

## Brunswick Privacy Policy

**Effective Date:** December 19, 2019

When you provide Brunswick with your information, we work hard to protect your information. This Privacy Policy is meant to help you understand what information we collect, why we collect it and how you may be able to update, manage and/or request that we delete your information. Please read this Privacy Policy carefully. By continuing to interact with our sites, you acknowledge that you have read and understand the terms described in this Privacy Policy.

This Privacy Policy applies to information collected by Brunswick Corporation, any affiliated or subsidiary companies (“Brunswick,” “we” or “us”), offline or online, including, but not limited to all websites or apps that post a link to this Privacy Policy (collectively, “the Sites”).

<b>How does Brunswick collect my personal information?</b>	<p>Brunswick collects and processes personal information for legitimate business purposes in order to, for example, process warranty information, communicate with existing customers about products and services, and/or address concerns related to purchased products or services. We collect your personal information, for example, when you:</p> <ul style="list-style-type: none"><li>• Browse our websites;</li><li>• Purchase a product or sign-up for a mailing list;</li><li>• Register your product for warranty service through a dealer;</li><li>• Submit a warranty claim through Brunswick or a dealer;</li><li>• Report product/service issues and/or complete customer surveys;</li><li>• Provide account information or give us your contact information;</li><li>• Participate in surveys or contests;</li><li>• Provide information to authenticate your access through the sites, such as user name and/or passwords; and/or</li><li>• Correspond with us directly.</li></ul>
<b>What does Brunswick collect?</b>	<p>Brunswick collects and processes customers’ personal information for legitimate business purposes. The types of personal information we collect and/or share depend on the product and/or service you have with us. This information may include:</p> <ul style="list-style-type: none"><li>• Your name and contact information;</li><li>• Your income and employment information;</li><li>• Your past purchase and transaction history;</li><li>• Identifiers such as real name, alias, postal address, unique personal identifier, online identifier, IP address, email address, account name, social security number, driver’s license number, passport number, financial account number, or other similar identifiers;</li><li>• Personal information, such as your age, date of birth, names of children, number of children, age or gender of children, telephone number, or your credit worthiness, assets income or liabilities, and protected classifications under California or federal law such as your race or religion;</li><li>• Commercial information, including records of personal property, products or services purchased, obtained, or considered, or other purchasing or consuming histories or tendencies;</li><li>• Biometric information;</li><li>• Internet or other electronic network activity information, including, but not limited to, browsing history, search history, and information regarding your interaction with our website;</li></ul>

	<ul style="list-style-type: none"> <li>• Precise geolocation data;</li> <li>• Audio, electronic, visual, or similar information;</li> <li>• Professional or employment-related information;</li> <li>• Education information; and</li> <li>• Inferences drawn from the above categories of information and reflecting your preferences, characteristics, psychological trends, predispositions, behavior, attitudes, intelligence, abilities, or aptitudes.</li> </ul> <p>We do not collect personal information about your online activities over time and across third party websites or online services when you use our Sites. However, we will treat a “do not track signal” transmitted from your web browser as a request to opt-out of the sale of your information to the extent that we are able to associate your browser with any other information about you.</p>
<p><b>Why does Brunswick collect my personal information?</b></p>	<p>In addition to instances in which you have consented to our use or processing of your information, Brunswick may use your information in order to:</p> <ul style="list-style-type: none"> <li>• fulfill a request you have made;</li> <li>• comply with a legal obligation that applies to Brunswick under California, EU or Member State law, or other applicable law;</li> <li>• ensure our Sites are functioning properly;</li> <li>• manage everyday business needs, such as administration and improvement of the Sites or Brunswick’s legitimate interests as a multinational manufacturer of marine products in order to, for example, protect our business and better understand our customers;</li> <li>• analyze the Sites’ performance and functioning;</li> <li>• prevent fraud, to enforce the Sites’ <a href="#">Terms of Use</a>, to comply with all applicable laws and corporate reporting obligations, and to enforce Brunswick’s agreements;</li> <li>• analyze how you use the Sites and to perform other market research;</li> <li>• provide and communicate with you about our products and services, including administering applicable warranties and recall notices;</li> <li>• provide you with advertisements based on your interests;</li> <li>• provide you with information about financial options for the purchase of our products, create internal analytics and reports; and combine with any of the information we collect from or about you and use it in the manner described above.</li> </ul> <p>We retain personal information for legitimate business, legal or tax purposes only. If any of those purposes no longer apply, we will destroy, de-identify, aggregate or anonymize the information in accordance with our internal policies and protocols, and as allowed by applicable law.</p>
<p><b>Who does Brunswick share my personal information with?</b></p>	<p>Brunswick does not sell the information you provide us for a profit, however, the information is shared with third parties. Brunswick shares your personal information internally and externally, including with:</p> <ul style="list-style-type: none"> <li>- Internal Brunswick departments that have responsibility for processing the data;</li> <li>- Business partners who are bound by data protection agreements or similar privacy protections, such as dealers and distributors; and/or</li> <li>- Third party processors who are bound by data processing agreements or similar privacy protections.</li> </ul> <p>In addition, we may disclose information about you to third parties under the following circumstances:</p> <ul style="list-style-type: none"> <li>• If we are required to do so by law or legal process;</li> <li>• To law enforcement authorities or other government officials;</li> <li>• When we believe disclosure is necessary or appropriate to prevent physical harm or financial loss, or in connection with an investigation of suspected or actual illegal and/or unethical activity;</li> </ul>

