



**KUGELHAHN MÜLLER GMBH**  
**PART OF BRAY INTERNATIONAL GROUP**

**PRIVACY POLICY · CORPORATE**  
**FOR EUROPEAN ECONOMIC AREA AND EXPORTING AFFILIATES**

**INTRODUCTION**

This Corporate Privacy Policy for European Economic Area and Exporting Affiliates (this “Policy”) sets forth how Bray International, Inc. and its affiliated subsidiaries that are subject hereto view the treatment of electronic data of a personal nature, including, without limitation, personally identifiable information of employees (whether current or past), prospective employees and contractors, customers, suppliers and other vendors. As much as this Policy sets forth rules for implementation in respect of privacy and data protection compliance, the intention is for this Policy also to constitute a statement of the principles and guidelines to which the Company will, and expects its employees and workforce to, adhere.

This Policy has been developed to apply to [Bray International, Inc., together with Flow-Tek, Inc., Ultraflo Corporation, Bray Sales, Inc., Unit Process Company, Nichols-Given Associates, Inc., Rite USA, LLC, Ritepro Nuclear USA, LLC, Ritepro Corporation, Bray Controls Canada Ltd., Bray Operating Group LLC, Bray Controls Government and Marine Sales, LLC, Bray Controls Caribbean Basin, LLC, Bray Controls (UK) Limited, Bray Controls Italia, S.r.l., Bray Controls Cyprus Limited, **Kugelhaahn Müller GmbH**, Bray Valves and Actuators, LLC, Bray Controls France, SARL, Bray Germany Property Holdings GmbH, Bray Controls Europe B.V., Bray Controls Benelux B.V., Bray Armaturen & Antriebe GmbH, Bray Armaturen & Antriebe Europa, and Bray Controls Poland] (collectively referred to herein as “the Company”, “we”, “our” or “Bray Companies”, and individually referred to as a “Bray Company”), but additional affiliates and subsidiaries may become subject to the application of this Policy from time to time.

The basic premise of this Policy is that the Company should ensure lawful collection, use, protection, disclosure and disposal of personal data. The Company believes this premise can be achieved in a manner that is consistent with our commercial vision and requirements. Thus, this Policy sets forth the rules and guidelines instructive for satisfying our premise within the context of our commercial operations.

In conjunction with the adoption of this Policy, the Company has established an office whose duties include the maintenance of our data privacy policies, rules, management and compliance. This office, our Data Privacy Office, is tasked with effectively communicating this Policy and any further or resulting rules and guidelines in respect of data privacy policies and rules within the Company (including among the Bray Companies’ employees). The Data Privacy Office is further obligated to enforce this Policy, maintain consistent governance of the rules and guidelines across the Bray Companies, and train relevant personnel (who would collect or access personal data or otherwise develop tools or systems used in processing personal data).



## 1. SCOPE

Personal data is any information relating to an identified or identifiable natural person. An identifiable natural person is someone who can be identified, directly or indirectly, by reference to an identification number or one or more factors specific to his or her physical, physiological, genetic, mental, economic, cultural or social identity. The concept of “processing” personal data means any part of collecting, using, protecting, retaining, disclosing and disposing of personal data, as well as collectively doing all of the foregoing with respect to such data.

We are a global company and therefore we process and transmit personal data for normal business purposes daily. Such activities are conducted for the Company’s human resource reasons, including (but not limited to) workforce planning, recruitment, on-boarding, managing performance, learning and development, providing compensation and benefits and maintaining payroll. We also process information relating to our customer, supplier and other vendor relationships for numerous reasons. These may include maintaining such relationships, analysis of commercial needs and satisfaction, and managing and administering contractual obligations. We also may process and transmit personal data to satisfy reporting and other compliance obligations and to facilitate communications and other legal processes.

The Company will follow this Policy and the rules and guidelines hereunder when processing and transmitting personal data. This includes when a Bray Company is processing personal data received from any or more of the other Bray Companies.

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 United States and European Union affiliate as designated authorities. In the European Economic Area and Switzerland (“Europe”), Bray Armaturen & Antriebe Europa and Bray Armaturen & Antriebe GmbH, a German *Gesellschaft mit beschränkter Haftung*, 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 the United States, Bray International, Inc. serves these functions.

## 2. TRANSPARENCY AND NOTICE

We maintain and provide notices to individuals 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 individuals to contact us or exercise their rights. If we do not provide notice at the time of collection, we will do so as soon as possible thereafter, except if there is an exemption under applicable law for not doing so.

