BRG INTELLIGENCE THAT WORKS

Privacy Statement

Berkeley Research Group, LLC and its affiliated companies (collectively **"BRG"** or **"Company"**) are committed to protecting your information by handling it responsibly and safeguarding it using appropriate technical, organizational, and physical security measures.

The purpose of this Privacy Statement is to describe why and how the Company collects and processes Personal Information and to provide information about your rights in relation to Personal Information. This Privacy Statement includes, where appropriate, the treatment of Personal Information of our employees, clients, and third parties when providing services and performing any other activities that form part of the operations of our business.

DEFINITIONS AND CATEGORIES OF PERSONAL INFORMATION

"Personal Information" means information the Company has collected or otherwise maintains or has in its possession that identifies or can be used to identify or authenticate an individual or household, including, but not limited to:

- names, age, gender, and date of birth
- addresses, telephone numbers, email addresses, country/state or residence, and other contact information
- identification numbers, credentials, passwords or personal identification numbers (PINs), user identification, and account access credentials
- employment or education details; financial and tax-related information
- geolocation data, IP address, browser, and log-in information
- security details, CCTV footage, and information on access to premises
- lifestyle and social circumstances
- details on how a Data Subject interacts with the Company, its clients, or related third parties, and any other relevant information

"Sensitive" or "special categories" of Personal Information means types of information that could create more significant risks to a person's fundamental rights and freedoms and that, therefore, is subject to heightened protections; such as:

- biometric, medical, health, or health insurance information
- information relating to race, ethnic origin, political views, or religion
- health, sex life, or sexual orientation
- sanctions, criminal convictions, conduct, or other reputational information

"Data Subject" means the person about whom Personal Information is collected.

PROCESSING ACTIVITIES

BRG processes Personal Information to deliver its services to clients. For its own purposes, the Company also uses Personal Information to analyse and improve how it delivers those services, manages and organizes its business, contacts representatives of its clients or prospective clients, and administers recruitment and events.

The Quick Read

We may use Personal Information for a number of purposes as permitted by law, for business purposes, and in accordance with our contractual arrangements, including, but not limited to:

- providing services and information to visitors to the Company's website;
- providing clients and potential clients with information about the Company;

- providing direct marketing communications about our products and services to third parties;
- detecting, preventing, and responding to fraud, intellectual property infringement, violations of our terms of use, or violations of law; and
- as otherwise disclosed at the time Personal Information is collected.

Where we intend to use or otherwise process your Personal Information for a purpose other than the purpose for which it was collected, we will provide you with information regarding the purpose for the processing, as well as other relevant information, prior to processing your Personal Information for the new purpose.

The Detailed Statement

Below are illustrative examples of BRG's processing activities.

Business communications and marketing

BRG processes Personal Information about business contacts, potential clients, existing corporate and personal clients, and other related individuals in order to promote our professional services, products, and capabilities or to communicate for the purpose of our day-to-day business activities.

The Company uses a customer relationship management system and third-party software to store and manage business relationship information. All Personal Information stored within the Company's system is entered by a BRG user and will include standard business contact information and relationship interaction information.

The Company may use Personal Information in connection with relationship management and marketing activities, such as sending thought leadership, details related to our services, event invitations, and other marketing or research purposes.

Data Subjects may, at any time, request not to receive marketing information either by using the unsubscribe link in communications from us or by contacting us using the contact details below.

BRG does not sell, rent, or trade Personal Information it collects with any third parties for promotional or marketing purposes.

Client data and Personal Information obtained in connection with providing professional services to our clients

As part of the services provided by BRG, the Company processes Personal Information of various Data Subjects, with whom we may or may not have a direct a relationship. For example, when BRG is engaged for an audit, valuation, or due diligence exercise, we will review datasets such as payroll, research, supplier, financial, and court proceedings data that may contain Personal Information.

The varied range of services that the Company provides to its clients or third parties requires that Personal Information be collected and used in relation to its services in various ways. The Company aims to collect and process the minimum amount of Personal Information necessary in order to perform the processing necessary to deliver our services to our clients.

Recruitment and human resources

BRG collects Personal Information from or about Data Subjects in order to manage or consider employment applications. The Personal Information that is collected and the manner in which it is processed may vary depending on the country in which the candidate is being considered for employment.

