

The Klingle Corporation Website Privacy Policy

Effective Date: February 6, 2023

This Policy was last updated: December 4, 2023

This Privacy Policy (“**Policy**”) describes how the Klingle Corporation collects, uses, and discloses your Personal Information when you visit our websites (the “**Sites**”) or otherwise interact with any of our features or services that reference this Policy (collectively, the “**Services**”). This Policy also explains how you can exercise certain rights you may have in connection with your privacy and personal information.

Your use of our Services, and any dispute over privacy, is subject to this Policy.

For ease of reference, you may click on any of the following links to jump to one of the sections addressed below:

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Scope of this Privacy Policy

This Privacy Policy applies to personal data collected through our “Services,” which include:

- Offline services you use when you visit The Kennedy-Warren;
- Digital services which include but are not limited to:
 - kennedywarren.com, subdomains, or mobile versions that link to or post this Privacy Policy

- On-premise or web-enabled technologies, such as Facility Wi-Fi or CCTV surveillance

If you are within or are a resident of a member nation of the EUROPEAN ECONOMIC AREA (the “EEA,” which includes the 27 European Union Member States, Iceland, Lichtenstein and Norway), Switzerland or the United Kingdom (“UK”) (collectively, the “EU”), these Services may apply to you if you are visiting our Sites.

Modifications

The Klingle Corporation reserves the right to make changes to this Policy at any time. Since this Policy may change as we modify or expand our Services, we suggest that you check back from time to time in order to understand how we treat your information. Our Policy’s effective date will always be set forth at the beginning and end of the Policy. Any changes will be immediately incorporated into this Policy and will be prospective only. We will not make any changes that have retroactive effect unless legally required to do so.

Any change to this Policy is effective immediately. Your continued use of the Services after any changes are made to this Policy constitutes your acceptance of the changes. If any changes are unacceptable to you, you should cease all use of the Services.

Accessibility Statement

The Klingle Corporation is committed to making its website kennedywarren.com, usable by all people, including those with disabilities. We are constantly in the process of making upgrades to achieve this goal.

Our Commitment to Help

We are dedicated to meeting your accessibility needs. Should you have specific questions or concerns about the accessibility of these sites or need assistance in using the processes found within these sites, we have individuals here at the Klingle Corporation to assist you.

Please contact us directly at privacy@bfsaul.com. We would be happy to assist in making your visits to our sites as convenient as possible.

Third Party Applications

While you are visiting our sites, you will notice that we make use of third-party sites. Though individuals may have challenges with access to these sites, the Klingle Corporation does not control or remedy the way content is portrayed.

Personal Information We Collect, Use and Share

Personal information is generally defined as information that, by itself or in combination with other information, identifies, relates to, describes, references, is reasonably capable of being associated with, or could reasonably be linked, directly or indirectly, with a particular consumer, device, or household (“Personal Information”). Personal Information can include, but is not limited to, your name, address, telephone number, email address, username and password, IP address or other online identifiers, browsing or search history, credit/debit card number or other financial information, professional or employment-related information, office address and other business information, demographic information, consumer preferences, biometric information such as fingerprints, precise location information, or any other type of information that, directly or indirectly, can be linked to or is reasonably capable of being associated with you.

When using the Services, we may collect, use, and share the following categories of Personal Information from you in the following ways:

Categories of Personal Information we collect	We may collect this Personal Information when you...	We collect this Personal Information so that we may...
<p>Contact information such as your email address, current address, and phone number.</p>	<ul style="list-style-type: none"> • Submit the Contact or Contact Us web form. • Schedule a tour with us. • Enter your address in a Map search. • Apply to become a resident by clicking Lease Now, Applicant Login, or Applicant Registration. • Login to our resident portal by clicking Resident Login. • Send us an email. • Use our Services which involve our affiliates, business partners, and vendors. • We may collect information about you from third parties. • Any other correspondence provided or made available to the Klingle Corporation. 	<ul style="list-style-type: none"> • Operate our business. We use Personal Information to allow you to use our Services, and otherwise run our day-to-day operations such as allowing you to tour our facilities, contact us with any questions or concerns, and apply to become a resident. • For other operational purposes. If we intend to use your Personal Information for any additional purpose not specified in this Policy, we will notify you (and, if necessary, obtain your consent) before using your Personal Information in this way. • Communicate with you. We may use Personal Information to communicate with you about our Services, and to respond to your inquiries, including if you contact us with a question or concern. • Enter a promotion or sweepstakes. We may enter your email in our promotion or sweepstakes. • Provide marketing and advertising. We may use Personal Information to contact you with surveys and information regarding our Services and those of our affiliates that we believe may be of interest to you. This may include commercial emails sent on behalf of ourselves, our affiliates, and our advertisers. • Comply with legal requirements. We may use Personal Information to comply with lawful court orders, law enforcement requests, or other legal requirements. • Use for security purposes. We may use Personal Information to mitigate fraud and protect The Klingle Corporation.

