

JLL Supplemental Privacy Statement for California Consumers

Effective date: January 2023

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](#).

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.

Categories of Personal Information

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 in the table 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 summonses; and exercise or defend the legal rights of JLL and its employees, affiliates, customers, contractors, and agents.

Your Rights

If you are a California resident, you have the following rights under the CCPA with respect to your personal information. You can exercise your rights using our [online form for personal information rights requests](#) or by calling toll-free 833-906-2120.

- **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.

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- **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 to limit the use of Sensitive Personal Information.** We do not collect or process 'Sensitive Personal Information' (as defined by applicable California law) for the purpose of inferring characteristics about consumers. We do not use or disclose Sensitive Personal Information for purposes other than those specified in the California Consumer Privacy Act Regulations. Such permitted purposes include the performance of services reasonably expected by an average consumer who requests those services; to prevent, detect and investigate security incidents; to resist malicious, deceptive, fraudulent or illegal actions directed at us; to ensure the physical safety of natural persons; short-term, transient uses such as nonpersonalized context-based advertising; to performing customer service, processing orders and fulfilling transactions, verifying customer information, processing payments, providing financing, analytic services, storage, or similar services on behalf of the business; to verify, maintain or improve the quality of a service; and purposes that do not infer characteristics about the consumer.
- **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.

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 identity 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.

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<p>Commercial Information Including records of personal property, products or services purchased, obtained or considered, real estate interests & preferences</p>	<ul style="list-style-type: none"> - You (<i>directly from consumer</i>). - Public records. - 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. - 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. - Third parties that provide access to information you make publicly available, such as social media platforms. - Your computer and mobile devices (<i>automatically</i>) when you visit or interact with our websites, applications, and online platforms. - Cookies, web beacons, and similar technologies (<i>automatically</i>) 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. - When you contact or visit us (<i>automatically</i>), such as when we record calls to our call center or use CCTV cameras - Your mobile devices and other internet-connected devices and applications (<i>automatically</i>). <p>We draw inferences from the information we collect from and about you, such as your preferences</p>	<ul style="list-style-type: none"> - Determine product/mobile app and service eligibility and coverage. - Provide our products/mobile apps and services to you. - Administer, manage, analyze, and improve our products and services. - Issue invoices and collect payments. - Fulfill payment obligations. - Communicate with you regarding our products/mobile apps and services. - Procure vendor/supplier products and services, including to manage and satisfy related vendor/supplier contractual obligations. - Analyze and better understand your needs, preferences, and interests. - Conduct internal business analysis and market research. - Advertising and product promotion, including to contact you regarding products, services, and topics that may be of interest to you. - Engage in joint marketing initiatives. - Comply with legal and regulatory obligations. - To identify you and your device(s) for any/all purposes identified above, including to monitor your use of and interactions with products/mobile apps, services, and advertisements for such purposes. 	<ul style="list-style-type: none"> - 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 with whom we have joint marketing and similar arrangements. - Third parties who provide product fulfillment services in connection with our products/mobile apps 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. - Other third parties as necessary to complete transactions and provide our products/services. - 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. - Third party network advertising partners. - Third parties who assist with our information technology and security programs. - Third parties who assist with fraud prevention, detection, and mitigation. - Consumer reporting agencies. - Our lawyers, auditors, and consultants. - Legal and regulatory bodies and other third parties as required by law.
<p>Contact details Name, address, email, telephone number</p>	<ul style="list-style-type: none"> - You (<i>directly from consumer</i>). - Authorized/legal representatives, - Payment processors and other financial institutions. - Third parties who assist with fraud prevention, detection, and mitigation. 	<ul style="list-style-type: none"> - Determine product/mobile app and service eligibility and coverage. - Provide our products/mobile apps and services to you. - Administer, manage, analyze, and improve our 	<ul style="list-style-type: none"> - JLL employees who require it to perform their jobs. - Other entities of the JLL group help us deliver our services. - Authorized/legal representatives.

