

## **Privacy Policy**

## Introduction

This policy describes the information Scafftag (Division of Brady) may collect through the use of the services we offer, how we collect it and how it is used. This policy also addresses precautions we take to protect your privacy and how to contact us with data privacy questions or requests.

## Policy Topics:

- Section A Personal Information
- Section B Children Under the Age of 13
- Section C Passive Information Collected
- Section D Cookies & Internet Tags
- Section E Active Information Volunteered
- Section F Duration of the Processing
- Section G Your Rights
- Section H Safety & Confidentiality
- Section I Compliance and Cooperation with Regulatory Authorities
- Section J Changes
- Section K Contact Information and Enforcement

## Section A: Personal Information

Personal information is information about a natural person that is readily identifiable to that individual. Personal information includes such things as an individual's name, address, email address, and/or phone number, and may include the Internet Protocol (IP) address of your computer.

We will not actively collect personal information about you unless you voluntarily provide it to us. You may always choose not to contact us by e-mail, participate in a survey or to provide any personal information on our website. Your choice to not participate in these activities online will not impair your ability to browse our website and to read or download information offered on the site.

We will passively collect personal data from you simply from your visit to our website. For more information about the data we will collect, see Sections C and D below.

## Section B: Children Under the Age of 18

This Site is not directed to children under the age of eighteen (18) and does not knowingly collect personally identifiable information from children.

## Section C: Passive Information Collected

This is information passively collected during your visit to our website. This information is used to help us understand how our site is being used so that we may continually improve it's content, performance, suitability and usefulness. We collect two types of passive data: navigational data and device information.

## **Navigational Data:**

Navigational data includes log files and clickstream data. Navigational data can identify a user's Web browser and operating system, when and for how long a user visits a website, what pages a user views on a website, and the address of the website that the user was visiting previously.

We collect this information and use it to administer a website, improve website content, and compile aggregated statistics for marketing and research purposes.

#### **Device information:**

Device information is your IP address, hardware model, operating system version, unique device identifiers, and mobile network information, including phone number.

We collect this information to associate your device identifiers or phone number with your Account.

## Section D: Cookies and Internet Tags

To serve our online users, we use "cookies" and similar files to customise your browsing experience with us. Cookies are small data files transferred to your computer, mobile phone or other device by your web browser at the request of a website. Cookies fall into two broad categories:

 Session cookies – these cookies allow websites to link the actions of a user during a browsing session. Session cookies are therefore temporary and once you close your browser, all session cookies are deleted. Session cookies are used to aid in website navigation and to collect statistical information. A common example is the shopping cart function, where the website will store details of your shopping cart as you proceed through the checkout process. • **Persistent cookies** – these cookies remain on your computer or device for the period time specified in the cookie. They are activated each time you visit the website that created the particular cookie. Persistent cookies also aid in website navigation and collecting statistical information, and are used to customize a website for a user, such as by storing passwords and preferences so that users do not have to reenter them each time they visit a website. A common example is an auto login or "remember me" function after you first register with a website.

#### **Functional Cookies (Persistent)**

These cookies allow our website to remember information you provide to us via our website and choices you make (such as your username, items you have put into your shopping cart and products you have viewed recently). The cookies allow our website to enhance the service we can offer you (as well as providing some degree of personalisation to our website).

In accordance with EC Regulations, we require your consent to transfer these cookies to your computer or device and by using our website you agree that we can transfer these cookies to your computer or device.

#### **Performance Cookies (Session)**

These cookies collect information about how visitors use our website, such as the referring domain, frequency of visits to certain web pages and the time spent by users during each visit to our website. These cookies do not collect personally identifying information and the data collected is anonymous. We use these cookies to monitor the services we provide via our website and to make improvements to the website as a whole.

In accordance with EC Regulations, we require your consent to transfer these cookies to your computer or device and by using our website you agree that we can transfer these cookies to your computer or device.

## Other Type of Cookies such as "Retargeting", "Behavioural" or Banner Advertising

We work with selected third party advertising companies who may set cookies on your computer or device during your visit to our website. These advertising companies use the information collected in these cookies to serve up ads relevant to you and your interests.

For cookies set by third parties (Google Analytics) we kindly refer you to the statements set forth by these parties on their respective websites. Beware, we do not have any influence on the content of these statements nor on the content of the cookies of these third parties: <u>Google Analytics cookies</u>.

## Other Type of Cookies such as "Retargeting", "Behavioural" or Banner Advertising

<u>Google (Analytics, AdWords Conversion, Adwords User Lists, Audiences, Dynamic Remarketing)</u>

This website uses Google Analytics, a web analysis service from Google Inc. ("Google") Google Analytics uses cookies, i.e. text files to be stored on your computer and which allow us to analyse your use of our website. The information generated by the cookie about your use of this website (including your IP address) is usually transmitted to a Google server in the USA and will be stored there. Google will use this information on behalf of the operator of this website for the purpose of evaluating your use of the website, compiling reports on website activity for website operators and providing other services relating to website activity and internet usage. Google may also transfer this information to third parties if required by law or if such third parties process the information on behalf of Google.