## 3. 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.



#### 4. DATA QUALITY AND PROPORTIONALITY

The Company processes personal data along the following guidelines:

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

#### 5. RIGHTS OF INDIVIDUAL ACCESS

The Company respects and complies with each individual's rights of access to personal data relating to her or him. We will confirm to any individual whether or not her or his personal data is being processed by the Company, and, if so, the purposes for which such data is being processed, the categories of such personal data being collected and used, the nature of the recipients or categories of recipients to whom the personal data is being disclosed. We expect to communicate with any individual consistent with the foregoing in a clear and concise manner about the personal data being processed and the basis for such processing. An individual may request the correction of inaccurate personal data and, in compliance with legal requirements, obtain the deletion or blocking of such personal data from the Company. Individuals can exercise such rights without constraint, at reasonable intervals and without excessive delay or expense, pursuant to the information found in Section 14 of this Policy.

#### 6. COMPLIANCE WITH LOCAL LAW

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

Unless otherwise indicated under applicable law or an extenuating legal basis exists otherwise, the Company will process personal data revealing racial or ethnic origin, political opinions, religious or philosophical beliefs, trade-union membership, health or sexuality only with a subject individual's express consent (such data otherwise is known as "sensitive" or "special" personal data).

#### 7. AUTOMATED DECISION MAKING

If we determine to process personal data pursuant to an automated decision-making function, the Company will use appropriate measures for safeguarding the legitimate interests of individuals in regard to such personal data. We will endeavor to provide information on the logic involved in making such determination and establishing such measures.

#### 8. DIRECT MARKETING

We will provide an opportunity and right of individuals to opt-out (without expense to them) from our marketing efforts if such efforts require processing personal data. We believe this can be most

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easily done by following instructions and links that we will provide in connection with such marketing efforts. Nevertheless, an individual can also exercise this right by contacting our Data Privacy Office at [privacy@bray.com](mailto:privacy@bray.com).

## **9. SECURITY, CONFIDENTIALITY AND USE OF THIRD PARTIES**

The Company applies appropriate technical and organizational measures to protect personal data against accidental or unlawful destruction, loss, alteration, unauthorized disclosure or access, in particular where personal data is transferred over a network, and against other unlawful forms of processing. We maintain a comprehensive information security program that is proportionate to the risks associated with our processing activities. On the basis of best practices, we review the program and adjust as necessary to mitigate against operational risks and to ensure the protection of personal data. The Company will also use enhanced security measures when processing any sensitive personal data.

We conduct third party security reviews to ensure 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. We also require that they only act upon our instructions.

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.

In some instances, we process personal information on behalf of our customers as a service (in a data processor capacity). We collect and process this personal information 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 the personal information as instructed by the customer or to provide the requested service. Unless otherwise instructed by the customer, we treat the personal information we process on behalf of our customers in line with our commitments on disclosure and transfer as set forth in this Policy.

## **10. CROSS-BORDER TRANSFERS AND TRANSFERS OUTSIDE OF EUROPE**

The Company maintains an inventory of key processing systems, storage locations, third party service providers and data flows. We ensure this information is kept up-to-date to reflect any change to processing activities. We also maintain processes to ensure that personal data transferred will be treated in accordance with this Policy, regardless of their location.

Furthermore, when we do rely on third parties outside of the Company, we maintain procedures to ensure protection for personal data and compliance with applicable laws to the personal data transferred. If personal data is disclosed to third parties located outside Europe, we take measures to ensure that personal data transferred receives adequate protection in accordance with applicable data protection rules, such as through contractual clauses.



## **11. 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 are 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.

## **12. COOPERATION WITH DATA PROTECTION AUTHORITIES**

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.

## **13. 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 take a responsible decision on what action to take and will consult the competent data protection authorities in case of doubt.

## **14. COMPLAINTS AND INQUIRIES**

Any individual whose personal data is subject to this Policy may raise concerns that the Company is not complying with them or applicable data protection law by contacting the Data Privacy Office to obtain details of the Company's complaint handling processes:

By email to: [privacy@bray.com](mailto:privacy@bray.com)

Or in writing to: **Bray Data Privacy Office**

### **Europe**

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

### **United States**

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

All complaints will be handled by the Data Privacy Office in an independent manner. Furthermore, all individuals are welcome to communicate with the Company regarding privacy issues (including questions on how to exercise individual rights of access, rectification, deletion or blocking) or with questions or comments through one of the means above. All of the Company's employees are responsible for reporting any complaints or privacy incidents that are brought to their attention.