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	<ul style="list-style-type: none"> - Consumer reporting agencies and other third parties who verify the information you provide. - Your mobile devices 	<ul style="list-style-type: none"> products/mobile apps and services. - Issue invoices and collect payments. - Fulfill payment obligations. - Communicate with you regarding our products and services. - Procure vendor/supplier products and services, including to manage and satisfy related vendor/supplier contractual obligations. - Analyze and better understand your needs, preferences, and interests. - Conduct internal business analysis and market research. - Advertising and product promotion, including to contact you regarding products, services, and topics that may be of interest to you. - Engage in joint marketing initiatives. - Administer, provide access to, monitor, and secure our information technology systems, websites, applications, databases, and devices. - Provide access to, monitor, and secure our facilities, equipment, and other property. - 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. - Comply with legal and regulatory obligations. - To identify you and your device(s) for any/all purposes identified above, including to monitor your use of and interactions with products/mobile apps and services for such purposes. - To establish, execute or terminate an app download with you. - To inform you of updates to and new features of our apps that may be of interest to you. 	<ul style="list-style-type: none"> - Third parties with whom we have joint marketing and similar arrangements. - Third parties who provide product fulfillment services in connection with our products/mobile apps 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. - Other third parties as necessary to complete transactions and provide our products/mobile apps and services - 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. - Third party network advertising partners. - Third parties who assist with our information technology and security programs. - Third parties who assist with fraud prevention, detection, and mitigation. - Consumer reporting agencies. - Our lawyers, auditors, and consultants. - Legal and regulatory bodies and other third parties as required by law. -
<p>Financial Information Including bank account number, credit or debit card number,</p>	<ul style="list-style-type: none"> - You (<i>directly from consumer</i>). - Public records. 	<ul style="list-style-type: none"> - Issue invoices and collect payments. - Fulfill payment obligations. 	<ul style="list-style-type: none"> - JLL employees who require it to perform their jobs.

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<p>payment amounts, financial means or other financial information.</p>	<ul style="list-style-type: none"> - 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 style="list-style-type: none"> - Analyze and better understand your needs, preferences, and interests. - Conduct internal business analysis and market research. - Comply with legal and regulatory obligations. - To identify you and your device(s) for any/all purposes identified above, including to monitor your use of and interactions with products/mobile apps and services for such purposes. 	<ul style="list-style-type: none"> - 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/mobile apps and services. - Payment processors, financial institutions, and others as needed to complete transactions and for authentication, security, and fraud prevention. - Other third parties as necessary to complete transactions and provide our products/mobile apps and services. - Third parties who assist with fraud prevention, detection, and mitigation. - Consumer reporting agencies. - Our lawyers, auditors, and consultants. - Legal and regulatory bodies and other third parties as required by law.
<p>Identification data Date of birth, proof of residency, government issued ID, driver's license number, passport number, or other similar identifiers.</p>	<ul style="list-style-type: none"> - You (<i>directly from consumer</i>). - 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 (<i>automatically</i>), such as when we record calls to our call center or use CCTV cameras 	<ul style="list-style-type: none"> - 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 style="list-style-type: none"> - JLL employees who require it to perform their jobs. - Other entities of the JLL group help us deliver our services. - Authorized/legal representatives. - Payment processors, financial institutions, and others as needed to complete transactions and for authentication, security, and fraud prevention. - Third parties who assist with fraud prevention, detection, and mitigation. - Consumer reporting agencies. - Our lawyers, auditors, and consultants. - Legal and regulatory bodies and other third parties as required by law.
<p>Location Data GPS coordinates or similar information regarding the location of a device.</p>	<ul style="list-style-type: none"> - You (<i>directly from consumer</i>). - Your computer and mobile devices (<i>automatically</i>) when you visit or interact with our websites, - Your mobile devices and other internet-connected devices and applications (<i>automatically</i>). 	<ul style="list-style-type: none"> - Determine product/mobile app 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 style="list-style-type: none"> - 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

