

Privacy Policy

Introduction

This Privacy Policy describes how The Kintock Group, Inc. The Kintock Group of New Jersey, Inc. and their affiliates (collectively, “Kintock,” the “Company,” “we,” “us,” and “our”) collect, use, maintain, and protect personal information. We respect your privacy and are committed to protecting it through the implementation of this privacy policy (the “Policy”).

This Policy describes the types of information we may collect from you, the user, or that you may provide when you visit our website, <https://www.kintock.org> (the “Website”), and it describes our practices for collecting, using, maintaining, protecting, and disclosing that information.

This Policy applies to information we collect on the Website from you, whether received in person, by e-mail, text, or other electronic messages between you and the Website, through any download you may make from the Website or by uploading information to the Website or when you interact with third-party websites or services linked to the Website and from others such as vendors and service providers that assist us with our business operations.

The Policy does not apply to information we receive or collect as a contractor or service provider on behalf of governmental authorities or others that are our “Contracting Agencies”. Please refer to the applicable Contracting Agency’s policy.

Please read this Policy carefully to understand our policies and practices regarding your information and how we treat it. If you do not agree with our policies and practices, you should elect not to use the Website. However, by accessing or using the Website, you agree to the terms and conditions of this Policy which we may change from time to time with or without notice. Your continued use of the Website following any changes is deemed to be your acceptance of those changes, so please check this Policy periodically for updates.

Information We Collect

We collect personal information that you provide to us. Certain information about your use of the Website is also collected automatically.

If you do nothing during your visit but browse through the Website, read pages, or download information, we will gather and store certain information about your visit automatically. We also collect information that you provide directly to us, such as, for example, when you sign up on the Website to receive a newsletter, submit information about a possible opportunity for employment at Kintock or a possible opportunity to provide Kintock with products or services as a vendor or share your success story with us. Information collected may include your name, contact information (such as email address, postal address, and phone number), and any other information you choose to provide.

We also receive personal information from third parties such as suppliers or service providers to facilitate our business operations. In the course of our business, we also regularly receive and

collect personal information about contractors or service providers for our Contracting Agencies who contract with us to provide them services.

Information Collected and Stored Automatically

When you access or use our Website, we automatically collect and store information related to the Website's performance and visitor behavior which may include the following concerning your visit: (1) log and usage information related to your visit, including the type of browser you use, application version, access times, pages viewed, and if you linked to the Website from another website, the address of such site, (2) device information for the source of your visit including the computer or mobile device you use to access the Website and the hardware model, operating system and version, unique device identifiers, and mobile network information. We (and our service providers) use technologies to collect information about your visit and use of the Website.

As described below, we use this information to help us make the Website more useful to visitors and to learn about the number of visitors to the Website and the types of technology our visitors use, among other uses and to gather data in regard to engagement metrics, form submissions, blog performance, and email campaign performance.

Cookies and Analytics

We use “cookies,” web beacons, and similar technologies for automated data collection and tracking of your usage of the Website. Cookies consist of a small file placed on the hard drive of your computer. Web beacons (also known as “pixel tags” or “clear GIFs”) are electronic images that may be used on our Website that help deliver cookies, count visits, and understand usage of the Website. You may refuse to accept browser cookies by activating the appropriate setting on your browser. However, if you select this setting, you may be unable to access certain portions of the Website. Unless you have adjusted your browser setting so that it will refuse cookies, our system will issue cookies when you direct your browser to our Website. Some portions of the Website require the use of cookies for full functionality.

Google Analytics is a web analytics service offered by Google that tracks and reports website traffic. Google uses the data collected to track and monitor the use of our Website. This data is shared with other Google services. Google may use the collected data to contextualize and personalize the ads of its own advertising network. You can opt-out of having your activity on the Website available to Google Analytics. For more information about the privacy practices of Google, please visit the Google Privacy & Terms web page: <http://www.google.com/intl/en/policies/privacy/>.

