# BARETZ+BRUNELLE

## PRIVACY POLICY

## Last Updated and Effective as of Dec. 12, 2022

BARETZ+BRUNELLE ("Company", "we", "our," or "us") understands that privacy is important to our users, and protecting your private information is our priority. This Privacy Policy discloses our practices regarding information collection and usage for www.baretzbrunelle.com (the "Website").

Overview

- We collect Personal Information (as defined below) from users of our Website when it is voluntarily provided to us and use it for the purposes for which it was provided (see *Information We Collect and How We Collect It* and *How We Use Your Information*).
- We automatically collect information from users of our Website for analytical purposes (see *Information We Collect and How We Collect It* and *How We Use Your Information*).
- We will not use or share information we collect from you with anyone except as described in this Privacy Policy.

By accessing or using the Website, you agree to this Privacy Policy. If you do not agree with our policies and practices, you should not use the Website or otherwise provide us with Personal Information.

Our Website is provided from the United States and all servers that make it available reside in the United States. You understand that data stored in the United States may be subject to lawful requests by the courts or law enforcement authorities in the United States.

If you have questions, you can always contact us using the information in the section below titled *Contact*.

### Information We Collect and How We Collect It

We may collect information, including Personal Information, when you provide such information to us directly, such as when you send us an email, or otherwise interact with us on the Website. Your provision of your Personal Information to us is completely voluntary. "Personal Information" is information that specifically identifies you. We do not collect Personal Information unless you submit that information to us.

Types of Personal Information we may collect directly from you include: name, email address, and company name. If you submit a job application to us, we may collect employment information from you, including any Personal Information contained in your cover letter or resume. We may also collect other information that you directly provide us, including marketing and communications data (e.g., your preferences in receiving marketing from us).

We, our service providers, or our third-party partners may also automatically collect information from you when you visit our Website through cookies and other tracking technologies. Such information does not directly identify you as an individual and may include:

## • Cookies and Similar Technology

We may store some information on your device or device hard drive as a cookie or similar type of file (such as clear gifs, web beacons, tags, and similar technologies that work on mobile devices) to collect data related to usage of the Website. "Cookies" are pieces of information that may be placed on your computer by a website for the purpose of collecting data to facilitate and enhance your communication and interaction with that website. Such data may include, without limitation, the address of the websites you visited before and after you visited the Website, the type of browser you are using, your Internet Protocol (IP) address, what pages in the Website you visit and what links you clicked on, the region where your device is located, and geo-IP data. We may use cookies to make your use of the Website more convenient, to enable us to administer or enhance our Website, or to protect the Website and its content from inappropriate use. Information that we collect from you via cookies and similar technologies will be stored in web server logs, which are records of the activities on our Website. The servers automatically capture and save the information electronically.

### • Site and Platform Analytics

We may work with third-party service providers who use the technologies described in this section to conduct website analytics to help us track and understand how visitors use our Website. One such provider is Google Analytics, a web analytics service provided by Google, Inc. ("Google"). Google Analytics uses cookies to help analyze how users use the Website. The information generated by these cookies about your use (including your IP address) will be transmitted to and stored by Google on servers in the United States. Google will use this information for the purpose of evaluating your use of the Website, compiling reports on activity for its staff, and providing other services relating to web page activity and internet usage. Google may also transfer this information to third parties where required to do so by law, or where such third parties process the information on Google's behalf. You may refuse the use of cookies by selecting the appropriate settings in your browser. By using the Website and accepting cookies, you consent to the processing of data about you by Google in the manner and for the purposes set out above. Please refer to the currently available opt-outs for Google Analytics by visiting https://tools.google.com/dlpage/gaoptout/.

### How We Use Your Information

We may use Personal Information and other information as described herein including for the following purposes:

- To contact you about and provide you and our clients with our services;
- To operate the Website and to provide you with any specific services that you have requested;
- To deliver content and product and service offerings relevant to your interests;
- To respond to law enforcement requests and as required by applicable law, court order, legal process, or governmental regulation;
- To help maintain the safety, security, and integrity of our Website, databases and other technology assets, and business;

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- To protect the rights, property, or safety of us or third parties, including our clients and other users of the Website;
- For internal research; for technological development and demonstration; and to improve, upgrade, or enhance our Website;
- For detecting security incidents; protecting against malicious, deceptive, fraudulent, or illegal activity; and prosecuting those responsible for that activity;
- To investigate suspected fraud, harassment, or other violations of any law, rule, or regulation, or the policies for the Website;
- In connection with a bankruptcy proceeding or the sale, merger, or change of control of the Company or the division responsible for the services with which your information is associated;
- To respond to your direct inquiries;
- To investigate or settle disputes;
- To enforce our agreements with you;
- To add you to our mailing lists and send you emails from time to time; and
- For any additional purposes that you specifically consent to.