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		<ul style="list-style-type: none"> - To identify you and your device(s) for any/all purposes identified above, including to monitor your use of and interactions with products/mobile apps and services for such purposes. - 	<ul style="list-style-type: none"> products/mobile apps and services. - Other third parties as necessary to complete transactions and provide our products/mobile apps and services. - Third parties who assist with our information technology and security programs. - Third parties who assist with fraud prevention, detection, and mitigation. - Our lawyers, auditors, and consultants. - Legal and regulatory bodies and other third parties as required by law.
<p>Mobile App Data Wi-Fi SSID</p> <p>Voice commands, transcriptions, text commands, etc.</p> <p>User history – scheduled calendar events and attendees, in-app actions, device info, browser history, etc.</p> <p>User preferences around dining, seating, meeting, etc.</p>	<ul style="list-style-type: none"> - You (<i>directly from consumer</i>). - Your mobile devices (<i>automatically</i>) when you visit or interact with our websites. - Your mobile devices and other internet-connected devices and applications (<i>automatically</i>). 	<ul style="list-style-type: none"> - To inform you of updates to and new features of our apps that may be of interest to you. - We may assess your interest in and the functionality of our app by logging and analyzing your use of it - To enable your use of our apps by utilizing your location data and voice recordings - To improve our app by capturing mobile aggregated interaction logs in production systems (anonymized, aggregate only) 	<ul style="list-style-type: none"> - JLL employees who require it to perform their jobs - Other entities of the JLL group that help us deliver our services - Organizations that support the products/mobile apps or services we provide to you - Anyone you give us permission to share it with - Official bodies to detect and prevent criminal activity, e.g., money laundering, theft, fraud, terrorism, cybercrime
<p>Network Activity Data 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.</p>	<ul style="list-style-type: none"> - 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. - Third parties that provide access to information you make publicly available, such as social media platforms. - Your computer and mobile devices (<i>automatically</i>) when you visit or interact with our websites, applications, and online platforms. - Cookies, web beacons, and similar technologies (<i>automatically</i>) when you visit our websites or third-party websites. - Third party advertising partners and other third parties who provide digital marketing services. 	<ul style="list-style-type: none"> - Determine product/mobile app and service eligibility and coverage. - Provide our products/mobile apps and services to you. - Administer, manage, analyze, and improve our products/mobile apps and services. - Analyze and better understand your needs, preferences, and interests and personalize our website, adverts, products/mobile apps and services accordingly. - Conduct internal business analysis and market research. - Advertising and product promotion, including to contact you regarding products, services, and topics that may be of interest to you. - Administer, provide access to, monitor, and secure our information technology systems, 	<ul style="list-style-type: none"> - 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 with whom we have joint marketing and similar arrangements. - Third parties who provide product fulfillment services in connection with our products/mobile apps and services. - Other third parties as necessary to complete transactions and provide our products/mobile apps and services. - 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.

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	<ul style="list-style-type: none"> - Third parties who provide website and online security services. - Your mobile devices and other internet-connected devices and applications (<i>automatically</i>). - We draw inferences from the information we collect from and about you, such as your preferences 	<ul style="list-style-type: none"> websites, applications, databases, and devices. - Monitor, investigate, and enforce compliance with our policies, product/service terms and conditions, and legal and regulatory requirements. - Comply with legal and regulatory obligations. - To identify you and your device(s) for any/all purposes identified above, including to monitor your use of and interactions with products/mobile apps and services for such purposes. 	<ul style="list-style-type: none"> - Third party network advertising partners. - Our lawyers, auditors, and consultants. - Legal and regulatory bodies and other third parties as required by law.
<p>Professional Information An individual's professional information, for example business title, position, organization, chain of command, etc.</p>	<ul style="list-style-type: none"> - You (<i>directly from consumer</i>). - Public records. - Authorized/legal representatives, - Consumer reporting agencies and other third parties who verify the information you provide. - 	<ul style="list-style-type: none"> - Determine product/mobile app and service eligibility and coverage. - Provide our products/mobile apps and services to you. - Analyze and better understand your needs, preferences, and interests. - Conduct internal business analysis and market research. - Advertising and product promotion, including to contact you regarding products, services, and topics that may be of interest to you. - Engage in joint marketing initiatives. - Comply with legal and regulatory obligations. 	<ul style="list-style-type: none"> - 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/mobile apps and services. - Third parties who deliver our communications, such as the postal service and couriers. - Other third parties as necessary to complete transactions and provide our products/mobile apps and services. - 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. - Third parties who assist with our information technology and security programs. - Third parties who assist with fraud prevention, detection, and mitigation. - Consumer reporting agencies. - Our lawyers, auditors, and consultants. - Legal and regulatory bodies and other third parties as required by law.