## 15. SPECIFIC RIGHTS FOR EUROPEAN INDIVIDUALS

### *Third Party Beneficiary Rights*

Individuals whose personal data is (i) subject to the EU Directive 95/46/EC on the Protection of Individuals with Regard to the Processing of Personal Data and on the Free Movement of Such Data or the Swiss Federal Act on Data Protection (both as amended or replaced from time to time) and (ii) transferred to a Bray Company outside of Europe (collectively “Beneficiaries”, and individually a “Beneficiary”) may seek enforcement of this Policy (other than Section 11 of this Policy covering audits) as third party beneficiaries by:

- lodging a complaint with each Bray Company that processes their personal data or by contacting the Data Privacy Office as set forth in Section 14 of this Policy;
- lodging a complaint with a national data protection authority of competent jurisdiction; or
- bringing proceedings against (i) Bray Armaturen & Antriebe Europa and Bray Armaturen & Antriebe GmbH in the courts in the state of North Rhine-Westphalia of the Federal Republic of Germany or (ii) each Bray Company located in Europe that transferred the personal data in their respective jurisdictions.

### *Liability, Jurisdiction & Burden of Proof*

As part of the remedies set forth in this Section 15 of this Policy, Beneficiaries may seek appropriate redress from Bray Armaturen & Antriebe Europa and Bray Armaturen & Antriebe GmbH before the courts in the state of North Rhine-Westphalia of the Federal Republic of Germany to remedy any breach of this Policy by any non-European Bray International company and, where appropriate, receive compensation for damages suffered as a result of such breach, in accordance with a decision of a court.

If such Beneficiary demonstrates that he or she has suffered damage and that such damage likely occurred due to a breach of this Policy by a non-European Bray International company, the burden of proof to show that this entity is not responsible for the breach or that no such breach took place will rest with Bray Armaturen & Antriebe Europa and Bray Armaturen & Antriebe GmbH.

## 16. EFFECTIVE DATE AND CHANGES AND PUBLICATION OF THE RULES

This Policy became effective on 1st June 2018 and applies to all processing of personal data by the Company on or after that date. This Policy may be modified as necessary, for example to ensure compliance with changes in local law or regulations, binding formal decisions of data protection authorities, as well as alterations to our processes or our internal organization.

We will communicate any material change to this Policy to the Landesbeauftragte für Informationsfreiheit und Datenschutz Nordrhein-Westfalen (the data protection authority for North Rhine-Westphalia) and, where required, any other relevant European data protection authorities on at least an annual basis. Administrative changes or changes resulting from a change in local data protection legislation in any European country will not be reported unless they have a significant impact on this Policy. We will communicate any changes to this Policy to the Bray Companies bound by them.

We will take measures to ensure that new Bray Companies are bound by this Policy and the Data Privacy Office will maintain an updated list of our companies subject to them. Personal data transfers to new Bray Companies will not take place before they are effectively bound by this Policy and able to comply. The updated list of Bray Companies will also be communicated to the Bray Companies bound by this Policy and to the data protection authorities at recurrent time intervals where required. This Policy will be made publicly available. For more information, please see [www.bray.com](http://www.bray.com).



**POLICY HISTORY**

Version	Date	Description
1.0	1st June 2018	Initial Policy release
1.1	14th November 2018	Minor updates



**KUGELHAHN MÜLLER GMBH**  
**PART OF BRAY INTERNATIONAL GROUP**

**PRIVACY NOTICE · THIRD PARTY**

Bray International, Inc. and affiliated companies (collectively “Bray”, “we”, “us” or “our”) care about your privacy and are committed to protecting your personal information in accordance with fair information practices and applicable data privacy laws.

As a sign of our commitment to privacy, we have adopted a Corporate Privacy Policy for the European Economic Area and Exporting Affiliates setting forth certain principles, guidelines and rules (the “Policy”). The Policy contains our global privacy commitments, including our policy on transfers of personal information and associated individual privacy rights, with the aim of ensuring that your personal information is protected while processed by our affiliates around the world. This Policy has been approved by *Landesbeauftragte für Informationsfreiheit und Datenschutz Nordrhein-Westfalen* (the data protection authority for North Rhine-Westphalia). You can consult our Policy on our website at <https://www.bray.com/privacy-policy>.

