal information.
- f. **Right to Limit the Use and Disclosure of Sensitive Personal Information.** To the extent your sensitive personal information, as that term is defined under California privacy law, is used to infer characteristics about you to create a profile, you have the right to object to the processing of your sensitive personal information. We do not process any sensitive personal information to infer characteristics about you without your consent.
- g. **Right to Object to Automated Decision-Making.** You may have the right not to be subject to a decision that is based solely on automated processing (where a decision is taken about you using an electronic system without human involvement) which significantly impacts your rights. No decision will be made by us about you solely on the basis of automated decision making which has a significant impact on you.
- h. **Right Against Discrimination.** You have the right not to be discriminated against for exercising any of the rights described in this section. We will not discriminate against you for exercising your privacy rights.

### **Submitting a Request to Exercise Your Privacy Rights**

To exercise your rights as a California consumer please submit a request to KAM via email or telephone us at the contact information provided in the "Contact Us" section.

Please note that to protect your privacy and security, we may need to verify your identity before we can process your request to exercise your privacy rights granted to you under California law. We may conduct the verification process by email or phone, and we may ask you to provide information such as your name, contact information, and any additional relevant information based on your relationship with us. You may also use an authorized agent to submit a request on your behalf. If you do so, KAM may require you to (1) provide the authorized agent written permission to do so, and (2) verify your own identity directly with the company.

## **10. Contact Us**

If you have any questions, concerns, or comments about privacy, you can contact us by email at [ccpa@us.kline.com](mailto:ccpa@us.kline.com), by postal mail at "K" Line America, Inc. 4860 Cox Rd., Suite 400 Glen Allen, VA 23060, or by telephone at 1-800-295-8375.