The Company may collect special categories of Personal Information when the information is relevant to the position with the Data Subject's consent, when it is permitted by law, or if there is a legal obligation to do so.

Candidates based in the UK can refer to the associate application privacy statement for that country for more details.

BRG may collect Personal Information and "special categories" of Personal Information from the following sources: the candidate directly; recruitment agencies; publicly available sources; professional references; and background screening checks.

Suppliers and subcontractors

BRG processes Personal Information related to our suppliers and contractors as well individuals associated with them in order to receive services and for day-to-day professional communications.

BRG also collects and processes Personal Information associated with services we receive from our advisors, such as lawyers, accountants, and consultants.

Company websites

BRG collects and processes specific information through its websites. To learn more, please visit our website privacy notice.

Visitors and other relationships

BRG processes Personal Information of individuals visiting its premises and events using technologies such as CCTV, access badges, Wi-Fi networks, and other amenities for the purpose of facilitating access to facilities and protecting personnel, visitors, members of the public, assets, and information.

Security, health and safety, and prevention of crime

BRG collects and processes Personal Information from various sources, including third-party data sources, for the following reasons:

- administering, maintaining, and ensuring the security of our networks, information systems, applications, and websites
- verifying and improving the information BRG holds about business relationships with individuals
- investigating or preventing security and safety incidents
- protecting our rights and those of our clients
- complying with legal and regulatory obligations relating to anti-money laundering, terrorist financing, fraud, and other unlawful activities

The Company does not regularly collect sensitive data, special categories of Personal Information, or criminal records about individuals except when processing Personal Information for the purpose of a legal, policy, or regulatory obligation, a human resources requirement, or specific client matters. When the Company is required to process such data, it is either on the instructions of a third party, with the express consent of the individuals, or as required by law. This often may involve establishing a lawful exemption including, but not limited to, the prevention or detection of crime; the establishment, exercise, or defense of legal rights; or in connection with current or prospective legal proceedings.

BRG does not usually process Personal Information relating to individuals under the age of thirteen years. When the Company needs to process such data, it is on the instructions of a third party, with the consent of a parent or guardian, or as required by law.

LEGAL RIGHTS IN RELATION TO PERSONAL INFORMATION

Data Subjects may have rights when it comes to how their Personal Information is handled under applicable local law(s). These rights may vary depending on circumstances and the applicable jurisdiction, but may include the right to:

- know what Personal Information the Company maintains about the individual, with whom the Company has shared the personal information, and the legal basis for doing so
- access the Personal Information and obtain a copy of such data
- have Personal Information deleted
- restrict or object to a processing activity
- data portability
- withdraw consent

LEGAL BASIS FOR PROCESSING PERSONAL INFORMATION

Depending on the Data Subject's local laws, the Company may be required to set out the legal basis for processing personal information. In such cases one or more of the following may apply:

- The processing is necessary for performance of a contract.
- The processing is necessary for compliance with a statutory, regulatory, health and safety, or legal obligation.
- The processing is necessary for the performance of a task carried out in the public interest.
- The Data Subject has agreed to the Company processing Personal Information for the relevant purpose.
- The legitimate interests pursued by the Company, its clients, or related third parties within the lawful operation of business, provided these do not interfere with the Data Subjects' rights; such as:

- to administer, manage, deliver, and promote our business and services.
- to improve our services, our website, and user experience; protect our IT networks; analyze communication traffic; promote information security; keep information confidential; and manage risks to our business.
- to fulfil our legal, regulatory, or professional obligations and consider any conflict of interest.
- to identify, attract, and source candidates; to carry out preemployment screening checks.
- to protect personnel, members of the public, assets, and information; or to prevent and detect unlawful acts; or to establish, exercise, and defend legal claims.
- to prevent against inadvertently dealing with unlawful or fraudulent activities.
- to organize and promote events and distribute communications related to such events.

TRANSFERS OF PERSONAL INFORMATION

BRG is a global organization and may transfer some Personal Information across geographical borders to BRG offices, personnel, or third parties located throughout the world. BRG will take appropriate steps to ensure that transfers of Personal Information are in accordance with applicable law and carefully managed to protect the Data Subject's privacy rights and interests. Transfers are limited to countries that are recognized as providing an adequate level of legal protection or where we are satisfied that alternative arrangements are in place to protect your privacy rights, such as maintaining appropriate technical and organizational safeguards.

