



BRAY INTERNATIONAL, INC.

Global Corporate Privacy Policy

This Global Corporate Privacy Policy serves as notification on how we collect and use personal data. This Policy sets forth rules for implementation in respect of privacy and data protection compliance. The intention is for this Policy to constitute a statement of the principles and guidelines to which the Company, its employees and workforce will adhere. To ease navigation throughout our Global Corporate Privacy Policy, please select the link below that corresponds to the topic of your interest.

[INTRODUCTION](#) 2

[CATEGORIES OF PERSONAL DATA](#) 3

[SENSITIVE PERSONAL DATA](#) 4

[LEGAL BASES FOR PROCESSING](#) 4

[FAIRNESS AND PURPOSE LIMITATION](#) 4

[DATA QUALITY AND PROPORTIONALITY](#) 5

[PURPOSES OF PROCESSING](#) 5

[RECIPIENTS OF PERSONAL DATA](#) 6

[TRANSPARENCY AND NOTICE](#) 7

[YOUR PRIVACY RIGHTS](#) 7

[CONSENT AND WITHDRAWAL OF CONSENT](#) 8

[AUTOMATED DECISION-MAKING](#) 9

[DIRECT MARKETING](#) 9

[RECORDS MANAGEMENT AND DATA RETENTION](#) 9

[CHILDREN ONLINE PRIVACY](#) 9

[WAYS OUR WEBSITE MAY COLLECT YOUR INFORMATION](#) 10

[FINANCIAL INCENTIVES](#) 11

[LINKS TO SOCIAL MEDIA AND WEBSITES OUTSIDE OF OUR OWN](#) 11

[COOKIES AND WEBSITE DATA COLLECTION TOOLS](#) 11

[DATA SECURITY](#) 14

[DATA BREACH RESPONSE](#) 14

[INTERNAL SHARING AND CROSS-BORDER DATA TRANSFERS](#) 14

[DATA INVENTORIES AND RECORDS OF PROCESSING ACTIVITIES](#) 15

[MONITORING COMPLIANCE THROUGH AUDITS](#) 15

[COOPERATION WITH DATA PROTECTION AUTHORITIES AND LOCAL LAW](#) 15

[CONFLICTS WITH NATIONAL LAW](#) 16

[HOW TO CONTACT US](#) 16

[MODIFICATIONS TO OUR PRIVACY POLICY](#) 16



Introduction

Bray International Inc. and affiliated companies (collectively referred to as “the Company,” “Bray,” “we,” “us,” “our,” or “Bray Companies,” and individually referred to as a “Bray Company”) care about the privacy of our current, past, and prospective employees, contractors, customers, suppliers, and vendors. We are committed to protecting personal data that we collect, use, store or otherwise process in accordance with fair information practices and applicable data privacy laws. We use the word “you” or “your” to refer to anyone within the scope of this Global Corporate Privacy Policy (this “Policy”).

This Policy sets forth how we process (*i.e.*, collect, use, store, transmit, protect, disclose, retain, and dispose of) your personal data and notify you of your rights. Personal data means any information relating to an identified or identifiable natural person: one who can be identified (directly or indirectly) by reference to an identifier such as name, an identification number, location data, an online identifier, or to one or more factors specific to the physical, physiological, genetic, mental, economic, cultural or social identity of that natural person. As we are a global company that processes and transmits personal data during normal, daily business operations, this Policy should be construed to comply with international, regional and state privacy laws and regulations applicable to Bray. Should any relevant laws be found to contradict the terms and provisions of this Policy, then the standards of such applicable law shall apply (and the terms and provisions of this Policy shall be modified accordingly for the applicable jurisdiction/circumstance).

The Policy contains our global privacy commitments, including our policy on transfers of personal data and associated individual privacy rights hereto referred to as ‘data subject rights,’ with the aim of ensuring that your personal data is protected while being processed by our affiliate Bray offices around the world. You can consult our Policy on our website at www.br

Categories of Personal Data

Personal data that we may collect and process includes:

