

External Privacy Policy

Applicable To: All external Users, customers, and visitors of BC and associated websites.

Approval Date: Excom 3rd December 2024

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1 Overview

This policy describes how Bridge Carbon LLC and its successors, subsidiaries, affiliates, divisions, and groups (collectively “BC”) collects, uses, and discloses certain personal information or personal data (“Personal Information”) that it receives. BC is committed to protecting the privacy and security of its online and offline visitors by maintaining the highest standards of confidentiality and security for all data collected from: (i) website visitors, (ii) clients, (iii) subcontractors, (iv) business partners, and (v) end Users of clients (“you” or “Users”). This privacy policy describes how BC collects information and how it is used.

This privacy policy applies to all visitors to the BC corporate website (<https://bridgecarbon.com>) and information collected by BC both online and offline through other means (“Services”). The use of Personal Information collected through BC’s Services shall be limited to the purpose of providing the service for which the User has engaged BC.

2 Policy

The following subsections detail the External Privacy Policy.

2.1 Your Data Protection Rights

BC would like to make sure that you are fully aware of your data protection rights. Every User is entitled to the following:

1. **The Right to Access.** You have the right to request from BC copies of your personal data. We may charge you a small fee for this service.
2. **The Right to Rectification.** You have the right to request that BC correct any information you believe is inaccurate or incomplete.
3. **The Right to Erasure.** You have the right to request that BC erase your personal data, under certain conditions.
4. **The Right to Restrict Processing.** You have the right to request that BC restrict the processing of your personal data, under certain conditions.
5. **The Right to Object to Processing.** You have the right to object to BC’s processing of your personal data, under certain conditions.
6. **The Right to Data Portability.** You have the right to request that BC transfer the data that we have collected to another organization, or directly to you, under certain conditions.

Refer to Section 2.6, Sharing, Transferring, or Disclosing Information, and Section 2.8, Accessing Collected Information.

2.2 Data Types Collected

While using our service(s), we may ask you to provide us with certain information. The types of information collected are further explained within the subsections below.

2.2.1 Personally Identifiable Information (PII)

PII data is information that can be used to contact or identify you. PII may include, but is not limited to:

1. Name
2. Email address
3. Phone number
4. Physical address

2.2.2 Non-Personal Information and Usage Data

The Personal Information Users provide to BC may be used for the following purposes:

- **Log Files:** BC gathers non-personal information automatically and stores it in log files. This non-personal information includes Internet Protocol (IP) address, browser type, language, country, Internet Service Provider (ISP), referring/exit pages, operating system, date/time stamp, clickstream data, unique device identifiers, and other diagnostic data. BC uses this information, which does not identify Users, to analyze trends, administer the site, track Users' movements around the site, and gather demographic information about the User base. BC does not link this automatically collected data to Users' Personal Information.
- **Social Media Features:** The BC website includes social media features such as the Facebook "Like" button and widgets, such as the Share-This button or interactive mini-programs that run on the site. These features may collect a User's IP address, which page is visited on the site, and may set a Cookie to enable the feature to function properly. Social media features and widgets are either hosted by a third party or hosted directly on the BC site. A User's interactions with these features are governed by the privacy policy of the company providing them.
- **Mobile Devices.** When you access the Services by or through a mobile device, we may collect certain information automatically, including, but not limited to, the type of mobile device you use, your mobile device's unique ID, the IP address of your mobile device, your mobile operating system, the type of mobile internet browser you use, unique device identifiers and other diagnostic data. We may also collect information that your browser sends whenever you use our Services or when you access the Services by or through a mobile device.


2.2.3 Tracking Technologies and Cookies

A Cookie is a small text file that is stored on a User's computer for record-keeping purposes. BC uses Cookies to make it easier for Users to navigate the website, so we can see which pages were viewed most, and track and target the interest of Users to enhance the experience. BC does not link the information stored in Cookies to any Personal Information submitted while on the website.

We use Cookies and similar tracking technologies to track the activity on our Services and store certain information. Tracking technologies used are beacons, tags, and scripts to collect and track information and to improve and analyze our Services.