The Quick Read

Disclosure of Personal Information

We share your Personal Information with the following third parties or under certain circumstances:

- our affiliates and subsidiaries;
- third-party service providers that work on our behalf and that have agreed to use the information solely in furtherance of our operations;
- as required by law, such as to comply with a subpoena or other legal process, or to comply with government reporting obligations;
- when we believe in good faith that disclosure is necessary to protect our rights, the integrity of our work, or the safety of others; or to detect, prevent, or respond to fraud, intellectual property infringement, violations of our terms of use, or violations of law;
- affiliates, service providers, advisors, and other third parties to the extent reasonably necessary to proceed with the negotiation or completion of a merger, acquisition, or sale of all or a portion of our assets or at bankruptcy; and
- As otherwise disclosed at the time Personal Information is collected.

We may share information that has been anonymized or aggregated without limitation.

The Detailed Statement

Transfers within BRG and BRG partners

The Company may transfer Personal Information with other BRG member firms when necessary to fulfill a legitimate interest. For example, when providing professional services to a client, the Company may transfer Personal Information with another BRG office involved in providing services to that client in a different country.

Other data transfers with partners such as law firms, professional advisors, law enforcement, regulatory, professional bodies, and government agencies are made in accordance with applicable laws or regulations.

Cross-border transfers

When required by local law, in cases where the Company processes Personal Information in a country different than the one the Data Subject is located in, such as outside the European Economic Area (EEA), data will only be shared:

- with third parties located in countries that offer an adequate level of Personal Information protection, and/or
- with third parties that have appropriate safeguards satisfying requirements from the originating jurisdiction, and/or

- under an agreement that satisfies the transfer of Personal Information, such as standard contractual clauses approved by the European Commission or binding corporate rules.

Further, BRG complies with the EU-US Privacy Shield Framework. To learn more information, please visit our Privacy Shield Policy.

Legally required transfers

The Company may have to collect, process, transfer, or disclose Personal Information in order to comply with relevant legal obligations, court directives, or professional bodies or regulators. Such disclosure may be necessary for the purpose of, or in connection with, legal proceedings (including prospective legal proceedings); obtaining legal advice; or establishing, exercising, or defending legal rights.

Service providers, partners, and third parties

To support its business infrastructure and client matters, the Company may transfer Personal Information to partners, third-party contractors, or their subsidiaries, such as:

- office support services (e.g., IT support providers, document services, cloud-based software services, communications providers)
- professional advisors, including auditors, lawyers, and insurers
- potential investors, financial partners, and their associated advisors
- banking, insurance, and payment providers
- marketing services and communication providers
- recruitment and human resources services providers
- credit agencies or other organizations that help BRG make decisions and prevent fraud and unlawful activities
- third parties that reasonably require access to Personal Information

Personal Information may only be shared with a third-party service provider if it has a need to know the information for the purpose of providing the contracted services.

Third-party providers and their sub-processors are obligated to maintain appropriate levels of security and confidentiality to process Personal Information as instructed by the Company.

Other transfers

Transfers of Personal Information may also be necessary during special circumstances, such as: restructuring of BRG's organization in relation with another entity; to fulfill the terms of an engagement and other agreements; for the prevention or detection of crime; for the establishment, exercise, or defense of legal rights; or in connection with current or prospective legal proceedings.

INFORMATION SECURITY AND DATA RETENTION

BRG has appropriate technical and organizational measures in place to protect and secure the Personal Information that we process.

The Company maintains generally accepted standards of technology and appropriate security measures to protect Personal Information from loss, misuse, unauthorized access, disclosure, alteration, or destruction. Only authorized personnel are provided access to Personal Information on a need-to-know basis.

Despite the Company's best efforts, security cannot be absolutely guaranteed against all threats. Particularly, data transmitted over the internet (e.g., emails) can be at risk, and the Company cannot guarantee the security of data transmitted over such means.

