

BROWNCO PRIVACY POLICY

INTRODUCTION

This Privacy Policy ("Privacy Policy") describes how Brownco Construction Company, Inc. ("Brownco", "Company", "we", "us", "our") treats personal information on our websites and online platforms.

This Privacy Policy does not apply to information collected or used for employment-related purpose. Brownco has separate, internal privacy practices and notices with regard to personal information that is collected from prospective, current, and former employees and job applicants.

It is Brownco's policy to respect your personal privacy. This Privacy Policy describes the types of information we may collect from you, including but not limited to information that you may provide when you visit our website, or elsewhere, and our practices for collecting, using, maintaining, protecting, and disclosing that information.

This Privacy Policy does not apply to information which may be collected by any third party (such as third-party websites, services, and links through our website) which may have their own security and privacy disclosures.

By accessing the website, you represent that you have read and understood this policy.

This Privacy Policy is effective as of October 1, 2022.

TYPES OF INFORMATION WE COLLECT

Brownco may collect information that identifies, relates to, describes, references, is reasonably capable of being associated with, or could reasonably be linked, directly or indirectly, with a particular individual, household, organisation or device ("Personal Information").

For the purposes of this policy, Personal Information does not include: Publicly available information from government records or Deidentified or aggregated consumer information.

Personal Information does include the following:

- Contact Information, such as name, mailing address, telephone number, work and personal email address, work and personal telephone number;
- Information You Provide, such as personalized messages sent through Brownco Sites, your cookie preferences;
- Business Information, such as your company name, job title, department and name of organization, business address;
- Demographic Information, such as birthdate, age, zip code and general geographic information;
- Device Information, such as, IP address, the identity of the Internet service provider, the name and version of the operating system, the name and version of the browser, the date and time of the visit, the pages visited; and

- Usage Information, such as information regarding how you use our Websites.

Also included are:

- Other Personal Information Categories Listed in the California Customer Records Statute (Cal. Civ. Code § 1798.80(e)) such as a signature, physical characteristics or description, 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; and
- Protected Classification Characteristics Under State or Federal Law, such as age (40 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).

HOW DO WE COLLECT YOUR INFORMATION

We collect your information in different ways. Below are some examples of how we may collect your information.

Directly From You. For example, when you:

- Register for an account.
- Submit an inquiry to us.
- Register for an event.
- Complete an online form.
- Contact a support or other team.
- Interact with our social media pages.
- Otherwise interact with us.

Passively. For example, when you:

- Visit and navigate our Websites on any device.
- Enable location-based features on our Websites.
- Click on a sponsored link or third-party advertisement.

Automatically. As you navigate through and interact with our Websites, we may use automatic data collection technologies to collect certain information about your equipment, browsing actions, and patterns, including:

- Details of your visits to our Websites, including traffic data, location data, logs, and other communication data and the resources that you access and use on the Websites.

From Third-Parties. We may receive information about you from other sources. For example, this may include receiving information from:

- Our business partners, including online advertising networks and analytics vendors.

- Social media sites, including LinkedIn, Facebook, Twitter, YouTube, Pinterest, Snapchat and Instagram.
- Your contacts or friends who provide your information to us because they think you may be interested in our services.
- Companies that provide information to supplement what we already know about you, including data aggregators. Certain third-parties might link your name or email address to other information they have collected. That might include online usage information.

By Combining Information. For example, we may:

- Combine information that we collect offline with information we collect through our Websites.
- Combine information we collect about you from the different devices you use to access our Websites.
- Combine information we get from third-parties with information we already have about you.

WHY DO WE COLLECT PERSONAL INFORMATION

We collect Personal Information to conduct our business activities. Brownco collects only the minimum amount of personal data required to fulfil these activities. These activities include:

- Executing business activities, including completing our services.
- Conducting marketing and promotional activities, including responding to inquiries about Brownco products or services, providing offers and information (as permitted by law) about products, services, or events offered by Brownco.
- Improving the functionality, security, and usability of Brownco's websites.
- Security, including monitoring log-in portals for access, validating identity, and preventing fraud.
- Fulfilling a legal or contractual obligation.
- Validating identity for security to allow access to Brownco premises and job sites.
- Complying with applicable laws or regulations.

Brownco will not use the personal data it collects for purposes other than those described above without notifying data subjects identified by the data.