<p>Identity information such as name, age, gender, passport information or data from government-issued identity cards, or from your accounts created in our applicant / resident portal.</p>	<ul style="list-style-type: none"> • Submit the Contact or Contact Us web form. • Schedule a tour with us. • Apply to become a resident by clicking Lease Now, Applicant Login, or Applicant Registration. • Login to our resident portal by clicking Resident Login. • Use our Services which involve our affiliates, business partners, and vendors. • We may collect information about you from third parties. • Any other correspondence provided or made available to the Klingle Corporation. 	<ul style="list-style-type: none"> • Operate our business. We use Personal Information to allow you to use our Services, and otherwise run our day-to-day operations such as allowing you to tour our facilities, contact us with any questions or concerns, and apply to become a resident. • For other operational purposes. If we intend to use your Personal Information for any additional purpose not specified in this Policy, we will notify you (and, if necessary, obtain your consent) before using your Personal Information in this way. • Communicate with you. We may use Personal Information to communicate with you about our Services, and to respond to your inquiries, including if you contact us with a question or concern. • Provide marketing and advertising. We may use Personal Information to contact you with surveys and information regarding our Services and those of our affiliates that we believe may be of interest to you. This may include commercial emails sent on behalf of ourselves, our affiliates, and our advertisers. • Comply with legal requirements. We may use Personal Information to comply with lawful court orders, law enforcement requests, or other legal requirements. • Use for security purposes. We may use Personal Information to mitigate fraud and protect the Klingle Corporation.
<p>Correspondence information when you contact us, such as to send an enquiry or make a request, or any personal information you include in free text boxes.</p>	<ul style="list-style-type: none"> • Submit the Contact or Contact Us web form. • Schedule a tour with us. • Apply to become a resident by clicking Lease Now, Applicant Login, or Applicant Registration. • Login to our resident portal by clicking Resident Login. • Send us an email. • Use our Services which involve our affiliates, business partners, and vendors. • We may collect information about you from third parties. • Any other correspondence provided or made available to the Klingle Corporation. 	<ul style="list-style-type: none"> • Operate our business. We use Personal Information to allow you to use our Services, and otherwise run our day-to-day operations such as allowing you to tour our facilities, contact us with any questions or concerns, and apply to become a resident. • For other operational purposes. If we intend to use your Personal Information for any additional purpose not specified in this Policy, we will notify you (and, if necessary, obtain your consent) before using your Personal Information in this way. • Communicate with you. We may use Personal Information to communicate with you about our Services, and to respond to your inquiries, including if you contact us with a question or concern. • Evaluate and improve our services. We may use the Personal Information we collect to evaluate and improve our Services and to measure, improve, and understand the effectiveness of our Services and its features. We may also use this information to develop new Service offerings.