Information You Provide to Us

Except for Information Collected and Stored Automatically described above, we do not collect your personally identifiable information on the Website unless you choose to provide it to us. If you provide us with personally identifiable information by, for example, sending us an e-mail or filling out a form and submitting it through the Website, we use that information to respond to your message and to help us provide you with the information and services that you request. When you submit information voluntarily through the Website, you are indicating your voluntary

consent to use of the information you submit. In addition to Information Collected and Stored Automatically, the information we collect on or through our Website may include (i) information that you provide by filling in forms on our Website; (ii) documents such as correspondence or resumes that you submit through the Website; and (iii) your search queries, if any, on the Website.

Information We Receive from Others

We regularly receive and collect personal information about individuals during the course of our business as a contractor and service provider for our Contracting Agencies. Such personal information that we collect in connection with our provision of services to our Contracting Agencies is collected and processed only on behalf of such Contracting Agencies and in accordance with our agreements with them. Our Contracting Agencies generally make the decisions about how or why such personal information will be processed, including any disclosure or transmission to third parties. As a result, if you have questions about your personal information that we may have received from or collected on behalf of a Contracting Agency, please contact the applicable Contracting Agency. We also receive personal information from vendors and service providers that facilitate our operations.

How We Use Your Information

In general, we use personal information to provide you with information, services, or products, to verify identities and communicate with you, to provide services to our Contracting Agencies and others, to comply with our legal obligations, and to provide safety and security.

More specifically we use information that we collect about you or that you provide to us, including any personal information, for various business purposes, including to (1) present our Website and its contents to you and to notify you about changes to the Website, (2) provide you with information, services, or products that you request from us, (3) verify your identity, (4) fulfill any other purpose for which you provide it, (5) carry out our obligations and enforce our rights arising from any contracts involving you and us, as applicable and (6) provide safety and security.

Disclosure of Your Information

In general, we share personal information with Contracting Agencies for which we provide services and with vendors, service providers and other third parties we use to support our business and who are bound by contractual obligations to keep personal information confidential and secure, and as necessary to comply with our legal and contractual obligations.

We may disclose without restriction any aggregated information about our users and any information that does not identify a specific individual. We may disclose personal information that we collect or you provide as described in this Policy (1) to fulfill the purpose for which you provide it, (2) to vendors, service providers and other third parties we use to support our business and who are bound by contractual obligations to keep personal information confidential and secure and to use it only for the purposes for which we disclose it to them, (3) to our Contracting Agencies for which we serve as a contractor or service provider, (4) to a buyer or other successor in the event of a merger, divestiture, restructuring, reorganization, dissolution or other sale or

transfer of some or all of Kintock's assets, whether as a going concern or as part of bankruptcy, liquidation or similar proceeding, in which personal information held by Kintock is among the assets transferred, (5) to our affiliates that are also covered by this Policy or that provide substantial similar privacy protections.

We may also disclose your personal information (1) to comply with any court order, law or legal process, including to respond to government or regulatory requests, (2) to comply with and enforce legal obligations, including assessing compliance with regulatory requirements and to enforce or apply our Terms of Use and other agreements, including for billing and collection purposes and (3) if we believe disclosure is necessary or appropriate to protect the rights, property, or safety of Kintock, our Contracting Agencies, employees, vendors, residents, persons receiving services from Kintock or others.

Retention of Information

We generally retain personal information until it is no longer needed for the purpose for which it has been provided unless we are required to keep it longer by law or policy. We therefore ordinarily destroy the information we collect when the purpose for which it was provided has been fulfilled unless we are required to keep it longer by law or official policy. In some cases, information that we receive or collect as a contractor or service provider for a Contracting Agency may become an agency record and may be subject to a Freedom of Information Act or similar request directed to that Contracting Agency.

Information Security

Although transmission of information electronically is never completely secure, we attempt to protect your personal information through the implementation of commercially reasonable security measures designed to protect against accidental loss of information and from unauthorized access, use, alteration and disclosure.