Users can manage Cookies by using features and functions available on most Internet browsers. For example, most browsers allow Users to choose what Cookies can be placed on a computer, and to delete or disable Cookies. Users can find instructions for managing Cookie controls on websites for particular browsers. Below are links for popular browsers:

- [Microsoft Internet Explorer](#)
- [Apple Safari](#)
- [Mozilla Firefox](#)
- [Google Chrome](#)

 **NOTE:** Disabling Cookies may prevent the use of specific features on BC sites and other websites, such as maintaining an online account.

The technologies BC uses may include:

1. **Cookies or Browser Cookies.** A “Cookie” is a small file placed on your device. You can instruct your browser to refuse all Cookies or to indicate when a Cookie is being sent. However, if you do not accept Cookies, you may not be able to use some parts of our Services. Unless you have adjusted your browser setting so that it will refuse Cookies, our Services may use Cookies. The use of Cookies by third parties is not covered by BC’s privacy policy. BC does not have access or control over these Cookies.
2. **Flash Cookies.** Certain features of our Services may use locally stored objects (or Flash Cookies) to collect and store information about your preferences or your activity on our Services. Flash Cookies are not managed by the same browser settings as those used for Browser Cookies. For more information on how you can delete Flash Cookies, please read “Where can I change the settings for disabling, or deleting local shared objects?” available via [Adobe Flash Cookies](#).
3. **Clear Gifs (Web Beacons/Web Bugs).** Certain sections of our Services and our emails may contain small electronic files known as web beacons (also referred to as clear gifs, pixel tags, and single-pixel gifs). Clear gifs are tiny graphics with a unique identifier, similar in function to Cookies, and are used to track the online movements of Web Users. In contrast to Cookies, which are stored on a User’s computer hard drive, clear gifs are embedded invisibly on Web pages and are about the size of the period at the end of this sentence. Clear gifs help BC as they provide information on effective content, count Users who have visited those pages or opened an email, and provide other related website statistics. BC does not tie the information gathered by clear gifs to User Personal Information.

Cookies can be “Persistent” or “Session” Cookies. Persistent Cookies remain on your personal computer or mobile device when you go offline, while Session Cookies are deleted as soon as you close your web browser.

We use both Session and Persistent Cookies for the purposes set out below:

1. **Necessary / Essential Cookies**
 - a. Type: Session Cookies
 - b. Administered by: Us
 - c. Purpose: These Cookies are essential to provide you with Services available through the Website and to enable you to use some of its features. They help to authenticate Users and prevent fraudulent use of User accounts. Without these Cookies, the Services that You have asked for cannot be provided, and We only use these Cookies to provide you with those Services.
2. **Cookies Policy / Notice Acceptance Cookies**
 - a. Type: Persistent Cookies
 - b. Administered by: Us
 - c. Purpose: These Cookies identify if Users have accepted the use of Cookies on the Website.
3. **Functionality Cookies**
 - a. Type: Persistent Cookies
 - b. Administered by: Us
 - c. Purpose: These Cookies allow us to remember choices you make when you use the Website, such as remembering your login details or language preference. The purpose of these Cookies is to provide you with a more personal experience and to avoid you having to re-enter your preferences every time you use the Website.
4. Please add any additional types of specific information or data collected here.


2.3 Data Types Not Collected

BC will not knowingly collect or use Personal Information from children younger than 18 years of age without parental consent. If you are a parent or guardian and you are aware that your child has provided us with Personal Information, please contact us. If we become aware that we have collected Personal Information from anyone under the age of 18 without verification of parental consent, we take steps to remove that information from our servers.


If we need to rely on consent as a legal basis for processing your information and your country requires consent from a parent, we may require your parent's consent before we collect and use that information.

2.4 Methods of Collection

Users may choose to provide their Personal Information through BC websites. How Users may provide their Personal Information, and the types of information Users may submit, are as follows:

 **NOTE:** BC will not knowingly collect or use Personal Information from children younger than 18 years of age without parental consent.