- **Contact Information and Identifiers.** Data such as name, job title, age and prefix, username, mailing address, telephone numbers, email address or other addresses that allow us to send you messages, company information and registration information you provide on our website.
- **Relationship Information.** Data such as the types of products and services that may interest you, contact and product preferences, languages, creditworthiness, marketing preferences and demographic data.
- **Transactional Information.** Data including purchases, inquiries, customer account information, order and contract information, delivery details, billing and financial data, details for taxes, transaction and correspondence history, and information about how you use and interact with our websites.
- **Security and Compliance Information.** Data that helps us secure our interests, including information for conflict checks, fraud prevention and internal verification, and information necessary for the security of our premises, such as visual recordings.
- **Internet or Other Electronic Network Activity Information.** Data automatically collected from our website and saved in our system log files, including the user's IP (Internet Protocol) address, browser type, browser version, operating system, internet service provider, date and time of access, duration of visit, time of first/most recent visit, referral websites, and linked sites.
- **System and Event Information.** Data that may be collected by products during their setup, configuration and operation, as well as information collected by our products in their ordinary course of operation. This information may include product usage information and product performance data. In some circumstances, this information may be personal data. The nature and extent of the information collected by our products will vary based on the type and function of the product and the type of services for which they are used, subject to applicable laws.
- **Employment Opportunity Information.** Data related to contact information may be collected by Bray's Career website page should a data subject express an interest in a particular position.

Sensitive Personal Data

Personal data relating to sensitive categories, such as race or ethnicity, religious or philosophical beliefs, political opinions, trade union membership, genetic data, biometric data, sexuality, or health information, is regarded as ‘sensitive personal data.’ Unless otherwise indicated under applicable law or an extenuating legal basis exists otherwise, the Company will process sensitive personal data only with the data subject’s express consent.

Bray is dedicated to the responsible handling of sensitive personal data. We strictly limit the use and disclosure of such information for the purposes of enabling employment at the Company, fulfilling the services you request, delivering goods, and ensuring the quality and safety of our services. If required by applicable law, permission to process your sensitive personal data will be obtained separately from non-sensitive personal data consent requests, and will clearly outline the purposes of processing, the necessity of such processing, and its impact on data subject rights. For sharing or direct marketing that uses sensitive data, we will adhere to special safeguards and legal bases stipulated by applicable law, which may include your right to limit the sharing of your personal data or our obligation to re-obtain your consent. If obtaining a license is a requirement under applicable law for processing necessary sensitive data, Bray will promptly secure the necessary license to ensure compliance.

Legal Bases for Processing

Bray adheres to the following legal bases for processing your personal data:

- The performance of a contract with our customers and suppliers.
- Compliance with legal obligations.
- Protecting your vital interests or those of another natural person.
- The legitimate interests of Bray, including our usual commercial activities.
- Carrying out the public’s interest.
- You have given us consent for one or more specific purposes.

Fairness and Purpose Limitation

Personal data will be processed in a fair and lawful manner. Personal data will be collected for specific and legitimate purposes and not further processed in a way incompatible with those purposes. In certain cases, additional consent from individuals may be required. The Company processes personal data for legitimate business purposes, such as the management and administration of human resources, customers, consumers, vendors and suppliers or to pursue compliance with legal requirements.

Data Quality and Proportionality

The Company processes personal data along the following guidelines:

- 1: Only relevant data — not in excess of the need for the purpose — is collected and used.
- 2: Only current complete and accurate data to the extent necessary is maintained.
- 3: Data will not be processed or retained in an identifiable format beyond what is necessary to achieve the purpose for which it is collected.

Purposes of Processing

- **Fulfill Your Orders.** To process transactions, deliver products and services, and provide customer service, account and billing management, support and training, product update and safety-related notices, and to provide other services related to your purchase.
- **Communicate with You and Manage our Contractual Obligations.** To manage our contractual obligations and your ongoing relationship with us, interact with you, analyze and improve the products and services we offer, analyze commercial needs and satisfaction, and inform you about our products, services, or special offers and promotions.
- **Security and Fraud Prevention.** To protect data subjects, employees, and Bray, prevent fraud, and ensure the security of our websites, networks, systems, and premises.
- **Power Our Services.** To manage our everyday business needs, such as payment processing and financial account management, product development, contract management, website administration, website functionality, website optimization, fulfillment, corporate governance, audit, reporting and legal compliance.
- **Human Resources.** To conduct workforce planning, recruitment, onboarding, managing performance, learning and development, providing compensation and benefits, and maintaining payroll.
- **Career Opportunities.** To respond to inquiries about job positions in which the prospective candidate may be a fit or to engage in further communications.
- **Comply with Law.** To comply with applicable law, such as satisfying tax or reporting obligations or to comply with a lawful governmental request.