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|  | <ul style="list-style-type: none"> <li>• If necessary to protect the vital interests of a person;</li> <li>• To enforce our <a href="#">Terms of Use</a>;</li> <li>• To protect our property, services and legal rights;</li> <li>• To prevent fraud against Brunswick, our affiliates, business partners, or authorized dealers;</li> <li>• To support auditing, compliance, and corporate governance functions;</li> <li>• To comply with any and all applicable laws; or</li> <li>• In connection with a corporate merger, consolidation, or restructuring, the sale of substantially all of our stock and/or assets, or other corporate change, including, without limitation, during the course of any due diligence process.</li> </ul> |
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### INFORMATION WE AUTOMATICALLY COLLECT

We collect certain information by automated means when you visit our Sites, such as how many users visited our Sites and the pages accessed. By collecting this information, we learn how to best tailor our Sites to our visitors. We collect this information through various means such as “cookies” and “web beacons.” In addition, we may collect IP addresses, as explained below. For more information regarding our use of cookies, please refer to our separate Cookie Policy.

**Cookies.** As described in our separate Cookie Policy, like many companies, we use “cookies” on some of our Sites. Cookies are pieces of code placed on your devices when you visit certain websites. We use cookies to tell us, for example, whether you have visited us before or if you are a new visitor and to help us identify features of the Sites in which you may have the greatest interest. Cookies may enhance your online experience by saving your preferences while you are visiting a particular website.

Most web browsers will tell you how to stop accepting new cookies, how to be notified when you receive a new cookie, and how to disable existing cookies. Please note, however, that without cookies you may not be able to take full advantage of all the features and functionality of the Sites.

**Web Beacons.** As described in our separate Cookie Policy, certain pages on our website contain “web beacons” (also known as Internet tags, pixel tags and clear GIFs). These web beacons allow third parties to obtain information such as the IP address of the computer that downloaded the page on which the beacon appears; the URL of the page on which the beacon appears; the time the page containing the beacon was viewed; the type of browser used to view the page; and the information in cookies set by the third party.

### CROSS-BORDER DATA TRANSFERS

To transfer data from the European Economic Area (EEA) to other countries, such as the United States, we comply with legal frameworks that establish an equivalent level of protection with EU law. By using the Sites or providing us with your personal information, you are transferring your personal information to us in the United States. In addition, we transfer the personal information we collect on the Sites to other countries where we do business.