		<ul style="list-style-type: none"> • Use for administrative purposes. To assess the usage, value and performance of our online products and services; to improve your experience with the sites; and as otherwise permitted by applicable law or regulation.
<p>Financial and payment information such as your credit card details, billing address, and bank account information.</p>	<ul style="list-style-type: none"> • Apply to become a resident by clicking Lease Now, Applicant Login, or Applicant Registration. • Login to our resident portal by clicking Resident Login. • Use our Services which involve our affiliates, business partners, and vendors. • We may collect information about you from third parties. 	<ul style="list-style-type: none"> • Operate our business. We use Personal Information to allow you to use our Services, and otherwise run our day-to-day operations such as allowing you to apply to become a resident and make a payment as a resident. • For other operational purposes. If we intend to use your Personal Information for any additional purpose not specified in this Policy, we will notify you (and, if necessary, obtain your consent) before using your Personal Information in this way.
<p>Personal credit information such as your credit report from at least one reputable credit bureau.</p>	<ul style="list-style-type: none"> • Apply to become a resident by clicking Lease Now, Applicant Login, or Applicant Registration. • Use our Services which involve our affiliates, business partners, and vendors. • We may collect information about you from third parties. 	<ul style="list-style-type: none"> • Operate our business. We use Personal Information to allow you to use our Services, and otherwise run our day-to-day operations such as allowing you to apply to become a resident. • For other operational purposes. If we intend to use your Personal Information for any additional purpose not specified in this Policy, we will notify you (and, if necessary, obtain your consent) before using your Personal Information in this way.
<p>Reservation information such as the dates, times, and location of your reservation.</p>	<ul style="list-style-type: none"> • Schedule a tour with us. • Make a reservation of facility space or maintenance through our resident portal. • Send us an email. • Use our Services which involve our affiliates, business partners, and vendors. • We may collect information about you from third parties. • Any other correspondence provided or made available to the Klingle Corporation. 	<ul style="list-style-type: none"> • Operate our business. We use Personal Information to allow you to use our Services, and otherwise run our day-to-day operations such as allowing you to tour our facilities or make a reservation for Service as a resident. • For other operational purposes. If we intend to use your Personal Information for any additional purpose not specified in this Policy, we will notify you (and, if necessary, obtain your consent) before using your Personal Information in this way. • Communicate with you. We may use Personal Information to communicate with you about our Services, and to respond to your inquiries, including if you contact us with a question or concern. • Evaluate and improve our services. We may use the Personal Information we collect to evaluate and improve our Services and to measure, improve, and understand the effectiveness of our Services and its features. We may also use this information to develop new Service offerings. • Use for administrative purposes. To assess the usage, value and performance of our online products and services; to improve your experience with the sites; and as otherwise permitted by applicable law or regulation.

<p>Preference information such as apartment selection, number of bedrooms, in-person or video tour, date and time of tour, move in date, desired apartment finish, text message opt-in, and other preferences for your stay.</p>	<ul style="list-style-type: none"> • Submit the Contact or Contact Us web form. • Schedule a tour with us. • Apply to become a resident by clicking Lease Now, Applicant Login, or Applicant Registration. • Send us an email. • Use our Services which involve our affiliates, business partners, and vendors. • We may collect information about you from third parties. • Any other correspondence provided or made available to the Klingle Corporation. 	<ul style="list-style-type: none"> • Operate our business. We use Personal Information to allow you to use our Services, and otherwise run our day-to-day operations such as allowing you to make specific choices related to residency, message opt-in, and other preferences about your stay with us. • For other operational purposes. If we intend to use your Personal Information for any additional purpose not specified in this Policy, we will notify you (and, if necessary, obtain your consent) before using your Personal Information in this way. • Communicate with you. We may use Personal Information to communicate with you about our Services, and to respond to your inquiries, including if you contact us with a question or concern. • Provide marketing and advertising. We may use Personal Information to contact you with surveys and information regarding our Services and those of our affiliates that we believe may be of interest to you. This may include commercial emails sent on behalf of ourselves, our affiliates, and our advertisers. • Evaluate and improve our services. We may use the Personal Information we collect to evaluate and improve our Services and to measure, improve, and understand the effectiveness of our Services and its features. We may also use this information to develop new Service offerings. • Use for administrative purposes. To assess the usage, value and performance of our online products and services; to improve your experience with the sites; and as otherwise permitted by applicable law or regulation.
<p>Technical information such as information about the device you use to interact with us such as a unique device identifier, hardware model, IP address, geolocation, operating system and version, and mobile network information.</p>	<ul style="list-style-type: none"> • Visit the sites. • We may collect information about you from third parties. 	<ul style="list-style-type: none"> • Operate our business. We use Personal Information to allow you to use our Services, and otherwise run our day-to-day operations such as allowing you to view and interact with our Sites. • For other operational purposes. If we intend to use your Personal Information for any additional purpose not specified in this Policy, we will notify you (and, if necessary, obtain your consent) before using your Personal Information in this way. • Provide marketing and advertising. We may use Personal Information to contact you with surveys and information regarding our Services and those of our affiliates that we believe may be of interest to you. This may include commercial emails sent on behalf of ourselves, our affiliates, and our advertisers. • Comply with legal requirements. We may use Personal Information to