Recipients of Personal Data

- **Third Parties:** We may use third parties to provide or perform services and functions on our behalf. We may make personal data available to these third parties to perform these services and functions. Any processing of that personal data will be per our instructions and compatible with the original purposes. We may conduct third party security reviews to ensure any third parties to whom we entrust personal data offer adequate protection. Whenever the Company relies on such third parties that may have access to personal data, we enter into contractual arrangements with them to ensure they provide sufficient technical and organizational measures to protect the security and confidentiality of the personal data.
- **As Required by Law:** We may also make personal data concerning data subjects available to public or judicial authorities, law enforcement personnel and agencies as required by law, including to meet national security or law enforcement requirements, and including to agencies and courts in the countries where we operate. Where permitted by law, we may also disclose such information to third parties (including legal counsel) when necessary for the establishment, exercise, or defense of legal claims or to otherwise enforce our rights, protect our property or the rights, property or safety of others, or as needed to support external audit, compliance and corporate governance functions.
- **Mergers & Acquisitions:** Personal data may be transferred to a party acquiring all or part of the equity or assets of Bray or its business operations in the event of a sale, merger, liquidation, dissolution, or other transaction in which such transfer is permissible (without your consent) under applicable law.
- **Affiliates:** We may also transfer and share such information to Bray affiliates in compliance with applicable law. Where any of the Bray Companies processes personal data on behalf of another within our umbrella of affiliated companies it will adhere to this Policy and the rules and guidelines hereunder and act only upon the instructions of the Bray Company on whose behalf the processing is being carried out. We maintain processes to ensure that prior to the transmittal of personal data to another of our Bray Companies, the receiving Bray Company is bound by this Policy and the rules and guidelines hereunder and abides by the applicable data privacy laws.

- **Customers as a Service:** We may process personal data, for example, on behalf of our customers by sharing your personal data with a local Bray employee to provide local customer and business support (in a data processor capacity). We collect and process this personal data only as instructed by our customer and will not use or disclose it for our own purposes. We maintain information security controls to protect your information and will only disclose or transfer personal data as instructed by the customer or to provide the requested service. Unless otherwise instructed by the customer, we treat the personal data we process on behalf of our customers in line with our commitments on disclosure and transfer as set forth in this Policy.

Bray does not “sell” or “share” your personal data as defined by applicable international, state, and regional laws, such as the European Union General Data Protection Regulation (GDPR), California Consumer Privacy Act (CCPA), and the Texas Data Privacy and Security Act (TDPSA).

Transparency and Notice

We maintain and provide notices to data subjects about why and how we collect and process their personal data. These notices include transparent and clear information on the use of personal data, including the purposes for which personal data is processed. Consistent with applicable legal requirements, notices will also include any other information to ensure that processing is fair such as the identity of the Bray Company proposing to use the personal data, any other recipients of such data, and the rights and practical means for such data subjects to contact us or exercise their rights. In accordance with applicable laws, if the method or purpose of processing the personal data is changed, a notice will be provided to the data subject, along with a request and/or option to re-obtain consent, opt-out of processing, or restrict the processing of the changed data.

For purposes of responding to or fulfilling a data subject rights request, if applicable law requires, a notification shall be made to data subjects communicating the status of their completed data subject rights request. (Details on Data Subject Rights are outlined in *Section Your Privacy Rights*). If further ruled by applicable law, a notice to data subjects with required information and in a required format will be provided if a data transfer of any kind occurs. If we do not provide notice at the time of collection, transfer, or change, we will do so as soon as possible thereafter, except if there is an exemption under applicable law that applies.

Your Privacy Rights

To the extent of applicable law, you may exercise the following rights without constraint, at reasonable intervals, and without excessive delay or expense:

- Right to access your personal data.
- Right to request erasure of your personal data.
- Right to rectify or update your inaccurate or out-of-date personal data.
- Right to restrict or object to processing as it applies to your personal data.

