# **BradyPLUS**

# **BradyPLUS Global Privacy Policy**

Brady Industries, LLC DBA BradyPLUS and Subsidiaries Privacy Policy

Effective Date: April 29, 2025.

Brady Industries, LLC Dba BradyPLUS, its subsidiaries, and affiliates (collectively, **"BradyPLUS" "we**," **"our**," or **"us"**) is committed to maintaining the privacy of personal information processed through our official websites and their associated pages that are directly controlled or operated by us (**"Websites"**), email, and/or via the services we provide to you (collectively, the **"Services"**). This Privacy Policy (**"Privacy Policy"**) describes how we process personal information related to you when you use our Services. This includes the privacy policy to understand how BradyPLUS may process your personal information via the Services we provide to you.

## 1. General

- a. By using our Services, you agree to the terms of this Privacy Policy. We recommend you check this Privacy Policy on a regular basis so that you know the current terms and conditions that apply to you. BradyPLUS may change this Privacy Policy from time to time to reflect our current practices. Any changes to this Privacy Policy will be posted on our Websites and will be effective when posted unless another date is referenced in the Privacy Policy. Your continued use of our Services after any updates to the Privacy Policy go into effect means that you agree to all of the terms of the new policy.
- b. If you are a California resident, see the "California Privacy Rights" section below for information provided pursuant to the California Consumer Privacy Act, as amended by the California Privacy Rights Act (together, the "**CCPA**"), including information about how to exercise your data access rights.

#### 2. **Personal Information We Collect and Sources**

- a. For purposes of this Privacy Policy, unless otherwise required by applicable law, "Personal Information" means any information that identifies, relates to, describes, is reasonably capable of being associated with, or could reasonably be linked, directly or indirectly, with a particular individual or household. This may include, without limitation information that identifies you or which could be used to identify you such as your name and contact details, or your user account information. "Personal Information" also may include information about how you use our Services. "Personal Information" does not include information that is considered publicly available, aggregated, or deidentified under applicable law.
- b. We collect Personal Information directly from you, if you become a registered user of one of our Websites, request information from BradyPLUS or our affiliates, or



otherwise communicate with us through our Services. This includes where you have contacted us through the "<u>Contact Us</u>" page on our Websites and similar situations in which you have chosen to provide the information to us, including for customer services support. Any of our communications with you, including any phone calls, may be monitored and recorded for quality purposes.

- c. When you visit our Websites, BradyPLUS automatically receives and records information on its server logs from your browser, including your IP Address, information collected by cookies (see "Cookies" section below), and the page you request.
- d. We collect your Personal Information to carry out the purposes described in the "How We Use and Share The Information We Collect" section below.
- e. The categories of Personal Information we may collect and process (but only to the extent and in a manner consistent with applicable law) are as follows:
  - (i) **Personal Identifiers and Personal Details.** We may collect personal identifiers (such as your name, email address, work address, telephone number, or contact details). If you create an account on our Websites, we may also collect your username and password.
  - (ii) **Business Information.** We may collect information about the business you work for (such as your company's name, industry, and business type as well as your role within the business).
  - (iii) **Payment Information.** We may collect billing information, such as your account number, credit or debit card number, expiration date, card verification number, and billing address if you make a purchase.
  - (iv) **Financial Information.** We may collect information about your creditworthiness if you apply for a line of credit through us.
  - (v) **Commercial and Preference Information.** We may collect your order history, such as what products you have purchased or services you browsed through our Websites. We may also collect your product and service preferences.
  - (vi) Internet and Network Activity Information. We may collect your IP address when you visit our Websites. We also use tracking tools like cookies and pixels to passively collect information about how you interact with our Websites and online content. This might include device identifiers ("Device ID"), the type of browser and operating system you are using, your browsing and search history on our Websites, what areas of our Websites you visit and for how long, what products or content you view and click on, what site you came from to get to us and what site you go to when you leave us, and your interactions with our digital ads and content on other sites. We may also embed technologies (which may include, for example,



web beacons, tags, and pixels) in the emails and other communications we or our vendors send to you to help us understand how you interact with those messages, such as whether and when you opened a message or clicked on any content within the message. We may engage or otherwise allow other parties to also collect information on our Websites in these ways.