		<p>comply with lawful court orders, law enforcement requests, or other legal requirements.</p> <ul style="list-style-type: none"> • Evaluate and improve our services. We may use the Personal Information we collect to evaluate and improve our Services and to measure, improve, and understand the effectiveness of our Services and its features. We may also use this information to develop new Service offerings. • Use for security purposes. We may use Personal Information to mitigate fraud and protect the Klingle Corporation. • Use for administrative purposes. To assess the usage, value and performance of our online products and services; to improve your experience with the sites; and as otherwise permitted by applicable law or regulation.
<p>“Clickstream” data (e.g., information regarding which of our Web pages you access, the frequency of such access, and your product and service preferences) may be collected by the Klingle Corporation itself, or by our service providers, using cookies, Web beacons, page tags, or similar tools that are set when you visit the sites or when you view an advertisement we have placed on another Web site.</p>	<ul style="list-style-type: none"> • Visit the sites. • We may collect information about you from third parties. 	<ul style="list-style-type: none"> • Provide marketing and advertising. We may use Personal Information to contact you with surveys and information regarding our Services and those of our affiliates that we believe may be of interest to you. This may include commercial emails sent on behalf of ourselves, our affiliates, and our advertisers. • Evaluate and improve our services. We may use the Personal Information we collect to evaluate and improve our Services and to measure, improve, and understand the effectiveness of our Services and its features. We may also use this information to develop new Service offerings. • Use for administrative purposes. To assess the usage, value and performance of our online products and services; to improve your experience with the sites; and as otherwise permitted by applicable law or regulation.
<p>Engagement data such as information related to how you interact with the Services and advertisements, such as referring and exit web pages and URLs, browsing history, and other similar information.</p>	<ul style="list-style-type: none"> • Visit the sites. • We may collect information about you from third parties. 	<ul style="list-style-type: none"> • Operate our business. We use Personal Information to allow you to use our Services, and otherwise run our day-to-day operations such as allowing you to view and interact with our Sites. • For other operational purposes. If we intend to use your Personal Information for any additional purpose not specified in this Policy, we will notify you (and, if necessary, obtain your consent) before using your Personal Information in this way. • Provide marketing and advertising. We may use Personal Information to contact you with surveys and information regarding our Services and those of our affiliates that we believe may be of interest to you. This may include commercial emails sent on behalf of ourselves, our affiliates, and our advertisers.

		<ul style="list-style-type: none"> • Use for administrative purposes. To assess the usage, value and performance of our online products and services; to improve your experience with the sites; and as otherwise permitted by applicable law or regulation.
<p>Third-party information such as Personal Information about you collected through our affiliates, business partners, and vendors who provide services on our behalf.</p>	<ul style="list-style-type: none"> • Schedule a tour with us. • Enter your address in a Map search. • Apply to become a resident by clicking Lease Now, Applicant Login, or Applicant Registration. • Login to our resident portal by clicking Resident Login. • Use our Services which involve our affiliates, business partners, and vendors. 	<ul style="list-style-type: none"> • Operate our business. We use Personal Information to allow you to use our Services, and otherwise run our day-to-day operations such as allowing you to tour our facilities, apply to become a resident, and provide an online portal for our residents to make financial transactions. • For other operational purposes. If we intend to use your Personal Information for any additional purpose not specified in this Policy, we will notify you (and, if necessary, obtain your consent) before using your Personal Information in this way. • Communicate with you. We may use Personal Information to communicate with you about our Services, and to respond to your inquiries, including if you contact us with a question or concern. • Provide marketing and advertising. We may use Personal Information to contact you with surveys and information regarding our Services and those of our affiliates that we believe may be of interest to you. This may include commercial emails sent on behalf of ourselves, our affiliates, and our advertisers. • Comply with legal requirements. We may use Personal Information to comply with lawful court orders, law enforcement requests, or other legal requirements. • Evaluate and improve our services. We may use the Personal Information we collect to evaluate and improve our Services and to measure, improve, and understand the effectiveness of our Services and its features. We may also use this information to develop new Service offerings. • Use for security purposes. We may use Personal Information to mitigate fraud and protect the Klingle Corporation. • Use for administrative purposes. To assess the usage, value and performance of our online products and services; to improve your experience with the sites; and as otherwise permitted by applicable law or regulation.
<p>Images such as closed-circuit television security systems and images captured while on-premises.</p>	<ul style="list-style-type: none"> • Visit the community. 	<ul style="list-style-type: none"> • Operate our business. We use Personal Information to allow you to use our Services, and otherwise run our day-to-day operations such as providing a safe and secure community for our residents and guests. • For other operational purposes. If we intend to use your Personal

