

PRIVACY POLICY

BRADBURY INTERNATIONAL UK LIMITED CHILTERN HOUSE LEYS ROAD BRIERLEY HILL WEST MIDLANDS DY5 3UP UNITED KINGDOM

Tel: +44 (0) 1384 893777 Fax: +44 (0) 1384 263890 e-mail: <u>bradburyuk@bradburygroup.com</u>



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1. Introduction:

Bradbury International UK Ltd understands that your privacy is important to you and that you care about how your personal data is used. We respect and value the privacy of everyone who visits this website, https://bradburygroup.com/Group-Locations-Live-Map/Bradbury-International-UK-LTD ("Our Site") and will only collect and use personal data in ways that are described here, and in a way that is consistent with our obligations and your rights under the law.

Please read this Privacy Policy carefully and ensure that you understand it. Your acceptance of this Privacy Policy is deemed to occur upon your first use of Our Site.

2. Definitions and Interpretation

In this Policy the following terms shall have the following meanings:

"Cookie"	means a small text file placed on your computer or device by Our Site when you visit certain parts of Our Site and/or when you use certain features of Our Site. Details of the Cookies used by Our Site are set out in Part 15, below; and
"Cookie Law"	means the relevant parts of the Privacy and Electronic Communications (EC Directive) (Amendment) Regulations 2011 (UK Regulations)

3. Information About Us

Our Site is owned and operated by The Bradbury Co. Inc a Sub-Chapter S Corporation registered in the United States of America under company number 48-0679015.

Registered address: 1200 East Cole Street Moundridge Kansas 67107 USA.

Address: 1200 East Cole Street Moundridge Kansas 67107 USA

- a) Email address: datacontrollerUK@bradburyco.com
- b) Telephone number: USA +1 620 345-6394, UK +44 (0)1384 893777
- c) Postal Address: PO Box 667 Moundridge Kansas 67107 USA

4. What Does This Policy Cover?

This Privacy Policy applies only to your use of Our Site. Our Site may contain links to other websites. Please note that we have no control over how your data is collected, stored, or used by other websites and we advise you to check the privacy policies of any such websites before providing any data to them.

5. What is Personal Data?

Personal data is defined by the General Data Protection Regulation (EU Regulation 2016/679) (the "GDPR") as 'any information relating to an identifiable person who can be directly or indirectly identified in particular by reference to an identifier'.

Personal data is, in simpler terms, any information about you that enables you to be identified. Personal data covers obvious information such as your name and contact details, but it also covers less obvious information such as identification numbers, electronic location data, and other online identifiers.



6. <u>What Are My Rights?</u>

Under the GDPR, you have the following rights, which we will always work to uphold:

- a) The right to be informed about our collection and use of your personal data. This Privacy Policy should tell you everything you need to know, but you can always contact us to find out more or to ask any questions using the details in Part 16.
- b) The right to access the personal data we hold about you. Part 14 will tell you how to do this.
- c) The right to have your personal data rectified if any of your personal data held by us is inaccurate or incomplete. Please contact us using the details in Part 16 to find out more.
- d) The right to be forgotten, i.e. the right to ask us to delete or otherwise dispose of any of your personal data that we have. Please contact us using the details in Part 16 to find out more.
- e) The right to restrict (i.e. prevent) the processing of your personal data.
- f) The right to object to us using your personal data for a particular purpose or purposes.
- g) The right to data portability. This means that, if you have provided personal data to us directly, we are using it with your consent or for the performance of a contract, and that data is processed using automated means, you can ask us for a copy of that personal data to re-use with another service or business in many cases.
- h) Rights relating to automated decision-making and profiling. We do not use your personal data in this way.

For more information about our use of your personal data or exercising your rights as outlined above, please contact us using the details provided in Part 16.

Further information about your rights can also be obtained from the Information Commissioner's Office or your local Citizens Advice Bureau.

If you have any cause for complaint about our use of your personal data, you have the right to lodge a complaint with the Information Commissioner's Office.

7. What Data Do We Collect?

Depending upon your use of Our Site, we may collect some or all of the following personal and non-personal data (please also see Part 15 on our use of Cookies and similar technologies)

- Name
- Email address
- Telephone number
- Business name
- Job title
- IP address
- A list of URLs starting with a referring site, your activity on Our Site, and the site you exit to.
- Information about the type of equipment you have reviewed or have inquired about.



