

Privacy Shield Policy

This Privacy Shield Policy (“**Policy**”) describes how Berkeley Research Group, LLC, its subsidiaries and affiliates in the United States (“**US**”), and its subsidiary in the United Kingdom, Berkeley Research Group (“**UK**”) Ltd. (“**BRG**,” “**we**,” or “**us**”) collect, use, and disclose certain Personal Information that we receive in the US from the European Union (“EU Personal Data”). This Policy supplements our Privacy Statement (www.thinkbrg.com/privacy), and unless specifically defined in this Policy, the terms in this Policy have the same meaning as the Privacy Statement.

BRG recognizes that the EU has established strict protections regarding the handling of EU Personal Data, including requirements to provide adequate protection for EU Personal Data transferred outside of the EU. To provide adequate protection for certain EU Personal Data about consumers, clients, suppliers, job applicants, and/or employees received in the US, BRG has elected to self-certify to the EU-US Privacy Shield Framework administered by the US Department of Commerce (“**Privacy Shield**”). BRG adheres to the Privacy Shield Principles of Notice, Choice, Accountability for Onward Transfer, Security, Data Integrity and Purpose Limitation, Access, and Recourse, Enforcement, and Liability.

For purposes of enforcing compliance with the Privacy Shield, BRG is subject to the investigatory and enforcement authority of the US Federal Trade Commission. For more information about the Privacy Shield, see the US Department of Commerce’s Privacy Shield website (www.privacyshield.gov). To review BRG’s representation on the Privacy Shield list, see the US Department of Commerce’s Privacy Shield self-certification list (www.privacyshield.gov/list).

PERSONAL DATA COLLECTION AND USE

Our Privacy Statement (www.thinkbrg.com/privacy) describes the categories of EU Personal Data that we may receive in the US, as well as the purposes for which we use that EU Personal Data. BRG will only process EU Personal Data in ways that are compatible with the purpose that BRG collected it for or for purposes the individual authorizes. Before we use your EU Personal Data for a purpose that is materially different than the purpose for which we collected it or that you authorized, we will provide you with the opportunity to opt out. BRG maintains reasonable procedures to help ensure that EU Personal Data is reliable for its intended use, accurate, complete, and current.

DATA TRANSFERS TO THIRD PARTIES

Third-Party Agents or Service Providers. We may transfer EU Personal Data to our third-party agents or service providers who perform functions on our behalf as described in our Privacy Statement. Where required by the Privacy Shield, we enter into written agreements with those third-party agents and service providers requiring them to provide the same level of protection the Privacy Shield requires and limiting their use of the data to the specified services provided on our behalf. We take reasonable and appropriate steps to ensure that third-party agents and service providers process EU Personal Data in accordance with our Privacy Shield obligations and to stop and remediate unauthorized processing. Under certain circumstances, we may remain liable for the acts of our third-party agents or service providers who perform services on our behalf for their handling of EU Personal Data that we transfer to them.

Disclosures for National Security or Law Enforcement. Under certain circumstances, we may be required to disclose your EU Personal Data in response to valid requests by public authorities, including to meet national security or law enforcement requirements.

SECURITY

BRG maintains reasonable and appropriate security measures to protect EU Personal Data from loss, misuse, unauthorized access, disclosure, alteration, or destruction in accordance with the Privacy Shield.

ACCESS RIGHTS

You may have the right to access the EU Personal Data that we hold about you and to request that we correct, amend, or delete it if it is inaccurate or processed in violation of the Privacy Shield. These access rights may not apply in some cases, including where providing access is unreasonably burdensome or expensive under the circumstances or where it would violate the rights of someone other than the individual requesting access. If you would like to request access to, correction of, amendment to, or deletion of your EU Personal Data, you can submit a written request to privacy@thinkbrg.com. We may request specific information from you to confirm your identity. In some circumstances, we may charge a reasonable fee for access to your information.

QUESTIONS OR COMPLAINTS

You can direct questions or complaints about the use or disclosure of your EU Personal Data to privacy@thinkbrg.com. We will investigate and attempt to resolve complaints or disputes regarding the use or disclosure of your EU Personal Data within 45 days of receiving your complaint. For unresolved complaints, we have agreed to cooperate with Judicial Arbitration and Mediation Services, Inc. (JAMS). If you are unsatisfied with the resolution of your complaint, you may contact JAMS at <https://www.jamsadr.com/file-an-eu-us-privacy-shield-or-safe-harbor-claim> for further information and assistance.

BRG commits to cooperate with EU data protection authorities (DPAs) and comply with the advice given by such authorities with regard to human resources data transferred from the EU in the context of the employment relationship.

BINDING ARBITRATION

You may have the option to select binding arbitration for the resolution of your complaint under certain circumstances, provided you have taken the following steps: (1) raised your complaint directly with BRG and provided us the opportunity to resolve the issue; (2) made use of the independent dispute resolution mechanism identified above; and (3) raised the issue through the relevant data protection authority and allowed the US Department of Commerce an opportunity to resolve the complaint at no cost to you. For more information on binding arbitration, see the US Department of Commerce's *Privacy Shield Framework: Annex I (Binding Arbitration)* at <https://www.privacyshield.gov/article?id=ANNEX-I-introduction>.

CONTACT US

If you have questions about this Policy or would like to request access to your EU Personal Data, please contact us at privacy@thinkbrg.com.

