

Last updated: November 2020

California Consumer Privacy Act Disclosure

Rights for California Residents

If you are a California resident you may have certain rights under the California Consumer Privacy Act (the “CCPA”) (*Cal. Civ. Code §1798.100 et seq.*) regarding your personal information, including:

- the right to request the specific pieces of personal information we collected about you; the categories of personal information we collected; the categories of sources used to collect the personal information; the business or commercial purposes for collecting your personal information; and the categories of third parties with whom we share your personal information each as it pertains to our activities in the preceding twelve (12) months;
- the right to request, on legitimate grounds, deletion of your personal information that we collected;
- the right to have someone you authorize make a request on your behalf; and
- the right not to be discriminated against for exercising any of these rights.

To exercise one or more of your rights, you, or someone you authorize, may call us at (888) 914-9661 (PIN: 260208) or email us at privacy@kennedywilson.com. We also must provide in this online disclosure certain details about our collection and handling of categories of personal information. The information that follows shows the types of personal information we may collect about California residents who are subject to the CCPA, the sources from which we collect it, and how we use and disclose it.

We will need to confirm your identity and California residency to process your requests to exercise your information, access or deletion rights. We cannot process your request if you do not provide us with sufficient detail to allow us to verify your identity, and understand and respond to the request. A California resident can empower an “authorized agent” to submit request on his/her behalf. We will require the authorized agent to have a written authorization confirming that authority.

Please note that the CCPA limits these rights by, for example, prohibiting us from providing certain sensitive information in response to an access request and limiting the circumstances in which we must comply with a deletion request. If we deny your request, we will communicate our decision to you.

Verifying Your Identity

Once you submit your verifiable request, we will verify your identity by matching the information you provided us with information in our systems. If you submit a request to know specific pieces of personal information or a request to delete certain information, in addition to verifying your identity with information we have on file, you also may be required to submit a signed declaration under penalty of perjury stating that the requestor is the consumer whose personal information is the subject of the request. If we are unable to respond to your request for specific pieces of information, we will evaluate your request as if it is a request to know the categories of personal information that we have collected about you.

We will generally avoid requesting additional information from you to verify you. However, if we cannot verify your identity based on the information we currently maintain, we may request additional information from you, which will only be used to verify your identity and for security or fraud-prevention purposes. We will delete any new personal information we collect to verify your identity as soon as practical after processing your request unless otherwise required by the CCPA.

Generally, if we are unable to verify your identity, we will deny your request and inform you of our inability to verify your identity and explain why we were unable to do so.

Please note that we are only required to respond to your request for access to your personal information twice within a 12-month period.

Personal Information

Categories of Personal Information

- *Personal identifiers, including those listed in other California statutes:* Name; telephone number; email address; postal address; account name; online identifier; device identifier; IP address
- *Characteristics of protected classifications:* date of birth/age; gender; military or veteran status; marital status; nationality; citizenship; request for leave
- *Professional or Employment:* title; salary; employment files; references
- *Education information:* details of your education and qualifications
- *Financial details:* bank account numbers; account holder name and details; transaction details

- *Internet or other electronic network activity information:* browsing history, search history, information regarding your interaction with a website, application, or advertisement
- *Geolocation data:* any information used to identify your physical location
- *Communications, recordings, images:* audio, electronic, visual

Our Sources of Personal Information

Category of Sources from which we Collect Personal Information

- We collect or obtain your personal information when you provide it to us when registering details requesting news or information about us, a property, an investment, or other services or when contacting us via an online contact form.
- We collect or obtain your personal information from additional online and offline sources or commercially available third-party sources.
- We collect or obtain your personal information when you apply for a job using the careers section on our website, including your resume.
- We collect or obtain your personal information when you visit our website. Specifically, the information we collect automatically may include information like your IP address, device type, unique device identification numbers, browser-type, broad geographic location (e.g. country or city-level location), mobile network information, your mobile operating system, the type of mobile browser you use, and time zone setting.

Use of Information

Business and Commercial Purposes for Use of Personal Information

- *Marketing/Prospecting:* communicating with you via any means (including via email, telephone, text message, social media, post, or in-person) subject to ensuring that such communications are provided to you in compliance with applicable law; and maintaining and updating your contact information where appropriate
- *Operation of our websites:* operation and management of our websites; providing content to you; displaying advertising and other information to you; and communicating and interacting with you via our website
- *IT operations:* management of our communications systems; operation of IT security; and IT security audits
- *Financial management:* sales; finance; corporate audit; and vendor management

- *Security*: physical security of our premises (including records of visits to our premises and CCTV recordings); and electronic security (including login records and access details, where you access our electronic systems)
- *Investigations*: detecting, investigating, and preventing breaches of policy, and criminal offenses, in accordance with applicable law
- *Legal compliance*: compliance with our legal and regulatory obligations under applicable law
- *Legal proceedings*: establishing, exercising, and defending legal rights
- *Improving our services*: identifying issues with existing services; planning improvements to existing services; and creating new services
- *Risk Management*: Audit, compliance, controls, and other risk management
- *Fraud prevention*: Detecting, preventing and investigating fraud

Disclosure of Information

Categories of Third Parties to Whom Personal Information is Disclosed

- You and, where appropriate, your family, your associates, and your representatives or any other person with your consent;
- To our group companies and affiliates;
- To third party services providers, suppliers, and partners that assist in providing our services, and other services to you;
- To any competent law enforcement body, regulatory, government agency, court, or other third parties where we believe disclosure is necessary as a matter of applicable law or regulation, to exercise, establish or defend our legal rights, or to protect your vital interests or those of any other person. This includes exchanging information with other companies and organizations for fraud protection

Sale of Personal Information

Kennedy Wilson does not offer an opt-out from the sale of personal information because Kennedy Wilson does not engage in the sale of personal information as contemplated by the CCPA. We share personal information with other businesses for a business purpose as described in our Privacy Policy. While we may benefit from such exchanges, we do not share personal information for the sole purpose of receiving compensation for that information. As noted in our Privacy Policy, none of our websites or online services are intended for or directed at children under 13 years of age. No one under 13 may provide any personal information to or on our website and we do not knowingly collect personal information from children under 13. Neither our website nor our services are directed at children under age 13 and we do not sell or disclose the

personal information of anyone we know is under age 13 in compliance with Children's Online Privacy Protection Act.

Changes to this Disclosure

We may change this disclosure from time to time. When we do, we will let you know by appropriate means such as by posting the revised disclosure on our CCPA website with a new "Last Updated" date. Any changes to this disclosure will become effective when posted unless indicated otherwise.