

# BRADY CORPORATION APPLICANT, CANDIDATE, AND EMPLOYEE PRIVACY POLICY

## This policy explains:

- What information we collect during our application, recruitment, hiring, and employment process and why we collect it;
- How we use that information; and
- How to access and update that information.

## Types of information we collect:

This policy covers the information you share with us and/or which may be acquired or produced by Brady Corporation, its subsidiaries and its affiliates (Brady) during the application, recruitment, hiring, or employment process, which includes, but may not be limited to:

- Your name, address, email address, telephone number and other contact information;
- Your resume or CV, cover letter, previous and/or relevant work experience or other experience, education, transcripts, or other information you provide to us in support of an application and/or the application and recruitment process;
- Information from interviews and phone-screenings you may have, if any;
- Details of the type of employment you are or may be looking for, current and/or desired salary and other terms relating to compensation and benefits packages, willingness to relocate, or other job preferences;
- Details of how you heard about the position for which you are applying;
- Any sensitive and/or demographic information disclosed during the application or recruitment process such as gender, information about your citizenship and/or nationality, veteran status, medical, health, and disability information, and/or your racial or ethnic origin;
- Reference information and/or information received from background checks (where applicable), including information provided by third parties;
- Information relating to any previous applications you may have made to Brady and/or any previous employment history with Brady;
- If we make you an offer, in addition to the above, your previous addresses, driver's license number, and date of birth;
- Your information from publicly available sources, including online, that we believe is relevant to your application or a potential future application (e.g. your LinkedIn profile); and/or
- Information related to any assessment you may take as part of the interview screening process;
- Results of any drug, alcohol, or other medical test you may be required to take;
- If hired, in addition to the above, we will collect your government identity or social security number, tax selections, any other information required for tax and social benefits or social security purposes, information for citizenship/visa verification, as

well as banking information if you choose to have your pay directly deposited, your photograph;

- Information about you, your spouse (if any) and your dependents necessary for the provision of health or other insurances, or other employment benefits
- Your emergency contact information, including their name, relationship, and phone number;
- Information about your work performance, including self-evaluations and performance reviews, disciplinary actions, promotions or discipline, pay raises, incentive or other compensation;
- Information regarding any work-related incident or injury, including medical or health information, and/or
- Any other personal information you may provide which may be relevant or necessary to your employment.

### **How we use information we collect:**

Your information will be used by Brady for the purposes of carrying out its application, recruitment, hiring, and employment processes which includes, but may not be limited to:

- Assessing your skills, qualifications and interests against our career opportunities;
- Verifying your information and carrying out reference checks and/or conducting background checks (where applicable) if you are offered a job;
- Communications with you about the recruitment process and/or your application(s), including, in appropriate cases, informing you of other potential career opportunities at Brady;
- Creating and/or submitting reports as required under any local laws and/or regulations, where applicable;
- Where requested by you, assisting you with obtaining an immigration visa or work permit, where required;
- Making improvements to Brady's application and/or recruitment process, including improving diversity in recruitment practices;
- Complying with applicable laws, regulations, legal processes or enforceable governmental requests;
- Proactively conducting research about your educational and professional background and skills and contacting you if we think you would be suitable for a role with us;
- As part of our commitment to equal opportunity employment, processing information regarding your membership in various organizations to support our diversity and inclusion efforts, including associating participant membership with sensitive and/or demographic information;
- If hired, in addition to the above, for the provision of compensation, benefits, evaluation of your performance, promotion or discipline, to meet legal and tax obligations, to provide training, and/or manage any work-related incident or injury, for security of our facilities and systems; and/or
- To accomplish any other lawful activity in furtherance of the company's objectives.

We will also use your information to protect the rights and property of Brady, our users, applicants, candidates, employees or the public as required or permitted by law.

If you are offered and accept employment with Brady, the information collected during the application and recruitment process will become part of your employment record.

We collect and process your information where it is necessary in order to take steps, at your request, prior to our potentially entering into a contract or other arrangement of employment with you.

We may also seek your consent to process your personal information in specific circumstances, or process it where necessary to comply with a legal obligation or for purposes connected to legal claims. If we use your information to improve our application or recruitment process, we do so on the basis that it is in our legitimate interests to ensure we recruit the best possible candidates.