We have implemented commercially reasonable security measures designed to protect your personal information from accidental loss and from unauthorized access, use, alteration, and disclosure. Unfortunately, however, the transmission of information via the Internet is not completely secure. Although we take commercially reasonable measures to protect your personal information, we cannot guarantee the security of information transmitted to our Website. Any transmission of personal information is at your own risk. We are not responsible for circumvention of any privacy settings or security measures contained on the Website.

Links from and to other Sites

Our Website may contain links to governmental agencies and private organizations, and other sites not associated with us may link to the Website. Kintock is not responsible for the privacy practices employed by such third-party websites or pages that have links to or from the Website. Once you link to another site, you are then subject to the privacy policies of the new site. It is always prudent to read the privacy policy of any site you visit.

We also partner with third parties to provide links to third-party websites to offer you additional information and services related to Kintock. You may see our logo on these third-party partner

websites. Users should review the applicable privacy policy for such third-party partner websites before submitting personal information. We may not have control over third-party partners' use of your information submitted to them.

Accessing and Correcting Your Information

With respect to those portions of the Websites where your personal information may be stored, you can also contact us to request revisions.

You may send us an e-mail at Pamela.Barton@Kintock.org. to request access to, correct or delete any personal information that you have provided to us. We may not accommodate a request to change information if we believe the change would violate any law or legal requirement or cause the information to be incorrect.

If you delete your user contributions from the Website, copies of your contributions may remain viewable in cached and archived pages or might have been copied or stored by other users of the Website. Proper access and use of information provided on the Website is governed by our Terms of Use.

Children

Our Website is not intended for use by children under the age of 18. The Website is intended for use only by adult residents of the United States and its territories. If you are not 18 years of age or older, you are not permitted to use our Website. We do not knowingly collect personal information from children under the age of eighteen (18) years. If you think that we have collected information from a child under the age of eighteen through our Website, please contact us. If we learn that we have collected the information of a child under the age of eighteen years, we still take reasonable steps to delete such information.

Special Notice to California Residents

In short: California law affords California residents certain rights with respect to their personal information, including the right to access and delete information, subject to exceptions and verification, and the right to opt-out of the sale of personal information.

Individuals who reside in California have specific rights with respect to their personal information, as that term is defined under California law. This Special Notice is a supplement to the Policy and applies to California residents.

Over the previous twelve months, we have collected or received personal information described by category below for business purposes, including (1) identifiers such as name(s) and contact information and other similar identifiers which are used to verify your identity, to communicate with you, to provide services to you and our Contracting Agencies, and to provide safety and security within our facilities, (2) personal information as described in Cal. Civ. Code § 1798.80(e), which in addition to identifiers also includes other identifying information not publicly available such as insurance policy number(s), education, employment and employment history, financial information, and medical information which type of personal information we may use to verify identities, to communicate with you, to provide services to you and our

Contracting Agencies for billing and collection purposes, and to provide safety and security within our facilities, (3) characteristics of protected classifications such as age, sex, religious affiliation, etc., which may be used to verify your identity, provide services to you and our Contracting Agencies, to provide safety and security within our facilities, and for reporting and compliance with laws and regulations, (4) biometric information such as facial images and fingerprints is used to verify identities, provide services to you and our Contracting Agencies, and to provide safety and security within our facilities, (5) geolocation data about physical movements and location which may be used to provide services to you and our Contracting Agencies, and to provide safety and security within our facilities, (6) commercial information about prior and prospective transactions which may be used to provide services to you and our Contracting Agencies, (7) internet and similar network activity such as Log and Usage Information, Device Information, Information from Cookies and Similar Technologies, and other interactions with the Website which may be used by us and by third party analytics service providers to verify identities, to maintain and improve the Website, its functionality, and our products and services, to detect, prevent, or investigate security incidents or fraud and to maintain records for administrative and security purposes, (8) audio, electronic, visual, thermal, olfactory, and similar information which may be used to verify identities, provide services to you and our Contracting Agencies, and to provide safety and security within our facilities, (9) professional or employment-related information which may be used verify identities, for employment purposes, and to provide services to individuals and our Contracting Agencies and (9) education information which may be used to verify identities and to provide services to individuals and our Contracting Agencies. We also draw inferences from personal information collected in certain circumstances to create profiles for purposes of safety and security within our facilities.