The IP address will not be associated with any other data held by Google. You can refuse the use of cookies by changing the settings on your browser; however, we like to point out that you may not be able to use all features of this website in this case. By using this site you accept that Google processes your data in the manner described above and for the aforementioned purpose. The data collection and storage can be revoked at any time with effect for the future. With regard to the current discussion about the use of analytical tools with full IP addresses, we would like to point out that this website uses Google Analytics with the extension "\_anonymizeIp ()" and therefore IP addresses are processed only shortened to ensure that no one will be able to determine your identity.

<u>Google Analytics Privacy Policy</u>. <u>Google Analytics Opt-out</u>.

#### Adobe Analytics / Omniture

We use Adobe Analytics software from Adobe Systems, Inc. ("Adobe"). It uses Cookies and tracking pixels either stored or retrieved from your computer/device and also makes it possible to analyse your use of our website. This process collects and saves data that we use to create use profiles based on pseudonyms. These profiles are used to analyse visitor behaviour and improve our offerings and design based on user needs. Without your expressly granted and formal consent, use profiles based on pseudonyms are not merged with personally identifiable information that we may have received from you in a different context. Adobe does not process your IP address and only saves it in truncated form. Adobe transfers the information collected within the European Union and stores it on its European Union servers

Adobe Privacy Policy. Adobe Opt-out.

#### <u>Eloqua</u>

Oracle Eloqua is used on this website and for e-mail services. Eloqua places a cookie for a better user experience, tracking and analysis, unless an Eloqua cookie already exists on your device. If you have already used a website that uses Eloqua, you may already have an Eloqua cookie. If you want to prevent the use of Eloqua cookies on your device in the future, this is possible via this link: Eloqua Opt-Out. Otherwise you always have the possibility not to use the contact forms, but to contact us by phone or e-mail.

#### Oracle Eloqua Privacy Policy. Oracle Eloqua Opt-out.

Cookie Name	Related To	Function	Lifetime
Eloqua	Eloqua	Analyse website usage, Track user behavior	730 days
ELQSTATUS	Eloqua	Analyse website usage, Track user behavior	730 days
_ga	Google Analytics	Used to distinguish users.	730 days
_gid	Google Analytics	Used to distinguish users.	1 day
_gat	Google Analytics	Used to throttle request rate.	1 minute

## Your Permission:

When you first visit our website you will be asked to accept our different kinds of cookies. For each category you can allow or refuse cookies. At any time, you can change the cookie settings for our website and thus revoke your permission.

- Google Analytics Opt-out: <u>https://tools.google.com/dlpage/gaoptout/</u>
- Eloqua Opt-out: <u>https://www.oracle.com/marketingcloud/opt-status.html</u>

## How to Control and Delete Cookies

Please note that disabling cookies could cause certain features and functionalities of our website to not work for you.

The Help menu on the menu bar of most browsers will tell you how to prevent your browser from accepting new cookies, how to have the browser prompt you when you receive a new cookie and how to disable cookies altogether.

## Internet Tags:

Internet tags (also known as single-pixel GIFs, clear GIFs, invisible GIFs, and 1by-1 GIFs) are similar to cookies, but they are smaller and are used to collect data such as IP address and browser type related to the user's computer. We use this information to monitor activity for the purpose of future improvement of our website.

## Section E: Active Information Volunteered

In addition to the passive information collected as described above, this website actively collects information as you volunteer it when making certain requests on the website. Some of the information collected is personal or unique to you (see Section A: Personal Information). We collect personal data from site registrants and visitors to the website on a voluntary basis. Visitors are not required to provide this information.

If during your visit to one of our websites you complete a form, send an e-mail, or perform some other transaction, this website may collect your name, company name, business address, business e-mail address, business phone number, business fax number, job title, industry sector, and/or credit card information.

To protect credit card numbers, we outsource this information to a certified payment processor via a hosted payment page on our website in accordance with PCI DSS regulations. The provider returns the credit card number to us as a token. We do not see, process or store customers' raw credit card information in any of our systems or databases. We are PCI compliant and attest to such via an annual SAQ-D and quarterly vulnerability scans performed by and attested to by an outside agency.

Scafftag (Division of Brady) BRADY is a Business to Business (B2B) Service provider of identification & safety products. All processing of personal data is based on a commercial, contractual basis to supply goods and services to the business community. However any data we collect that can identify an individual will be protected and treated as local laws dictate.

