

# KLINGBEIL

## CAPITAL MANAGEMENT

### Privacy Policy

Effective Date: 10/25/2024

Last Updated: 7/9/2025

### SUMMARY

Klingbeil Capital Management (referred to as "we," "us," or "our") respects your privacy and is committed to protecting the personal information you share with us through our Prospect Portal, Resident Portal or Marketing Website (the "Portals" or "Website"). This Privacy Policy explains how we collect, use, and protect your information when you visit our Portals or Website or interact with us online.

By using the Portals or Website, you agree to the collection and use of information in accordance with this Privacy Policy. **If you do not agree with the terms of this Privacy Policy, please do not use our sites.**

We and our service providers collect personal information in several ways, including when you: engage in transactions or contracts with us, provide your information through our services, visit our facilities, contact our offices, or communicate with us. We may also gather information from other sources, such as public databases and joint marketing partners.

### 1. Information We Collect

We collect several types of information to provide and improve our services:

#### *a. Personal Information*

When you inquire about our properties, fill out forms, or communicate with us through the Portals or Website, we may collect personal information, such as:

- Name
- Email address
- Phone number
- Mailing address(es)
- Employment information (e.g., in relation to rental applications)

#### *b. Non-Personal Information*

We may automatically collect non-identifiable information when you visit the Portals or Website, including:

- IP address
- Browser type and version
- Pages you visit on our Portal
- Time and date of your visit
- Referring URL

### *c. Cookies*

We use cookies and similar technologies to enhance your experience on the Portals or Website. Cookies are small data files stored on your browser to help the Portals function efficiently and provide insights into user behavior. You can choose to disable cookies via your browser settings.

**"Do Not Track" Notice:** "Do Not Track" is a preference that you can set in your browser to let websites you visit know that you do not want them collecting certain information about you. We do not currently respond to, or honor, Do Not Track signals or requests from your browser.

## **2. How We Use Your Information**

We may use the information we collect for the following purposes:

- To communicate with you and respond to your inquiries or requests.
- To provide information about our properties and services.
- To process rental applications.
- To enhance business operations and improve the functionality and user experience of the Portals or Website.
- To send marketing communication, newsletters, promotional content (you can opt-out at any time) and facilitating social sharing features.
- To conduct data analysis, audits, fraud prevention, and improving services to comply with legal obligations and grow our organization.

## **3. Sharing Your Information**

We will not sell or rent your personal information to third parties. However, we may share your information with:

- **Affiliates and Service Providers:** Trusted third parties that help us operate the Portals, process rental applications, or provide customer support.
- **Legal Requirements:** If required by law, we may disclose your personal information to comply with legal processes, protect our rights, or address safety concerns.
- **Business Transfers:** If we undergo a business change (e.g., merger, sale, or reorganization), personal information may be transferred as part of the assets.
- **Rights Protection:** We may disclose personal information to protect our rights, privacy, safety, or property, or that of others, including enforcing our Terms of Use and preventing fraud.

## **4. Security of Your Information**

We take reasonable measures to protect the information you provide us from unauthorized access, alteration, disclosure, or destruction. However, no method of transmission over the Internet is entirely secure, and we cannot guarantee absolute security. If you have reason to believe that your interaction with us is no longer secure, please immediately notify us in accordance with the "Contact Us" section below. Where we collect your payment card information, we will comply with all applicable Payment Card Industry Data Security Standards (PCI-DSS).

## 5. Your Choices

You have the right to:

- Access, update, or correct your personal information.
- Opt-out of receiving marketing communications.
- Request the deletion of your personal information, subject to legal obligations.

We give you choices regarding our use and disclosure of your personal information for marketing purposes. You may opt out from:

- Receiving marketing-related emails from us. If you no longer want to receive marketing related emails from us on a going-forward basis, you may opt out by following the "unsubscribe" option contained in any such email.
- Receiving other promotional text communications, like SMS. If you no longer want to receive marketing related texts, you may opt out by replying "STOP" to any message you may receive from us.

***It is up to you to keep your personal information on our services up to date.*** You can update your personal information by logging into your account. If you are unable to update your personal information, you can contact us in accordance with the "Contact Us" section below or contact your community leasing office directly.

## 6. Links to Third-Party Portals or Websites

Our Portals or Website may contain links to third-party Portals or Websites. We are not responsible for the privacy practices or content of these external sites. The information practices and content of such third-party websites are governed by their own privacy notices. We encourage you to review the privacy notices of such third-party websites to understand their information practices.

