

Brink's Privacy Policy

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INTRODUCTION

The Brink's Company and its affiliates and subsidiaries (collectively, "Brink's," "we," "our," "us," or "the Company") is committed to protecting the privacy and security of its customers, vendor representatives, employees, job applicants, end users or customer of Brink's customer, and other third parties. This Privacy Policy describes how we collect, use, process, and disclose your personal data and information (referred to as "personal information" or "personal data" in this Policy), in conjunction with your access to and use of Brink's services (the "Services").

Brink's complies with the EU-U.S. Data Privacy Framework (EU-U.S. DPF), the UK Extension to the EU-U.S. DPF, and the Swiss-U.S. Data Privacy Framework (Swiss-U.S. DPF) as set forth by the U.S. Department of Commerce. Brink's has certified to the U.S. Department of Commerce

that it adheres to the EU-U.S. Data Privacy Framework Principles (EU-U.S. DPF Principles) with regard to the processing of personal data received from the European Union in reliance on the EU-U.S. DPF and from the United Kingdom in reliance on the UK Extension to the EU-U.S. DPF. Brink's has certified to the U.S. Department of Commerce that it adheres to the Swiss-U.S. Data Privacy Framework Principles (Swiss-U.S. DPF Principles) with regard to the processing of personal data received from Switzerland in reliance on the Swiss-U.S. DPF. If there is any conflict between the terms in this privacy policy and the EU-U.S. DPF Principles and/or the Swiss-U.S. DPF Principles, the Principles shall govern. To learn more about the Data Privacy Framework (DPF) program, and to view our certification, please visit the Data Privacy Framework website: <https://www.dataprivacyframework.gov/>.

SCOPE

This Privacy Policy is meant to apply globally but does not override any applicable data privacy laws and regulations in countries where Brink's operates. Certain countries may also have localized variances to this Privacy Policy which may be displayed on their websites or available upon request to the local Data Protection Officer.

INFORMATION WE COLLECT

The categories of personal information we may collect include:

- Contact information (such as name, email address, mailing address, residency, phone number, and date of birth) (captured for applicants, employees, end users, and customers).
- Login credentials (such as username and password) (captured for applicants, employees, end users, and customers).
- Personal identifiers (such as Social Security Number (SSN) or national identification number, date of birth, employee identification number, customer information file number (CIF), Taxpayer Identification Number (TIN), other DBA number(s), vehicle registration numbers, other government issued identification(s), account name, online identifier, and signature) (captured for applicants, employees, and customers).
- Financial information (such as bank, credit or debit card number, account type, routing number, bank institution name, account balances, credit history, investment activity, income or source of funds, and payment/transaction history) (captured for employees and customers).
- Commercial information (such as primary business address, secondary business address, ownership information, products or services purchased, obtained, or

considered, account details, customer signatures, or other purchasing or consuming histories or tendencies) (captured for customers).

- Professional or employment-related information (such as offer letters, terms of employment, occupation, title, work location, salary details performance evaluations, granting and use of corporate payment cards and account activity, CV information, prior employment history, professional licenses, language and other relevant skills, visa/work permit, photograph, performance reviews and disciplinary records) (captured for applicants and employees).
- Demographic information (such as age, gender, race, color, origin, citizenship, and ethnicity) (captured for applicants and employees).
- Personal characteristics (such as veteran status, disability status, marital status, and familial information) (captured for applicants and employees).
- Medical information (medical condition, disabilities, health-related information, information on dependents and beneficiaries, or health insurance information) (captured for applicants and employees).
- Biometric information (such as fingerprints, hand prints, faceprints, retina scans, keystroke, and voiceprints) (captured for employees).
- Geo-location information (such as IP address, city/state, zip code, physical location or movements) (captured for employees, end users, and customers).
- Internet or other Electronic Network Activity information (such as browsing history, search history, information on a consumer's interaction with a website, application or advertisement) (captured for employees and customers).

In addition to the above categories, you may choose to provide us with additional pieces of information when you request services, fill in a form, update or add information to your account, update your employment information, apply for a job or update your application, or interact with us in other ways.

HOW WE USE INFORMATION WE COLLECT

We may use or disclose the personal information we collect for one or more of the following purposes:

- Perform our Services and respond to requests. We may use personal information to fulfill requests, process payments, and perform Services requested by you.
- Protection and security. We may use personal information to protect the security and integrity of Brink's Services, our users, and others.