Personal Data is actively collected when volunteered on this website through the following activities:

- Send us an e-mail or complete and submit a "contact us" reply form. In this case, we may use the information you provide for many reasons, including to reply to your e-mail and to learn more about our users.
- Register a product or demo online. We use the information you provide to notify you if your item has been recalled or requires an update, or when new versions of the product or demo are released.
- Submit a literature request, demo request, catalog request, sample request or mailing list form. In this case, we use the information you provide to send to you, online or offline, materials you request, and to contact you regarding product demonstrations or sales.
- Complete a price list application form. We use the information you provide to send you the requested price lists.

- Register as a user on the website. We use this information to verify your identity.
- Download certain kinds of software or information available on the Site. We use the information submitted in connection with such downloads to inform you of new software or information releases and to record who has downloaded the software and information available on this Site.
- Enter an online promotion, contest, or sweepstakes. We use the information you submit to determine eligibility and to contact you in connection with the promotion, contest, or sweepstakes.
- Complete survey, feedback, and question forms. We use the information provided in these forms to respond to your questions, evaluate products and services, and better understand our shareholders, distributors, and customers.
- Request a quote or place an order. We will request general contact, billing and shipping information. On orders we will request purchase order or other payment information such as a credit card number and expiration date. We will use this information to complete the transaction and to deliver the information, products or services you ordered and to collect payment.
- Submit a "Request a Return Material Authorization (RMA) Number" form. We use the information contained in this form to help you return products that you have purchased. We may also use the information you provide to notify you if your item has been recalled or requires an update, or when new versions of the product are released.
- Submit a Contact a BRADY Distributor / Find a BRADY Distributor form. The information you submit in this form is sent to the distributor you have selected or if you haven't a distributor will be selected for you based on your described application.

#### **Other Internal Use of Personal Data**

Using the legal basis of Legitimate Interest, we will also use your Personal Data to provide you with information on our products and services that we think might be of interest to you unless you have indicated a preference not to receive such information. If you choose not to receive this type of information, please contact us in one of the many ways outlined in Section G - Your Rights.

We use the information we collect from all of our services to improve our product and service offering. We also use this information to offer you tailored content – like giving you more relevant search results and ads.

When you contact us through our website or Customer Service, we might keep a record of your communication to help solve any issues you might be facing. We may use your email address to inform you about our services, such as letting you know about upcoming changes or improvements.

The processing of your personal data does not include profiling, nor shall you be subjected to automated decisions.

We will ask for your consent before using information for a purpose other than those set out in this Privacy Policy.

The disclosure or processing of Personal Data as contemplated in this Policy may be to a party outside your jurisdiction. To meet our contractual agreements to deliver tailored products to you we may transfer personal Information you have submitted through this Site to us, to our affiliated companies, and to any other third parties described in this Policy, all or some of which may be located in foreign jurisdictions that may not provide "adequate protection" for Personal Data, but for which we have entered into Binding Corporate Rules or Standard Contractual Agreements.

We reserve the right to disclose or transfer any Personal Information collected at this Site:

- to protect the security of the Site
- to protect ourselves and our affiliated companies against liability
- to respond to subpoenas or other judicial processes
- if we believe in good faith that the law requires it
- in connection with any sale, assignment, or other transfer of all or a part of our business or company or any business or our affiliated companies.

We offer our range of high quality safety and identification solutions through a network of distributors specialised in several markets/segments. In order to fulfil your request we may share your volunteered information with a distributor based on your application to provide you the best knowledge and service possible.

#### **External Use of Volunteered Information**

Please note that there are instances where we share your volunteered information with third parties in order to fulfill your request. We, like many companies that provide products and services to customers, may employ other companies and individuals to perform specific functions on our behalf. Examples include, but are not limited to: manufacturing and/or fulfilling orders; delivery of packages, mail, and e-mail; address hygiene; credit card processing services; research that improves the quality of services or offers provided to you, including customer satisfaction surveys; or performing a credit check as part of your order. These providers have access to the information that they require to perform their functions but are strictly forbidden from using it for any other purposes. You may, however, "opt-out" of this use of your volunteered information at any time, but doing so may impair our ability to provide you with proper service and to process your orders (See Section G - Your Rights).

#### Public forums, refer a contact, and customer testimonials

We may provide bulletin boards, blogs, or chat rooms on our websites. Any personal information you choose to submit in such a forum may be read, collected, or used by others who visit these forums, and may be used to send you unsolicited messages. We are not responsible for the personal information you choose to submit in these forums. You may elect to use our referral program to inform contacts about our websites and services. When using the referral program, we request the contact's name and email address. We will automatically send the contact a one-time email inviting him or her to visit one of our websites. We do not store this information.

We may post a list of customers and testimonials on our websites, including information such as customer names and titles. We obtain the consent of each customer prior to posting any names or testimonials.