## 7. Google Analytics

This Portal or Website may be used by Google Analytics, a web analytics service provided by Google, Inc. ("Google"). Google Analytics uses Cookies. The information generated by the Cookie about your use of the Portal (including your IP address) will be transmitted to and stored by Google on servers in the United States. Google will use this information for the purpose of evaluating your use of the Portal or Website, compiling reports on Portal and Website activity for Portal and Website operators and providing other services relating to Portal and Website activity and internet usage. Google may use the data collected to contextualize and personalize the ads of its own advertising network. Google may also transfer this information to third parties where required to do so by law, or where such third parties process the information on Google's behalf. Google will not associate your IP address with any other data held by Google. You may refuse the use of cookies by selecting the appropriate settings on your browser, however, please note that if you do this you may not be able to use the full functionality of this Portal. By using this Portal or Website, you consent to the processing of data about you by Google in the manner and for the purposes set out above. *You are responsible for finding and reviewing Google's most up-to-date privacy policy.*

This Portal or Website may be used by the Google AdWords remarketing service to advertise on third party Portals (including Google) to previous visitors to our site. It could mean that we advertise to previous visitors who haven't completed a task on our site, for example using the contact form to make an enquiry. This could be in the form of an advertisement on the Google search results page, or a site in the Google Display Network. Third-party vendors, including Google, use cookies to serve ads based on someone's past visits to the Klingbeil Capital Management Portal. Of course, any data collected will be used in accordance with our own privacy policy and Google's privacy policy. You can set preferences for how Google advertises to you using the Google Ad Preferences page, and if you want to you can opt out of interest-based advertising entirely by cookie settings or permanently using a browser plugin.

## 8. Children's Privacy

Our Portals or Website is not intended for children under the age of 13, and we do not knowingly collect personal information from children. If you believe we have collected information from a child, please contact us, and we will promptly remove the information. Please send an email to [corpcontact@kcm.com](mailto:corpcontact@kcm.com) with the subject line "Personal Information of a Minor."

## 9. California Consumers

Your Rights Under the CCPA and CPRA

As a California resident, you have the following rights regarding your personal information:

- **Right to Know:** You have the right to request details of the specific personal information we collect, use, and disclose.
- **Right to Delete:** You have the right to request the deletion of your personal information, subject to certain exceptions.
- **Right to Opt-Out of Sale of Personal Information:** We do not sell personal information as defined under the CCPA. If this changes, we will provide a clear opt-out mechanism.
- **Right to Correct:** You have the right to request the correction of any inaccurate personal information we maintain about you.
- **Right to Limit Use of Sensitive Personal Information:** You may request that we limit the use of sensitive personal information to only necessary purposes.
- **Non-Discrimination:** We will not discriminate against you for exercising any of your rights under the CCPA or CPRA.

To exercise your rights, you can contact us in accordance with the "Contact Us" section below.

## 10. European Union Consumers

Your Rights Under the GDPR

- **Purpose Limitation:** Your personal information will only be collected and processed for the purposes that are explicitly stated in this policy.
- **Data Minimization:** We will only collect the minimum amount of information that is necessary.
- **Accuracy:** Your personal information should be accurate and current. For more information on your rights regarding your personal information, please refer to Section #5, Your Choices.

- **Storage Limitation:** Your personal information will only be stored for as long as is necessary.
- **Integrity and Confidentiality:** We will use security measures like encryption to ensure the integrity and confidentiality of personal information.
- **Accountability:** We are committed to complying with the GDPR and will respect the rights outlined below.

As a European Union consumer, you have the right to:

- Access your personal data
- Request rectification of your personal data
- Request erasure of your personal data
- Object to processing
- Data portability
- Withdraw consent at any time

To exercise your rights, you can contact us in accordance with the "Contact Us" section below.

## 11. Changes to This Privacy Policy

We may update this Privacy Policy from time to time. Any changes will be posted on this page with the updated date. We encourage you to review this Privacy Policy periodically for any updates. You are responsible for visiting our site and this Privacy Notice to check for any changes.

## 12. Contact Us

If you have any questions or concerns about this Privacy Policy, please contact us at:

- Email: [corpcontact@kcm.com](mailto:corpcontact@kcm.com) with the subject line "Portal or Website Privacy Policy Concern."
- Mailing Address: 10530 Linden Lake Plaza, Suite 300, Manassas, VA 20109

**For Additional Privacy Policies – Entrata**

Visit <https://www.entrata.com/privacy-policy>