- **EU-US and Swiss-US Privacy Shield Frameworks.** Brunswick, as well as its U.S. affiliates, divisions, subsidiaries further identified below, comply with the EU-U.S. Privacy Shield Framework and Swiss-U.S. Privacy Shield Framework for personal data as set forth by the U.S. Department of Commerce regarding the collection, use, and retention of personal information transferred from the European Union and Switzerland to the United States. If there is any conflict between the terms in this privacy policy and the Privacy Shield Principles, the Privacy Shield Principles shall govern. To learn more about the Privacy Shield program, and to view our certification, please visit <https://www.privacyshield.gov/>.

The U.S. Brunswick entities adhering to the Privacy Shield Principles include: Attwood Corporation; BBG Logistics, Inc.; Blue Water Finance, Inc.; Boston Whaler, Inc.; Brunswick Commercial & Government Products, Inc.; Brunswick Family Boat Co. Inc.; Brunswick Financial Services Corporation; Brunswick Leisure Boat Company, LLC; Brunswick Marine in EMEA, Inc.; Brunswick Marine Sales Corporation; Brunswick Product Protection Corporation; Garelick Mfg. Co.; Land 'N'

Sea Distributing, Inc.; Lund Boat Company; Marine Power International Limited; Marine Power International Pty. Limited; Marine Power New Zealand Limited; Sea Ray Boats, Inc.; and Thunder Jet Boats, Inc.

With respect to personal data received or transferred pursuant to the Privacy Shield, Brunswick and its related entities listed above are subject to the investigatory and enforcement powers of the U.S. Federal Trade Commission. In certain circumstances, employees who have submitted personal data to Brunswick for Human Resources purposes may invoke binding arbitration when other dispute resolution methods have been exhausted, as described in [Annex 1](#) to the Privacy Shield.

As described in the [Privacy Shield Principles](#), Brunswick remains responsible for any of your personal information under the Privacy Shield and transferred to a third party acting as an agent on its behalf. Brunswick commits to cooperate with EU data protection authorities (DPAs) and the Swiss Federal Data Protection and Information Commissioner (FDPIC) and comply with the advice given by such authorities with regard to personal data transferred from the EU and Switzerland in the context of the employment relationship.

- **Model Contract Clauses & Data Processing/Protection Agreements.** Where appropriate, Brunswick has created and entered into Data Processing or Data Protection Agreements with relevant parties (vendors with whom we share personal information, for example) to ensure the appropriate transfer of your information. In the EEA, those agreements incorporate model contract clauses, which have been approved by the European Commission as an adequate means of protection when transferring data outside of the EEA.

## HOW WE PROTECT YOUR INFORMATION

We work hard to protect you and Brunswick from unauthorized access, alteration, disclosure or destruction of information we hold. To that end, we maintain administrative, technical, and physical safeguards to protect against loss, misuse or unauthorized access, disclosure, alteration or destruction of the information you provide when visiting or using the Sites.

## YOUR RIGHTS TO YOUR INFORMATION

If you are a resident of the EU, you have the right to request access to the personal information we have collected about you for the purposes of reviewing, modifying, or requesting erasure of the information. You also have the right to request a copy of the information we have collected about you. In certain situations, you may also request that we restrict or cease processing or sharing your information.

If you would like to make a request to access, review, or correct the personal information we have collected about you, please contact us at [privacy@brunswick.com](mailto:privacy@brunswick.com) or please fill out the form found [here](#).

If you are a resident of Nevada, you have the right to request that we restrict or cease the transfer of your information to third parties in some situations. If you would like to make a request to restrict the sharing of your information, please contact us at [privacy@brunswick.com](mailto:privacy@brunswick.com) or please fill out the form found [here](#).

To help protect your privacy and security, we will take reasonable steps to verify your identity before granting access to your information.

- **California Resident Access Rights:** If you are a California resident, beginning on January 1, 2020, you have the rights described below regarding your personal information:

*Access to Specific Information and Data Portability:* You have the right to request that we disclose certain information to you about our collection and use of your personal information over the past 12 months. Once we receive and confirm your personal information request, we will disclose to you, based on your request:

- The categories and specific pieces of personal information we collected about you;
- The categories of sources for the personal information we collected about you;

- Our business or commercial purpose for collecting or selling that personal information;
- The categories of third parties with whom we share that personal information; and
- If we sold or disclosed your personal information for a business purpose, two separate lists identifying: (a) the categories of your personal information collected and sold, and the categories of the third parties to whom the data was sold; and (b) the categories of your personal information that was disclosed for business purposes.