Data retention and disposal

Personal Information will only be retained for the time it is needed to fulfill the business purpose for which it was collected or to satisfy a legal, regulatory, or policy requirement. This period will usually be the period of the Data Subject or client's relationship; the period required of any potential investigation or litigation related to services provided; or the period of the contract or engagement with the Company. The Company uses approved equipment, techniques, and procedures to destroy data and sanitize digital media once the data retention period has expired.

EXERCISING DATA PROTECTION AND PRIVACY RIGHTS

Only the Data Subject, or an authorized legal representative, may make a verifiable Data Subject request related to your personal information. You may also make a verifiable Data Subject request on behalf of your minor child.

The request must provide the following:

- sufficient information that allows BRG to reasonably verify you are the person about whom we collected Personal Information about or an authorized representative
- sufficient details about the request so BRG can properly understand, evaluate, and respond to it

The Company does not charge a fee to process or respond to any data request, unless the requests are manifestly unfounded or excessive (where permitted by law).

Please be aware that BRG may be unable to afford these rights to you under certain circumstances, such as if we are legally prevented from doing so. Also, the request may be denied if it is deemed excessive, repetitive, or manifestly unfounded.

Keeping Personal Information up to date

BRG strives to ensure the completeness and accuracy of the Personal Information it holds. In order to keep the most up-to-date information, it is important for the Data Subject to inform us of any changes to his or her contact details or other Personal Information.

Contact information

To contact our Data Protection Officer, please email: dpo@thinkbrg.com

Berkeley Research Group, 8 Salisbury Square, London, UK, EC4Y 8BB United Kingdom

BRG Privacy line TOLL FREE: 1.866.825.1996

NOTICE FOR UK AND EU RESIDENTS

As a Data Subject, you have the right to complain to the relevant data protection authority regarding our handling of your data. BRG is registered as a Personal Information controller with the UK's Information Commissioner Office (ICO), which regulates and supervises the use of Personal Information in the UK. To contact the **ICO helpline: +44 (0)303 123 1113.**

Data Subjects whose Personal Information is being processed by the Company in the EU or the UK, subject to certain exemptions and circumstances, will have certain rights regarding their data as described above. Some requests may not always be entirely addressed, for example if the request is subject to specific legal exemptions, if it infringes the rights or confidentiality of others, or if it must be handled differently as required by law.

The Company stores Personal Information on servers located in the EEA; however, when we have a business reason to do so, such data may be transferred to BRG member firms or third parties located outside the EEA in accordance with this Privacy Statement. All member firms and third parties are required to maintain appropriate levels of security and confidentiality to process Personal Information as instructed by the Company; and are required to safeguard Personal Information in accordance with our contractual obligations and data protection legislation.

NOTICE FOR CALIFORNIA RESIDENTS

This notice supplements the information otherwise contained in this Privacy Statement and applies solely to Personal Information that is subject to the California Consumer Privacy Act of 2018 (CCPA). This policy page uses industry-standard technologies and a document structure generally accessible to users with disabilities using audio readers, screen readers, and speech synthesizers. When used in this section, the terms **"Personal Information," "Consumer,"** and **"Sale"** have the meanings set forth in the CCPA.

Information we collect

The Company may collect categories of Personal Information that can identify, or be directly or indirectly associated with, a particular Consumer or household. In particular we have collected the following categories of Personal Information from Consumers within the last twelve (12) months:

- Identifiers.

  Examples: a real name, Internet Protocol (IP) address, email address, or other similar identifiers.

- Personal information categories listed in the California Customer Records statute (Cal. Civ. Code §1798.80(e)).

  Examples: a name, signature, Social Security number, physical characteristics or description, address, telephone number, passport number, driver's license or state identification card number, insurance policy number, education, employment, employment history, bank account number, credit card number, debit card number, or any other financial information, medical information, or health insurance information. Some Personal Information included in this category may overlap with other categories.

- Protected classification characteristics under California or federal law.

  Examples: age (forty years or older), race, color, ancestry, national origin, citizenship, religion or creed, marital status, medical condition, physical or mental disability, sex (including gender, gender identity, gender expression, pregnancy or childbirth and related medical conditions), sexual orientation, veteran or military status, genetic information (including familial genetic information).

- Commercial information.

  Examples: records of personal property; products or services purchased, obtained, or considered; or other purchasing or consuming histories or tendencies.

- Internet or other electronic network activity information.

