

# January 2020

# JLL Supplemental Privacy Statement for California Consumers

# JLL Supplemental Privacy Statement for California Consumers

## Why?

The California Consumer Privacy Act of 2018 (CCPA) gives California residents the right to know what personal information Jones Lang LaSalle (JLL), together with its subsidiaries and affiliates collects about them, including whether it is being sold or disclosed to third parties. JLL does not sell or disclose personal information to third parties without a business agreement. The CCPA also grants certain rights to California residents, including the right to delete their personal information (subject to certain exceptions) and the right to prevent JLL from selling their personal information. Companies are also prohibited from retaliating or discriminating against consumers for exercising their rights under the CCPA.

All companies need to collect and share consumers' personal information for everyday business purposes, marketing, and maintenance of the safety, security, and integrity of their websites and other assets, among other reasons. This Supplemental Statement for California Consumer provides the information required under the CCPA and applies to both JLL's online and offline activities. For more information about how we collect, use, and share information please view our Privacy Statement.

#### What?

Please view the chart below to learn about the categories of personal information we have collected about you in the preceding 12 months, along with the categories of sources from which the personal information was collected, the purpose for collecting the personal information, and the categories of third parties with whom we share the personal information for a business or commercial purpose.

In addition to the purposes for collecting and sharing personal information described below, JLL collects and discloses any and all personal information (regardless of your relationship or interaction with us) as necessary or appropriate to: comply with laws and regulations; monitor, investigate, and enforce compliance with and potential breaches of JLL policies and procedures and legal and regulatory requirements; comply with civil, criminal, judicial, or regulatory inquiries, investigations, subpoenas, or summons; and exercise or defend the legal rights of JLL and its employees, affiliates, customers, contractors, and agents.

#### Personal information

In this Supplemental Statement, "personal information" (or "PI") means any information that identifies, relates to, describes, or is capable of being associated with you or your household, whether directly or indirectly.

## Your rights

If you are a California resident, you have the following rights under the CCPA with respect to your personal information:

- **Right to Notice.** Before or at the time we collect personal information from you, you have the right to receive notice of the personal information to be collected and the purposes for which we use it. This Supplemental Statement is intended to satisfy this requirement.
  - You also have the right to request that we disclose to you the categories of personal information we have collected about you in the preceding 12 months, along with the categories of sources from which the personal information was collected, the purpose for collecting or selling the personal information, the categories of third parties with whom we shared the personal information, and the categories of third parties with whom we sold the personal information.
- **Right of Access.** You have the right to request that we disclose or provide you with access to the specific pieces of personal information we have collected about you in the preceding 12 months.
- **Right to Deletion.** You have the right to request that we delete the personal information we collect from you. However, in certain situations we are not required to delete your personal information, such as when the information is necessary in order to complete the transaction for which the personal information was collected, to provide a good or service requested by you, to comply with a legal obligation, to engage in research, to secure our websites or other online services, or to otherwise use your personal information internally in a lawful manner that is compatible with the context in which you provided the information.

- **Right to Opt-Out of the Sale of Personal Information.** JLL does not sell your personal information as the term is defined based on our understanding of the CCPA. We have not sold any personal information to third parties for business or commercial purposes in the 12 months prior to the effective date of this Supplemental Privacy Statement. We do share personal information with third parties for business and commercial purposes including without limitation advertising and marketing based on Users online activities over time and across different sites, services and devices.
- **Right Not to Be Subject to Discrimination.** You have the right to be free from discrimination or retaliation for exercising any of your rights under the CCPA as described above.

You can exercise your rights by calling toll-free 833-906-2120 or by emailing privacy-am@am.jll.com

#### Verification

We value the security and confidentiality of your personal information. Therefore, if you exercise your right to notice, right of access, or right to deletion, we must first verify your identify to make sure that you are the person about whom we have collected personal information. We verify every request carefully.

- Along with your request, we ask that you provide us with a scanned copy of your government-issued ID, driver's license or utility bill (from the last 3 months); for verification purposes.
- When all of your household members jointly submit a request, we ask that each of you provide us with a scanned copy of your government-issued ID, driver's license or utility bill (from the last 3 months); for verification purposes.

