



# Privacy Policy

We operate and provide services in different regions around the globe. For all international transfers of personal data, we adhere to the principles of notice, choice, accountability for onward transfer, security, data integrity and purpose limitation, access, recourse, enforcement and liability.

When there are international transfers of your personal information, we will ensure that an adequate level of protection is provided for the information by using one or more of the following approaches:

We may enter into written agreements, such as standard contractual clauses, with recipients that require them to provide the same level of protection for the data.

We may rely on other transfer mechanisms approved by authorities in the country from which the data are transferred.

Your personal information could be transferred, stored and processed in the United States using appropriate transfer mechanisms as required by applicable law. Please note, however, that the data protection laws in the United States may not be as comprehensive as those in your country of residence. Pursuant to the laws of the United States, we may be required to disclose personal information in response to requests by public authorities, including to meet national security or law enforcement requirements. To the best of our knowledge our systems are not subject to routine access by government authorities without warrants or appropriate accountability via established legal process.

## 2.1 Data Privacy Framework

Kobre & Kim complies with the EU-U.S. Data Privacy Framework (EU-U.S. DPF), the UK Extension to the EU-U.S. DPF, and the Swiss-U.S. Data Privacy Framework (Swiss-U.S. DPF) (together, the “Frameworks”) as set forth by the U.S. Department of Commerce. Kobre & Kim has certified to the U.S. Department of Commerce that it adheres to the EU-U.S. Data Privacy Framework Principles (EU-U.S. DPF Principles) with regard to the processing of personal data received from the European Union and the United Kingdom in reliance on the EU-U.S. DPF and the UK Extension to the EU-U.S. DPF. Kobre & Kim has certified to the U.S. Department of Commerce that it adheres to the Swiss-U.S. Data Privacy Framework Principles (Swiss-U.S. DPF Principles) with regard to the processing of personal data received from Switzerland in reliance on the Swiss-U.S. DPF. If there is any conflict between the terms in this privacy policy and the EU-U.S. DPF Principles and/or the Swiss-U.S. DPF Principles, the Principles shall govern. To learn more about the Data Privacy Framework (DPF) program, and to view our certification, please visit <https://www.dataprivacyframework.gov/>.

Kobre & Kim remains responsible and liable under the EU-U.S. DPF Principles, the UK Extension to the EU-U.S. DPF, and/or the Swiss-U.S. DPF Principles if third party agents that it engages to process the personal data on its behalf do so in a manner inconsistent with the Principles unless Kobre & Kim proves that it is not responsible for the event giving rise to the damage. Kobre & Kim complies with the Frameworks’ principles for all onward transfers of personal data from the EU, the United Kingdom; and Switzerland, including the onward-transfer liability provisions.

With respect to personal data received or transferred pursuant to the Frameworks, Kobre & Kim is subject to the investigatory and enforcement powers of the U.S. Federal Trade Commission (FTC). In certain situations, we may be required to disclose personal information in response to lawful requests by public authorities, including to meet national security or law enforcement requirements.

In compliance with the EU-U.S. DPF, the UK Extension to the EU-U.S. DPF, and the Swiss-U.S. DPF, Kobre & Kim commits to resolve DPF Principles-related complaints about our collection and use of your personal information. EU, UK, and Swiss individuals with inquiries or complaints regarding our handling of personal data received in reliance on the EU-U.S. DPF, the UK Extension to the EU-U.S. DPF, and the Swiss-U.S. DPF should first contact Kobre & Kim via the below:

**Physical contact address for non-EU residents:**

# KOBRE & KIM

Kobre & Kim  
ATTN: Data Privacy  
800 Third Avenue  
New York, New York 10022

## **Physical contact address for EU and Switzerland residents:**

Kobre & Kim  
ATTN: Data Protection Officer  
Tower 42  
25 Old Broad Street  
London, EC2N 1HQ

Email Address: [privacypolicy@kobrekim.com](mailto:privacypolicy@kobrekim.com)

In compliance with the EU-U.S. DPF, the UK Extension to the EU-U.S. DPF, and the Swiss-U.S. DPF, Kobre & Kim commits to cooperate and comply respectively with the advice of the panel established by the EU data protection authorities (DPAs), the UK Information Commissioner's Office (ICO), and the Swiss Federal Data Protection and Information Commissioner (FDPIC) with regard to unresolved complaints concerning our handling of human resources data received in reliance on the EU-U.S. DPF, the UK Extension to the EU-U.S. DPF, and the Swiss-U.S. DPF in the context of the employment relationship.