HOW DO WE USE YOUR INFORMATION

Depending on how you interact with us, or the business and commercial purpose for the collection of information, we may use Personal Information for a variety of purposes, including:

- To deliver the services that you have requested;
- To communicate with you by email, postal mail, telephone and/or mobile devices about services that may be of interest to you either from us, our affiliate companies or other third parties;
- To resolve disputes and troubleshoot problems;

- To measure interest in our services
- To customize your experience;
- To detect and protect us against error, fraud, and other criminal activity;
- To do as otherwise described to you at the time of collection;
- To send you notifications regarding new services offered by our Websites that we think you may find valuable;
- For analytical purposes to help us better understand how our Websites are being used, and better design our Websites to improve content and ease of use;
- In the aggregate for the purpose of publishing trends on the usage of our Websites;
- To respond to your requests or questions;
- For marketing purposes;
- For administrative purposes; and
- As otherwise permitted by law or as we may notify you

HOW DO WE SHARE YOUR INFORMATION

We may share your information in the following ways:

- Internally. We may share your information with our parent, subsidiary, and affiliate entities.
- With Our Service Providers. We may share your information with third-parties who perform services on our behalf. For example, this may include companies that send emails on our behalf or help us run our Websites.
- With Our Business Partners. For example, this may include data aggregators, advertisers, media buying agencies, advertising networks and advertising service providers.
- With Third-Parties for Marketing Purposes. This may include third-parties in whose products or services we believe you may be interested. These third-parties may also share your information with others. These third-parties may use your information for their own marketing purposes or the marketing purposes of others. This may include the delivery of interest-based advertising.
- With Any Successors to All or Part of Our Business. For example, if we merge with, acquire or are acquired, or sell part of our business to another entity. This may include an asset sale, corporate reorganization or other change of control.
- To Comply With the Law or To Protect Ourselves. For example, this could include responding to a court order or subpoena. It could also include sharing information if a government agency or investigatory body requests. We might share information when we are investigating a potential fraud.
- Where You Have Asked Us to Share Your Information with a Third-Party
- For Other Reasons We May Describe to You.

CHILDREN UNDER 18

Brownco's websites and social media are meant for adults. We do not knowingly collect personally identifiable data from persons under the age of 18 and we strive to comply with the provisions of COPPA (The Children's Online Privacy Protection Act).

If you are a parent or legal guardian and think your child under 13 has provided us with information, please contact us at info@browncoinc.com. You can also write to us at the address listed at the end of this Statement. Please mark your inquiries "COPPA Information Request."

HOW DO WE STORE YOUR INFORMATION & FOR HOW LONG

Our Sites are hosted and offered in the United States of America, and are subject to US federal, state, and local law. If you are accessing our Sites from another country, please be advised that you may be transferring your information to us in the US.

We take the security of your information seriously and take all commercially reasonable steps to ensure your information is protected from loss, theft, alteration, or misuse, in alignment with applicable law and appropriate to the sensitivity of the information involved. However, please be advised that even the best security measures cannot fully eliminate all risks, and we cannot therefore guarantee complete security of your information.

We keep your information for as long as necessary in accordance with the purpose for which it was collected, our business needs, and our legal and regulatory obligations. If we dispose of your information, we will do so in a way that is secure and appropriate to the nature of the information subject to disposal.

SOCIAL MEDIA

Brownco is active on several social media platforms, currently including Facebook, Twitter, Instagram, and LinkedIn. In the future Brownco may use other social media platforms.

Among our goals for our social media activity is engagement in an ongoing dialogue with individuals and organizations interested in construction, employment at Brownco, and other related topics. To that end, we encourage you to respectfully share thoughts and opinions on our social media pages. We would like to but unfortunately are unable to respond individually to every comment. If we decide to follow a social media user, it does not imply endorsement.

We follow companies and individuals relevant to the construction industry. Similarly, a retweet or content share does not imply endorsement. We may share information relevant to our business or to the construction industry and our partnerships.

We do have guidelines, however, and posts that violate these guidelines are subject to removal. A comment will be deleted if it contains:

- Hate speech
- Profanity, obscenity, or vulgarity
- Nudity in profile pictures
- Defamation to a person or people
- Name calling and/or personal attacks
- Comments whose main purpose are to sell a product
- Comments that infringe on copyrights or trademarks
- Spam comments, such as the same comment posted repeatedly on a profile
- Other comments that Brownco's Social Media team deems inappropriate

All links posted as comments Brownco posts will be reviewed and may be deleted. Repeated violations of the Brownco comment policy may cause the author to be blocked from our social media profiles.