#### **Third-Party Service Integrations**

Our websites and services may allow you to integrate the services with various online third-party services like Google, Microsoft OneDrive, or Dropbox ("Third-Party Service"). In order to take advantage of these features, you may need to authenticate, register for or log into Third-Party Services through our website or services or on the websites of the respective Third-Party Service providers. When you enable integration with or login to Third-Party Services through our website or services, we will collect relevant information necessary to enable our website or services to access that Third-Party Service. We do not store your login credentials.

When you enable our website or services to link content and data between Third-Party Services, the Third-Party Services may provide us with access to certain information that you have provided to the Third-Party Services, and we will use, store, and disclose that information in accordance with this Privacy Policy. However, please remember that the manner in which Third-Party Services use, store, and disclose your information is governed by the policies of those third parties, and we shall have no liability or responsibility for the privacy practices or other actions of any Third-Party Services that may be enabled within our website or services.

## Section F: Duration of the Processing

We will store and process your personal data during the period necessary depending on the purposes of the processing, the contractual relationship between us and to comply with record retention laws and regulations.

## Section G: Your Rights

People have different privacy concerns. Our goal is to be clear about what information we collect so that you can make meaningful choices about how it is used. Therefore we are informing you of the following rights you have with respect to your personal data:

#### Right of access and right to obtain a copy:

You have the right to freely obtain at any moment access to your personal data, as well as to be informed about the purpose of the processing by us.

#### Right to rectification, erasure, or restriction:

You have the choice to share your personal data with us. You also have the right to request us to rectify or erase your personal data as far as this does not interfere with the execution of any contractual obligations. You acknowledge that a refusal to share data or a request to erase these data will make the delivery of certain services and/or products impossible. You can also request the processing of your personal data to be restricted.

## **Right to object:**

You also have the right to object to the use of your personal data for purposes of direct marketing.

## Right to data portability:

You have the right to obtain your personal data which is processed by us in a structured, commonly used and machine-readable format and/or to transfer this data to another data controller.

#### Right to withdraw consent:

When data processing is based on your consent, you have the right to withdraw your consent.

#### **Exercising your rights:**

You can exercise your rights by contacting us in the following ways:

- E-mail privacyeurope@bradycorp.com
- Website via this form:

https://www.brady.co.uk/en-gb/forms/contact/privacy-policy-request

Requests to remove emailing consent can also be made directly in each email.

## Right to file a complaint:

You have the right to file a complaint with the Belgian Privacy Commission: Commission for protection of personal life, Drukpersstraat 35, 1000 Brussels, Tel +32 (0)2 274 48 00, Fax +32 (0)2 274 48 35, e-mail: <u>commission@privacycommission.be</u>.

This does not affect a procedure before the civil court.

If you have suffered damages caused by the processing of your personal data you can file a claim for damages.

## Section H: Safety & Confidentiality

We have adopted safety measures which are suited on both a technical and an organisational level to avoid the destruction, the loss, the forgery, the adjustment, the non-authorised access or the notification of the personal data by accident to a third party, as well as the non-authorised processing of these data. We work hard to protect our organization and our users from unauthorised access to or unauthorised alteration, disclosure or destruction of information that we hold. In particular:

- We encrypt many of our services using SSL.
- We may offer you two-step verification when you access your Account on our website

We shall not be liable in any way for direct or indirect damages caused by a wrongful or improper use of the personal data by a third party.

At all times you shall comply with safety standards, for instance by avoiding all non-authorised access to your login and access code. You are solely responsible for the use of the Website on your computer, IP-address and identification data, as well as for its confidentiality.

# Section I: Compliance and Cooperation with Regulatory Authorities

We regularly review our compliance with our Privacy Policy. We also adhere to several self-regulatory frameworks, including the EU-US Privacy Shield Frameworks. When we receive formal written complaints, we will contact the person who made the complaint to follow up. We work with the appropriate regulatory authorities, including local data protection authorities, to resolve any complaints regarding the transfer of personal data that we cannot resolve with our users directly.

## Section J: Changes

Our Privacy Policy may change from time to time. We will not reduce your rights under this Privacy Policy without your explicit consent. We will post any Privacy Policy changes on this page and, if the changes are significant, we will provide a more prominent notice (including, for certain services, email notification of Privacy Policy changes). We will also keep prior versions of this Privacy Policy in an archive for your review.

## Section K: Contact Information and Enforcement

## **Contact Information**

If you have questions or concerns about our privacy policy, you may contact us at privacyeurope@bradycorp.com or by any of the means outlined in <u>Section G</u>.

#### Enforcement

We use a self-assessment approach to assure compliance with this privacy policy and periodically verifies that the policy is accurate, comprehensive for the information intended to be covered, prominently displayed, completely implemented, and accessible. We encourage interested persons to raise any complaints or concerns using the contact information provided in this section and we will investigate and attempt to resolve any concerns regarding use and disclosure of personal information.