You may also authorize someone else to submit these requests on your behalf. To do so, you may designate directly with us another person who may act on your behalf by such as providing us with a notarized copy of power of attorney, or ask the authorized agent (lawyer) to provide us with a copy of your written permission and a scanned copy of their own government-issued ID.

#### Contact us

Call toll-free 833-906-2120 or email us at privacy-am@am.jll.com to contact us with questions regarding this Supplemental Statement. California residents who are unable to review or access this Supplemental Privacy Statement due to a disability may call toll-free 833-906-2120 to access this Supplemental Privacy Statement in an alternative format.

Category of Personal Information Collected	Sources of the Category of Personal Information	Purposes for Collecting the Category of Personal Information	Third Parties With Whom We Share the Category of Personal Information for a Business or Commercial Purpose
Commercial Information Including records of personal property, products or services purchased, obtained or considered, real estate interests & preferences	<ul> <li>You (directly from consumer).</li> <li>Public records.</li> <li>Third parties who provide digital marketing and analytics services for us using cookies and similar technologies that contain a unique identifier, such as an advertising ID.</li> <li>Authorized/legal representatives.</li> <li>Payment processors and other financial institutions.</li> <li>Third parties who assist with fraud prevention, detection, and mitigation.</li> <li>Consumer reporting agencies and other third parties who verify the information you provide.</li> <li>Third parties that provide access to information you make publicly available, such as social media platforms.</li> <li>Your computer and mobile devices (automatically) when you visit or interact with our websites, applications, and online platforms.</li> <li>Cookies, web beacons, and similar technologies (automatically) when you visit our websites or third-party websites.</li> <li>Third party advertising partners and other third parties who provide digital marketing services.</li> <li>Third parties who provide website and online security services.</li> <li>Third parties who provide website and online security services.</li> <li>When you contact or visit us (automatically), such as when we record calls to our call center or use CCTV cameras.</li> <li>Your mobile devices and other internet-connected devices and applications (automatically).</li> <li>We draw inferences from the information we collect from and about you, such as your preferences.</li> </ul>	<ul> <li>Determine product and service eligibility and coverage.</li> <li>Provide our products and services to you.</li> <li>Administer, manage, analyze, and improve our products and services.</li> <li>Issue invoices and collect payments.</li> <li>Fulfill payment obligations.</li> <li>Communicate with you regarding our products, and services.</li> <li>Procure vendor/supplier products and services, including to manage and satisfy related vendor/supplier contractual obligations.</li> <li>Analyze and better understand your needs, preferences, and interests.</li> <li>Conduct internal business analysis and market research.</li> <li>Advertising and product promotion, including to contact you regarding products, services, and topics that may be of interest to you.</li> <li>Engage in joint marketing initiatives.</li> <li>Comply with legal and regulatory obligations.</li> <li>To identify you and your device(s) for any/all purposes identified above, including to monitor your use of and interactions with products, services, and advertisements for such purposes.</li> </ul>	<ul> <li>JLL employees who require it to perform their jobs.</li> <li>Other entities of the JLL group help us deliver our services.</li> <li>Authorized/legal representatives.</li> <li>Third parties with whom we have joint marketing and similar arrangements.</li> <li>Third parties who provide product fulfillment services in connection with our products and services.</li> <li>Payment processors, financial institutions, and others as needed to complete transactions and for authentication, security, and fraud prevention.</li> <li>Third parties who deliver our communications, such as the postal service and couriers.</li> <li>Other third parties as necessary to complete transactions and provide our products/services.</li> <li>Third parties who provide marketing and data analytics services, such as social media platforms used to deliver our ads, website/email optimization providers, email marketing vendors, and data analytics vendors.</li> <li>Third party network advertising partners.</li> <li>Third parties who assist with our information technology and security programs.</li> <li>Third parties who assist with fraud prevention, detection, and mitigation.</li> <li>Consumer reporting agencies.</li> <li>Our lawyers, auditors, and consultants.</li> <li>Legal and regulatory bodies and other third parties as required by law.</li> </ul>
Contact details Name, address, email, telephone number	<ul> <li>You (directly from consumer).</li> <li>Authorized/legal representatives.</li> <li>Payment processors and other financial institutions.</li> <li>Third parties who assist with fraud prevention, detection, and mitigation.</li> <li>Consumer reporting agencies and other third parties who verify the information you provide.</li> <li>Your mobile devices.</li> </ul>	<ul> <li>Determine product and service eligibility and coverage.</li> <li>Provide our products and services to you.</li> <li>Administer, manage, analyze, and improve our products and services.</li> <li>Issue invoices and collect payments.</li> <li>Fulfill payment obligations.</li> </ul>	<ul> <li>JLL employees who require it to perform their jobs.</li> <li>Other entities of the JLL group help us deliver our services.</li> <li>Authorized/legal representatives.</li> <li>Third parties with whom we have joint marketing and similar arrangements.</li> <li>Third parties who provide product fulfillment services in connection with our products and services.</li> </ul>