- Administrative communications. We may use personal information to send you important information regarding our Services, such as changes to our terms, conditions, and policies and/or other administrative information.
- Marketing communications. We may use personal information to show you promotions or content based on your interests. You may opt out from receiving marketing communications, as described in the “Your Rights” section.
- Research and surveys. We may use personal information from you, our service providers, publicly available sources and other third parties to conduct research or invite you to participate in surveys about our products and services.
- Internal business purposes. We may use personal information collected from the categories mentioned for our internal business purposes, such as managing finance and accounting, data analysis and statistics, audits, billing and collection / reconciliation / accounts receivable activities and other internal corporate management functions and administration, managing invoices, managing customer/vendor accounts, developing new offerings, and monitoring or improving the use and satisfaction of our services.
- Testimonials and reviews. We may display personal testimonials of satisfied customers on our site in addition to other endorsements. By submitting such information, you grant Brink’s the right to post and publish such information at our sole discretion. With your consent we may post your testimonial along with your name.
- Employees. Administration, payroll, bonuses, compensation, carrying out obligations under employment and tax laws, employee investments/incentive programs/benefits/pensions, employee performance, appraisal and evaluations, trainings, mobility and international assignment, employee travel administration, expense reimbursement, financial statistics and reporting, administration of corporate payment cards, management of immigration and visa matters, administration of employee termination process and related records update, attendance/vacations/sick leave/absenteeism, corporate entity management, reporting and licensing of management-level employees, board membership management, maintaining and managing global employee directories/calendars/communications, Intranet management, facilitate employee log-in to company online portals and resources, global reporting and analysis, reporting on occupational health and safety issues, conducting employee surveys including diversity surveys where applicable, compliance with internal policies, code of conduct and applicable law, conducting investigations and reviewing disciplinary and grievance issues, facilitating acquisitions and divestments, operation of a whistleblowing hotline, monitoring the use of company IT systems such as Internet, telephone and email usage, management of access control systems (including badges) and conducting pre-employment background checks.

- Applicants. Managing the recruitment process, contacting the individual for future job opportunities, conducting pre-employment background checks, verifying references, assessing qualifications, managing a candidate pool, managing a global online career portal where job posts may be published from time to time.
- Managing global IT infrastructure and systems. We may use personal information in our data storage systems and information technology activities, including technical support, business continuity, disaster recovery, data archive and back-up activities.
- Legal and regulatory. We may use personal information to comply with our legal or regulatory obligations, conducting due diligence, protecting against, identifying and preventing fraud, money laundering, sanctions compliance and other criminal activity, defend legal claims or cooperate with government organization and law enforcement.

HOW WE SHARE PERSONAL INFORMATION

We may share your personal information with the following entities:

- Affiliated entities. We may share your personal information with our parent or subsidiaries and corporate affiliates.
- Third party service providers. We may share personal information with third party service providers who provide us with services, such as data analysis, online advertising, payment processing, order fulfillment, security and IT services, customer service, conducting audits, and other similar services. We grant our service providers access to personal information only to the extent needed for them to perform their functions, and require them to protect the confidentiality and security of such personal information.
- Commercial partners. We may share personal information with unaffiliated third parties who partner with us to deliver our services or on our commercial activities. Depending on the choices you have made and the nature of the joint activity, these third parties may contact you regarding products or services of interest. However, we do not sell personal information to unaffiliated third parties for their own marketing purposes.
- Business transfers or assignments. In the event of any reorganization, merger, sale, joint venture, assignment, transfer or other disposition of all or any portion of our business, assets or stock (including without limitation in connection with any bankruptcy or similar proceedings), we may transfer information to a third party.
- Law enforcement; emergencies; compliance. We may disclose personal information about you to others as we believe to be appropriate: (i) under applicable law including laws outside your country of residence; (ii) to comply with legal process; (iii) to respond to requests from public and government authorities including public and government authorities outside your country of residence; (iv) to enforce our terms and conditions;

(v) to protect our operations and property interest; (vi) to protect the rights, privacy, safety or property of Brink's, our employees, users of our service, or others; and (vii) to permit us to pursue available remedies or limit the damages that we may sustain.