This Privacy Notice explains how we collect and use personal information. Personal Information 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.

We collect personal information in a variety of ways through our normal business activities, both online and offline. This includes, for example, when you place orders or purchase products or services, enter into agreements or communicate with us, or visit and use our websites. We also receive personal information from our customers in order to perform services on their behalf.

**IDENTITY OF DATA CONTROLLER**

To identify the Bray entity responsible for the processing of your personal information, you can ask your Bray business contact, consult the list of our locations on the Bray public website ([www.bray.com](http://www.bray.com)) or contact our Data Privacy Office at:

By email to: [privacy@bray.com](mailto:privacy@bray.com)

Or in writing to: **Bray Data Privacy Office**

**Europe**

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

**United States**

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



## **CATEGORIES OF PERSONAL INFORMATION**

Personal information that we may collect and process includes:

- Contact information that allows us to communicate with you, such as: your 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 that helps us do business with you, 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 about how you interact with us, 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 that helps us to secure our interests, including information for conflict checks, fraud prevention and internal verification, as well as information necessary for the security of our premises, such as visual recordings.
- Our products may collect system and event information relating to 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.

## **LEGAL BASES FOR PROCESSING**

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

## **PURPOSES OF PROCESSING**

- Fulfilling your orders for products or services and related activities, such as product and service delivery, customer service, account and billing management, support and training, product update and safety related notices, and to provide other services related to your purchase.
- Managing our contractual obligations and your ongoing relationship with us, including interacting with you, analyzing and improving the products and services we offer, informing you about our products or services, as well as special offers and promotions.
- Ensuring the security of our websites, networks and systems, and premises, as well as protecting us against fraud.



- Managing our everyday business needs, such as payment processing and financial account management, product development, contract management, website administration, fulfillment, corporate governance, audit, reporting and legal compliance.

## RECIPIENTS OF PERSONAL INFORMATION

- **Third Parties:** We may use third parties to provide or perform services and functions on our behalf. We may make personal information available to these third parties to perform these services and functions. Any processing of that personal information will be on our instructions and compatible with the original purposes.
- **As Required by Law:** We may also make personal information concerning individuals 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 information 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.

## INTERNATIONAL TRANSFERS

The third parties, subsidiaries and affiliates to which your personal information can be disclosed may be located throughout the world; therefore, information may be sent to countries having different privacy protection standards than your country of residence. In such cases, we take measures to ensure that your personal information receives an adequate level of protection, which include our Policy, which set forth our high standards for processing personal information collected and processed by us globally to protect your personal information.

Bray complies with the EU-U.S. Privacy Shield Framework and the Swiss-US Privacy Shield Framework as set forth by the U.S. Department of Commerce regarding the collection, use, and retention of personal information transferred from the European Union and Switzerland to the United States. Bray International, Inc., together with its United States-based subsidiaries, has certified to the Department of Commerce that it adheres to the Privacy Shield Principles. If there is any conflict between the terms in this Privacy Notice and the Privacy Shield Principles, the Privacy Shield Principles shall govern. To learn more about the Privacy Shield program, and to view our certification, please visit <https://www.privacyshield.gov/>. Please note that we believe our Policy and the Privacy Shield Principles will also apply to our United Kingdom entit(ies) and activities once the United Kingdom has left the European Union.

Bray has responsibility for the processing of personal information it receives under the Privacy Shield and subsequently transfers to a third party acting as an agent on its behalf. Bray shall remain liable under the Privacy Shield Principles if its agent processes such personal information in a manner inconsistent with the Privacy Shield Principles, unless Bray proves that it is not responsible. You



have the possibility, under certain conditions, to invoke binding arbitration for complaints regarding Privacy Shield compliance not resolved by any of the other Privacy Shield mechanisms. For additional information please see: <https://www.privacyshield.gov/article?id=ANNEX-lintroduction>. The Federal Trade Commission has jurisdiction over Bray's compliance with the Privacy Shield Principles.

## **RETENTION**

We will retain your personal information 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.

## **PROTECTION OF PERSONAL INFORMATION**

We apply appropriate technical, physical and organizational measures that are reasonably designed to protect personal information against accidental or unlawful destruction, loss, alteration, unauthorized disclosure or access, and against other unlawful forms of processing. Access to personal information is restricted to authorized recipients on a need-to-know basis. We maintain a comprehensive information security program that is proportionate to the risks associated with the processing. The program is continuously adapted to mitigate operational risks and to protect personal information, taking into account industry-accepted practices. We will also use enhanced security measures when processing any sensitive personal information.