8. How Do You Use My Personal Data?

Under the GDPR, we must always have a lawful basis for using personal data. This may be because the data is necessary for our performance of a contract with you, because you have consented to our use of your personal data, or because it is in our legitimate business interests to use it. Your personal data may be used for the following purposes:

- Providing and managing your access to Our Site;
- Personalising and tailoring your experience on Our Site;
- Supplying our products and services to you. Your personal details are required in order for us to enter into a contract with you.
- Personalising and tailoring our products and services for you.
- Communicating with you. This may include responding to emails or calls from you.
- Supplying you with information by email and post that you have opted-in to (you may unsubscribe or opt-out at any time by following the link at the bottom of the email to the OptOut page and following the directions to unsubscribe and optout of future mailings.
- Analysing your use of Our Site and gathering feedback to enable us to continually improve Our Site and your user experience.

With your permission and/or where permitted by law, we may also use your personal data for marketing purposes, which may include contacting you by email, telephone, text message and post with information, news, and offers on our products and services. You will not be sent any unlawful marketing or spam. We will always work to fully protect your rights and comply with our obligations under the GDPR and the, Privacy and Electronic Communications (EC Directive) (Amendment) Regulations 2011 (UK Regulations) and you will always have the opportunity to opt-out.

9. How Long Will You Keep My Personal Data?

We will not keep your personal data for any longer than is necessary in light of the reason(s) for which it was first collected. Your personal data will therefore be kept for the following periods (or, where there is no fixed period, the following factors will be used to determine how long it is kept):

- We are required under UK tax law to keep your basic personal data (as identified in Part 7) for a minimum of 6 years.
- Your information we use for marketing purposes will be kept with us until you notify us that you no longer wish to receive this information.

10. <u>How and Where Do You Store or Transfer My Personal</u> Data?

We may store or transfer some or all of your personal data in countries that are not part of the European Economic Area (the "EEA" consists of all EU member states, plus Norway, Iceland, and Liechtenstein). These are known as "third countries" and may not have data protection laws that are as strong as those in the UK and/or the EEA. This means that we will take additional steps in order to ensure that your personal data is treated just as safely and securely as it would be within the UK and under the GDPR as follows.

We share your data within the group of companies of which we are a part. Where this involves the transfer of personal data outside the EEA, our group ensures that personal data is protected by requiring all companies within the group to follow the same rules with respect to personal data usage. These are known as "binding corporate rules". More information on binding corporate rules is available from the <u>European Commission</u>.



Please contact us using the details below in Part 16 for further information about the particular data protection mechanism used by us when transferring your personal data to a third country.

The security of your personal data is essential to us, and to protect your data, we take a number of important measures. We have implemented reasonable and appropriate administrative, technical, and physical security measures to protect against the unauthorized access, destruction or alteration of your information based on its sensitivity. Despite our best efforts, however, no security measures are completely impenetrable.

11. Do You Share My Personal Data?

We will not share any of your personal data with any third parties for any purposes, subject to one important exception.

In some limited circumstances, we may be legally required to share certain personal data, which might include yours, if we are involved in legal proceedings or complying with legal obligations, a court order, or the instructions of a government authority.

We may share your personal data with other companies in our group for sales and improved website experience.

12. How Can I Control My Personal Data?

- 12.1 In addition to your rights under the GDPR, set out in Part 6, when you submit personal data via Our Site, you may be given options to restrict our use of your personal data. In particular, we aim to give you strong controls on our use of your data for direct marketing purposes (including the ability to opt-out of receiving emails from us which you may do by unsubscribing using the links provided in our emails.
- 12.2 You may also wish to sign up to one or more of the preference services operating in the UK: The Telephone Preference Service ("the TPS"), the Corporate Telephone Preference Service ("the CTPS"), and the Mailing Preference Service ("the MPS"). These may help to prevent you receiving unsolicited marketing. Please note, however, that these services will not prevent you from receiving marketing communications that you have consented to receiving.

13. Can I Withhold Information?

You may access Our Site without providing any personal data at all. However, to use all features and functions available on Our Site you may be required to submit or allow for the collection of certain data.

You may restrict our use of Cookies. For more information, see Part 15 and our Cookie Policy <u>https://bradburygroup.com/Privacy</u>.