We collect or receive such personal information from the following sources: (1) You, either in person through your use of the Website or through other forms of communication; and (2) our vendors and service providers that assist us with our business operations; and (3) our Contracting Agencies.

Your Rights under California Law

Access to Your Personal Information

You may request access to the personal information that we have collected and maintained about you (along with information concerning its use and disclosure) over the past twelve months after receipt of appropriate verification. You may only make two such requests during any twelve-month period.

Deletion of Personal Information

You have the right to request that we delete personal information collected and maintained about you, subject to certain exceptions. Once your request is verified and we have determined that we are required by law to do so, we will delete your personal information accordingly. Any request to delete personal information may be denied if it

is necessary for us to retain your information under one or more exceptions recognized by California law. Please note that a record of your deletion request may be retained.

Opting Out

You have the right at any time to direct us not to sell your personal information, which is your right to opt-out. We have not sold personal information within the previous twelve months.

Non-Discrimination

We will not discriminate against you for exercising any of your rights under California law.

Exercising Your Rights

To request access to or deletion of your personal information, or to exercise your right to opt-out of any sale of your personal information, please submit a verifiable consumer request to us addressed to:

Chief Operating Officer

580 Virginia Drive

Suite 250

Fort Washington, PA 19034.

Alternatively, send the request by e-mail to Pamela.Barton@Kintock.org.

Verifying Your Request

Only you or a person that you authorize to act on your behalf, may make a request concerning your personal information. For requests to access or delete personal information, your request must be verified before we can fulfil it.

Verifying your request will require you to provide sufficient information for us to reasonably verify that you are either the person about whom we collected personal information, or a person authorized to act on your behalf. Such verification information may include non-public Identifier information and other personal information that you have previously provided to us.

We use the personal information that you have provided in a verifiable request in order to verify your request. If we cannot verify your identity or authority, we may deny your request. Please also note that we may charge a reasonable fee or refuse to act on a request if such request is excessive, repetitive, or manifestly unfounded.

Your Right under the California “Shine the Light” Law

Residents of California also have the right to obtain certain information about the types of personal information that companies with whom they have an established business relationship (and that are not otherwise exempt) have shared with third parties for direct marketing purposes during the preceding calendar year. If you wish to submit a request, please contact us at Pamela.Barton@Kintock.org. We have not shared personal information with third parties for direct marketing purposes within the preceding calendar year.

Do Not Track

The Website currently does not respond to browser Do Not Track signals or similar signals.

Contacting Us

If you have any questions regarding our privacy practices related to the personal information of California residents, please contact us by email at Pamela.Barton@Kintock.org.

Special Notice to Users Outside of the United States

The Websites are intended for use by adult residents of the United States and its territories. Information provided by you and collected during your use of the Website is processed within the United States subject to its data protection and other laws. If you access the Website from outside of the United States, Information Collected and Stored Automatically and Information You Provide to Us on the Website will be transferred to and processed within the United States subject to laws that may be deemed to provide inadequate data protection by certain other countries or foreign data protection authorities. By accessing the Website and submitting personal information to us, you consent to the general use of and disclosure of such information as provided in this Policy and to the transfer and storage of such information in the United States.

Changes to Our Privacy Policy

We will notify you of material changes to this Policy by notice on the Website.

Contact Information

Contact us through the methods indicated in this Policy.

To ask questions or comment about this Policy and our privacy practices, contact us at:

Chief Operating Officer

580 Virginia Drive

Suite 250

Fort Washington, PA 19034

Email: Pamela.Barton@Kintock.org.