## **WAYS WE MAY COLLECT INFORMATION AND YOUR RIGHTS**

### **Website and Generation of Log Files**

Our system automatically collects data and information from the accessing computer on each occasion a user visits our website. The following data may be collected:

- (1) Information on the browser type and version used
- (2) The user's operating system
- (3) The user's internet service provider
- (4) The user's IP address
- (5) The date and time of the access
- (6) Websites from which the user was referred to our website
- (7) Websites accessed by the user's system via our website
- (8) Duration of the user's visit
- (9) The user's country of origin
- (10) The user's preferred language
- (11) Time of the user's first visit and most recent visit

This data is also saved in our system log files. We do not store this data together with the user's other personal data.

We collect the foregoing data on the basis of protecting our legitimate interests, including our

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commercial activities. The temporary storage of the IP address by our system is required to deliver the website to the user's computer. The user's IP address must therefore be stored for the duration of the session. The storage of data in log files serves the purpose of warranting the proper functioning of our website. The data is also used to optimize the website and to safeguard the security of our IT systems.

The data is deleted as soon as the purpose of collecting them has been achieved. Where data is collected to operate the website, this is the case as soon as the respective session ends. If the data is stored in log files, this is the case after a maximum of 30 days. Data may be stored for longer periods in certain circumstances. If this is the case, the user's IP addresses are deleted and truncated with the result that is no longer possible to trace them back to the accessing client.

The collection of data for the provision of the website and storage of the data in log files is absolutely essential for the operation of the website. This means that the users cannot object to this collection and storage of data.

### **Use of Cookies**

Our website uses cookies. 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 at the next occasion you visit the website. We use cookies to make our website more user-friendly. 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 (Sharkgate.net, etc.)
- (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)

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 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 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.

### **Registration**

Our website offers users to register by providing their personal data. The data is entered into a form, transmitted to us and then stored by us. The data is not disclosed to third parties, unless a payment processing service is involved in an e-commerce transaction. The following data may be collected during the registration process:

- (1) First name
- (2) Surname
- (3) E-mail address
- (4) Password
- (5) Address
- (6) Post code
- (7) City
- (8) Date of birth
- (9) Telephone number
- (10) Fax number
- (11) Tax number
- (12) Company
- (13) Company website

The following additional data is stored when registering:

- (1) Date and time of the registration
- (2) Date and time of the registration confirmation
- (3) Date and time consent to the Privacy Notice was granted
- (4) Website where the registration was carried out

The user's consent for the processing of these data is obtained during the course of the registration process.

We collect the foregoing data on the basis you have given us consent. If the registration serves the purpose of performing a contract with the user or to implement pre-contractual measures, the legal basis for the data processing is also the performance of such contract. The data is deleted as soon as the purpose of collecting them has been achieved.



### **Contact Form and Contact by E-mail**

Our website offers a contact form that can be used to send electronic correspondence to us. A similar form can be used to enroll in one of the training courses offered by Bray. The data entered into these forms will be transmitted to and stored by us. The following data may be stored at the time the form is submitted:

- (1) The user's IP address
- (2) The language and URL of the page accessed
- (3) The user's browser and operating system
- (4) The user's referring page
- (5) Date and time contact was made

With respect to the processing of the data, users are referred to the Privacy Notice at the time of submitting the form and must acknowledge and confirm their consent to the Privacy Notice.

Alternatively, users may contact us via the e-mail address provided. In this case, the user's personal data transmitted in the e-mail will be stored.

We collect the foregoing data on the basis you have given us consent. The legal basis for the processing of the data submitted is the protection of our legitimate interests, including our commercial activities. We process the personal data submitted via e-mail or an online form for processing the user's inquiry. Any other personal data processed during the submission process serve the purpose of preventing misuse of the contact and to safeguard the security of our IT systems.

The data is deleted as soon as the purpose of collecting them has been achieved. The user may revoke his declaration of consent to the processing of personal data at any time. Users who contact us by e-mail may revoke their consent to the storage of their personal data at any time. If a consent is revoked, the correspondence with the user will be terminated.