Category of Personal Information Collected	Sources of the Category of Personal Information	Purposes for Collecting the Category of Personal Information	Third Parties With Whom We Share the Category of Personal Information for a Business or Commercial Purpose
		<ul> <li>Communicate with you regarding our products, and services.</li> <li>Procure vendor/supplier products and services, including to manage and satisfy related vendor/supplier contractual obligations.</li> <li>Analyze and better understand your needs, preferences, and interests.</li> <li>Conduct internal business analysis and market research.</li> <li>Advertising and product promotion, including to contact you regarding products, services, and topics that may be of interest to you.</li> <li>Engage in joint marketing initiatives.</li> <li>Administer, provide access to, monitor, and secure our information technology systems, websites, applications, databases, and devices.</li> <li>Provide access to, monitor, and secure our facilities, equipment, and other property.</li> <li>Detect security incidents and other fraudulent activity.</li> <li>Monitor, investigate, and enforce compliance with our policies, product/service terms and conditions, and legal and regulatory requirements.</li> <li>Comply with legal and regulatory requirements.</li> <li>Comply with legal and regulatory obligations.</li> <li>To identify you and your device(s) for any/all purposes identified above, including to monitor your use of and interactions with products and services for such purposes.</li> </ul>	<ul> <li>Payment processors, financial institutions, and others as needed to complete transactions and for authentication, security, and fraud prevention.</li> <li>Third parties who deliver our communications, such as the postal service and couriers.</li> <li>Other third parties as necessary to complete transactions and provide our products/services</li> <li>Third parties who provide marketing and data analytics services, such as social media platforms used to deliver our ads, website/email optimization providers, email marketing vendors, and data analytics vendors.</li> <li>Third party network advertising partners.</li> <li>Third parties who assist with our information technology and security programs.</li> <li>Third parties who assist with fraud prevention, detection, and mitigation.</li> <li>Consumer reporting agencies.</li> <li>Our lawyers, auditors, and consultants.</li> <li>Legal and regulatory bodies and other third parties as required by law.</li> </ul>
Financial Information Including bank account number, credit or debit card number, payment amounts, financial means or other financial information.	<ul> <li>You (directly from consumer).</li> <li>Public records.</li> <li>Authorized/legal representatives,</li> <li>Payment processors and other financial institutions.</li> </ul>	<ul> <li>Issue invoices and collect payments.</li> <li>Fulfill payment obligations</li> <li>Analyze and better understand your needs, preferences, and interests</li> </ul>	<ul> <li>JLL employees who require it to perform their jobs.</li> <li>Other entities of the JLL group help us deliver our services.</li> <li>Authorized/legal representatives,</li> </ul>