		<p>Information for any additional purpose not specified in this Policy, we will notify you (and, if necessary, obtain your consent) before using your Personal Information in this way.</p> <ul style="list-style-type: none"> • Comply with legal requirements. We may use Personal Information to comply with lawful court orders, law enforcement requests, or other legal requirements. • Use for security purposes. We may use Personal Information to mitigate fraud and protect the Klingle Corporation.
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Types of Third Parties

- This information may be processed by us, or on our behalf by other entities, solely in accordance with our instructions.
- We disclose information we collect from you to service providers, consultants, auditors, attorneys, vendors, contractors, or agents who perform functions on our behalf. This includes entities that host our Sites, perform research and development, and assist us in performing analytics on our Sites.
- We disclose the information we collect from you to our affiliates or subsidiaries.
- We may disclose your information to others when it is necessary to provide the Services you requested.
- If (i) we or our affiliates are or may be acquired by, merged with, or invested in by another company, or (ii) if any of our shares or assets are or may be transferred to another company, whether as part of a bankruptcy or insolvency proceeding or otherwise, we may transfer the information we have collected from you to the other company. As part of the business transfer process, we may share certain of your personal information with lenders, auditors, and advisors, including attorneys and consultants.
- We disclose Personal Information to comply with the law, a judicial proceeding, court order, or other legal process, such as in response to a court order or a subpoena.
- We disclose Personal Information when we believe it is appropriate to do so to investigate, prevent, or take action regarding illegal activities, suspected fraud, situations involving potential threats to the safety of any person, violations of this Policy, or as evidence in litigation in which we are involved.
- We may disclose Personal Information for a new use or purpose not described in this Policy. If there is a “material change” to the purpose or categories of Personal Information collected or shared, we will notify you beforehand or at the time of disclosure and provide you with the choice of legally applicable opt-in or opt-out consent.

Our Use of Cookies

Cookies are small text files that may be placed on your Web browser when you visit our Sites, or when you view advertisements that we have placed on other Web sites. Cookies allow your browser to remember some specific information which the Web server can later retrieve and use. When you quit your browser, some cookies are stored in your computer's memory, while some expire or disappear.

Cookies are used primarily for administrative purposes, to improve your experience with our Web sites. Examples of this would include the use of cookies:

- To improve site security by “authenticating” you (i.e., verify that you are who you say you are) when you sign into our Sites.
- To keep track of your specified preferences such as language, time zone and timeouts after periods of inactivity.
- To allow you to navigate our Sites more easily by “remembering” your identity so that you do not have to input your password multiple times as you move between pages or services.

We use Cookies for the following purposes:

- **Website Operation.** Cookies help us run our websites securely and enable basic functions like page navigation.
- **Performance and Analytics.** Cookies help us analyze how you interact with our Sites. These Cookies enable us to monitor and improve website performance, Services, and your experience.
- **Personalization.** For example, your language preference is remembered.
- **Advertising.** We can display advertising content depending on location, language, and your past browsing history.

If you wish to prevent Cookies from tracking your activity, or visits across multiple websites, you can set your browser to block certain Cookies or notify you when a Cookie is set. If you block Cookies, certain features and Services may not work. For more information on how you can customize your browser's Cookie setting, please visit the link to your web browser below:

- [Google Chrome](#)
- [Safari](#)
- [Microsoft Edge](#)
- [Mozilla Firefox](#)

We are not responsible for the completeness, effectiveness, or accuracy of any third-party opt-out options or programs.

Do Not Track

Some website browsers offer a “Do-Not-Track” setting or extension you can activate to signal your preference not to have data about your online browsing activities monitored and collected. Currently, our Sites and Services do not recognize “Do-Not-Track” requests. You may, however, disable certain tracking as discussed in this section (e.g., by disabling cookies).