- At your direction. We may use and disclose your personal information as you otherwise consent.

Brink's does not sell any personal information for money. However, we may share your personal information with third parties and service providers for the purposes described in this Policy. Brink's does not offer financial incentives for the use or sharing of personal information.

SECURITY AND PROTECTION OF PERSONAL INFORMATION

Brink's uses administrative, technical, and physical security measures to help protect your information against unauthorized access, loss, destruction, or alteration. If you know or have reason to believe that your personal information has been lost, stolen, misappropriated, or otherwise compromised or in case of any actual or suspected unauthorized use of your Brink's Account, please contact us following the instructions in the "Contact Us" section.

INTERNATIONAL TRANSFERS OF PERSONAL INFORMATION

Due to the nature of our global business and the technologies required, your personal information may be accessed by our employees, suppliers and other third parties from locations around the world whose data protection laws may be different than those in the European Union or the United States. We will implement appropriate protection to ensure your personal information remains adequately protected and aligned with this Privacy Policy and applicable data protection laws.

Brink's will only transfer EU data subject personal data outside the EEA if one of the following conditions applies:

- The European Commission has issued a decision confirming that the country or territory to which EU personal data is transferred ensures an adequate level of protection for the data subjects' rights and freedoms on the basis of Article 45 of the EU General Data Protection Regulation (GDPR).
- Appropriate safeguards or an approved code of conduct or certification mechanism is in place, such as Binding Corporate Rules (BCRs) or Standard Contractual Clauses (SCCs) approved by the European Commission.
- The data subject has provided explicit consent to the proposed transfer after being informed of any potential risks.

- The transfer is necessary for one of the other reasons set out in the GDPR, including the performance of a contract between us and the data subject, reasons of public interest, to establish, exercise or defend legal claims or to protect the vital interests of the data subject where the data subject is physically or legally incapable of giving consent and, in some limited cases, for our legitimate interest.

DATA PRIVACY FRAMEWORK

Brink's and its U.S. affiliates and subsidiaries identified in Appendix A (collectively, "Brink's") are committed to comply with the EU-U.S. DPF and the UK Extension to the EU-U.S. DPF and the Swiss-U.S. DPF for all personal data received from the EU, United Kingdom, and/or Switzerland.

Brink's is subject to the investigatory and enforcement powers of the Federal Trade Commission.

Brink's has the responsibility for the processing of personal information we receive under the EU-U.S. DPF and the UK Extension to the EU-U.S. DPF and the Swiss-U.S. DPF and subsequent transfers to a third party acting as an agent on our behalf. We can be liable under the DPF Principles if the agent processes such personal information in a manner inconsistent with the DPF Principles. Individuals have the ability to invoke binding arbitration under certain conditions.

In compliance with the EU-U.S. DPF and the UK Extension to the EU-U.S. DPF and the Swiss-U.S. DPF, Brink's commits to refer unresolved complaints concerning our handling of personal data received in reliance on the EU-U.S. DPF and the UK Extension to the EU-U.S. DPF and the Swiss-U.S. DPF to JAMS, an alternative dispute resolution provider based in the United States. If you do not receive timely acknowledgment of your DPF Principles-related complaint from us, or if we have not addressed your DPF Principles-related complaint to your satisfaction, please visit <https://www.jamsadr.com/dpf-dispute-resolution> for more information or to file a complaint. The services of JAMS are provided at no cost to you.

In compliance with the EU-U.S. DPF and the UK Extension to the EU-U.S. DPF and the Swiss-U.S. DPF, Brink's commits to cooperate and comply respectively with the advice of the panel established by the EU data protection authorities (DPAs) and the UK Information Commissioner's Office (ICO) and the Swiss Federal Data Protection and Information Commissioner (FDPIC) with regard to unresolved complaints concerning our handling of human resources data received in reliance on the EU-U.S. DPF and the UK Extension to the EU-U.S. DPF and the Swiss-U.S. DPF in the context of the employment relationship.

To learn more about the EU-U.S. DPF and the UK Extension to the EU-U.S. DPF and the Swiss-U.S. DPF and to obtain a copy of the DPF Principles, please visit this page: <https://www.dataprivacyframework.gov/>. To view the DPF List, please visit this page: <https://www.dataprivacyframework.gov/list>.