- (vii) **Location Information.** We may collect information about your general location using your IP address and your zip code.
- (viii) **Employment-Related Information.** If you apply for a job, we may collect information about your work experience and previous employment, your education history, your resume, your skill sets and certifications, other Personal Information you have provided in your CV and/or cover letter, your eligibility to work in the US, and salary expectations. If you apply for a job, you can choose to also voluntarily provide any of the following information: ethnicity, gender, disability status, and/or veteran status. If you interview in our office premises, we may also collect images and activity captured using CCTV.
- (ix) Audio and Visual Information. We may monitor and collect activity and communications made using BradyPLUS communications and computing devices and systems (such as our phone devices and email systems). For example, we may record audio during customer service calls for quality assurance purposes.
- (x) Inferences. We may draw inferences from any of the above categories in connection with the purposes stated as to such categories. We do not, however, use Sensitive Personal Information as defined in <u>Section 14 (Your Rights Under the CCPA</u>) provided by you to draw any inferences, make decisions or take actions.

#### 3. How We Use and Disclose the Personal Information We Collect

- a. If you provide us with your email address, we may use it to communicate with you. For example, we may want to inform you about content relevant to your interests, about new features and material on our Websites, to request your opinion on matters concerning our Websites, to make you aware of highlights in our products or Services, to respond to your inquiries or comments, to communicate with you regarding your account or purchases you have made, or to contact you about an employment opportunity. You can opt out of receiving these communications from us at any time by clicking the link located in the message or by writing to us at marketing@BradyPLUS.com.
- b. BradyPLUS reserves the right to send registered users maintenance emails, including but not limited to, service confirmation, renewal/expiration notice, and infrequent service alert messages, regardless of whether you have opted in or opted out of any regular email list that may be offered through our Websites. The purpose



of these maintenance email messages will be to inform users of our Websites of specific changes that may impact their ability to use our Websites.

- c. Website usage information helps us to evaluate how our visitors and registered users use and navigate our Websites on an aggregate basis, including the number and frequency of visitors and registered users to each web page, and the length of their visits.
- d. We may use Personal Information that we collect in the following ways:
  - (i) for the purposes for which you specifically provided the information including, but not limited to, enabling us to process, validate, and verify registrations and transactions;
  - (ii) to cross-reference the material in our database with your interests to send you customized announcements of content that is explicitly relevant to your interests;
  - (iii) to send you email notifications about products or services, or to otherwise contact you;
  - (iv) to enhance existing features or develop our Services;
  - (v) to enable us to respond to an inquiry or other request you make when you contact us via our Services, including for customer service support;
  - (vi) to provide you with more effective customer service;
  - (vii) to enable us to process and consider your employment application to join BradyPLUS; and
  - (viii) in any other ways that are in accordance with this Privacy Policy as it may be amended from time to time.
- e. We may disclose Personal Information that we collect with the following entities:
  - (i) our subsidiaries and affiliated companies (a full list can be found <u>here</u>) to enable us to carry out our obligations arising from any contracts and/or to provide you with the information, products, and services that you request from us;
  - (ii) third-party service providers that we engage to perform services on our behalf. We may disclose Personal Information with service providers who assist us with the uses of Personal Information described in this Privacy Policy. This may include service providers who send emails for us, help us manage and operate our Services, fulfill purchases, provide advertising or marketing services or place our advertisements on other platforms, provide analytics and search engine support, track advertising impressions,



investigate and prevent data incidents, provide physical and digital security services, audit our business and financial statements, vet job applicants, and provide legal advice. Personal Information received by service providers may also be subject to their privacy policies.

- (iii) our distributors, business partners, or other third parties to whom you have directed that we disclose your Personal Information;
- (iv) third-party analytics companies. These third parties receive aggregate, notuser-specific, information about our usage patterns; and
- (v) federal, state, and local government agencies and bodies who provide us with valid information requests, subpoenas, warrants, court orders and other legal process.
- (vi) Note that, from time to time, we may offer Services in a co-branded manner with an unrelated company. Unless otherwise specified, Personal Information may be collected and used in connection with such services both by us and by that unrelated company, subject to each of our respective privacy policies.
- (vii) We may also disclose your Personal Information (a) where required to respond to authorized requests from government authorities or where required by law; (b) where it is necessary to protect the rights, property or safety of BradyPLUS and our affiliated companies, our customers, distributors, or business partners. This may involve the enforcement of our agreements, preventing or taking action regarding illegal activities or fraud, addressing situations involving potential threats to the safety of any person, or preserving or providing evidence for litigation.
- (viii) In the event of a merger, acquisition, financing due diligence, reorganization, bankruptcy, receivership, sale of company assets, or transition of service to another entity (whether by private sale, through operation of law, as part of a divestiture plan, or otherwise), we may provide Personal Information associated with each such business unit to the persons and/or entities assuming control of such business unit or as otherwise necessary to complete the transaction as permitted by law or contract. We cannot promise that an acquiring party or the merged entity will have the same privacy practices or treat your information the same as described in this Privacy Policy.

