# **Kenley Privacy Policy**

*Last Updated: 2025-3-04* 

Thank you for visiting the Kenley.ai landing page. We respect your privacy and are committed to protecting your personal data. This Privacy Policy explains how we collect, use, disclose, and safeguard your information when you visit our website. It also outlines your rights under applicable privacy laws, including the General Data Protection Regulation (GDPR) and the California Consumer Privacy Act (CCPA), where relevant.

# 1. Scope

This Privacy Policy applies to the Kenley.ai website (the "Site"). It does **not** cover any public-facing application for the Kenley workspace, as no such public-facing app is currently offered.

#### 2. Information We Collect

We collect information about you in various ways, including through:

## 1. Cookies and Tracking Tools

- We use cookies and similar technologies to collect information about your browsing behavior on our Site. This may include your IP address, browser type, referring/exit pages, and timestamps.
- We only deploy non-essential cookies (e.g., analytics cookies) **after** you provide consent via our cookie banner.

#### 2. Analytics Services

- Google Analytics: Tracks site usage, pages visited, and user interactions to help us improve the Site.
- **Microsoft Clarity**: Provides insights into user behavior, such as how users navigate and interact with our pages.

• **VisitorQueue**: Identifies and tracks visits by potential business leads to enhance our B2B marketing efforts.

#### 3. Form Submissions

• If you choose to fill out forms, or contact us, we may collect personal data you input such as your name, email address, job title, and company name.

We only collect the minimum personal data necessary for the purposes described in this Policy.

#### 3. How We Use Your Information

We use the information we collect for purposes that may include:

- **Website Analytics**: Understanding how visitors interact with our Site, so we can optimize user experience and improve content.
- Marketing and Lead Generation: Identifying potential clients, responding to inquiries, and delivering relevant information about our services.
- **Site Performance**: Monitoring and troubleshooting site performance, security, and user experience.

We do **not** sell any of the personal data we collect.

## 4. Legal Basis for Processing (GDPR)

Under the GDPR, we rely on the following legal bases for processing your personal data:

- **Consent**: For the use of non-essential cookies and other analytics tools (as indicated in our cookie banner). You can withdraw consent at any time by adjusting your cookie preferences.
- **Legitimate Interests**: For security measures, website functionality, and business analytics that help us operate our Site and improve our services.

#### 5. Data Retention

We retain personal data only for as long as is necessary to fulfill the purposes outlined in this Policy, unless a longer retention period is required or permitted by law. When data is no longer needed, we securely erase it or anonymize it.

#### 6. Third-Party Sharing

We may share your information with the third-party analytics providers described above (Google Analytics, Microsoft Clarity, VisitorQueue) to process data on our behalf. These providers only have access to the information necessary to perform specific tasks, in compliance with applicable data protection laws.

Aside from these service providers, we do **not** share or sell personal data with any other third parties, unless required by law or as part of a corporate transaction (e.g., merger, acquisition).

#### 7. International Data Transfers

Your personal data may be transferred to and processed in countries other than your own, including the United States, where some of our third-party service providers are located. When we transfer data from the European Economic Area (EEA) to a country that has not been deemed to provide an adequate level of protection, we use appropriate safeguards such as Standard Contractual Clauses (SCCs) or rely on your explicit consent, as required by applicable law.

#### 8. Data Security

We take the security of your personal data seriously and use appropriate technical and organizational measures to safeguard it. We use secure servers, encryption where appropriate, and restrict access to personal data to employees and contractors who need to know it for the purposes stated in this Policy.

#### 9. Your Rights

Under certain circumstances and depending on your jurisdiction (e.g., GDPR in the EU, CCPA in California), you have rights regarding your personal data, which may include:

- Access: You can request a copy of the personal data we hold about you.
- Rectification: You can ask us to correct inaccuracies in your personal data.
- Erasure ("Right to be Forgotten"): You can request that we delete your personal data.
- Restriction of Processing: You can ask us to stop using all or some of your personal data.
- **Data Portability**: You can request a copy of your personal data in a structured, commonly used, machine-readable format.
- Withdrawal of Consent: Where we rely on your consent, you may withdraw it at any time.
- Opt-Out (CCPA): If applicable, you can opt out of certain sharing of your data.

To exercise these rights or make an inquiry, please contact us using the details in <u>Section 12</u>.

## 10. Cookies and Similar Technologies

1. **Consent**: We use a cookie banner to obtain your consent before placing any nonessential cookies or using analytics. You can modify your cookie preferences at any time via the banner settings (where available) or by adjusting your browser settings.

## 2. Types of Cookies:

- Essential Cookies: Necessary for the Site to function properly.
- Analytics Cookies: Help us measure how users interact with Site content.
- **Preference Cookies** (if any): Remember user choices to improve user experience.

For more information on how we use cookies, please review our <u>Cookie Policy</u> (if a separate Cookie Policy page exists).

## 11. Children's Privacy

Our Site is not intended for individuals under the age of 16, and we do not knowingly collect personal data from children. If you believe we may have inadvertently collected personal data from someone under the age of 16, please contact us immediately so we can delete that information.

#### 12. Contact Us

If you have any questions, concerns, or requests regarding this Privacy Policy or our data practices, please contact us at:

AnswerGrid, Inc. d/b/a Kenley,

1111B S GOVERNORS AVE STE

Dover, Delaware 20473

**United States** 

Email: security@Kenley.ai

If required by law, you may also have the right to lodge a complaint with a supervisory authority (e.g., your local data protection authority in the EEA).

# 13. Changes to This Privacy Policy

We may update or modify this Policy from time to time to reflect changes in our data practices or applicable laws. When we do, we will revise the "Last Updated" date at the top of this page. We encourage you to review this Policy periodically to stay informed about how we are protecting your data.

<b>Thank you for trusting Kenley with your information.</b> If you have any questions or concerns, please contact us at any time.