-
- Right to restrict or object to processing as it applies to your sensitive personal data.
 - Right to restrict or object to automated decision-making.
 - If previously granted authorization, the right of relatives to make requests on behalf of deceased, incapacitated, or data subject with other impairments.
 - Right to data portability.
 - Right to know all data collected about you.
 - Right to say no to the sale or sharing of your information (opt-out).
 - Right to be informed of what categories of data will be collected about you prior to its collection.
 - Right to know the categories of third parties with whom your data is shared.
 - Right to know the categories of sources of information from which your data was acquired.
 - Right to know the business or commercial purpose of collecting your information.
 - Right to be informed of any changes in the processing purpose and method, categories of information collected, or third parties with whom your personal data is shared.
 - Right to lodge a complaint with a supervisory authority.

To submit a request to exercise any of these rights, please contact our Data Privacy Office via email at: privacyrequest@bray.com Bray will not discriminate against you for exercising your data subject rights.

Upon submission of a data privacy request, we will authenticate your identity by requesting information such as your name, email address, or other contact details, along with the Bray company office with which you established a relationship. In accordance with the applicable country, regional or state privacy law in which the relationship was established, you may have the right to designate an authorized agent or another person to submit a request on your behalf. To designate an authorized agent or another person to exercise your rights and preferences, please provide your authorized agent with a signed, written permission confirming that they have been authorized by you.

We will respond to your requests within the timeframe stipulated by the regulations in the country in which you established a relationship with Bray. If more time is required to complete your request, we will notify you of the delay, reasons for the delay, and actions you can take as a result of the delay.

If your request is denied, you may appeal our decision by using the specified contact method stated above. Please enclose a copy of or otherwise specifically reference the decision you want to appeal. We will respond to your appeal in accordance with applicable law.

Consent and Withdrawal of Consent

By providing personal data to us, you understand and agree to the collection, processing, international transfer, and use of such information as set forth in this Privacy Policy. Where required by applicable law we will ask your explicit consent.



You may always object to the use of your personal data for direct marketing purposes or withdraw any consent previously granted for a specific purpose, free of charge, or by contacting our Data Privacy Office through one of the contact methods stated throughout this Policy.

Automated Decision-Making

Bray respects your rights under law regarding automated decision-making. Bray does not currently process personal data pursuant to an automated decision-making function. If we determine a need to process your personal data pursuant to such function, Bray will use appropriate measures for safeguarding the legitimate interests of data subjects in regard to such personal data.

Direct Marketing

We will provide an opportunity for data subjects to exercise their right to opt out from our marketing efforts if such efforts require processing personal data. We believe this can be most easily accomplished by following instructions and links that we will provide in connection with Bray's marketing activities. Additionally, a data subject can also exercise this right by contacting the Company's Data Privacy Office at one of the contact methods stated below.

Records Management and Data Retention

We will retain your personal data as long as necessary to achieve the purpose for which it was collected, usually for the duration of any contractual relationship and for any period thereafter as legally required or permitted by applicable law. If we wish to process your data beyond that point of time, we will ask for your consent for such activity.

Children Online Privacy

Our websites are not directed at children 18 years of age or younger, and we do not use them to knowingly solicit personal data from or market to children. If we learn that a child has provided personal data through one of our websites, we will remove that information from our systems.

Ways Our Website May Collect Your Information

The table below outlines Bray’s website processing activities and your associated rights.