## 4. Children Under the Age of Sixteen (16)

a. If you are a person under the age of sixteen (16), we do *not* want to receive, collect or store any Personal Information about you, including, but not limited to, your name, address or email address. BradyPLUS does not knowingly collect Personal Information from children under 16, nor do we sell Personal Information for valuable consideration or share the Personal Information for behavioral or targeted



advertising of any individual we know to be under the age of 16. In the event that we learn that we have collected any Personal Information from a child under the age of 16 without verification of parental consent, we will delete that information from our database as quickly as reasonably possible.

# 5. Security and Links to Other Sites

- a. Whenever BradyPLUS handles information that you enter on our Services, regardless of where this occurs, we take steps to ensure that your information is treated securely and in accordance with this Privacy Policy. Unfortunately, no data transmission over the internet can be guaranteed to be one hundred percent (100%) secure. As a result, while we strive to protect your Personal Information, BradyPLUS cannot guarantee, ensure or warrant the security of any information you transmit to us. You understand and agree that you transmit such Personal Information at your sole risk. Once we receive your transmission, we make reasonable efforts to maintain its security on our systems.
- b. BradyPLUS does not control the privacy policies of our business partners, suppliers, or other sites to which we provide hyperlinks. This Privacy Policy applies only to our official Websites. It does not apply to websites and mobile applications owned or operated by third parties that are not branded with our logos. Any external links to other websites are clearly identifiable as such, and we are not responsible for the content or the privacy policies of these other websites. Please review the privacy policies on those websites and applications directly to understand their privacy practices.

## 6. **Retention of Your Personal Information**

a. BradyPLUS will store your Personal Information for as long as required by law, and where there is no legal requirement, we will only store your Personal Information for as long as necessary to fulfill the purpose for which the Personal Information was collected, including but not limited to the business and commercial purposes described in this Privacy Policy (including the California Residents section) or any other notice provided at the time of collection. Your Personal Information may be retained longer if required or permitted by applicable law.

# 7. Cookies and Other Tracking Tools

- a. BradyPLUS uses tracking tools like browser "cookies" and web beacons to passively collect information about you. A "cookie" is a small file that is placed on a website visitor's device or browser (by a third party or us) to collect information about your activities through our Services. Cookies may be used for many purposes by us and third parties, such as:
  - (i) To speed up navigation and provide you with custom-tailored content.
  - (ii) To remember the information you gave us, so you do not have to re-enter it each time



- (iii) you visit our Websites.
- (iv) To monitor the effectiveness of certain marketing email campaigns.
- (v) To monitor the total number of visitors, pages viewed, and banners served on our Websites.
- (vi) To automatically collect Device ID information.
- (vii) To enable features.
- (viii) To serve behavioral based advertisements. California residents may opt out of behavioral
- (ix) based advertisements via the methods outlined in <u>Section 15 (How to</u> <u>Submit a Request</u>).
- (x) For analytics.
- (xi) To market our Services to you.
- b. You have the ability to accept or decline most cookies. You can usually modify your browser setting to decline cookies if you prefer. If you choose to decline cookies, however, you may not be able to sign in or use interactive or other related features of our Services that depend on cookies. Note that, if you accept cookies, you have the ability to later delete cookies that you have accepted. If you choose to delete cookies, any settings and preferences controlled by those cookies will be deleted and may need to be recreated. If your browser settings are set up as 'Do Not Track', the use of cookies and tracking technologies will not apply to you.

For more information on cookies and how they can be managed and deleted please visit the following: <u>http://www.allaboutcookies.org/</u>, <u>http://www.networkadvertising.org/choices/</u>, or <u>http://www.aboutads.info/choices/</u>.

## 8. Third Party Advertising & Analytics/Privacy Controls

a. We may use third party advertising companies, ad agencies, analytics providers, and network advertisers to target and serve ads when you visit our Websites and elsewhere online and offline, and to provide us with data regarding use of our Websites and Services and effectiveness of our advertisements. These third parties may set and access their own tracking technologies on your device (including cookies), and they may otherwise collect or have access to certain data about your use of our Websites. Some of these third party companies may collect Personal Information over time when you visit and/or access our Websites or other online websites and services. We may share data, typically data that has been aggregated, pseudonymized or de-identified, device ID information, and location data with third party advertising companies, analytics providers, and other third parties for these



purposes. To the extent we deploy these technologies, if you would like to opt-out of third-party advertising and analytics, there are a variety of tools available to you:

- (i) **"Do Not Track"** or **"DNT"** refers to technology that internet users can employ to block the tracking of their browsing activity by analytics companies, advertising networks, and other such entities. When you choose to turn on the DNT settings in your browser, your browser will send a signal to websites, analytics providers, advertisement networks, plug-in providers, and other web service providers you encounter while browsing to stop tracking your activity. Presently, BradyPLUS does not respond to DNT signals.
- (ii) The Global Privacy Control ("GPC") (California Residents Only). The GPC refers to a signal that is a technical specification in your browser settings that you can use to automatically inform websites of your privacy preferences with respect to third-party online tracking. Please note that currently, only California residents may request that we honor GPC signals. To find out more about and to set up GPC, please visit <a href="https://globalprivacycontrol.org/#about">https://globalprivacycontrol.org/#about</a>.
- NAI/DAA opt-out. We use a We use a variety of third parties to perform (iii) advertising and analytics services, and some of these companies may be members of the Network Advertising Initiative ("NAI") or Digital Advertising Alliance ("DAA"). You mav wish to visit https://optout.networkadvertising.org, which provides information regarding targeted advertising and the opt-out procedures of NAI members, including opt out mechanisms for web browsers, mobile and other connected devices, and a tool to opt out from participating NAI members using your hashed email address for interest-based advertising. You may also want to visit https://optout.aboutads.info, which provides information regarding targeted advertising and offers an opt-out for DAA-participating companies. Note that these are cookie-based opt-outs. If you disable your Cookies or upgrade your browser after opting out, or if you use different devices or browsers, you will need to indicate your opt-out choices across those other devices and browsers. Mobile devices may contain settings that allow you to disable tracking advertising and analytics. In addition, the digital advertising industry has provided the ability for mobile users to their intent not to receive targeted advertising register at https://aboutads.info/appchoices.

## 9. **Processing in the U.S.**

a. Our Services are intended for visitors and registered users from the United States and are not intended for an international audience. All data collected through our Services will be stored and processed in the U.S.



## 10. California Privacy Rights

**California Shine the Light**. Residents of California have the right to request information from us regarding other companies to whom we have disclosed certain categories of information during the preceding year for the other companies' direct marketing purposes. If you are a California resident and would like to make such a request, please email us at: privacy@bradyplus.com or write to us at:

7055 S Lindell Rd Las Vegas, NV 89118

#### 11. Categories of Personal Information Sold or Shared to Third Parties

BradyPLUS has not "sold" your Personal Information, as that term is defined under the CCPA and below, in the preceding twelve (12) months.

a. BradyPLUS may "share" (as defined below) your Personal Information for the following circumstances: (i) targeted or cross-context behavioral advertising; or (ii) if required to do so by law. In this context, we may share certain identifiers such as your Device ID and or other electronic network activity information. Relatedly, we do not sell or share Personal Information of California residents under sixteen (16) years of age. If you would like to submit a request to opt out of the sharing of your Personal Information if you have the right to do so under your state's applicable privacy law, please click here or see Section 15 (How to Submit a Request).

For purposes of this Privacy Policy, "**sell**" means the sale or transfer of your Personal Information to a third party for monetary or other valuable consideration, subject to certain exceptions in applicable law. For purposes of this Privacy Policy, "**share**" means transferring, making available, or otherwise disclosing your Personal Information to another party for purposes of sending advertising to you based on your Personal Information obtained from your activities across distinctly-branded sites. "**Share**" and "**sharing**" as used in this section, does not include transfers of Personal Information described in this Privacy Policy as part of a corporate business transaction, such as a merger, acquisition, or joint venture, or in the event of insolvency, bankruptcy, or receivership. Should such an event occur, we will use reasonable efforts to direct the transferee to use the Personal Information you have provided to us in a manner that is consistent with this Privacy Policy.

Please see the section on "Cookies and Other Tracking Tools" above for information about the collection and use of Personal Information by third parties who process information collected by cookies and similar technologies that we permit them to use on our Services.

#### 12. Additional State-Specific Privacy Disclosures (Utah and Nevada)

Depending on your state of residency, you have certain rights related to your Personal Information. If you or an authorized agent wish to exercise these rights, you can submit a request using the methods listed in Section 15 (How to Submit a Request).