  Examples: browsing history, search history, and information regarding a consumer's interaction with an Internet website, application, or advertisement.

- Professional or employment-related information
- Education information that is not publicly available personally identifiable information, as defined in the Family Educational Rights and Privacy Act (20 USC § 1232(g), 34 CFR Part 99).
- Inferences drawn from any of the information identified above to create a profile about a consumer reflecting the consumer's preferences, characteristics, psychological trends, preferences, predispositions, behavior, attitudes, intelligence, abilities, and aptitudes.

The Company obtains the categories of Personal Information listed above from the following categories of sources: from our clients directly, service providers, or third parties. For more information about how we collect Personal Information, see the "Processing Activities" section of this Privacy Statement.

Use and disclosure of Personal Information

In the past twelve (12) months, we have used and disclosed the Personal Information designated above for commercial and business purposes. Our business purposes include financial management, human resources management, legal and regulatory compliance, acting on our client's instructions, security management, internal research and operations, activities to maintain and improve our services, and other one-time uses. Our commercial purposes include performing our engagements with clients, public relations, and marketing. Further information about these uses can be found in the "Processing Activities" section of this Privacy Statement.

Recipients of Personal Information

We disclose the categories of Personal Information designated above to the categories of third parties listed below for business purposes:

- service providers
- affiliates not under the BRG brand;
- government entities
- internet service providers
- data analytics providers
- operating systems and platforms
- professional advisors

When we disclose Personal Information for a business purpose, we enter a contract that describes the purpose and requires the recipient to both keep that Personal Information confidential and not use it for any purpose except performing the contract or as otherwise required by law. For more information about how we disclose Personal information for business purposes, see the "Transfers of Personal Information" section of this Privacy Statement.

Sales of Personal Information

We do not, and will not, engage in Sales of Personal Information.

Your rights and choices

California residents have certain rights with respect to the Personal Information collected by us. If you are a California resident, you may exercise the following rights regarding your Personal Information, subject to certain exceptions and limitations:

- the right to know the categories and specific pieces of Personal Information we collect, use, and disclose about you; the categories of sources from which we collected your Personal Information; our purposes for collecting your Personal Information; the categories of your Personal Information that we have disclosed for a business purpose; and the categories of third parties with which we have shared Personal Information.
- the right to request that we delete the Personal Information we have collected from you or maintain about you.
- although we do not currently engage in Sales of Personal Information, the right to opt out of any future Sale(s) of your Personal Information.
- the right not to receive discriminatory treatment for the exercise of the privacy rights conferred by the CCPA.

Exercising access, data portability, and deletion rights

To exercise any of the rights described above, please submit a verifiable consumer request to us by either:

- calling the BRG Privacy line at 1.866.825.1996 (toll free)
- emailing us at privacy@thinkbrg.com

Verification process and required information

You may only make a verifiable consumer request for access twice within a twelve-month period. We may need to request additional information from you to verify your identity or understand the scope of your request, although you will not be required to create an account with us to submit a request or have it fulfilled. We will require you to provide, at a minimum, sufficient information that allows BRG to verify to a reasonable degree of certainty that you are the person about whom we collected Personal Information or an authorized representative, such as providing two or more pieces of information matching those maintained by BRG, which BRG has deemed reliable for the purposes of verification, and sufficient details about the request, so BRG can properly understand, evaluate, and respond to it. Only the Consumer or an authorized legal representative may make a verifiable request related to your personal information. You may also make a verifiable request on behalf of your minor child.

Authorized agents

Only you, an agent with the power of attorney to act on your behalf, or a person registered with the California Secretary of State that you authorize to act on your behalf may make a verifiable consumer request related to your Personal Information. You may designate an authorized agent to make a CCPA request on your behalf by providing the authorized agent written permission to do so. BRG may require the authorized agent to present a lawful power of attorney or other government-approved legal representation document, as well as the original or notarized copy of government-approved identification for the Consumer and the representative.

ACCEPTANCE, AMENDMENT, AND REVISION

This Privacy Statement was last updated in March 2023 and may be revised at any time. The Company will provide notifications by posting amendments to this Privacy Statement on this website.

Your continued use of BRG's websites constitutes your acceptance of the practices described in this Privacy Statement and elsewhere on the websites.