Purposes of Processing	Categories of Personal Data	Legal Bases of Processing	Categories of Sources	Third Parties	Individual Rights	Retention
Website and Generation of Log Files						
Storage of data in log files warrants proper website functioning, optimizes the website, and safeguards the security of our IT systems	<u>Internet Details:</u> Referring Website(s) + Linked Sites + Browser Type + Browser Version + Operating System + Internet Service Provider + IP Address + Date/Time of Access + Duration of Visit + Country of Origin + Preferred Language + Time of First/Most Recent Visit	Protection of our legitimate interests	Our system automatically collects data and information from the accessing computer on each occasion a user visits a website	No disclosures	The collection of data for the provision of the website and storage of the data in log files is essential for the operation of the website. This means that you cannot object to this collection and storage of data	Data is deleted as soon as the purpose for collecting has been achieved. Website data is deleted at session end. Log files are retained for a maximum of 30 days. If data is stored for longer, your IP address is deleted and truncated with the result that can't be traced to you.
Storage of IP address allows our system to deliver the website to the user's computer						
Registration						
To perform a contract with the user or implement pre-contractual measures	<u>Contact Details:</u> First Name + Surname + E-mail Address + Password + Address + Post Code + City + Date of Birth + Telephone Number + Fax Number + Tax Number <u>Job Details:</u> Company Name + Company Website <u>Internet Details:</u> Registration Date/Time + Registration Confirmation Date/Time + Date/Time Consent to the Privacy Notice was Granted + Website where Registration was Carried Out	User has given consent	We collect this information directly from you through a form you complete and transmit to us	Data is not disclosed to third parties, unless a payment processing service is involved in an e-commerce transaction	You consent to processing during registration	Data is deleted as soon as the purpose for collecting has been achieved
Contact Form and Contact by Email						
To process the user's inquiry	<u>Internet Details:</u> IP address + Language/URL of the Page Accessed + Browser/Operating System + Referring Page + Data/Time Contact was Made	User has given consent	We collect this information directly from you through an email you send to us or a form you complete and transmit to us	No disclosures	You consent to processing during registration or prior to form submission when you acknowledge the Privacy Notice	Data is deleted as soon as the purpose for collecting has been achieved
To prevent the misuse of the contact and to safeguard the security of our IT systems	<u>Contact Details:</u> First name + Surname + Email Address + Address + Post Code + City + Telephone Number + Fax Number <u>Job Details:</u> Job title + Company Name + Company Website	Protection of our legitimate interests			You may revoke consent to process/store your personal data. This will terminate your correspondence with us	
Newsletter						
To deliver the newsletter	<u>Contact Details:</u> Email Address	User has given consent	We collect this information directly from you through an email you send to us or a form you complete and transmit to us	No disclosures	You consent to processing during registration or at the time of form submission	Data is deleted as soon as the purpose for collecting has been achieved
To enable newsletter tracking (i.e., web beacons, tracking pixels) that performs statistical analysis and matches recipients to optimal newsletter content	<u>Internet Details:</u> IP Address, Registration Date/Time, Information on Accessing Client Collected Through Web Beacons	Protection of our legitimate interests			You may unsubscribe or revoke consent to the storage of your personal data	

Financial Incentives

Bray does not engage in any financial incentive programs and therefore does not seek opt-in consent from data subjects for financial incentive programs.

Links to Social Media and Websites Outside of our Own

We may provide links to social media via small widgets and third parties' websites ("linked sites") from our websites. Linked sites are not necessarily reviewed, controlled or examined by us. Each linked site may have its own terms of use and privacy notice, and users must be familiar and comply with all such terms when using linked sites. We are not responsible for the policies and practices of any linked site, or any additional links contained in them. These links do not imply our endorsement of the linked sites or any company or service and we encourage users to read these linked sites' terms and notices prior to using them. When placing a link, we carefully check the linked site to determine that it does not contain obviously illegal content—if we subsequently become aware that the linked site contains illegal content, we will promptly remove the link.

Bray's social media content is reviewed and managed in a way that is compliant with applicable international, regional, and state laws.

Cookies and Website Data Collection Tools

Our website uses cookies and similar technologies to improve user experience. Cookies are text files that are stored in the internet browser or by the internet browser on the user's computer system. When a user visits a website, cookies can be placed locally on the user's device. This cookie contains a character string, which is a unique identification code of the browser that will be recognized each time a user visits the website. Some elements of our internet site require that the accessing browser can still be identified after having left our page. The cookies may store and transmit the following data:

1. Items collecting for purchase.
2. Login information.
3. Chat information.
4. Security mechanisms for forms.
5. Wish list items.
6. Google Analytics services.
7. General check of the Facebook Pixel.
8. Google Maps integration.
9. Messenger data for a target-group focused website experience.
10. Integration of YouTube clips.

Our website also uses cookies that allow for an analysis of the user's navigation and use of the website. The following data can be transferred:

-
1. Entered search terms and strings.
 2. Page views.
 3. Use of website functions (a session cookie assists during the form submit process to hold the Google ReCaptcha spam token).
 4. Information on the browser type and version used.
 5. The user's operating system.
 6. The user's internet service provider.
 7. The user's IP address.
 8. The date and time of the access.
 9. Websites from which the user was referred to our website.
 10. Websites accessed by the user's system via our website.
 11. Duration of the user's visit.
 12. The user's country of origin.
 13. The user's preferred language.
 14. Time of the user's first visit and most recent visit.

The collected user data is pseudonymized by technical methods. The data can then no longer be traced back to the accessing user. The data is not merged with any of the user's other personal data. When accessing the website, users are informed about the use of cookies for analysis purposes by an info banner, which also refers to this data protection declaration. This includes information on how the placing of cookies can be prevented by changing the browser settings.