Category of Personal Information Collected	Sources of the Category of Personal Information	Purposes for Collecting the Category of Personal Information	Third Parties With Whom We Share the Category of Personal Information for a Business or Commercial Purpose
	<ul> <li>Third parties who assist with fraud prevention, detection, and mitigation.</li> <li>Consumer reporting agencies and other third parties who verify the information you provide.</li> </ul>	<ul> <li>Conduct internal business analysis and market research.</li> <li>Comply with legal and regulatory obligations.</li> <li>To identify you and your device(s) for any/all purposes identified above, including to monitor your use of and interactions with products and services for such purposes.</li> </ul>	<ul> <li>Third parties who provide product fulfillment services in connection with our products and services.</li> <li>Payment processors, financial institutions, and others as needed to complete transactions and for authentication, security, and fraud prevention.</li> <li>Other third parties as necessary to complete transactions and provide our products/services</li> <li>Third parties who assist with fraud prevention, detection, and mitigation.</li> <li>Consumer reporting agencies.</li> <li>Our lawyers, auditors, and consultants.</li> <li>Legal and regulatory bodies and other third parties as required by law.</li> </ul>
Identification data Date of birth, proof of residency, government issued ID, driver's license number, passport number, or other similar identifiers.	You (directly from consumer).     Authorized/legal representatives,     Third parties who assist with fraud prevention, detection, and mitigation.     Consumer reporting agencies and other third parties who verify the information you provide.      When you contact or visit us (automatically), such as when we record calls to our call center or use CCTV cameras	Fulfill payment obligations.     Administer, provide access to, monitor, and secure our information technology systems, websites, applications, databases, and devices.     Comply with legal and regulatory obligations.	<ul> <li>JLL employees who require it to perform their jobs.</li> <li>Other entities of the JLL group help us deliver our services.</li> <li>Authorized/legal representatives,</li> <li>Payment processors, financial institutions, and others as needed to complete transactions and for authentication, security, and fraud prevention.</li> <li>Third parties who assist with fraud prevention, detection, and mitigation.</li> <li>Consumer reporting agencies.</li> <li>Our lawyers, auditors, and consultants.</li> <li>Legal and regulatory bodies and other third parties as required by law.</li> </ul>
Location Data Your phones GPS location	You (directly from consumer).     Your computer and mobile devices (automatically) when you visit or interact with our websites,     Your mobile devices and other internet-connected devices and applications (automatically).	Determine product and service eligibility and coverage.     Detect security incidents and other fraudulent activity.     Monitor, investigate, and enforce compliance with our policies, product/ service terms and conditions, and legal and regulatory requirements.	<ul> <li>JLL employees who require it to perform their jobs.</li> <li>Other entities of the JLL group help us deliver our services.</li> <li>Authorized/legal representatives,</li> <li>Third parties who provide product fulfillment services in connection with our products and services.</li> <li>Other third parties as necessary to complete transactions and provide our products/services</li> </ul>

Category of Personal Information Collected	Sources of the Category of Personal Information	Purposes for Collecting the Category of Personal Information	Third Parties With Whom We Share the Category of Personal Information for a Business or Commercial Purpose
Network Activity Data	Third parties who provide digital marketing and analytics services.	To identify you and your device(s) for any/all purposes identified above, including to monitor your use of and interactions with products and services for such purposes.      Determine product	<ul> <li>Third parties who assist with our information technology and security programs.</li> <li>Third parties who assist with fraud prevention, detection, and mitigation.</li> <li>Our lawyers, auditors, and consultants.</li> <li>Legal and regulatory bodies and other third parties as required by law.</li> <li>JLL employees who require it to perform their jobs.</li> </ul>
Internet or other electronic network activity information, such as browsing history, search history, cookie data, referring/exiting URL, clickstream data, time spent on webpage or advertisement, and other information regarding an individual's interaction with an internet website, application, email or advertisement.	marketing and analytics services for us using cookies and similar technologies that contain a unique identifier, such as an advertising ID.  Third parties that provide access to information you make publicly available, such as social media platforms.  Your computer and mobile devices (automatically) when you visit or interact with our websites, applications, and online platforms.  Cookies, web beacons, and similar technologies (automatically) when you visit our websites or third-party websites.  Third party advertising partners and other third parties who provide digital marketing services.  Third parties who provide website and online security services.  Your mobile devices and other internet-connected devices and applications (automatically).  We draw inferences from the information we collect from and about you, such as your preferences.	<ul> <li>and service eligibility and coverage.</li> <li>Provide our products and services to you.</li> <li>Administer, manage, analyze, and improve our products and services.</li> <li>Analyze and better understand your needs, preferences, and interests.</li> <li>Conduct internal business analysis and market research.</li> <li>Advertising and product promotion, including to contact you regarding products, services, and topics that may be of interest to you.</li> <li>Administer, provide access to, monitor, and secure our information technology systems, websites, applications, databases, and devices.</li> <li>Monitor, investigate, and enforce compliance with our policies, product/ service terms and conditions, and legal and regulatory requirements.</li> <li>Comply with legal and regulatory requirements.</li> <li>Comply with legal and regulatory obligations.</li> <li>To identify you and your device(s) for any/all purposes identified above, including to monitor your use of and interactions with products and services for such purposes.</li> </ul>	<ul> <li>Other entities of the JLL group help us deliver our services.</li> <li>Authorized/legal representatives,</li> <li>Third parties with whom we have joint marketing and similar arrangements.</li> <li>Third parties who provide product fulfillment services in connection with our products and services.</li> <li>Other third parties as necessary to complete transactions and provide our products/services</li> <li>Third parties who provide marketing and data analytics services, such as social media platforms used to deliver our ads, website/email optimization providers, email marketing vendors, and data analytics vendors.</li> <li>Third party network advertising partners.</li> <li>Our lawyers, auditors, and consultants.</li> <li>Legal and regulatory bodies and other third parties as required by law.</li> </ul>