Information Regarding Children

The Services are intended for individuals 18 years of age and older. Our Services are not directed at, marketed to, nor intended for, children under 18 years of age. The Klingle Corporation does not knowingly collect, use, or sell any information, including Personal Information, directly from children under 18 years of age.

If the Klingle Corporation learns that it has collected any information regarding a person younger than 18 years of age without consent, the Klingle Corporation will delete or destroy the information immediately.

If there is concern that information regarding a person younger than 18 years of age was somehow collected by the Klingle Corporation, any minor, or the parent(s) or legal guardian(s) of such minor, who wishes to request the removal of the minor’s information should submit their request by using the contact details provided in the [“Contact Us”](#) section below.

Your European Economic Area (EEA) Privacy Rights

European Economic Area (EEA) residents should be aware that you may be entitled under applicable data protection laws to the following rights with regard to the Klingle Corporation’s collection, use and sharing of your Personal Information:

- **Right to object to certain data processing:** To the extent that the Klingle Corporation is relying upon the legal basis of legitimate interest to process your personal data, then you have the right to object to such processing, and the Klingle Corporation must stop such processing unless we can either demonstrate compelling legitimate grounds for the processing that override your interests, rights and freedoms or where the Klingle Corporation needs to process the data for the establishment, exercise or defense of legal claims. Where the Klingle Corporation relies upon legitimate interest as a basis for processing we believe that we can demonstrate such compelling legitimate grounds, but we will consider each case on an individual basis.
- **Information and access:** You have the right to be provided with certain information about the Klingle Corporation’s processing of your personal data and access to that data (subject to exceptions).
- **Rectification:** If your personal data changes, we encourage you to inform us of the change. You have the right to require inaccurate or incomplete personal data to be updated or corrected.

- **Erasure:** You have the right to require that your data be erased in certain circumstances, including where it is no longer necessary for us to process this data in relation to the purposes for which we collected or processed the data, or if we processed this data on the basis of your consent and you have since withdrawn this consent.
- **Data portability:** Where we process your personal data on the basis of your consent, or where such processing is necessary for entering into or performing our obligations under a contract with you, you may have the right to have the data transferred to you or another controller in a structured, commonly used and machine-readable format, where this is technically feasible.
- **Right to restriction of processing:** You have the right to restrict the Klingle Corporation processing of your personal data while your request for data rectification or objection to personal data processing is being considered, if we no longer need to process your data but you need that data in connection with a legal claim, or if our processing is unlawful but you do not want us to erase the data. If this right applies, we will continue to store your data but will only further process it with your consent, for the establishment, exercise or defense of legal claims, to protect the rights of another person, or for reasons of important public interest.
- **Right to withdraw consent:** If we require your consent to process any of your information, we will request this consent separately. To the extent that the Klingle Corporation relies on your consent to process any of your personal data, you have the right to withdraw your consent to such processing at any time.
- **Complaint:** You also have the right to lodge a complaint with a supervisory authority, in particular that in your Member State of residence, where applicable.

If you would like to exercise the above rights in any way, please contact us at privacy@bfsaul.com or use the mailing address provided in the [“Contact Us”](#) section below.

The lawful basis for processing your personal information is made up of one or more of the following reasons depending on the circumstances: (i) your consent, and/or (ii) providing the services you have requested, and/or (iii) legitimate interests, and/or (iv) compliance with applicable laws, regulations, court orders or other legal process.

Your California Privacy Rights

California residents should be aware that this section does not apply to: Personal Information covered by certain sector-specific privacy laws, including the Fair Credit Reporting Act (FCRA), the Gramm-Leach-Bliley Act (GLBA) and its implementing regulations, the California Financial Information Privacy Act (FIPA), and the Driver’s Privacy Protection Act of 1994.