We will not, however, disclose any of the following information in response to an access request: your social security number, driver’s license number or other government-issued identification number, financial account number, any health or medical identification number, an account password, or security questions or answers in response to a request to know.

*Deletion Request:* You have the right to request that we delete the personal information that we collected from you and retained, subject to certain exceptions. Once we receive and confirm your personal information request and verify your identity through our two-tier verification process, we will delete your personal information to the extent required by law and unless permitted or required by law to retain your personal information.

We may deny your deletion request if retaining the information is necessary for us or our service providers to:

- Complete the transaction for which we collected the personal information, provide a good or service that you requested, take actions reasonably anticipated within the context of our ongoing business relationship with you, or otherwise perform our contract with you;
- Detect security incidents, protect against malicious, deceptive, fraudulent, or illegal activity, or prosecute those responsible for such activities;
- Debug products to identify and repair errors that impair existing intended functionality;
- Exercise free speech, ensure the right of another consumer to exercise their free speech rights, or exercise another right provided for by law;
- Comply with California Penal Code Section 1546 *et seq.* (the California Electronic Communications Privacy Act);
- Engage in public or peer-reviewed scientific, historical, or statistical research in the public interest that adheres to all other applicable ethics and privacy laws, when the information's deletion may likely render impossible or seriously impair the research's achievement, if you previously provided informed consent;
- Enable solely internal uses that are reasonably aligned with consumer expectations based on your relationship with us;
- Comply with a legal obligation; or
- Make other internal and lawful uses of that information that are compatible with the context in which you provided it.

*Do Not Sell My Personal Information:* We do not sell your personal information to third parties for a profit; however, the information is shared as described in this Policy. Should you wish to opt-out of this exchange, or not be contacted for marketing purposes, please click [here](#) and complete an “Opt-Out Request”. You can also click the “Do Not Sell My Personal Information” button on the bottom of each Site’s main page, which will take you to the same webform.

#### *Exercising Your CCPA Rights*

To exercise the CCPA rights described above, please submit a verifiable personal information request to us by either:

- Calling us at 855-283-1103 or 847-735-4002;
- Completing an online request form by clicking [here](#); or
- Emailing us at [privacy@brunswick.com](mailto:privacy@brunswick.com).

Only you or a person registered with the California Secretary of State that you authorize to act on your behalf may submit a personal information request. You may also make a personal information request on behalf of your minor child. If an authorized agent submits a request on your behalf, unless that agent produces a power of attorney signed by you, we may require that: (1) you or the authorized agent produce your written permission for the agent to act on your behalf and (2) you to verify your identity.

You may only submit two personal information requests within a 12-month period. The verifiable personal information request must:

- Provide sufficient information that allows us to reasonably verify you are the person about whom we collected personal information, or an authorized representative; and
- Describe your request with sufficient detail that allows us to properly understand, evaluate, and respond to it.

If we cannot verify a request to delete, we will treat that request instead as a request to opt-out of the sale of your information.

We endeavor to respond to a personal information request within 45 days of its receipt, and we will confirm receipt of your request to know or to delete within 10 days of its receipt. If we require more time (up to 90 days), we will inform you of the reason and extension period in writing. We will deliver our written response by mail or electronically. If provided electronically, we will select a format to provide your personal information that is in a portable and readily useable format. The response we provide will also explain the reasons we cannot comply with a request, if applicable.

We do not charge a fee to process or respond to your personal information request unless it is excessive, repetitive, or manifestly unfounded. If we determine that the request warrants a fee, we will tell you why we made that decision and provide you with a cost estimate before completing your request.

#### *Non-Discrimination*

Unless permitted or required by law, if you exercise any of your rights pursuant to California Civil Code 1798.100 *et seq*, the California Consumer Privacy Act (your “CCPA Rights”), 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; or
- Suggest that you may receive a different price or rate for goods or services, or a different level or quality of goods or services.