14. How Can I Access My Personal Data?

If you want to know what personal data we have about you, you can ask us for details of that personal data and for a copy of it (where any such personal data is held). This is known as a "subject access request".

All subject access requests should be made in writing and sent to the email or postal addresses shown in Part 16. To make this as easy as possible for you, a Subject Access Request Form is available for you to use. You do not have to use this form, but it is the easiest way to tell us everything we need to know to respond to your request as quickly as possible.



There is not normally any charge for a subject access request. If your request is 'manifestly unfounded or excessive' (for example, if you make repetitive requests) a fee may be charged to cover our administrative costs in responding.

We will respond to your subject access request within one month of receiving it. Normally, we aim to provide a complete response, including a copy of your personal data within that time. In some cases, however, particularly if your request is more complex, more time may be required up to a maximum of three months from the date we receive your request. You will be kept fully informed of our progress.

15. How Do You Use Cookies?

Our Site may place and access certain first-party Cookies on your computer or device. Firstparty Cookies are those placed directly by us and are used only by us. We use Cookies to facilitate and improve your experience of Our Site and to provide and improve our products and services. We have carefully chosen these Cookies and have taken steps to ensure that your privacy and personal data is protected and respected at all times.

All Cookies used by and on Our Site are used in accordance with current Cookie Law.

Before Cookies are placed on your computer or device, you will be shown a header drop down requesting your consent to set those Cookies. By giving your consent to the placing of Cookies you are enabling us to provide the best possible experience and service to you. You may, if you wish, deny consent to the placing of Cookies; however certain features of Our Site may not function fully or as intended.

Name of Cookie	Provider	Purpose
.ASPXANONYMOUS	bradburygroup.com	Authentication
hs_opt_out	bradburygroup.com	Opt Out Hubspot
hssc	bradburygroup.com	Hubspot Tracking
hssrc	bradburygroup.com	Hubspot Tracking
hstc	bradburygroup.com	Hubspot Tracking
hubspotutk	bradburygroup.com	Hubspot Tracking
RequestVerificationToken	bradburygroup.com	Authentication
utma	bradburygroup.com	Analytics
utmc	bradburygroup.com	Analytics
utmz	bradburygroup.com	Analytics
_ceg.s	bradburygroup.com	Analytics
_ceg.u	bradburygroup.com	Analytics
_ceir	bradburygroup.com	Analytics
dnn_IsMobile	bradburygroup.com	Performance
language	bradburygroup.com	Performance

The following first-party Cookies may be placed on your computer or device:



Our Site uses analytics services provided by Google, Hubspot, more analytics tools, and Wistia. Website analytics refers to a set of tools used to collect and analyse anonymous usage information, enabling us to better understand how Our Site is used. This, in turn, enables us to improve Our Site and the products and services offered through it.

The analytics service(s) used by Our Site use(s) Cookies to gather the required information. You do not have to allow us to use these Cookies, however whilst our use of them does not pose any risk to your privacy or your safe use of Our Site, it does enable us to continually improve Our Site, making it a better and more useful experience for you.

In addition to the controls that we provide, you can choose to enable or disable Cookies in your internet browser. Most internet browsers also enable you to choose whether you wish to disable all Cookies or only third-party Cookies. By default, most internet browsers accept Cookies, but this can be changed. For further details, please consult the help menu in your internet browser or the documentation that came with your device.

You can choose to delete Cookies on your computer or device at any time, however you may lose any information that enables you to access Our Site more quickly and efficiently including, but not limited to, login and personalisation settings.

It is recommended that you keep your internet browser and operating system up-to-date and that you consult the help and guidance provided by the developer of your internet browser and manufacturer of your computer or device if you are unsure about adjusting your privacy settings.

16. How Do I Contact You?

To contact us about anything to do with your personal data and data protection, including to make a subject access request, please use the following details

- Email address: datacontrollerUK@bradburyco.com
- Telephone number: +44 (0)1384 893777
- Postal Address: Bradbury International UK Ltd, Chiltern House, Leys Road, Brierley Hill, West Midlands, DY5 3UP

17. Changes to this Privacy Policy

We may change this Privacy Notice from time to time. This may be necessary, for example, if the law changes, or if we change our business in a way that affects personal data protection.

Any changes will be immediately posted on Our Site and you will be deemed to have accepted the terms of the Privacy Policy on your first use of Our Site following the alterations. We recommend that you check this page regularly to keep up-to-date.