Depending on where you reside, you may have one or more of the following rights with regard to the Klingle Corporation’s collection, use and sharing of your Personal Information:

- **Right to Access:** The right to request that we disclose what Personal Information we collect, use, disclose or sell about you.
- **Right to Deletion:** The right to request the deletion of Personal Information we have collected or maintain about you.
- **Right to Opt-Out:** The right to opt out of profiling, automated decision-making, and the sale or sharing of Personal Information.
- **Right to Correct Inaccurate Personal Information:** The right to request any inaccurate Personal Information about you maintained by the Klingle Corporation be corrected.
- **Right of Restriction of Sensitive Data:** The right to direct the Klingle Corporation to limit its use of the consumer's sensitive personal information to that use which is necessary to perform the services or provide the goods reasonably expected by an average consumer who requests those goods or services.
- **Right of Portability:** The right to have specific pieces of personal information transferred to another entity in a format easily understandable to the average consumer, and a commonly used, machine-readable format.
- **Non-Discrimination:** The right not to receive discriminatory treatment by the Klingle Corporation, in terms of the services and prices offered on or through our Services, because you exercised these rights regarding the collection, use and sharing of your Personal Information.

If you would like to access, review, edit, delete or have us properly dispose of any copies of the Personal Information that the Klingle Corporation collected about you (subject to any applicable legal exceptions), or if you would like to exercise the above rights in any other way, please contact us at privacy@bfsaul.com or use the mailing address provided in the "[Contact Us](#)" section below.

You may be able to opt out of the Klingle Corporation sharing your Personal Information with the entities identified in this Policy by sending us an email at the address above, unless the sharing of your Personal Information is necessary to perform one of the following business purposes: to count ad impressions and evaluate their effectiveness; to detect, protect against, and prosecute security incidents; to debug or troubleshoot functional errors that may arise with the Services; to complete short-term tasks related to an existing interaction you have with the Klingle Corporation; to maintain or service your account; to process payments and fulfill orders or other transactions you authorize; to verify your customer information; and to ensure the safety and quality of the Services.

The Klingle Corporation will attempt to accommodate any request to delete or properly dispose of any copies of your Personal Information, but we cannot guarantee we can eliminate all Personal Information from the specified uses. Therefore, please be as specific as possible in any request to delete or dispose of copies of your Personal Information. We may deny your deletion request if retaining the information is necessary for us or our service providers to:

- Complete the transaction for which we collected the Personal Information, provide a good or service that you requested, take actions reasonably anticipated within the context of our ongoing business relationship with you, or otherwise to perform a contract we entered into with you;
- Detect security incidents, protect against malicious, deceptive, fraudulent, or illegal activity, or prosecute those responsible for such activities;
- Debug products to identify and repair errors that impair existing intended functionality;
- Exercise free speech, ensure the right of another consumer to exercise their free speech rights, or exercise another right provided for by law;
- Comply with the California Electronic Communications Privacy Act (Cal. Penal Code § 1546);
- 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 the information's deletion may likely render impossible or seriously impair the research's achievement, if you previously provided informed consent;
- Enable solely internal uses that are reasonably aligned with consumer expectations based on your relationship with us;
- Comply with a legal obligation; or
- Make other internal and lawful uses of that information that are compatible with the context in which you provided it.

If you choose to delete certain portions of your Personal Information, it may affect your ability to use certain Services. If the request relates to information that the Klingle Corporation needs to make the Sites or other Services function properly for you, you may no longer be able to use those Services. Any removal of content by the Klingle Corporation does not ensure or guarantee complete or comprehensive removal of the content in all places. The content may have been shared or reposted by other parties, or federal or state law may require maintenance of the content or information.

You may grant an authorized agent written permission to submit requests regarding your Personal Information, but we may deny authorized agent requests absent proof that you authorized such agent to act on your behalf, or if we are unable to verify your identity.

The Klingle Corporation is required to verify the identity of any person or entity that requests the disclosure or deletion of Personal Information. If you have a password-protected account with us, we will use our existing authentication procedures to verify your identity. For most other consumer requests, the Klingle Corporation will ask you to provide information that matches at least two pieces of personal information we store about you before responding to your request. If you would like to request the specific pieces of your personal information that the Klingle Corporation has collected, or if you would like us to delete highly sensitive information, you will need to match at least three pieces of information we store about you, and you must provide a signed declaration

under penalty of perjury that you are the consumer whose personal information you are requesting.

We cannot respond to your request or provide you with Personal Information if we cannot verify your identity or authority to make the request and confirm the Personal Information relates to you. Making a verifiable consumer request does not require you to create an account with us. We will only use Personal Information provided in a verifiable consumer request to verify the requestor's identity or authority to make the request.

