

Last updated: February 2021

Online Privacy Policy

Introduction

Kennedy Wilson (“KW”, “Kennedy Wilson”, “we”, “us” or “our”) respects the privacy rights of individuals. We are committed to your right to privacy and handling personal information responsibly and in accordance with applicable law. This privacy policy (the “Privacy Policy”) explains how we may collect, share, use, and protect information when you visit or use our website www.kennedywilson.com (the “website”) and online services that include links to this Privacy Policy. This Privacy Policy does not apply to information collected by us offline or through any other means, including on any other website operated by us or any third party or through any application or content (including advertising) that may link to or be accessible from our website.

As you review this Privacy Policy, here are a few general principles to keep in mind:

- Our website is hosted in the United States. If you visit our website or use one of our online services, your information may be transferred or processed in the United States.
- If you are a California resident, you may have rights under the California Consumer Privacy Act of 2018 (the “CCPA”). Please see “Additional Information for California Residents” below.
- If you are a UK or EEA resident, you may have rights under UK or European data protection laws. Please see “Additional Information for UK and EEA Residents” below.
- If you are a tenant or prospective tenant of Kennedy Wilson Europe (KWE) properties, you may have rights under UK or European data protection laws (such as the General Data Protection Regulation (the “GDPR”)). [Learn more in our KWE Tenant Privacy Notice](#)
- 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. 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. If you are under 13, do not use or provide any information on this website.

- Our social media websites or pages may have additional terms about the privacy of your information. Please review the privacy policy for the specific online service you are using.

Information We Collect

Personal Information You Give Us

When you choose to contact us, register for an event, or request e-mail alerts or other news or information about us, a property, an investment, or other services we provide, we may receive information that can identify you or your business and include such items as your title, name, email, phone number, contact details, postal address, your organization, country of residence, occupation, role, and preferences. Additionally, if you contact us via email, we may keep a record of that correspondence and the information you provide and any amended information you provide when responding to our emails including your title, name, contact details, and changes to your contact preferences.

Applicants for Employment

If you apply for employment with Kennedy Wilson, we collect information you provide to us when you complete and submit a job application using the careers section on our website, including your resume, and any information you may provide to us as a follow-up to your application. We may also collect information about you from vendors and service providers that we work with in the application process, such as vendors that process or review applications, that suggest candidates for us, or that assist with an applicant's potential relocation.

We may use the information we collect, in order to:

- process and evaluate an applicant's application, qualifications, and credentials for employment with us;
- contact applicants regarding the status of their application for employment;
- assist with the onboarding of an applicant into employment;
- conduct internal research;
- conduct background checks;
- monitor our recruitment initiatives and equal opportunities policies;
- determine an applicant's need for special accommodations;
- evaluate an applicant's legal ability or capacity for employment;
- detect security incidents, protect against malicious, deceptive, fraudulent, or otherwise illegal activity; and
- determine the terms of an applicant's potential employment with us.

Kennedy Wilson does not sell your personal information. However, we may share your information with our affiliates and with service providers who assist us in the application process. For example, we may share your information to conduct background checks, coordinate relocations, or utilize executive search vendors, or vendors who otherwise process applications. We may also share your information to satisfy any applicable law, regulations, subpoenas, court orders, warrants, governmental requests, or legal process if in our good faith opinion such is required or permitted by law. We may also share your information with a third-party performing audit, legal, operational, or other similar services for or on behalf of Kennedy Wilson. Moreover, we reserve the right to disclose and transfer the information we collect: (i) to a subsequent owner, co-owner, or operator of the website or associated databases; or (ii) in connection with the negotiation, planning, or completion of a corporate merger, consolidation, restructure, sale of substantially all of our shares or assets, or other corporate change.

Usage and Other Information We Automatically Collect About You

When you visit our website, we may use automatic data collection technologies to collect and log certain information about your equipment, browsing actions, and patterns, including details of your visit to our website, (e.g., traffic data, logs, other communication data, and resources that you can access and use on our website) and information about your computer or device and internet connection (including, but not limited to, your IP address, operating system, browser type, broad geographic location (e.g. country or city-level location), mobile network information, your mobile operating system, and the type of mobile browser you use).

