

Privacy Policy for California Consumer Privacy Act

Date last updated: 26 December, 2019

“K” Line America, Inc. (hereinafter referred to as “**KAM**”) respects your concerns about privacy. This Privacy Policy for the California Consumer Privacy Act (hereinafter, “**CCPA Privacy Policy**”) applies solely to California consumers and addresses the Personal Information (as defined below) that “KAM” collects online and offline. This CCPA Privacy Policy does not apply to KAM job applicants, employees, owners, directors, officers or natural persons who provide services to KAM pursuant to a written contract, where the Personal Information KAM collects about those individuals relates to their current, former, or potential role(s) at KAM.

This CCPA Privacy Policy uses certain terms that have the meanings given to them in the California Consumer Privacy Act of 2018 and its implementing regulations (the “**CCPA**”), including:

- “Personal Information,” which means information that identifies, relates to, describes, is reasonably capable of being associated with, or could reasonably be linked, directly or indirectly, with a particular consumer or household.
- “Sell,” “selling,” “sale,” or “sold,” which means the selling, renting, releasing, disclosing, disseminating, making available, transferring, or otherwise communicating orally, in writing, or by electronic or other means, your Personal Information by KAM to another business or a third party for monetary or other valuable consideration.

1. Notice at Collection and Use of Personal Information

The table below describes the categories of Personal Information (as listed in the CCPA) that KAM may collect about you and the business or commercial purposes for which each category of Personal Information may be collected, used, or disclosed:

Category	Personal Information Collected	Business or Commercial Purposes
Category A	Identifiers, such as a real name, e-mail address, business address, IP address, and unique personal identifier (such as cookies)	<ul style="list-style-type: none"> • Performing services on KAM’s behalf or on behalf of another, including fulfilling transactions, processing payments, and other services • Undertaking activities to maintain the quality or safety of, or improve, a service which KAM may control or provide • Communicating with business partner contacts about the transportation services, including harbor operation, renting and selling terminals, terminal operation, and shipping operation • Building up and managing business relationships with actual and potential business partners • Complying with applicable laws and regulations • Evaluating and improving website for sales and recruitment activities
		<ul style="list-style-type: none"> • Receiving and replying to inquiries
Category B	Additional data subject to the California customer records law (any categories of personal information described in subdivision (e) of Cal. Civ. Code Sec. 1798.80), such as telephone number, mobile phone number, and facsimile number	<ul style="list-style-type: none"> • Performing services on KAM’s behalf or on behalf of another, including fulfilling transactions, processing payments, and other services • Undertaking activities to maintain the quality or safety of a service which KAM may control or provide • Communicating with business partner contacts about the transportation services, including harbor operation, renting and selling terminals, terminal operation, and shipping operation • Building up and managing business relationships with actual and potential business partners • Complying with applicable laws and regulations • Receiving and replying to inquiries

Category C	Internet or network activity information, such as cookie information	<ul style="list-style-type: none"> • Evaluating and improving KAM's website for sales and recruitment activities
Category D	Professional or employment-related information, such as business position and company name	<ul style="list-style-type: none"> • Performing services on KAM's behalf or on behalf of another, including fulfilling transactions, processing payments, and other services • Undertaking activities to maintain the quality or safety of a service which KAM may control or provide • Communicating with business partner contacts about the transportation services, including harbor operation, renting and selling terminals, terminal operation, and shipping operation • Building up and managing business relationships with actual and potential business partners • Receiving and replying to inquiries

2. "K" Line America, Inc.'s Prior Collection, Use, and Disclosure of Personal Information

KAM may have collected and used your Personal Information, as described in Section 1 above, during the 12-month period prior to the effective date of this CCPA Privacy Policy. For Personal Information collected during that timeframe, this section describes: (i) the categories of sources from which KAM may have obtained the Personal Information; (ii) the categories of third parties with whom KAM may have shared the Personal Information; and (iii) the categories of Personal Information KAM may have disclosed for a business purpose.

A. Sources of Personal Information

For each of these categories, KAM collects Personal Information from:

- I. Actual or potential employees of KAM's business partners, employees of competitors of KAM's business partners, and supervisory authorities of KAM's business partners
 - Category A: Identifiers
 - Category B: Data subject to the California customer records law
 - Category D: Professional or employment-related information

- II. KAM's agents and lawyers of KAM's business partners
 - Category A: Identifiers
 - Category B: Data subject to the California customer records law

III. Website visitors and users

- Category A: Identifiers
- Category B: Data subject to the California customer records law
- Category C: Internet or network activity information
- Category D: Professional or employment-related information

B. Sharing of Personal Information

KAM may have shared your Personal Information with certain categories of third parties, as described below.

I. Data Analytics Providers

- Category A: Identifiers
- Category C: Internet or network activity information

C. Sale of Personal Information

KAM does not sell Personal Information and has not sold Personal Information during the 12-month period prior to the effective date of this CCPA Privacy Policy, including the Personal Information of minors.

D. Disclosure of Personal Information for a Business Purpose

KAM may have disclosed the following categories of Personal Information to third parties, for KAM's operational business purposes:

I. Data Analytics Providers

- Category A: Identifiers
- Category C: Internet or network activity information

3. Your Rights and Requests

If you are a California consumer, you have certain choices regarding your Personal Information, as described below:

- I. Access: You have the right to request, twice in a 12-month period, that KAM disclose to you the following information it has collected, used, disclosed, and sold about you during the 12 months preceding your request:
 - (I) The categories of Personal Information KAM collected about you;
 - (II) The categories of sources from which KAM collected such Personal Information;

- (III) The business or commercial purpose(s) for collecting such Personal Information about you;
 - (IV) The categories of third parties with whom KAM shared such Personal Information;
 - (V) The specific pieces of Personal Information KAM has collected about you; and
- II. Deletion: You have the right to request that KAM delete certain Personal Information it collected from you.

How to Submit a Request. To make an access or deletion request (described above), please contact KAM by any of the following means:

- +1-800-295-8375
- ccpa@us.kline.com

Verifying Requests. To help protect your privacy and maintain security, KAM will take steps to verify your identity before granting you access to your Personal Information or complying with your request. In addition, if you ask KAM to provide you with specific pieces of Personal Information, KAM will require you to sign a declaration under penalty of perjury that you are the consumer whose Personal Information is the subject of the request.

If you designate an authorized agent to make an access or deletion request on your behalf, 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 (as described above).

Additional Information. If you choose to exercise any of your rights under the CCPA, you have the right to not receive discriminatory treatment by KAM. To the extent permitted by applicable law, KAM may charge a reasonable fee to comply with your request. Please contact +1-800-295-8375 to request this CCPA Privacy Policy in an alternative format.

4. Changes to this CCPA Privacy Policy

KAM may change this CCPA Privacy Policy from time to time. The “Date last updated” at the top of this page states when this CCPA Privacy Policy was last updated; any changes will become effective upon KAM posting the revised CCPA Privacy Policy.

KAM will post a prominent notice on the site to notify you of any significant changes to this CCPA Privacy Policy and indicate the date it was most recently updated.

5. Contact “K”Line America, Inc.

If you have any questions or concerns regarding this CCPA Privacy Policy or KAM’s privacy practices, please contact KAM at:

“K” Line America, Inc.
4860 Cox Rd., Suite 400
Glen Allen, VA 23060
+1-800-295-8375
ccpa@us.kline.com