DATA RETENTION

We generally retain personal information as long as necessary to fulfill the purposes for the collection. Generally, personal information is retained for the duration of our relationship with you, plus any legally required record or data retention period and/or any period of time necessary to exercise our legal rights.

YOUR RIGHTS

You may exercise the applicable rights described in this section by contacting us. Please note that we will ask you to verify your identity and request before taking further action. We will fulfill all verified requests we receive unless an exemption applies. In some jurisdictions and/or under some laws or regulations, you may have the right to:

- Withdraw consent to processing at any time
- Receive certain information about our processing activities
- Request access to your personal information
- Opt-out or prevent use of your personal information for direct marketing purposes or the sale of your personal information
- Ask to erase or delete personal data if it is no longer necessary in relation to the purposes for which it was collected or processed or to rectify inaccurate data or complete incomplete data
- Restrict processing in specific circumstances
- Challenge processing which has been justified on the basis of legitimate interests or in the public interest
- Request a copy of an agreement under which personal information is transferred outside of the European Economic Area
- Object to decisions based solely on automated processing, including profiling (ADM)
- Prevent processing that is likely to cause damage or distress to the data subject or anyone else
- Be notified of a personal data breach which is likely to result in high risk to their rights and freedoms
- Make a complaint to the appropriate data protection authorities
- In limited circumstances, receive or ask for your personal information to be transferred to a third party in a structured, commonly used and machine readable format

We respond to all requests to exercise your applicable rights under this Policy. To exercise your applicable rights or if you have any questions about this Policy, please see the “Contact Us” section below.

We reserve the right to verify your identity in connection with any requests regarding personal information to help ensure that we provide the information we maintain to the individuals to whom it pertains, and allow only those individuals or their authorized representatives to exercise rights with respect to that information. If you are an authorized agent making a request on behalf of a consumer, we may require and request additional information to verify that you are authorized to make that request.

We reserve the right to deny your request if we cannot verify your identity. Where we deny your request in whole or in part, we will endeavor to inform you of the denial, provide an explanation of our actions, and the reason(s) for the denial.

We will not restrict or deny you access to our Services because of choices and requests you make in connection with your personal information. You may exercise any of the applicable rights described in this section by contacting us using any of the methods in the “Contact Us” section below. We will promptly respond to all applicable requests.

CHANGES

Brink’s reserves the right to change this Privacy Policy at any time without notice. In the event the Privacy Policy requires changes due to regulatory or other requirements, then the Privacy Policy will be promptly amended to reflect such changes.

CONTACT US

If you have any questions, complaints, or applicable requests pertaining to this Privacy Policy or Brink’s handling practices, including practices under GDPR, you may contact the Global Data Protection Officer: dpo_gdpr@brinksinc.com or the Global Data Privacy Counsel: dataprivacy@brinksinc.com.

Questions, complaints, and applicable requests pertaining to this Privacy Policy or Brink’s handling practices for California citizens should be directed to dpo.ccpa@brinksinc.com. For contact details of Brink’s local Data Protection Officer(s) (when one has been appointed at country level), contact the Global Data Protection Officer.

Contact details of individual Brink’s companies and affiliates, including phone numbers, can be found here: <https://www.brinks.com/en/contact-us>.

APPENDIX A

The Brink's Company and its U.S. Affiliates and Subsidiaries Certifying to the EU-U.S. DPF and the UK Extension to the EU-U.S. DPF and the Swiss-U.S. DPF

- Brink's Holding Company
- Brink's, Incorporated
- Brink's Delaware, LLC
- Brink's Global Payments, LLC
- Brink's Finance Holding Company, LLC
- Brink's Capital Holding Company, LLC
- Brink's Capital, LLC
- Brink's Complete Holding Company, LLC
- Brink's Security International, Inc.
- Brink's Brokerage Company, Incorporated
- Brink's C.I.S., Inc.
- Brink's Cambodia, Inc.
- Brink's Global Services International, Inc.
- Brink's Global Services USA, Inc.
- Brink's International Management Group, Inc.
- Brink's Network, Incorporated
- Brink's Myanmar, Limited
- Brink's Vietnam, Incorporated
- BAX Holding Company
- Brink's AR LLC
- Brink's Administrative Services Inc.
- The Brink's Company Political Action Committee
- The Brink's Foundation
- Testlink USA Inc.