Social media is a 24/7 medium; our moderation capabilities, sadly, are not. We may not see every inappropriate comment right away, but we have faith that our community will ignore personal attacks and negative speech, or respond politely, until we can address the situation.

We may use hyperlinks on our Sites that redirect you to a social network if you click on the respective link. However, when you click on a social plug-in, such as Facebook's "Like" or Twitter's "tweet" button, that particular social network's plugin will be activated, and your browser will directly connect to that provider's servers.

So for example, when you click on the Facebook's "Like" button on the Sites, Facebook will receive your IP address, the browser version and screen resolution, and the operating system of the device you have used to access the Sites.

If you do not use these buttons, none of your data will be sent to the respective social network's plugin provider.

Settings regarding privacy protection can be found on the websites of these social networks and are not within our control.

CHOICES REGARDING YOUR INFORMATION

We provide you the ability to exercise certain controls and choices over how we collect, use, store, and share your information. Please note that if you are a resident of California, you may have additional rights (see California Privacy Rights section below).

Review & Correction. You may at any time review or change the information we have about you by going to your account settings (if applicable) or contacting us using the contact information below.

Change Preferences. You may change your choices for subscriptions, newsletters, and alerts by sending a request to info@browncoinc.com. Please mark your inquiry "Privacy".

Unsubscribe from Brownco Communications. You may choose whether you want to receive marketing and/or advertising messages from us. To exercise this right, please send a request to info@browncoinc.com. Please mark your inquiry "Privacy".

Control Advertising and Online Tracking. You have a right to control how your information is tracked online.

You have certain choices about how we use your information. Some choices you make are browser and device specific.

Marketing Communications: You can opt out of receiving our marketing communications by using the unsubscribe link within each email.

Cookies and Other Tracking Technologies:

- **Cookies:** You can adjust your browser to control cookies to require your affirmative acceptance for new cookies, automatically reject cookies and/or delete or disable existing cookies. How you do so depends on the type of cookie and the browser that you are using.
- **Flash Cookies:** You may need to take an additional action to manage flash cookies. Why? Because flash cookies cannot be controlled through your browser settings.
- **Web Beacons:** Web beacons can be embedded in web pages, videos, or emails, and can allow a web server to read certain types of information from your browser, check whether you have viewed a particular web page or email message, and determine, among other things, the time and date on which you viewed the Web beacon, the IP address of your computer, and the URL of the web page from which the Web beacon was viewed.
- **Google Analytics:** We may use Google Analytics on our Websites to help us understand how you use our Websites.
- You may prevent your data from being used by Google Analytics by downloading and installing the Google Analytics Opt-out Browser Add-on, available at <https://tools.google.com/dlpage/gaoptout/>.
- Google's ability to use and share information collected by Google Analytics about your visits to this Site is restricted by the Google Analytics Terms of Service, available at <http://www.google.com/analytics/terms/us.html>, and the Google Privacy Policy, available at <http://www.google.com/policies/privacy/>.
To learn more about how Google collects and processes data in connection with Google Analytics, visit <http://www.google.com/policies/privacy/partners/>
- **Email Tools:** You can also change your email settings to block the automatic download of images in email messages, as such images may contain technologies that help us understand how you interact with the message.

Note that deleting or blocking cookies may impact your experience on our Websites, as some features may not be available. Certain options you select are browser and device specific.

OUR DO NOT TRACK POLICY

Some browsers have "do not track" features that allow you to tell a website not to track you. These features are not all uniform. We do not currently respond to those signals. If you block cookies, certain features on our Websites may not work. If you block or reject cookies, not all the tracking described here

will stop. If an industry standard on responding to such signals is established and accepted, we may reassess how to respond to those signals.

You may also have the right to assert a legal right regarding our collection and use of your information under applicable law.

THIRD PARTIES

Brownco contractually prohibits its contractors, affiliates, vendors, and suppliers from disclosing personally identifiable information received from Brownco, other than in accordance with this Privacy Policy.

However, third parties are under no obligation to comply with this Privacy Policy with respect to personally identifiable information that users provide directly to those third parties, or that those third parties collect for themselves. These third parties include providers of utilities, widgets, and a variety of other third-party applications accessible through the website. Brownco neither owns nor controls the third-party websites and applications accessible through the website.