We collect the foregoing data on the basis of protecting our legitimate interests, including our commercial activities. The purpose of using strictly necessary cookies is to make the website more user-friendly. Some of the functions offered on our website may not be available if cookies are disabled. These functions depend on recognizing the browser after it has left the website. The following applications require the use of cookies: (i) shopping function (e.g., collection of items for purchase) and (ii) tracking functions (e.g., country of origin). The user data collected by strictly necessary cookies is not used to generate user profiles. Analysis cookies are exclusively used for the purpose of improving the quality of our website and its contents. The analysis cookies provide us with information on how the website is used and how we can improve our services.

The user's computer stores and transmits the cookies to our website. This means that our users are in full control over the use of cookies. Cookies that have already been placed can be deleted at any time. This can also be set to automatic. You may not be able to use the full scope of functions offered on our website if you have cookies deactivated.

The following are tools we may utilize on our website to collect information about you:

- **Google Analytics:** We may use Google Analytics on our website to collect information about your online activity on our websites, such as the web pages you visit, the links you click, and the searches you conduct on our websites. We may use the information to compile reports and to help us improve the website. The cookies collect information in an anonymous form, including the number of visitors to the website, where visitors have come to the site from and the pages they visited. The information generated by those cookies and your current IP-address will be transmitted by your browser to, and will be stored by Google on, servers in the United States and other countries. Google will use this information on our behalf for the purpose of evaluating your use of our website as described above. The IP address collected through Google Analytics will not be associated with any other data held by Google and is not otherwise stored on Bray databases. Bray retains the privilege to access IP addresses gathered for Google Analytics functions to address breaches. However, this access is limited to the Bray Azure console and is permissible only within a 3-month timeframe following the IP address collection. Once this period elapses, the IP address is erased, and Bray loses visibility of the IP address. For more information about the information gathered using Google Analytics please visit <http://www.google.com/intl/en/analytics/privacyoverview.html>. You can prevent these cookies by selecting the appropriate settings on your browser. If you do this, you may not be able to use the full functionality of our websites. You may download and install the Google Analytics Opt-out Browser Add-on available here: <http://tools.google.com/dlpage/gaoptout>.
- **Google Remarketing Technology:** Our websites may use Google's remarketing technology. This technology enables users who have already visited our online services and shown interest in our services to see targeted advertising on the websites of the Google partner network. The information generated by the cookie about the website use will be transmitted to and stored on servers in the United States by Google. Bray does not have the ability to see, transmit, or otherwise store IP addresses for Google Remarketing Technology purposes. Using cookies, the user behavior on a website can be analyzed and subsequently utilized to provide targeted product recommendations and advertising based on the user's interests. If you would prefer to not receive any targeted advertising, you can deactivate the use of cookies for these purposes by visiting <https://www.google.com/settings/ads/>. Alternatively, users can deactivate the use of cookies by third party providers by visiting <http://www.networkadvertising.org/choices/>), the Network Advertising Initiative's deactivation website. Please note that Google has its own data protection policy which is independent of our own. We assume no responsibility or liability for their policies and procedures. Please read Google's privacy policy before using our websites <https://www.google.com/intl/en/policies/privacy/>).

- **LinkedIn Insight Tag:** The LinkedIn Insight Tag enables the collection of data regarding members' visits to your website, including the URL, referrer, device and browser characteristics, timestamp and page views. This data is encrypted, then de-identified within seven days, and the de-identified data is deleted within ninety days. LinkedIn does not share personal data with the website owners, it only provides aggregated reports about the website audience and ad performance. LinkedIn also provides retargeting for website visitors, enabling the website owner to show personalized ads off its website by using this data, but without identifying the member. LinkedIn members can control the use of their personal data for advertising purposes through their account settings.

Data Security

Bray maintains a comprehensive information security program that is proportionate to the risks associated with its data processing activities. We implement the appropriate administrative, technical, physical, and organizational safeguards to reduce the risk of accidental or unlawful destruction, loss, alteration, unauthorized disclosure, or access to personal data. Our technical measures include encryption, firewalls, regular software updates, intrusion detection/prevention systems, restricted access to authorized users on a need-to-know basis, and multi-factor authentication. Physically, we ensure security through surveillance systems and restricted access to data centers and server rooms. Organizationally, we prioritize data security through employee training on privacy best practices, handling of personal data, incident response plans, and third-party security practices. The program is continuously adapted to mitigate operational risks and protect personal data.