Additional Sources of Information We May Collect About You

We may also collect information about you from additional online and offline sources or commercially available third-party sources (e.g., credit reference agencies; law enforcement authorities; etc.). Additionally, if you choose to contact us regarding our certain of our services or a property or request other information about Kennedy Wilson and our services through a mobile application or one of our websites, we may receive information that can identify you or your business and include such items as your title, name, email, phone number, contact details, postal address, your organization, country of residence, occupation, role, and preferences. We may collect information such as unique device identifiers for your mobile device and other device settings, information about your location, and analytical information about how you use your mobile device. We may ask your permission before collecting certain information, such as precise geo-location information.

Use of Information

If permissible under applicable laws and regulations, we may use the information discussed above in several ways, such as:

- *Marketing/Prospecting*: communicating with you via any means (including email, telephone, text message, social media, or in-person, etc.); 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 websites
- *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 to our electronic systems, if applicable)
- *Investigations*: detecting, investigating, and preventing breaches of our corporate policies; criminal offenses; and violations of other rules, regulations, or laws
- *Legal compliance*: compliance with our legal and regulatory obligations under applicable law
- *Legal proceedings*: establishing, exercising, and defending our 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

Additionally, we may use your information for any other purpose disclosed by us when you provide the information or with your consent. We may also use data that we collect on an aggregated or anonymous basis (such that it does not identify any individual customers) for various business purposes, where permissible under applicable laws and regulations.

Kennedy Wilson does not sell your personal information. However, we may disclose your personal information to a third party for a business purpose as described in this Privacy Policy.

Disclosure of Information

We may disclose your personal information to:

- you and, where appropriate and with your consent, your family, your associates, and your representatives or any other person;
- to our group companies and affiliates;
- to third party services providers, suppliers, vendors, and partners that assist in providing our services, and other services to you; or
- 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, protect or defend our legal rights, or to protect the interests of our customers or users of our website. This includes exchanging information with other companies and organizations for fraud protection.

Understanding Cookies

We use cookies and similar tracking technology (collectively, “Cookies”) to collect and use personal information about you. For further information about the types of Cookies we use, why, and how you can control Cookies, please see the [Kennedy Wilson Cookie Notice](#).

Linking to Third-Party Websites

We may provide links to websites that are owned or operated by other companies (“third-party websites”) and our Privacy Policy does not apply to these third-party websites. When you use a link online to visit a third-party website, you will be subject to that website’s privacy and security practices. You should familiarize yourself with the privacy policy, terms of use, and security practices of the linked third-party website before providing any information on that website.

Security

We have implemented security policies, appropriate organizational and technical measures to protect the information that we have under our control from unauthorized access, improper use or disclosure, unauthorized modification, and unlawful destruction or accidental loss. Unfortunately, the transmission of information via the Internet is not completely secure. Although we do our best to protect your information, we cannot guarantee the security of your information transmitted through our website and any transmission is at your own risk. Once we have received your information, we will use strict procedures and security features to try to prevent unauthorized access.

Updating your Information

You have the right to opt-out from marketing communications we send you at any time. If you wish to withdraw your consent to receive marketing materials, this can be done by:

- updating your preferences on your online account, if you have one
- clicking on the unsubscribe link on any emails we send you; or
- emailing us at privacy@kennedywilson.com

If you withdraw your consent, this will not affect our rights to have sent you marketing material before your withdrawal, but we will not send any further marketing.

Changes to this Privacy Policy

We may change this Privacy Policy from time to time. When we do, we will let you know by appropriate means such as by posting the revised policy on this page with a new “Last Updated” date. Any changes to this Privacy Policy will become effective when posted unless indicated otherwise.

Additional Information for California Residents

The CCPA provides eligible California residents with specific rights with respect to our collection, retention and use of personal information. The below link is to our California Consumer Privacy Notice, which supplements this Privacy Policy and applies solely to eligible residents of the State of California (“consumers” or “you”) as of January 1, 2020.

[California Consumer Privacy Notice](#)

Additional Information for UK and EEA Residents

EU and UK data protection laws provide EEA and UK residents with specific rights with respect to our collection, retention and use of personal information. The below link is to our EEA and UK Privacy Notice, which supplements this Privacy Policy and applies solely to EEA and UK residents who access this website, as of May 25, 2018.

[Website Privacy Notice for EEA and UK residents](#)