Thus, this Privacy Policy does not apply to information provided to or gathered by the third parties that operate them. Before visiting a third party, or using a third-party application, whether by means of a link on the Website, directly through the website or otherwise, and before providing any personally identifiable information to any such third party, users should inform themselves of the privacy policies and practices (if any) of the third party responsible for that website or application, and should take those steps necessary to, in those users' discretion, protect their privacy.

LINKS

Our Websites may contain links to other third-party sites that are not governed by this policy. If you click on a link to a third-party site, you will be taken to a site we do not control.

We are not responsible for the privacy practices used by third-party sites. We suggest that you read the privacy policies of those sites carefully. We are not responsible for these third-party sites.

CALIFORNIA

Privacy Rights - California Consumer Privacy Act (CCPA)

If you are a California resident, you may have certain rights concerning your personal information collected by BROWNCO. For the purposes of this section, all terms and phrases shall have the same meaning as set forth under the CCPA.

Right to Know. You have a right to submit a verifiable request to us, up to two times per calendar year, requesting that we disclose the following information: (1) the categories of personal information we have collected from or about you; (2) the categories of sources from which we have collected such information, and the business or commercial purpose for such collection; (3) the categories of third parties with whom we have shared or sold your information, and the business or commercial purpose for said sharing or selling; and (4) the specific pieces of your personal information, subject to exceptions.

Please note, your request may only go back 12 months from the date of your request. To submit a request to know, you may send an e-mail to info@browncoinc.com. Please mark your inquiry "Privacy".

Right to Delete. You have a right to request that we delete your personal information, subject to certain exceptions such as if the information is necessary to complete the transaction for which the information was collected, detect security incidents, protect against malicious deceptive, fraudulent, or illegal activity, identify and repair errors and for various other reasons available under the law. To submit a request to delete, send an e-mail to info@browncoinc.com. Please mark your inquiry "Privacy".

Verification. To protect your personal information and prevent against fraud, we may verify your identity before responding to your requests to know or delete by matching the information provided in your request with the information we have on file about you, and depending on the sensitivity of information requested utilizing more stringent verification methods, including but not limited to requesting additional information from you and/or requiring you to sign a declaration under penalty of perjury.

Notice of Collection. To learn more about the categories of personal information we collect from and about California residents, including the sources of collection and including those categories we have collected in the last twelve months, please see What Type of Information Do We Collect, How We Collect Your Information, and How We Use Your Information sections above.

To learn more about how we share this information, please see the How We Share Your Information section.

Notice of Sale. We do not sell your personal information

Notice of Disclosure for a Business Purpose. To learn more about the categories of personal information we have disclosed for a business purpose in the last twelve months, please see What Type of Information Do We Collect and How We Share Your Information sections above.

Non-Discrimination

We will not discriminate against you for exercising any of your CCPA rights. Unless permitted by the CCPA, we will not:

- Deny you goods or services.
- Charge you different prices or rates for goods or services, including through granting discounts or other benefits, or imposing penalties.
- Provide you a different level or quality of goods or services.
- Suggest that you may receive a different price or rate for goods or services or a different level or quality of goods or services.

European Privacy Rights

To the extent you live within the European Union, Personal Information may be subject to further treatment and rights.

GENERAL

Privacy Policy Changes

This Privacy Policy may be updated from time to time. All changes to the Privacy Policy will be reflected on this page. If any changes are made to the Privacy Policy, Brownco will revise the "Effective" date at the top of this statement. Brownco may, as determined in its discretion, decide to notify users of changes made to this Privacy Policy via email or otherwise. Accordingly, it is important that users always maintain and update their contact information. Unless stated otherwise, our current Privacy Policy applies to all information that we have about you and your profile.

Enforcement

We use a self-assessment approach to ensure compliance with this Privacy Policy and periodically verify the policy is accurate and is comprehensive for the Personal Information intended to be covered, prominently displayed, and completely implemented. We encourage interested persons to raise concerns using the contact information provided at the bottom of this page, and we will investigate and attempt to resolve any complaints and disputes regarding use and disclosure of Personal Information.

HOW TO CONTACT US

If you have any questions, comments or concerns with respect to our privacy practices or this Privacy Policy, or wish to update your information, please feel free to contact us at info@browncoinc.com. Please mark your request "Privacy". You may also write to us at the following address:

Privacy Officer
c/o Brownco Construction Company, Inc
1000 E Katella Ave, Anaheim
CA 92805, United States
Re: Website Privacy Statement