Data Breach Response

In the event of a data breach or incident of unauthorized access, collection, processing, or similar unjustified disclosure of personal data, we are committed to promptly implementing reasonable risk mitigation measures. We will notify affected data subjects of the breach and, if necessary, inform the relevant authorities, as required under applicable laws.

Internal Sharing and Cross-Border Data Transfers

In the normal course of business operations, the Company may share or transfer in-country personal data deemed necessary for the purposes for which it was collected. These sharing practices may include in-country transfers with the appropriate operational team or department to meet the Company's legal, regulatory, or contractual obligations. During these data-sharing activities, the Company adheres to established data privacy policies, standard operating procedures, leading practices, and guidance to assure the appropriate use limitations, lawful bases, access controls, and information security safeguards for the protection of personal data.

We have established procedures to assure that personal data transferred will be handled in conformity with this Policy, irrespective of the applicable regulations. When relying on third parties, we uphold procedures to safeguard personal data and ensure compliance with the relevant laws governing the transferred data. In places where personal data is disclosed to third parties outside the jurisdiction of its origin, we implement measures to assure the transferred personal data receives sufficient protection, often through contractual clauses in accordance with applicable data protection rules.

Data Inventories and Records of Processing Activities

The Company maintains an inventory that reflects how and where key IT systems and applications collect, use, access, share, transmit, process, retain, store, transfer, and dispose of personal data. We ensure this information is reviewed and updated routinely to reflect any change to the Company's processing activities.

Monitoring Compliance Through Audits

In addition to the work of our Data Privacy Office, we maintain processes with the Company's internal audit department to regularly audit our compliance with this Policy. Audit findings will be reported to our management and the Data Privacy Office and include follow-up on action plans to ensure corrective measures are taken. Audit findings will be made available to the competent data protection authorities upon their request.

Cooperation with Data Protection Authorities and Local Law

The Company will only use personal data in accordance with the applicable data protection law. This includes laws that may relate to the processing of personal data. If such applicable law requires greater protection of personal data than is set forth in this Policy, the Company will adhere to the requirements of such law.

We will cooperate with the relevant data protection authorities and will respond to requests and questions about compliance with applicable data privacy laws and this Policy. When personal data is transferred between Bray Companies, the importing and exporting entities will cooperate with inquiries and audits from the data protection authority responsible for the exporting entity. The Company will also consider the advice of data protection authorities with competent jurisdiction on data protection or privacy law issues that may affect this Policy. Moreover, the Company will comply with any formal decision on the application and interpretation of this Policy by a data protection authority with competent jurisdiction that is final and to which no further appeal is possible.

Conflicts With National Law

If the Company has reason to believe that there is a conflict between national law and this Policy, which is likely to prevent it from complying with this Policy, we will promptly notify the Data Privacy Office or our local data privacy contact, except where local law prohibits such notification. The Data Privacy Office or our local data privacy contact will make a responsible decision on what action to take and will consult the competent data protection authorities in case of doubt.

How To Contact Us

For purposes of convenience and being responsive in respect of complying with this Policy and complying with legal obligations relating to access and recourse, we have established both a general and specific European Union affiliate as designated authorities. In the European Economic Area and Switzerland (“Europe”), Bray Controls Europe B.V, acts as the affiliate with delegated data protection responsibility and is responsible for taking the necessary actions to ensure compliance with this Policy by the Bray Companies. In all other jurisdictions for which our operations require a designated data protection affiliate, Bray International, Inc. serves these functions.

If you would like to communicate with us regarding privacy issues or have questions, comments, or complaints, please contact our Data Privacy Office as follows:

By email to: privacy@bray.com

Or in writing to: Bray Data Privacy Office

In Europe

c/o Bray Controls Europe B.V.
Joulestraat 8
1704 PK Heerhugowaard
The Netherlands

In United States and any other region

c/o Bray International, Inc.
13333 Westland East Blvd.
Houston, TX 77041
United States of America

Modifications to our Privacy Policy

We reserve the right to change, modify, and update this Privacy Policy at any time. Please check periodically to ensure that you have reviewed the most current notice.

This Global Corporate Privacy Policy was last updated **17th September 2024**.