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<p>Tenant data Consumption data or family members</p>	<ul style="list-style-type: none"> - You (<i>directly from consumer</i>). - Public records. - 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. - We draw inferences from the information we collect from and about you, such as your preferences - 	<ul style="list-style-type: none"> - Determine product/mobile app and service eligibility and coverage. - Provide our products/mobile apps and services to you. - Administer, manage, analyze, and improve our products/mobile apps 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. - Advertising and product promotion, including to contact you regarding products, services, and topics that may be of interest to you. - Administer, provide access to, monitor, and secure our information technology systems, websites, applications, databases, and devices. - Provide access to, monitor, and secure our facilities, equipment, and other property. - 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. - Comply with legal and regulatory obligations. - To identify you and your device(s) for any/all purposes identified above, including to monitor your use of and interactions with products/mobile apps and services for such purposes. 	<ul style="list-style-type: none"> - 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/mobile apps 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. - Other third parties as necessary to complete transactions and provide our products/mobile apps and services. - Third parties who assist with our information technology and security programs. - Third parties who assist with fraud prevention, detection, and mitigation. - Consumer reporting agencies. - Our lawyers, auditors, and consultants. - Legal and regulatory bodies and other third parties as required by law.
<p>Visual and voice recordings Audio, electronic, visual, such as customer service call recordings, voice commands, photographs, recordings from CCTV cameras</p>	<ul style="list-style-type: none"> - When you contact or visit us (<i>automatically</i>), such as when we record calls to our call center or use CCTV cameras - 	<ul style="list-style-type: none"> - Administer, manage, analyze, and improve our products/mobile apps and services. - Analyze and better understand your needs, preferences, and interests. - Conduct internal business analysis and market research. 	<ul style="list-style-type: none"> - 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

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		<ul style="list-style-type: none"> - Administer, provide access to, monitor, and secure our information technology systems, websites, applications, databases, and devices. - Provide access to, monitor, and secure our facilities, equipment, and other property. - 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. - Comply with legal and regulatory obligations. - To identify you and your device(s) for any/all purposes identified above, including to monitor your use of and interactions with products/mobile apps and services for such purposes. 	<ul style="list-style-type: none"> products/mobile apps and services. - Other third parties as necessary to complete transactions and provide our products/mobile apps and services. - Third parties who assist with our information technology and security programs. - Third parties who assist with fraud prevention, detection, and mitigation. - Consumer reporting agencies. - Our lawyers, auditors, and consultants. - Legal and regulatory bodies and other third parties as required by law.
<p>Written Signature An individual's written signature, such as a signature on a contract or lease document</p>	<ul style="list-style-type: none"> - You (<i>directly from consumer</i>). - 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 style="list-style-type: none"> - Issue invoices and collect payments. - Fulfill payment obligations. - 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. - Comply with legal and regulatory obligations. - To identify you for any/all purposes identified above - 	<ul style="list-style-type: none"> - 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/mobile apps and services. - Payment processors, financial institutions, and others as needed to complete transactions and for authentication, security, and fraud prevention. - Other third parties as necessary to complete transactions and provide our products/mobile apps and services. - Third parties who assist with fraud prevention, detection, and mitigation. - Consumer reporting agencies. - Our lawyers, auditors, and consultants. - Legal and regulatory bodies and other third parties as required by law.

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How long we keep your information

We endeavor to keep your information only for as long as we need it for legitimate business or legal reasons in accordance with the applicable records retention policies/schedules. We calculate retention periods for your personal information in accordance with the following criteria, the length of time necessary to fulfil the purposes we collected it, for the length of time it is reasonable to keep records to demonstrate that we have fulfilled our duties and obligations, any limitation periods within which claims might be made, any retention periods prescribed by law or recommended by regulators, professional bodies or associations, the existence of any relevant proceedings. We will then delete it safely and securely.

Contact Us

Please use our [online form for privacy-related concerns](#) or call toll-free 833-906-2120 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.