Category of Personal Information Collected	Sources of the Category of Personal Information	Purposes for Collecting the Category of Personal Information	Third Parties With Whom We Share the Category of Personal Information for a Business or Commercial Purpose
Professional Information An individual's professional information, for example director positions	<ul> <li>You (directly from consumer).</li> <li>Public records.</li> <li>Authorized/legal representatives,</li> <li>Consumer reporting agencies and other third parties who verify the information you provide.</li> </ul>	<ul> <li>Determine product and service eligibility and coverage.</li> <li>Provide our products and services to you.</li> <li>Analyze and better understand your needs, preferences, and interests.</li> <li>Conduct internal business analysis and market research.</li> <li>Advertising and product promotion, including to contact you regarding products, services, and topics that may be of interest to you.</li> <li>Engage in joint marketing initiatives.</li> <li>Comply with legal and regulatory obligations.</li> </ul>	<ul> <li>JLL employees who require it to perform their jobs.</li> <li>Other entities of the JLL group help us deliver our services.</li> <li>Authorized/legal representatives,</li> <li>Third parties who provide product fulfillment services in connection with our products and services.</li> <li>Third parties who deliver our communications, such as the postal service and couriers.</li> <li>Other third parties as necessary to complete transactions and provide our products/services</li> <li>Third parties who provide marketing and data analytics services, such as social media platforms used to deliver our ads, website/email optimization providers, email marketing vendors, and data analytics vendors.</li> <li>Third parties who assist with our information technology and security programs.</li> <li>Third parties who assist with fraud prevention, detection, and mitigation.</li> <li>Consumer reporting agencies.</li> <li>Our lawyers, auditors, and consultants.</li> <li>Legal and regulatory bodies and other third parties as required by law.</li> </ul>
Tenant data Consumption data or family members	<ul> <li>You (directly from consumer).</li> <li>Public records.</li> <li>Authorized/legal representatives,</li> <li>Third parties who assist with fraud prevention, detection, and mitigation.</li> <li>Consumer reporting agencies and other third parties who verify the information you provide.</li> <li>We draw inferences from the information we collect from and about you, such as your preferences</li> </ul>	Determine product and service eligibility and coverage.     Provide our products and services to you.     Administer, manage, analyze, and improve our products and services.     Issue invoices and collect payments.     Communicate with you regarding our products, and services.     Analyze and better understand your needs, preferences, and interests.     Conduct internal business analysis and market research.	JLL employees who require it to perform their jobs.     Other entities of the JLL group help us deliver our services.     Authorized/legal representatives,     Third parties who provide product fulfillment services in connection with our products and services.     Payment processors, financial institutions, and others as needed to complete transactions and for authentication, security, and fraud prevention.     Third parties who deliver our communications, such as the postal service and couriers.

