



Keeley Companies Mobile Application Privacy Policy

Effective Date: 10/02/2020

I. INTRODUCTION

This Keeley Companies Mobile Application Privacy Policy (“Privacy Policy”) describes how Keeley Companies, Inc. and its affiliates (collectively, “Keeley” “we,” or “us”) collects, uses and shares personal information obtained from you when you utilize our mobile applications, or use the features, functionality, applications, content, products and services made available on or through the mobile applications (collectively, the “Keeley Companies Mobile App Services”), and describes your privacy choices when accessing using the Mobile App Services.

Your Consent to this Privacy Policy. Please read this Privacy Policy carefully. By accessing or using the Mobile App Services, whether as an unregistered visitor or as a registered member, you consent to our collection, use, and sharing of personal information as described in this Privacy Policy. In addition, to become a registered member, you may be required to confirm that you have read and accepted this Privacy Policy. If you do not accept this Privacy Policy, you should leave Website.com immediately and discontinue all use of the Mobile App Services.

Changes to this Privacy Policy. We reserve the right to modify this Privacy Policy from time to time, including without limitation as necessary to reflect new or unanticipated uses of personal information not previously disclosed in this Privacy Policy. Any such modifications shall be effective when posted by us on our designated website or otherwise made available to you. Your access to and use of the Mobile App Services after we have modified this Privacy Policy shall signify your acceptance of the amended terms. It remains your responsibility to review this Privacy Policy regularly to ensure that you are updated as to any changes.

II. HOW WE COLLECT AND USE PERSONAL INFORMATION

Personal Information You Volunteer. We collect any personal information that you provide while using the Mobile App Services. This may include your name, mailing address, email address, phone number, and other contact information, account information, demographic information, and any other personal information that you submit when registering for the Mobile App Services, completing your personal profile, posting content, requesting that we contact you, or using the Mobile App Services. We use this personal information to:

- Create and validate your account;
- Communicate with you regarding your account and the Mobile App Services (including via announcements and our newsletter);
- Provide any Mobile App Services that you request;
- Monitor and improve the quality of the Mobile App Services;
- Customize and improve the quality of our advertising and promotions;
- As otherwise required or permitted under applicable law; and
- For any other purpose made apparent at the time of collection.





Your Choices When Submitting Personal Information. You may be required to submit certain personal information via our mobile applications in order to create an account, validate your identity, or use certain Mobile App Services. By default, some of this information will be displayed and made available to other users of the Mobile App Services. We urge you to carefully consider the types of personal information that you include in your personal profile or submit for posting on via the mobile applications. For more information, please see the section entitled Privacy Practices of Third Parties below.

Automatic Collection of Information. Certain types of non-personally identifiable information may be collected automatically when you use the Mobile App Services. For instance, we may collect the IP address and/or MAC address of the mobile device you are using; the name of the domain and host from which you access the Internet; the type of browser you are using; time and date stamp information; and information regarding your visit to the mobile applications, including features viewed or used. We do not treat this information as personal information, unless it is combined with contact, account or similar information that personally identifies you.

Cookies. Like many websites, Keeley may use session-based or persistent “cookies” or similar technologies to automatically gather some information about you or offer a personalized experience when using the Mobile App Services. We use these technologies to enhance navigation, log account information, log click-stream data for advertisers, and facilitate your use of the Mobile App Services. Certain of the Mobile App Services may require cookies, and cannot be used without enabling cookies. If you are concerned about cookies stored on your computer, we encourage you to follow your browser’s guidance for deleting cookies after completing a browsing session.

III. HOW WE SHARE PERSONAL INFORMATION

Service Providers. We may share personal information collected through the Mobile App Services with companies that perform services on our behalf, including companies that provide support services to us (such as data storage and application hosting services) or that help us market our products and services.

Business Partners. We do not rent or sell your personal information to unaffiliated third parties for mass marketing purposes. We may share personal information collected through the Mobile App Services with our affiliated entities and our strategic business partners. These affiliates and business partners may use the information to contact you about products or services that may be of interest, to improve the quality and relevance of their products and services, or as otherwise required or permitted under applicable law.

Law Enforcement and Protection. We may disclose your personal information when we believe disclosure is appropriate to comply with the law (including a court order or subpoena); to prevent or investigate a possible crime, such as fraud or identity theft; to enforce the terms that govern your use of Website.com; or to protect the rights, property or safety of Website.com, other users, or third parties. We also reserve the right to report to appropriate law enforcement or government agencies any activities that we, in good faith, believe to be harmful or unlawful, with or without providing notice to you.



Business Transfers. All personal information and other content submitted by you to us is treated as a business asset, and may be transferred to another company that acquires an ownership interest in the stock or assets of Keeley or one of our operating divisions, including as the result of a sale, merger, reorganization, dissolution or liquidation.

IV. END USER LICENSE AGREEMENT

This Privacy Policy, and your submission and our use of personal information, is further subject to any End User License Agreement we may adopt from time-to-time.

V. CHILDREN

The Mobile App Services are intended for and directed to adults. In compliance with the Children's Online Privacy Protection Act (COPPA), we do not knowingly permit registration or submission of personally identifiable information by anyone under 13 years of age. If you are under the age of 13, please do not provide us with any personally identifiable information. If we are notified that someone under the age of 13 has provided us with personally identifiable information, we will use reasonable efforts to remove such personal information from our databases.

VI. ONLINE SECURITY

Keely implements measures to protect against the loss, misuse or alteration of sensitive personal submitted via the mobile applications control. However, please bear in mind that no mobile application or data transmission over the Internet is totally secure. As a result, we cannot promise or guarantee the security of any personal information you provide on or through the Mobile App Services.

VII. CONTACTING US

If you have questions about this Privacy Policy, desire to make corrections to personal information submitted to us, or any other questions or comments concerning Keeley or the Mobile App Services, please contact us at: helpdesk@keeleycompanies.com