In compliance with the EU-U.S. DPF, the UK Extension to the EU-U.S. DPF, and the Swiss-U.S. DPF, Kobre & Kim commits to refer unresolved complaints concerning our handling of personal data received in reliance on the EU-U.S. DPF, the UK Extension to the EU-U.S. DPF, and the Swiss-U.S. DPF to TRUSTe Dispute Resolution, an alternative dispute resolution provider based in the United States. If you do not receive timely acknowledgment of your DPF Principles-related complaint from us, or if we have not addressed your DPF Principles-related complaint to your satisfaction, please visit <https://feedback-form.truste.com/watchdog/request> for more information or to file a complaint. The services of TRUSTe are provided at no cost to you.

Under certain conditions, you may invoke binding arbitration when other dispute resolution procedures have been exhausted. For more information, visit the Data Privacy Framework website (<https://www.dataprivacyframework.gov/framework-article/G%E2%80%93Arbitration-Procedures>).

Users can view the types of cookies that we use, why we use them, and control how we use any cookies that are not strictly necessary for the functioning of our website using the "Cookie Settings" link on the cookie banner at the bottom of our website, or by clicking [here](#).

When users first access our website, we provide you the opportunity to actively consent or not consent to cookies used on our site before any, other than those that are strictly necessary, cookies are downloaded to your device. Consent is obtained via a pop-up window whereby clicking 'I Accept,' indicates that you consent to our use of cookies.

At any time, users can withdraw or change your consent to the cookies on our domain, either by indicating specific consent for specific categories of cookies or by rescinding consent to all except cookies strictly necessary for site function, by accessing the settings in your web browser. Instructions for how to do this are included in the section below.

However, please note that if you delete cookies or refuse to accept them, you might not be able to use all of the features we offer, you may not be able to store your preferences and some of our pages might not display properly. It is highly recommended that for the most secure and efficient user experience when visiting our site that you accept our use of cookies.

## **2.2 Asia-Pacific Economic Cooperation (APEC) Cross-border Privacy Rules (CBPR) System**

Kobre & Kim's privacy practices comply with the APEC Cross Border Privacy Rules System. The APEC CBPR system provides a framework for organizations to ensure protection of personal data transferred among participating APEC economies. More information about the APEC framework can be found here

[PDF] <https://cbprs.blob.core.windows.net/files/2015%20APEC%20Privacy%20Framework.pdf>.

### **Passive Collection**

# KOBRE & KIM

As is true of most websites, this website gathers certain information automatically. This information may include internet protocol (IP) addresses, browser type, internet service provider (ISP), referring/exit pages, the files viewed on our website (e.g., HTML pages and graphics), operating system, date/time stamp, and/or clickstream data to analyze trends in the aggregate and administer the website.

## **Tracking Technologies**

Our website uses cookies and similar technologies. Additionally, we utilize third-party services, including Google Analytics and LinkedIn, which also set cookies. These features allow us to analyze trends and track movement to better understand how individual users experience our website as a whole. You can control or block the use of cookies at the individual browser level. However, disabling or deleting cookies may limit your use of certain features or functions on our website. To learn more about how we use tracking technologies, please read our **Cookie Policy**.

## **Advertising and Social Networking Services**

We partner with third parties that use tracking technology to track advertising across various sites external to Kobre & Kim. Our third party partners may use cookies or similar technologies in order to provide you advertising based upon your browsing activities and interests. If you wish to opt out of interest-based advertising, click here. <https://www.youronlinechoices.com/>

Please note you will continue to receive generic ads.

Our website includes social media features, such as Facebook, Twitter, YouTube and LinkedIn sharing buttons as well as other social media integrations. These features may collect your IP address, which page you are visiting on our site, and may set a cookie to enable the feature to function properly. Social media features and widgets are either hosted by a third party or hosted directly on our Site. In some instances, such as sharing content with your network, you must login to your social media account to do so. Your interactions with these features are governed by the privacy policy of the company providing it.