



California Online Privacy Policy

KPFF, Inc. (the “Company”) has developed this Privacy Policy out of respect for the privacy of our customers and visitors to our Website. This policy describes the personal information we collect, use, and disclose about individual consumers and website visitors who are California residents. This policy applies only to California residents who are natural persons; it does not apply to any entities (whether business, non-profit or governmental) or to any person who is not a California resident.

Whenever you visit our website, we will collect some information from you automatically simply by you visiting and navigating through this site, and some voluntarily when you submit information using a form on the website, request information, or use any of the other interactive portions of our Web site. Through this website, we will collect information that can identify you and/or your activity.

And whenever you communicate, interact or do business with us, whether online or at any Company locations or stores, we will be collecting personal information from you or about you in the course of our interaction or dealings with you.

KPFF, Inc. may collect the following categories of personal information about you based on your specific transactions and interactions with the Company or its website. For each category of information, we identify examples of the category, the business purposes for which we use the information in that category, the categories of sources from which the information is collected, and the categories of third parties with whom we have shared the information in the last 12 months.

Category of Personal Information	Personal Identifiers & Contact Information
Examples	Name, mailing address, email address, phone number
Business Purpose(s) for Which Information is Used	<ul style="list-style-type: none"> • Responding to inquiries through Website; and • Verifying and responding to consumer requests.
Categories of Sources from Which Information Received	Visitors of our Website
Categories of Third Parties to Whom Info Was Disclosed in Last 12 Months	We do not share this information with any third party, unless required to do so by law or government agency or for the purpose of defending or prosecuting legal claims.

Category of Personal Information	Protected Classifications
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Examples	Gender, age, language preference
Business Purpose(s) for Which Information is Used	<ul style="list-style-type: none"> • Improving the Website experience for all visitors; • Understanding the demographics of our Website visitors
Categories of Sources from Which Information Received	Visitors of our Website and the device and browser used to access the Website
Categories of Third Parties to Whom Info Was Disclosed in Last 12 Months	We do not share this information with any third party, unless required to do so by law or government agency or for the purpose of defending or prosecuting legal claims.

Category of Personal Information	Internet Activity
Examples	Date and time of your visit to this Website; webpages visited; links clicked on the Website; browser ID; browser type; device ID; operating system; form information downloaded; domain name from which our site was accessed; and cookies
Business Purpose(s) for Which Information is Used	<ul style="list-style-type: none"> • Improving the Website experience for all visitors; • Understanding the demographics of our Website visitors; • Operating and maintaining the Website; • Detecting security incidents; • Debugging to identify and repair errors that impair existing intended functionality of the Website; • Protecting against malicious or illegal activity and prosecuting those responsible; and • Verifying and responding to consumer requests.
Categories of Sources from Which Information Collected	Visitors of our Website and the device and browser used to access the Website
Categories of Third Parties to Whom Info Was Disclosed in Last 12 Months	We do not share this information with any third party, unless required to do so by law or government agency or for the purpose of defending or prosecuting legal claims.

Category of Personal Information	Geolocation Data
Examples	IP Address
Business Purpose(s) for Which Information is Used	<ul style="list-style-type: none"> • Improving the Website experience for all visitors; • Understanding the demographics of our Website visitors; • Detecting security incidents; • Debugging to identify and repair errors that impair existing intended functionality of the Website; • Protecting against malicious or illegal activity and prosecuting those responsible; and • Verifying and responding to consumer requests.
Categories of Sources from Which Information Received	Visitors of our Website and the device and browser used to access the Website
Categories of Third Parties to Whom Info Was Disclosed in Last 12 Months	We do not share this information with any third party, unless required to do so by law or government agency or for the purpose of defending or prosecuting legal claims.

Category of Personal Information	Mobile Device Data
Examples	Information collected when you navigate, access or use any of our websites via mobile device, including device type, software type
Business Purpose(s) for Which Information is Used	<ul style="list-style-type: none"> • Improving the Website experience for all visitors; • Understanding the demographics of our Website visitors; • Detecting security incidents; • Debugging to identify and repair errors that impair existing intended functionality of the Website; • Protecting against malicious or illegal activity and prosecuting those responsible; and • Verifying and responding to consumer requests.
Categories of Sources from Which Information Received	Visitors of our Website and the device and browser used to access the Website

Categories of Third Parties to Whom Info Was Disclosed in Last 12 Months	<p>We do not share this information with any third party, unless required to do so by law or government agency or for the purpose of defending or prosecuting legal claims.</p>
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Do we sell any of your personal information?

The Company does NOT and will not sell your personal information, including the data of any minors. We do not sell or otherwise trade the personal information that we collect from our site visitors at any point or under any circumstance.

Third-party vendors

The Company may use other companies and individuals to perform certain functions on our behalf. Examples include administering e-mail services and running special promotions. Such parties only have access to the personal information needed to perform these functions and may not use or store the information for any other purpose. Subscribers or site visitors will never receive unsolicited e-mail messages from vendors working on our behalf.

Business transfers:

In the event the Company sells or transfers a particular portion of its business assets, consumer information may be one of the business assets transferred as part of the transaction. If substantially all of the assets of the Company are acquired, consumer information may be transferred as part of the acquisition.

Compliance with law/safety:

The Company may disclose specific personal information based on a good faith belief that such disclosure is necessary to comply with or conform to the law or that such disclosure is necessary to protect the users of our Website, the site itself, or the public.