### **Who may have access to your information:**

- Your information may be shared with our affiliates, subsidiaries or joint ventures in the United States and in other jurisdictions, in relation to the purposes described above. If you have been referred for a job at Brady by a current Brady employee, with your consent, we may inform that employee about the progress of your application and let the Brady employee know the outcome of the process. In some cases, if it is identified that you have attended the same university/school or shared the same previous employer during the same period as a current Brady employee we may consult with that employee for feedback on you.
- All Brady employees will have access to your personal business information, including your name, job title, business telephone number(s), worksite location, and email address, as well as any additional information you choose to publish/post using Brady's systems.
- Brady may also use service providers acting on Brady's behalf to perform some of the services described above including for the purposes of the verification / background checks, and if hired, the provision of compensation and benefits. Your information will also be provided to various governmental entities, as required by law, as well as external tax and human resource service providers. These service providers may be located outside the country in which you live or the country where the position you have applied for is located.
- Brady may sometimes be required to disclose your information to external third parties such as to local labor authorities, courts and tribunals, regulatory bodies and/or law enforcement agencies for the purpose of complying with applicable laws and regulations, or in response to legal process.
- We will also share your personal information with other third parties if we have your consent (for example if you have given us permission to contact your references), or to detect, prevent or otherwise address fraud, security or technical issues, or to protect against harm to the rights, property or safety of Brady, our users, applicants, candidates, employees or the public or as otherwise required by law.
- It is your responsibility to obtain consent from references before providing their personal information to Brady.
- Brady operates globally, which means your information may be stored and processed outside of the country or region where it was originally collected, including in the United States. In some of these countries, you may have fewer rights in respect of your information than you do in your country of residence. Regardless of

where your information is processed, we apply the same protections described in this policy. We also comply with certain legal frameworks relating to the transfer of data, such as the European frameworks described below. The European Commission has determined that certain countries outside of the European Economic Area (EEA) adequately protect personal data. You can review current European Commission adequacy decisions on [the Commission website](#). To transfer data from the EEA to other countries, such as the United States, we comply with legal frameworks that establish an equivalent level of protection with EU law.

- o [Model contract clauses](#). The European Commission has approved the use of model contract clauses as a means of ensuring adequate protection when transferring data outside of the EEA. By incorporating [model contract clauses](#) into a contract established between the parties transferring data, personal data is considered protected when transferred outside the EEA or the UK to countries which are not covered by an adequacy decision. We rely on these model contract clauses for data transfers.

Brady takes appropriate steps to protect information about you that is collected, processed, and stored as part of the application and recruitment process.

### **Our retention of your information:**

If you apply for a job at Brady and your application is unsuccessful (or you withdraw from the process or decline our offer), Brady will retain your information for some period of time after your application. We retain this information for various reasons, including in case we face a legal challenge in respect of a recruitment decision, to consider you for other current or future jobs at Brady and to help us better understand, analyze and improve our recruitment processes.

If you do not want us to retain your information for consideration for other roles, or want us to update it, please contact [askHR@bradycorp.com](mailto:askHR@bradycorp.com). Please note, however, that we may retain some information if required by law or as necessary to protect ourselves from legal claims.

If you are employed by Brady, we retain your personal information beyond your service for a variety of reasons, including legal or regulatory requirements, in case we face a legal challenge regarding your employment, and to process post-employment benefit fulfillment requests.

### **Your rights in respect of your information:**

In certain countries or jurisdictions, you may have certain rights under data protection law. This may include the right to request access or to update or review your information, request that it be deleted or anonymized, or object to or restrict Brady using it for certain purposes.

If you are in the EEA or the UK and wish to exercise a right of access, you can email us at [privacyeurope@bradycorp.com](mailto:privacyeurope@bradycorp.com) or complete the form found at this link: <https://www.brady.eu/forms/contact/privacy-policy-form>.

If you are located in the US or Canada and wish to exercise a right of access please call us at +1 888-250-3082 or complete the form found at this link:  
<https://www.bradyid.com/forms/contact/privacy-request>.

If you are located anywhere else in the world, check your local Brady website and look for contact information in the Privacy Policy linked on the main page. We will respond to any requests in accordance with applicable law, and so there may be circumstances where we are not able to comply with your request.

You can also contact Brady's Data Protection Officer at [michael\\_golden@bradycorp.com](mailto:michael_golden@bradycorp.com). Depending on your country of residence, you may also raise any questions or concerns you have regarding your personal information with your local data protection authority.

### **Changes to this Policy:**

We may change this policy from time to time. We will post any changes to this policy on this page. Each version of this policy is identified at the bottom of the last page by its effective date.

Last updated: December 27, 2022