- **Contact BC:** If a User communicates with BC through the “Contact Us” link on BC websites, via online registration, voluntary customer survey or feedback, etc., BC may ask for information such as name, email address, and telephone number. This allows BC to respond to User questions and comments.
- **Request Technical Support:** If a User requests technical support online, BC will ask for information necessary to complete the transaction, such as name, location, and information about computer hardware, software, and the nature of the problem the User is experiencing. BC may retain non-personal information concerning technical issues to provide the User with continuing support. This information may be made available to technical specialists to improve service for similar technical issues encountered by end Users.
- **Marketing Communications:** BC may ask Users for contact details, including phone number, email address, and company name when downloading whitepapers or viewing webinars.
- **Careers:** Users may be able to submit a resume and other information online to apply for a job with BC. BC may ask Users to provide email addresses, residence, education, work experience, and other Personal Information typically found on a resume. Personal Information collected from a resume may be aggregated with information from third parties when verifying the veracity of the Personal Information provided.
- **Public Forums and Blog Comments:** Users may provide Personal Information in BC's publicly accessible blog or community forums. Users should be aware that any information provided in these areas may be read, collected, and used by other Users who access the blog or forums.
- **Testimonial:** BC posts customer testimonials on BC websites which may contain Personal Information. We do obtain User consent before posting the testimonial to post the User name along with the testimonial.
- **BC as Services and Solutions Provider:** BC may obtain various types of Personal Information about Users of clients, subcontractors, and business partners. This may include:
 - Contact information (points of contact (POCs), addresses, phone, and fax numbers, and email addresses)
 - Information about products and services ordered or provided
 - Financial and payment information
 - User ID, passwords, and information collected through Internet-based activities
 - Other transaction-related information

 **NOTE:** BC also collects business information such as the legal name of the business, address, network, and storage system information.

2.5 Using Information

BC uses Personal Information only in ways that are compatible with the purposes for which it was collected or consented to by the User. BC takes commercially reasonable steps to ensure that the personal information is relevant to its intended use, and is accurate, up-to-date, and complete. The Personal Information Users provide to BC may be used for the following purposes:

- **For Account Management.** To manage your account and your registration as a User of the Services. The Personal Information you provide can give you access to different functionalities of the Services that are available to you as a registered User.
- **For the Performance of a Contract or Service.** To provide and maintain our Services, including monitoring the usage of our Services as well as to evaluate the quality of our Services and establish or maintain client and business relationships. The development, compliance, and undertaking of the purchase contract for the products, items, or services you have purchased or of any other contract with us through the Services.
- **To Contact Users.** To contact a User by email, telephone calls, SMS, or other equivalent forms of electronic communication, such as a mobile application's push notifications regarding updates or informative communications related to the functionalities, products, or contracted services, including the security updates, when necessary or reasonable for their implementation.
- **To Provide Users with Information.** This may include news, special offers, and general information about other goods, services, events, and other information that may be of interest to you that we offer that are similar to those that you have already purchased or enquired about unless you have opted not to receive such information.
- **To Manage User Requests.** To attend and manage User requests.
- **For Business Transfers.** We may use your information to evaluate or conduct a merger, divestiture, restructuring, reorganization, dissolution, or other sale or transfer of some or all our assets, whether as a going concern or as part of bankruptcy, liquidation, or similar proceeding, in which Personal Information held by us about our Service User is among the assets transferred.
- **Recruitment.** To help BC conduct recruitment-related activities, evaluate a User's interest in employment, and contact a User regarding possible employment with BC.
- **For Other Purposes.** We may use your information for other purposes, such as data analysis, identifying usage trends, determining the effectiveness of our promotional campaigns, and evaluating and improving our service, products, services, marketing, and your experience. To conduct other activities as necessary or appropriate in connection with the servicing and development of the business relationship

2.6 Sharing, Transferring, or Disclosing Information

BC may share User's Personal Information only in ways described in this privacy policy. Your information, including Personal Information, is processed at BC's operating offices and in any other places where the parties involved in the processing are located. It means that this information may be transferred to — and maintained on — computers located outside of your state, province, country, or other governmental jurisdiction where the data protection laws may differ from those from your jurisdiction. Your consent to this Privacy Policy followed by your submission of such information represents your agreement. BC will take all steps reasonably necessary to ensure that your data is treated securely and under this Privacy Policy and no transfer of your Personal Information will take place to an organization or a country unless there are adequate controls in place including the security of your data and other Personal Information. Sharing and/or transferring your data may be used in conjunction with the following:

- **With other Service Providers.** We may share your Personal Information with service providers to monitor and analyze the use of our service, to contact you, or that provide services on BC's behalf. Such companies may include a payment processor or customer service provider. These companies are authorized to use Personal Information to provide such services to BC.
- **For Business Transfers.** We may share or transfer your Personal Information in connection with or during negotiations of any merger, sale of all or a portion of Company assets, financing, or acquisition of all or a portion of our business to another company. Users will be notified via email or prominent notice (e.g., public website notice) of any change of ownership or uses of Personal Information, as well as any choices the User may have regarding Personal Information. We will provide notice before your Personal Information is transferred and becomes subject to a different Privacy Policy.
- **With Affiliates.** We may share your information with our affiliates, in which case we will require those affiliates to honor this Privacy Policy. Affiliates include our parent company and any other subsidiaries, joint venture partners, or other companies that we control or that are under common control with us.
- **With Business Partners.** We may share your information with our business partners to offer you certain products, services, or promotions.
- **With other Users.** When you share Personal Information or otherwise interact in public areas with other Users, such information may be viewed by all Users and may be publicly distributed outside.
- **With Your Consent.** We may disclose your Personal Information to any third party or for any other purpose with your consent. BC does not **sell** Users' Personal Information to third parties.
- **In Connection with Recruiting.** When Users provide Personal Information in connection with a job search, it is maintained in a database that is managed by a third-party service provider. BC's service provider is authorized to use the information only in connection with hosting, managing, and maintaining BC's resume database.
- **Law Enforcement.** Under certain circumstances, BC may be required to disclose your Personal Information if required to do so by law or in response to valid requests by public authorities (e.g., a court or a government agency). BC shares User Personal Information as required by law, such as to comply with a subpoena or similar legal process; and when BC believes, in good faith, that disclosure is necessary to protect BC's rights, protect User's safety or the safety of others, investigate fraud, or respond to a government request.
- **Other Legal Requirements.** BC may disclose your Personal Information in the good faith belief that such action is necessary to:
 - Comply with a legal obligation
 - Protect and defend the rights or property of BC
 - Prevent or investigate possible wrongdoing in connection with the Services
 - Protect the personal safety of Users of the Services or the public
 - Protect against legal liability
- **Within the organizational "Company".** BC shares User Personal Information within BC's family of companies. BC has central sales functions that cross-sell different services to individual clients. Client's names and POCs could be shared among the different BC companies, or from the different BC companies to this central sales organization for lead generation. Sometimes company names and POCs are shared for cross-marketing purposes as well. Customer data used to support operations, either technical data, device, or employee data, will only be used by the operation center supporting that customer, and is not shared with any other business or function within BC.

2.7 Preventing Marketing Communication

If a User does not want BC to use their Personal Information data to distribute marketing communication, Users can exercise the right to prevent such processing by selecting/clearing (as applicable) certain checkboxes on the web pages and/or forms on which BC collects User Personal Information for this purpose. Also, to the extent that Users receive marketing communications from BC and wish to unsubscribe or otherwise stop receiving such communications, Users can do so from the unsubscribe link on the email itself.

2.8 Accessing Collected Information

If Users would like to have access to the Personal Information that BC retains to correct inaccuracies or request the removal of Personal Information from the blog, testimonials, or community forums, Users may contact BC. See Section 4. BC will respond with an acknowledgment of the User's access requests within 30 days.

In some cases, BC may not be able to remove Users' Personal Information. In such cases, BC will inform User of the inability to do so and why.

For Users with an existing relationship with one of BC's clients, and with whom BC has no direct relationship, refer to the client's website and contact the client with any such requests. BC will cooperate as appropriate with requests from clients to assist with such responses. If the client requests that BC remove the data, BC will respond with an acknowledgment of the request within 30 days.

