

# Privacy Policy

## 1. Introduction

The website located at the domain [www.kgb.com](http://www.kgb.com), ( known as the “Site”) is operated by kgb (“kgb” or “we” or “our” or “us”). Your privacy is important to us. This Privacy Policy describes the types of information collected from you, what we do with it, with whom we share it, and how you can correct or change such information. It is your responsibility to review this Privacy Policy carefully. This Site are operated in and controlled from the United States of America. If you have any questions about this Privacy Policy or the Site, or if you wish to [please](mailto:info@kgb.com) contact [info@kgb.com](mailto:info@kgb.com) or at the address at the end of this policy.

We are the data controller for the purposes of the UK General Data Protection Regulation (the “GDPR”) and may be contacted at the below with respect to matters relating to its responsibilities as the data controller:

The Clubhouse  
Holborn Circus  
20 St Andrew Street  
London  
EC4A 3AG  
Email: [info@kgb.com](mailto:info@kgb.com)

**We encourage you to read and review this privacy policy carefully. By using our Site, you are accepting the practices described in this Privacy Policy.**

## 2. Privacy Policy

This privacy policy applies to your use of the Site but not does apply to any third-party sites that may be linked to them or to any third-party entities listed on the Site.

When you visit the Site, you may provide us with certain information about yourself and we will receive other information regarding your use of the Site. We collect the following personal information about visitors to the Site: (i) information you may choose to submit to kgb using any means of contact listed on the Site, such as an email address or phone number. In those cases, we will use such information to maintain our business records, manage our relationship with you, communicate with you and comply with law and will not disclose such information to any outside party, other than information relating to your use of the Site, such as the searches you undertake, the pages you visit, your browser or phone type, IP address, requested URL, referring URL, and timestamp information, and other similar types of information. We use this information to operate and administer the Site. We also use this information in the aggregate to perform statistical analyses of user behavior and characteristics in order to measure interest in and use of the various areas of the Sites. You cannot be identified from this aggregate information.

Enforcement. In certain cases, we may use the information we collect in connection with your use of the Site (including your personal information) in order to investigate, enforce, and apply our Terms of Use and Privacy Policy.

## 3. Use of Information We Collect

We may use the information you provide about yourself to fulfill your requests for our products, programs, and services, to respond to your inquiries about our services, and to offer you other products, programs, or services we believe may be of interest to you.

We may use or disclose your information to respond to subpoenas, court orders, or legal process, or to establish or exercise our legal rights or defend against legal claims.

If we believe it is necessary, we may disclose your personal information to third parties in a good-faith belief that such disclosure is reasonably necessary to (i) take action regarding suspected illegal activities; (ii) enforce or apply our Terms of Use or Privacy Policy; (iii) comply with legal process, such as a search warrant, subpoena, statute, or court order; or (iv) protect our rights, reputation, or property or that of our users, affiliates, or the public. Please note that we are not required to question or contest the validity of any search warrant, subpoena, or other similar governmental request we may receive.

We use information about which links have been followed and whether action has been taken on another party's website to improve our offerings and to customize our services.

When you visit our Site, we may collect technical and navigational information, such as computer browser type, Internet protocol (IP) address, pages visited, and average time spent on our Site. This information may be used, for example, to alert you to software compatibility issues, or it may be analyzed to improve our website design and functionality.

## 4. Cookies

As of September 2023, kgb.com does not collect any cookie information. Any historical cookie information has been removed from all systems.

# 5. No Guarantees

While this Privacy Policy expresses kgb's standards for maintenance of private data, kgb is not in a position to guarantee the standards will always be met. There may be factors beyond our control that may result in unintentional disclosure of data. We follow generally accepted industry standards to protect the personal information submitted to us, both during transmission and once we receive it. But no method of transmission over the Internet or method of electronic storage, is 100 percent secure. Therefore, while we strive to use commercially acceptable means to protect your personal information, we cannot guarantee its absolute security.

# 6. Data

Where the GDPR applies, you may have the following rights in relation to Personal Information that constitutes "personal data" as defined in the GDPR:

- (i) You have the right to ask us to correct your personal information where it is inaccurate or incomplete.
- (ii) You have the right to ask us to access the personal information we hold about you and be provided with certain information about how we use your personal information and who we share it with.
- (iii) In some cases, you have the right to ask us to delete the personal information we hold about you:
  - a. Where you believe it is no longer necessary for us to hold your personal information;
  - b. Where we are processing your personal information on the basis of legitimate interests and you object to the processing and we cannot demonstrate an overriding legitimate reason for the processing; or
  - c. Where you believe the personal information we hold about you is being unlawfully processed by us.
- (iv) In some cases, you have the right to us to stop processing of your personal information:
  - a. Where you believe the personal information we hold about you is inaccurate and while we verify the accuracy;
  - b. Where we want to erase your personal information as the processing is unlawful but you want us to continue to store it;
  - c. Where we no longer need your personal information for the purposes of processing but you require us to retain the data for the establishment, exercise or defence of legal claims; or
  - d. Where you have objected to us processing your personal information based on our legitimate interests and we are considering your objection.
- (v) You can object to our processing of your personal information based on our legitimate interests and we will no longer process your personal information unless we can demonstrate an overriding legitimate ground.

- (vi) To exercise any of the rights above or if you want to make a complaint about how we process information about you, please email us at [info@kgb.com](mailto:info@kgb.com). You are still entitled to your right to raise a complaint with the data protection supervisory authority in the EU country in which you live or work or where you think we have infringed applicable data protection laws in the applicable country.

## 7. Changes to This Policy

We reserve the right to make changes to this Privacy Policy. You may review updates to our Terms of Use and Privacy Policy at any time via links on our Sites. You agree to accept electronic communications and/or postings of an annual or revised Privacy Policy on the Sites and that such electronic communications or postings constitute notice to you of the Privacy Policy. We reserve the right to modify this policy from time to time, so please review it regularly. If we make material changes to this policy, we will notify you here, by email, and/or by means of a notice on our home page.

### *kgb Contact Information*

You can contact kgb with any questions or issues relating to this Privacy Policy at:

kgb  
3400 Bath Pike, Suite 203  
Bethlehem, PA

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