Use of cookies and other tracking technologies

Cookies are small files that a Website may transfer to a user’s computer that reside there for either the duration of the browsing session (session cookies) or on a permanent (until deleted) basis (persistent cookies) that may be used to identify a user, a user’s machine, or a user’s behavior. We make use of cookies under the following circumstances and for the following reasons:

- Compile data about site traffic to offer a better Website experience
- Understand and save visitor preferences for future visits

Do Not Track (DNT) is a privacy preference that users can set if they do not want web services to collect information about their online activity. However, there is currently no universal standard for sending and receiving DNT signals. Due to this lack of universal standard, it would be impossible for us to promise that we comply with all known and unknown DNT standards.

Therefore, we do not respond to DNT signals or other mechanisms that provide a choice regarding the collection of personal information about activities over time and across different Web sites or online services. If a universal standard for DNT becomes available, we may revisit our DNT Policy.

External links:

Our website contain links to other sites. The Company is not responsible for the privacy practices or the content of such websites. To help ensure the protection of your privacy, we recommend that you review the privacy policy of any site you visit via a link from our website.

Children under the age of 16

Our Website is not intended for children under 16 years of age. No one under age 16 may provide any personal information on the Website. We do not knowingly collect personal information from children under 16. If you are under 16, do not use or provide any information on our Website. If we learn we have collected or received personal information from a child under 16 without verification of parental consent, we will delete that information. If you believe we might have any information from or about a child under 16, please contact us at the email address below.

Your Rights as a California Consumer

If you are a California resident, you have the following rights:

1. **Right to Know.** The right to request, up to 2 times in a 12-month period, that we identify to you (1) the categories of personal information we have collected, disclosed or sold about you in the last 12 months, (2) the categories of sources from which the personal information was collected, (3) the business purpose for which we use this information, and (4) the categories of third parties with whom we share or have shared your personal information in the last 12 months;
2. **Right to Access.** The right to request, up to 2 times in a 12-month period, that we provide you access to or disclose to you, free of charge, the specific pieces of personal information we have collected about you in the last 12 months;
3. **Right to Delete.** The right to request, up to 2 times in a 12-month period, that we delete personal information that we collected from you, subject to certain exceptions;
4. **Right to Opt-Out.** The right to opt-out of the sale of your personal information to third parties;
5. The right to designate an authorized agent to submit one of the above requests on your behalf; and
6. The right to not be discriminated against in receiving different or less favorable pricing, service or financial incentive for exercising any of the above rights.

You can submit any of the above 4 types of consumer requests by any of the 2 options below:

1. Submit an online request on our website at <https://www.kpff.com/form/ccpa-request-form>.
2. Call our privacy toll-free line at 1-888-841-8153.

How we will verify that it is really you submitting the request:

When you submit a Right to Know, Right to Access, or Right to Delete consumer request through one of the methods provided above, we will ask you to provide some information in order to verify your identity and respond to your request. Specifically, we will ask you to verify information that can be used to link your identity to particular records in our possession, which depends on the nature of your relationship and interaction with us. For example, we may need you to provide your name, address, email, phone number, last 4 digits of your SSN and your date of birth. In addition, our third-party identity verification provider will require your authorization to access your credit report. If your sole interaction with us was as a website visitor, then in order to verify your identity, we will need to ask you to provide your name, email, phone number, IP address, device ID, browser ID, and/or cookie ID.

Responding to your Right to Know, Right to Access, and Right to Delete requests

We endeavor to respond to a verifiable consumer request within forty-five (45) days of its receipt. If we require more time (up to 45 days or 90 days total from the date we receive your request), we will inform you of the reason and extension period in writing. We will deliver our written response by mail or electronically, at your option. Any disclosures we provide will only cover the 12-month period preceding our receipt of your verifiable consumer request. The response we provide will also explain the reasons we cannot comply with a request, if applicable. We do not charge a fee to process or respond to your verifiable consumer request unless it is excessive, repetitive, or manifestly unfounded. If we determine that the request warrants a fee, we will tell you why we made that decision and provide you with a cost estimate before completing your request.

Responding to your consumer request to opt-out of the sale of your personal information

We will act upon a verifiable consumer request to opt-out within fifteen (15) days of its receipt. We will notify all third parties to whom we have sold personal information within 90 days of our receipt of your request that you have exercised your right to opt-out and instruct them not to further sell the information. We will notify you when this has been completed by mail or electronically, at your option.

A request to opt-out need not be a verifiable consumer request. However, we may deny a request to opt-out if we have a good faith, reasonable, and documented belief that a request to opt-out is fraudulent. If we deny your request to opt-out, we shall inform you of our decision not to comply and provide an explanation as to why we believe the request is fraudulent.

How to authorize an agent to act on your behalf

You can authorize someone else as an Authorized Agent who can submit a consumer request on your behalf. To do so, you must either (a) execute a valid, verifiable, and notarized Power of Attorney or (b) provide other written authorization that we can then verify. When we receive a consumer request submitted on your behalf by an Authorized Agent, that person will be asked to provide written proof that they have your permission to act on your behalf, and we will also contact you and ask you for information to verify your own identity directly with us and not through your Authorized Agent.

Consent to Terms and Conditions

By using this Website, you consent to all Terms and Conditions expressed in this Privacy Policy.

Changes

From time to time we may modify and/or update this Privacy Policy and so we encourage you to check back on a regular basis to determine if any changes have been made.

Questions About the Policy

If you have any questions about this privacy policy, go to <https://www.kpff.com/form/ccpa-request-form>, e-mail [dataprivacy \[at\] kpff.com](mailto:dataprivacy@kpff.com), or call 1-888-841-8153.

*****This policy was last updated September 9th, 2020.***