### **Newsletter**

Our website offers users to subscribe to a free newsletter. The data entered in the registration form will be transmitted to us. The following data is collected during such registration:

- (1) IP address of the accessing computer
- (2) Date and time of registration

Your consent to the data processing is obtained during the registration process, where you are also referred to this Privacy Notice. If you submit your e-mail address to us during the course of purchasing goods or services via our website, we may subsequently use this data for sending out a newsletter. In this case, the newsletter will only contain direct advertising for similar products or services offered by our company. Data is not disclosed to third parties as part of the data processing concerned with the sending of newsletters. The data is used exclusively for sending out the newsletter.

We also use newsletter tracking, which means that the e-mails sent by us contain small image files, also called web beacons or tracking pixels, which are embedded in the e-mails but not directly contained in them (only as a link to a web address). These are downloaded from the external server by the webmail application running in the browser. Information regarding the call-up, the IP address and information on the accessing client is collected.

We collect the foregoing data on the basis you have given us consent and the protection of our legitimate interests. The collection of the user's e-mail address serves the purpose of delivering the

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newsletter. The tracking of the newsletter service serves the purpose of performing statistical analysis to determine how many e-mails are read when and which links are accessed frequently. In this case, the use does not allow for inferences to persons. The information is used for the optimization of newsletter content or to better match the newsletter to the mail clients used by the recipients.

The newsletter subscription can be cancelled (unsubscribe) by the user at any time. All newsletters contain an unsubscribe link. This also gives the user the opportunity to revoke his consent to the storage of the personal data collected during the registration process.

#### **Google Analytics:**

We may also 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. 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. Likewise, users that are similar to the visitors of our website can be addressed. The information generated by the cookie about the website use will be transmitted to and stored on servers in the United States by Google. In the event that the IP address is transferred, it will be reduced by the last 3 digits. 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 through Google by visiting the website: <https://www.google.com/settings/ads/>. Alternatively, users can deactivate the use of cookies by third party providers by visiting the Network Advertising Initiative's deactivation website (<http://www.networkadvertising.org/choices/>). 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/>).

#### **Linked sites:**

We may provide links to 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 doesn't contain obviously illegal content — if we should subsequently become aware that the linked site contains illegal content, we will promptly remove the link.

#### **Children:**

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

#### **YOUR RIGHTS**

You may request to access, rectify, or update your inaccurate or out-of-date personal information by contacting our Data Privacy Office through the following link: [privacy@bray.com](mailto:privacy@bray.com). To the extent of applicable law, you may have the right to request erasure of your personal information, restriction of processing as it applies to you, object to processing and the right to data portability. You may also have the right to lodge a complaint with a supervisory authority.

#### **CONSENT AND WITHDRAWAL OF CONSENT**

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

You may always object to the use of your personal information for direct marketing purposes or withdraw any consent previously granted for a specific purpose, free of charge by clicking on relevant links on our websites, following the directions contained in an email or by contacting our Data Privacy Office through the following link: [privacy@bray.com](mailto:privacy@bray.com).

#### **AUTOMATED DECISION MAKING**

Bray respects your rights under law regarding automated decision-making. Bray doesn't currently process personal data pursuant to an automated decision-making function. If we determine to process personal data pursuant to such function, Bray will use appropriate measures for safeguarding the legitimate interests of individuals in regards to such personal data.

#### **HOW TO CONTACT US**

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](mailto:privacy@bray.com)



Or in writing to: **Bray Data Privacy Office**

**Europe**

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

**United States**

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

In compliance with the Privacy Shield Principles, Bray commits to resolve complaints about our collection or use of your personal information. European Economic Area and Swiss individuals with inquiries or complaints regarding our Privacy Shield policy should first contact our Data Privacy Office at the above link. Bray has further committed to cooperate with the panel established by the EU data protection authorities (DPAs) and the Swiss Federal Data Protection and Information Commissioner (FDPIC) with regards to unresolved Privacy Shield complaints concerning data transferred from the European Economic Area and Switzerland.

**MODIFICATIONS TO OUR PRIVACY NOTICE**

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

**LOCAL ADDENDA FOR CERTAIN COUNTRIES**

We have extended the Privacy Notice with specific information for certain countries where required by applicable local law. You can find these complementary notices through the local addenda links on the Privacy homepage.

This Privacy Notice is effective as of 14th November 2018

**POLICY HISTORY**

Version	Date	Description
1.0	14th November 2018	Initial Policy release