We reserve the right to supplement your Personal Information with information we gather from other sources which may include online and offline sources. For example, from time to time, we will receive Personal Information about you from third parties. Such third parties may include analytics providers, payment providers, hotel and transport providers, and third parties that provide technical services to us so that we can operate our Website and provide our services. We may also collect personal information about you from publicly available sources or media reports.

We reserve the right to use and disclose information that is not Personal Information in any manner permitted by law except as otherwise provided in this Privacy Policy. Furthermore, we may permit our vendors and subcontractors to access your Personal Information, but they are only permitted to do so in connection with performing services for us. They are not authorized by us to use the information for their own benefit.

As noted above, we may collect information that is not Personal Information ("Non-Personal Information"). We may aggregate or de-identify Personal Information so that the information does not personally identify you or anyone else, such as by using such information for analysis to understand how consumers are interacting with the Website and to improve the Website user experience. Because Non-Personal Information, including aggregate or de-identified information, does not personally identify you, we may collect, use and disclose Non-Personal Information for any purpose permitted by law. In some instances, we may combine Non-Personal Information with Personal Information. If we combine any Non-Personal Information, the combined information will be treated by us as Personal Information.

### Third-Party Links

As a convenience to you, we may provide links to third-party websites, apps, or services from within the Website. We are not responsible for the privacy practices or content of these third-party sites, and by providing a link, we are not endorsing or promoting such third-party sites.

#### Security

The security of your information is very important to us. We attempt to provide for the secure transmission of your information from your devices to our servers by utilizing encryption software. However, due to the inherent open nature of the Internet, we cannot guarantee that communications between you and the Company, or information stored on the Website or our servers, will be free from unauthorized access by third parties such as hackers, and your use of the Website demonstrates your assumption of this risk. We have put in place reasonable physical, electronic, and managerial procedures to safeguard the information we collect. Only those employees who need access to your information in order to perform their duties are authorized to have access to your Personal Information. If you have reason to believe that your interaction with us is no longer secure, please immediately notify us of the problem by contacting us via the information in the section below titled *Contact*.

#### Data Retention

We will retain your information for as long as your inquiry is active or as needed to provide you with the Website and for a reasonable time thereafter in accordance with our standard procedures or as necessary to comply with our legal obligations, to resolve disputes, and to enforce our agreements. Even if we delete some or all of your information, we may continue to retain and use anonymous or aggregated data previously collected. Please note that we will not be liable for disclosures of your data due to errors or unauthorized acts of third parties.

### Protection for Children

Our Website is intended for users ages 18 and over. We do not knowingly collect Personal Information from minors. When we become aware that Personal Information (or other information that is protected under applicable law) from a child under 13 has been collected, we will use all reasonable efforts to delete such information from our databases. If you believe we might have any Personal Information from or about a child under 13, please contact us at admin@baretzbrunelle.com.

### Opt-Out

To opt out of any future promotional messages from us, you may unsubscribe at any time by following the instructions contained in the message itself. Your request will be processed within a reasonable time after receipt. Please note that if you opt out in this manner, certain aspects of our services may no longer be available to you.

If you want to stop or restrict the placement of cookies or flush any cookies that may already be on your computer or device, please refer to and adjust your web browser preferences. Further information on cookies is available at www.allaboutcookies.org. By deleting our cookies or disabling future cookies, you

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may not be able to access certain areas or features of our Website, and some of the Website's functionality may be affected.

Please note that, unless required by law, we do not respond to or honor "Do Not Track" (a/k/a DNT) signals or similar mechanisms transmitted by web browsers.

#### Changes to Policy

We reserve the right, at our discretion, to change, modify, add, or remove portions from this Privacy Policy at any time, provided that any such modifications will only be applied prospectively. We encourage you to periodically review the Website for the latest information on our privacy practices. Your continued use of the Website following the posting of any changes to this policy means you accept such changes.

#### Contact

For questions or concerns relating to privacy, we can be contacted at: admin@baretzbrunelle.com.