Category of Personal Information Collected	Sources of the Category of Personal Information	Purposes for Collecting the Category of Personal Information	Third Parties With Whom We Share the Category of Personal Information for a Business or Commercial Purpose
		<ul> <li>Advertising and product promotion, including to contact you regarding products, services, and topics that may be of interest to you.</li> <li>Administer, provide access to, monitor, and secure our information technology systems, websites, applications, databases, and devices.</li> <li>Provide access to, monitor, and secure our facilities, equipment, and other property.</li> <li>Detect security incidents and other fraudulent activity.</li> <li>Monitor, investigate, and enforce compliance with our policies, product/service terms and conditions, and legal and regulatory requirements.</li> <li>Comply with legal and regulatory obligations.</li> <li>To identify you and your device(s) for any/all purposes identified above, including to monitor your use of and interactions with products and services for such purposes.</li> </ul>	<ul> <li>Other third parties as necessary to complete transactions and provide our products/services</li> <li>Third parties who assist with our information technology and security programs.</li> <li>Third parties who assist with fraud prevention, detection, and mitigation.</li> <li>Consumer reporting agencies.</li> <li>Our lawyers, auditors, and consultants.</li> <li>Legal and regulatory bodies and other third parties as required by law.</li> </ul>
Visual and voice recordings Audio, electronic, visual, such as customer service call recordings, voice commands, photographs, recordings from CCTV cameras	When you contact or visit us (automatically), such as when we record calls to our call center or use CCTV cameras	<ul> <li>Administer, manage, analyze, and improve our products and services.</li> <li>Analyze and better understand your needs, preferences and interests.</li> <li>Conduct internal business analysis and market research.</li> <li>Administer, provide access to, monitor, and secure our information technology systems, websites, applications, databases, and devices.</li> <li>Provide access to, monitor, and secure our facilities, equipment, and other property.</li> <li>Detect security incidents and other fraudulent activity.</li> <li>Monitor, investigate, and enforce compliance with our policies, product/service terms and conditions, and legal and regulatory requirements.</li> </ul>	<ul> <li>JLL employees who require it to perform their jobs.</li> <li>Other entities of the JLL group help us deliver our services.</li> <li>Authorized/legal representatives,</li> <li>Third parties who provide product fulfillment services in connection with our products and services.</li> <li>Other third parties as necessary to complete transactions and provide our products/services</li> <li>Third parties who assist with our information technology and security programs.</li> <li>Third parties who assist with fraud prevention, detection, and mitigation.</li> <li>Consumer reporting agencies.</li> <li>Our lawyers, auditors, and consultants.</li> <li>Legal and regulatory bodies and other third parties as required by law.</li> </ul>

Category of Personal Information Collected	Sources of the Category of Personal Information	Purposes for Collecting the Category of Personal Information	Third Parties With Whom We Share the Category of Personal Information f or a Business or Commercial Purpose
Written Signature An individual's written signature, such as a signature on a contract or lease document	You (directly from consumer).     Authorized/legal representatives,     Payment processors and other financial institutions.     Third parties who assist with fraud prevention, detection, and mitigation.     Consumer reporting agencies and other third parties who verify the information you provide.	<ul> <li>Comply with legal and regulatory obligations.</li> <li>To identify you and your device(s) for any/all purposes identified above, including to monitor your use of and interactions with products and services for such purposes.</li> <li>Issue invoices and collect payments.</li> <li>Fulfill payment obligations.</li> <li>Detect security incidents and other fraudulent activity.</li> <li>Monitor, investigate, and enforce compliance with our policies, product/service terms and conditions, and legal and regulatory requirements.</li> <li>Comply with legal and regulatory obligations.</li> <li>To identify you for any/all purposes identified above</li> </ul>	<ul> <li>JLL employees who require it to perform their jobs.</li> <li>Other entities of the JLL group help us deliver our services.</li> <li>Authorized/legal representatives,</li> <li>Third parties who provide product fulfillment services in connection with our products and services.</li> <li>Payment processors, financial institutions, and others as needed to complete transactions and for authentication, security, and fraud prevention.</li> <li>Other third parties as necessary to complete transactions and provide our products/services</li> <li>Third parties who assist wit fraud prevention, detection, and mitigation.</li> <li>Consumer reporting agencies.</li> <li>Our lawyers, auditors, and consultants.</li> <li>Legal and regulatory bodies and other third parties as required by law.</li> </ul>