However, if you do exercise one or more of your CCPA Rights, we reserve the right to charge you a different price or rate from other consumers, or provide you a different level or quality of goods or services. At this time, we do not offer financial incentives for the continued collection, use, sharing and/or sale of your personal information.

## **RETENTION OF YOUR INFORMATION**

Brunswick retains all personal information for the duration of the relevant business relationship or, where required, in accordance with its information management policies and schedules. When deleting personal information based on a request, Brunswick will make reasonable attempts to ensure that all instances of the information are deleted in their entirety.

## **LINKS TO OTHER WEBSITES & SOCIAL NETWORK ACCOUNTS**

Our Sites may provide links to other websites for your convenience and information. These websites may operate independently from our Sites. Linked websites may have their own privacy notices or policies, which we strongly suggest you review if you visit any linked websites. To the extent any linked websites you visit are not part of this website, we are not responsible for their content, any use of the websites, or the privacy practices of any of those websites.

Some of our Sites allow you sign into and associate your social network accounts including, but not limited to, Twitter, LinkedIn, Facebook, YouTube, Instagram, and Pinterest with Brunswick.

By using this functionality you give Brunswick permission to access all of the elements of your social network profile information that you have made available to be shared and to use it in accordance with the social network’s terms of use and this Privacy Policy. Please refer to the privacy settings in your social network account for information about what data is shared with us and other connected applications and to manage the data that is shared through your account, including information about your activities using our sites.

If you would like to disconnect a social media account from Brunswick, refer to the settings of that social media account and its provider.

### **THIRD-PARTY ADVERTISEMENTS**

Third parties, including advertisers, will collect information, potentially including personal information, about your activities over time and across different websites when you use the Sites. Those third parties provide Brunswick with data collection, reporting, ad response measurement, and analytical information, and assist with delivery of relevant marketing messages and advertisements.

Collection of your personal information by third parties is not governed by this Privacy Policy. Please consult the privacy policies of those third parties to determine how they collect and use your personal information.

Many third-party advertisers and some web browsers and mobile devices allow you to opt out of third-party advertising. Information and resources to opt out of interest-based advertising are available from the Digital Advertising Alliance at <http://www.aboutads.info/choices/>. You may also opt out of tracking and receiving targeted advertisements on your mobile device by some mobile advertising companies and other similar entities by downloading the App Choices app at [www.aboutads.info/appchoices](http://www.aboutads.info/appchoices). Please note that opting out through these mechanisms does not opt you out of being served advertising. You will continue to receive generic ads while visiting the Sites and elsewhere online.

### **CHILDREN'S PRIVACY**

Our Sites are general audience Sites not directed at children under the age of 16. If we obtain actual knowledge that any information we collect has been provided by a child under the age of 16, we will promptly delete that information.

### **HOW TO CONTACT US**

If you have any questions or comments about this Privacy Policy, please contact:

Brunswick Corporation  
Attn: Law Department  
26125 N. Riverwoods Blvd., Suite 500  
Mettawa, IL 60045  
Phone: 855-283-1103 or 847-735-4002  
Email: [privacy@brunswick.com](mailto:privacy@brunswick.com)

If you would like to update your contact information or preferences, have your information removed from our mailing lists, or no longer receive marketing emails resulting from information collected via product registration cards or other sources, you may do so by:

- Adjusting the settings in an account you created through the Sites;
- Unsubscribing via the links contained in emails from us; or
- Completing an online request form by clicking [here](#).

### **UPDATES TO OUR PRIVACY POLICY**

This Privacy Policy may be updated periodically. We may modify this Privacy Policy at any time in our sole discretion. If we make material changes to this Privacy Policy that increase our rights to use personal information we have previously collected about you, we will obtain your consent either through an email to your registered email address or by prominent posting on our sites. If we intend to further process your personal data for a purpose other than that for which the personal data were collected, prior to that further processing, Brunswick shall provide you with information about that other purpose and with additional information necessary to ensure fair and transparent processing.