We may send periodic promotional emails to you. You may opt out of promotional emails by following the opt-out instructions contained in the email. If you opt out of receiving promotional emails, we may still send you emails about other services you have requested to receive from us.

Global Privacy Control

We respond to the Global Privacy Control signal for California residents. California residents may use the Global Privacy Control (GPC) to communicate your privacy preferences. If the Klingle Corporation detects the GPC signal from your device, the Klingle Corporation will not share your data. To learn more, visit [Global Privacy Control — Take Control of Your Privacy](#).

Do Not Sell or Share My Personal Information

To request an opt-out of the sale or sharing of your Personal Information you may contact us at privacy@bfsaul.com or use the mailing address provided in the "[Contact Us](#)" section below.

Limit the Use of My Sensitive Personal Information

To request for a restriction of the processing of your Sensitive Personal data you may contact us at privacy@bfsaul.com or use the mailing address provided in the "[Contact Us](#)" section below.

Your Virginia Privacy Rights

Subject to certain exceptions, Virginia residents also have the right to request confirmation of processing activities of their Personal Information and to request access, deletion, correction, and portability of said Personal Information. Virginia residents have the right to opt-out of processing of Personal Information for the purposes of targeted advertising, profiling, and the sale of Personal Information. You have the right not to be discriminated against if you choose to exercise those rights. If you are a Virginia resident and would like to exercise the above rights in any way, please contact us at

privacy@bfsaul.com or use the mailing address provided in the [“Contact Us”](#) section below.

Retention and Disposal of Personal Information

The Klingle Corporation retains collected information for a reasonable amount of time in order to fulfill the stated purpose for why the information was collected. The Klingle Corporation will also retain collected information connected to business records for periods of time required by law. If the Klingle Corporation determines that collected information is no longer needed, it will delete such information.

Securing Personal Information

The Klingle Corporation is committed to protecting the privacy and confidentiality of your personal information. We maintain physical, electronic, and procedural safeguards to protect the information against loss, misuse, damage or modification and unauthorized access or disclosure. Some of the other central features of our information security program are:

- A dedicated group that designs, implements and provides oversight to our information security program;
- The use of specialized technology such as firewalls;
- Testing of the security and operability of products and services before they are introduced to the Internet, as well as ongoing scanning for publicly known vulnerabilities in the technology;
- Internal and external reviews of our Internet sites and services;
- Monitoring of our systems infrastructure to detect weaknesses and potential intrusions;
- Implementing controls to identify, authenticate and authorize access to various systems or sites;
- Protecting information during transmission through various means including, where appropriate, encryption; and
- Providing the Klingle Corporation personnel with relevant training and continually updating our security practices in light of new risks and developments in technology.

Legal Disclaimers

Nothing in this Policy restricts our ability to:

- Comply with federal, state, or local laws;
- Comply with a civil, criminal, or regulatory inquiry, investigation, subpoena, or summons by federal, state, or local authorities;

- Cooperate with law enforcement agencies concerning conduct or activity that we reasonably and in good faith believe may violate federal, state, or local law;
- Exercise or defend legal claims;
- Detect security incidents and protect against fraudulent or illegal activity and prosecute those responsible for such activity; or
- Transfer Personal Information as part of a merger or acquisition, dissolution, bankruptcy, or any other transaction in which a third party assumes control of all or part of our business.

Links

Our Sites and Services may contain links to unaffiliated websites. Any access to and use of such linked websites is not governed by this Policy, but instead is governed by the privacy policies of those websites. We are not responsible for the information practices of such websites.

Updates to This Policy

This Policy is current as of the Effective Date set forth above. We may change this Policy from time to time, so please be sure to check back periodically. We will post any changes to this Policy on our Sites, and any material change to this Policy will be effective immediately.

Contact Us

If you have questions about this Policy, the privacy aspects of our Sites or Services, or would like to make a privacy-related inquiry, complaint, or dispute, please contact us at:

Privacy Team c/o Legal Department
The Klingle Corporation
7501 Wisconsin Ave Suite 1500E
Bethesda, MD 20814
Phone: (301) 986-6200
Email: privacy@bfsaul.com

The Klingle Corporation intends to strictly enforce this Policy. If you believe there has been some violation of this Policy, please contact the Klingle Corporation.

This Policy was last updated: December 4, 2023