2.9 Accessing Other Sites via Links

The BC website contains links to other sites that are not owned or controlled by BC. Be aware that BC is not responsible for the privacy practices of such other sites. If you click on a third-party link, you will be directed to that third-party's site. We strongly advise you to review the Privacy Policy of every site you visit. We have no control over and assume no responsibility for the content, privacy policies, or practices of any third-party sites or services.

BC encourages Users to be aware when leaving BC's site, and to read the privacy statements of each website that collects Personal Information.

⚠ CAUTION: This privacy policy applies only to information collected by BC websites.

Some of BC's websites provide employees access to personnel and benefits information from the Internet, may provide more detailed privacy or disclaimer notices, or are subject to the BC Employee Privacy Statement which takes priority over this notice. These websites include:

- E-mail websites
- Timesheets
- Password Change
- BC Human Resources Portal(s)
- Any other Web-based portal used by a specific team.

2.10 Protecting Personal Information

The security of your Personal Information is important to us but remember that no method of transmission over the Internet, or method of electronic storage is 100% secure. While we strive to use commercially acceptable means to protect your Personal Information, we cannot guarantee its absolute security. BC takes reasonable precautions to protect Personal Information in the United States and/or internationally from loss, misuse, unauthorized access, disclosure, alteration, and destruction. BC also makes reasonable efforts to keep Personal Information reliable for its intended use, accurate, current, and complete.

When BC collects sensitive Personal Information on websites or through the Services, BC encrypts the transmission of that information using Secure Sockets Layer (SSL) technology. No method of transmission over the Internet, or method of electronic storage, is 100% secure, however. Therefore, BC cannot guarantee its absolute security.

2.11 Each country in which we do business may have additional laws and regulations that may apply and we will adhere to all applicable data privacy laws and regulations. Retaining and Securing Information

BC securely stores data using the latest technologies and in compliance with industry best practice security standards. See also Section 2.11. BC is committed to taking appropriate technical, physical, and organizational measures to protect employee Personal Information (including sensitive information) against unauthorized or accidental destruction, alteration, disclosure, accidental loss, unauthorized access, misuse, unlawful processing, or damage. These measures include equipment, application security, information security, access security, and training of staff that are required to process other employees' Personal Information about this policy and the appropriate processing of employee Personal Information.

BC retains Personal Information only for as long as is necessary for the purposes set out in this Policy. We will retain and use Personal Information to the extent necessary to comply with our legal obligations (for example, if we are required to retain your data to comply with applicable laws), resolve disputes, and enforce our legal agreements and policies.

BC also retains Usage Data for internal analysis purposes. Usage Data is generally retained for a shorter time, except when this data is used to strengthen the security or to improve the functionality of our Services, or we are legally obligated to retain this data for longer periods.

BC will retain Personal Information processed on behalf of clients for as long as needed to provide services to the clients. BC will retain and use this Personal Information as necessary to comply with legal obligations, resolve disputes, and enforce agreements.

If a User wishes to request that BC no longer uses Personal Information to provide services, contact BC; see Section 4.

3 Modifying the Privacy Policy

We may update our Privacy Policy from time to time and reflect changes to information practices or relevant applicable laws. We will notify you of any changes by posting the new Privacy Policy on this page.

BC will notify Users by email (sent to the e-mail address specified in the account) or prominent notice (e.g., public website notice). BC encourages Users to periodically review this page for the latest information on privacy practices.

If BC makes any material changes, we will let you know via email and/or a prominent notice on our website before the change becomes effective and will include the "Last updated" or "Approval" date on the Privacy Policy. Changes to this Privacy Policy are effective when they are posted on this page.

4 Contacting BC

If you have any questions, concerns, or suggestions regarding BC's Privacy Policy, or you would like to exercise one of your data protection rights, please contact BC by email: info@bridgecarbon.com.

You can also raise any concern or pose questions via [Bridge Carbon Voices](#)-

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Document Revision History

Revision History	Date	Summary of Changes	Author
1.0			IT, Legal