## 13. Categories of Personal Information Disclosed to Service Providers

We disclose your Personal Information to certain third parties to enable them to fulfill the purposes described in the "<u>How We Use and Disclose the Personal Information We Collect</u>" section of the Privacy Policy above. The Personal Information provided to our service providers is limited to that Personal Information which is necessary for them to fulfill these purposes. Our service providers have contractually agreed not to use your Personal Information other than as necessary to fulfill the applicable purposes and in accordance with the CCPA. In the preceding twelve (12) months, we have disclosed the categories of Personal Information described above in Section 11 "Categories of Personal Information Sold or Shared to Third Parties", with the following categories of service providers:

- (i) Data Analytics Providers
- (ii) Government Entities
- (iii) Operating Systems and Platforms
- (iv) Customer Support Providers
- (v) Internet Service Providers
- (vi) Insurance Providers
- (vii) Technology Providers
- (viii) Cybersecurity Providers
- (ix) Supply Chain Management Providers
- (x) Workforce Management and Human Resource Management Providers

We disclose Personal Information to our service providers in accordance with the purposes described in Section 3 (<u>How We Use and Disclose the Personal Information We Collect</u>) of the Privacy Policy above.

## 14. Your Privacy Rights Under the CCPA

- a. *Right to Know and to Access.* Subject to certain exceptions, and legal obligations, you have the right to request that we disclose certain information to you about our collection and use of your Personal Information over the past twelve (12) months, including whether we sell or share such information. You also have the right to request access to Personal Information collected about you and information regarding the following:
  - The categories of Personal Information we collected about you;



- The categories of sources of that information;
- The business or commercial purposes for which we collect, sell, or share Personal Information about you;
- The categories of Personal Information about you that we have disclosed about you and the categories of persons or vendors to whom it was disclosed for a business purpose; and
- The specific pieces of Personal Information we have collected about you.

This information is disclosed above in the "<u>Personal Information We Collect and Sources</u>" and "<u>How We Use and Disclose the Personal Information We Collect</u>" sections. You may also submit a request for this information as described below. To protect your Personal Information, we may request additional information to verify your identity before we act on your request. To the extent legally required, we will provide a copy of the Personal Information we have collected about you, in a portable and, to the extent technically feasible, readily usable format that allows you to transmit the data to another entity without hindrance. We may provide this data to you via email to the email address you have provided with your request.

- b. *Right to Correction.* You have the right to request that we correct any inaccurate Personal Information we maintain about you. In response to your request, we may request additional information showing that the information you want to correct is inaccurate.
- c. *Right to Deletion.* You may request that we delete your Personal Information. This right is subject to certain exceptions, and legal obligations imposed by state or federal privacy and employment laws. We will delete or de-identify Personal Information not subject to one of these exceptions from our records and will direct our service providers to take similar action.
- d. *Right to Opt-Out of the Sale or Sharing of Personal Information to Third Parties.* You have the right to opt out of the sale or sharing of your Personal Information by BradyPLUS to third parties.
- e. *Right to Limit Use and Disclosure of Sensitive Personal Information.* You have the right to direct us to limit our use of your sensitive Personal Information to that use which is necessary to fulfill the purposes reasonably expected by an average consumer who requests those goods or services. California law considers the following pieces of Personal Information to be "Sensitive Personal Information:" social security number, driver's license number or other government-issued identification number, financial account number, any health insurance or medical identification number, an account password, security questions and answers, or unique biometric data. We do not knowingly collect Sensitive Personal Information, nor do we use it to infer characteristics about you.



f. *Non-Discrimination or Retaliation.* We will not discriminate or retaliate against you for exercising any of your data privacy rights. For example, we will not deny you goods or services or charge you a different price or rate for goods or services if you make an access, deletion, or do not sell request.

## 15. How to Submit a Request

You or an authorized agent may submit a request to exercise your right above through one of the following means:

- (i) By filling out a Consumer Data Request Form available <u>here</u>.
- (ii) By calling us toll-free at +1 877-788-PLUS.
- (iii) By emailing us at privacy@bradyplus.com

Consumers or their authorized agent may be required to submit information such as name, email address, the website they have visited, and their city and state so that we can verify their identity to process the request. The information collected from you will be used for the sole purpose of verifying your identity to allow you to exercise your rights under the data protection laws. The verification steps will vary depending on the sensitivity of the Personal Information and whether you have an account with us, however, we will not require you to create an account with us in order to exercise your rights. We may deny certain requests, or fulfill a request only in part, based on our legal rights and obligations.

## 16. Authorized Agent

California law permits California consumers to use an authorized agent to make privacy rights requests. We require the authorized agent to provide us with proof of the California consumer's written permission (for example, a power of attorney) that shows the authorized agent has the authority to submit a request for the California consumer. We may request additional information in order to verify that the agent has the authority to submit a request on your behalf, including reaching out to you directly for verification.

## 17. Contact Us with Questions

a. If you have any questions about this Privacy Policy, the practices of the BradyPLUS Services, or your dealings with our Services, please contact us at:

7055 S Lindell Rd Las Vegas, NV 89118 Phone: +1 877-788-PLUS Email: <u>privacy@bradyplus.com</u>