



# BRINK'S GLOBAL DATA PROTECTION POLICY

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## A. PURPOSE

As stated in the Brink's Code of Ethics, The Brink's Company, including its affiliates and subsidiaries, is committed to protecting the privacy and security of its customers, suppliers, employees, workers and other third parties.

This Policy sets forth key data protection principles governing the Processing of Personal Data\* by all Brink's Entities ("Principles").

This Policy is intended to promote within Brink's a data protection-focused culture and practices that are designed to protect the Personal Data Processed in the context of Brink's activities in accordance with applicable law.

\* Capitalized terms or acronyms used in this Policy have the meanings set out in the "Terms/Roles and Definitions" page.



## B. SCOPE

This Policy applies to all lines of Brink's business and Brink's Entities in accordance with their respective decision-making rules. It covers all Personal Data Processed by Brink's, regardless of the media in which the data is maintained, and may relate to prospective, past or present employees, workers, customers, clients or supplier contacts, shareholders, website users or any other individuals.

This Policy is meant to apply globally but does not override any applicable data protection laws or regulations in countries where Brink's operates. Certain countries may have data protection laws and regulations that impose additional obligations or guiding principles beyond those set out in this Policy. To comply with these additional or varying requirements, Brink's may develop localized variances to this Policy ("Sub-Policies"), such as the European Data Protection Policy for implementation of the Policy in the European Economic Area and the United Kingdom.

These Sub-Policies may be displayed on the relevant Brink's local intranet or made available upon request to the local DPO, Legal or Human Resources Representative. These Sub-Policies are intended to supplement the Policy. In case of conflict between this Policy and any such Sub-Policy, the latter shall govern for Brink's operations or Processing activities in the region covered by the Sub-Policy.

## C. COMPLIANCE

All Brink's Personnel must read, understand, and comply with this Policy when Processing Personal Data on Brink's behalf. Compliance with this Policy and all Implementing Documentation is mandatory. Any breach of this Policy may result in disciplinary action for the individuals in accordance with applicable law and in substantial financial penalties for Brink's.



## D. TERMS/ROLES & DEFINITIONS

**Brink's Entity:** The Brink's Company or any of its subsidiaries.

**Brink's Personnel:** all Brink's employees, contractors, directors and members.

**Data Protection Officer (DPO):** the person or team with responsibility for monitoring Brink's data protection compliance and formally appointed as such.

**Data Subject:** an identified or identifiable individual about whom we Process Personal Data. Data Subjects may be nationals or residents of any country and may have legal rights regarding their Personal Data.

**Implementing Documentation:** Brink's policies, operating procedures, processes or guidelines related to this Policy and designed to protect Personal Data.

**Personal Data:** any information (1) relating to an identified or identifiable individual or (2) that identifies, relates to, describes, is reasonably capable of being associated with, or could reasonably be linked, directly or indirectly, with a particular individual or household. This includes information relating to an individual that we can identify (directly or indirectly) from that data alone or in combination with other identifiers we possess or can reasonably access, in particular identifiers such as a name, an identification number, location data, an online identifier or one or more factors specific to the physical, physiological, genetic, mental, economic, cultural or social identity of that Data Subject. Personal Data excludes anonymous data or data from which the identity of an individual has been permanently removed.

**Personal Data Breach:** any actual or reasonably suspected unauthorized or accidental access to or loss, use, alteration, destruction, acquisition, or disclosure of, Personal Data transmitted, stored or otherwise Processed by Brink's or its service providers.

**Privacy Notices (also referred to as Fair Processing Notices) or Privacy Policies:** separate notices setting out information that may be provided to Data Subjects when Brink's collects Personal Data about them.

**Processing or Process:** any operation or set of operations which is performed on Personal Data or on sets of Personal Data, whether or not by automated means, such as collection, recording, organization, structuring, storage, adaptation or alteration, retrieval, consultation, use, disclosure by transmission or transfer to third parties, dissemination or otherwise making available, alignment or combination, restriction, erasure or destruction.

**Pseudonymization or Pseudonymized:** replacing information that directly or indirectly identifies an individual with one or more artificial identifiers or pseudonyms so that the person, to whom the data relates, cannot be identified without the use of additional information which is meant to be kept separately and secure.

**Transfer:** any operation or set of operations which support the communication, copy or movement of Personal Data by using a network or any other medium, to the extent that such Personal Data is intended to be Processed by the third party who receives it. Remote access to Personal Data is an example of a Transfer.

## E. DATA PROTECTION OFFICER

Where applicable, Brink's has designated a Data Protection Officer (DPO).

Please contact Brink's DPO or Brink's Legal Department with any questions about this Policy or with any concerns that this Policy is not being or has not been followed. In particular, contact the DPO or the Brink's Legal Department in the following circumstances as appropriate:

- If you are unsure as to whether Personal Data is Processed lawfully under applicable law;
- if you need assistance obtaining Data Subjects' consent to Process the Personal Data lawfully under applicable law;
- If you need to draft a Privacy Notice;
- If you are unsure about how long to keep Personal Data;
- If you are unsure about what security or other measures you need to implement to protect Personal Data;
- If there has been a Personal Data Breach;
- If you are unsure on what basis to use for a Transfer of Personal Data to a country outside the one in which the Personal Data was collected;
- If you need any assistance dealing with any rights invoked by a Data Subject;
- Whenever you are engaging in a new, or change in an existing, Processing activity which is likely to significantly affect individuals, or you are planning to use Personal Data for purposes other than that for which it was collected;
- If you need help complying with applicable privacy laws when carrying out direct marketing activities; or
- If you need help with contracts or other areas in relation to sharing Personal Data with third parties.



## F. DATA PROTECTION PRINCIPLES

The Brink's Company expects all Brink's Entities to comply with applicable data protection and privacy laws when Processing Personal Data in the context of their activities.

More generally, Brink's recognizes and adheres to the Personal Data Protection Principles set out below. These Principles reflect the privacy standards contained in internationally accepted instruments and in the laws of many countries in which Brink's conducts business activities. These Principles shall apply to all Processing of Personal Data by Brink's Entities and their Personnel.

### F.1. LAWFULNESS, FAIRNESS, AND TRANSPARENCY

Personal Data shall be collected and Processed lawfully and in a fair and transparent manner.

Personal Data shall not be collected or obtained by deception or without the Data Subjects' knowledge. Subject to applicable law, Brink's will provide Data Subjects with information regarding the Processing of their Personal Data that is easily accessible to them, concise, transparent, intelligible, and written in clear and plain language so that Data Subjects can easily understand it. Such information shall be provided through appropriate Privacy Notices and include (where applicable) information about (1) the identity of the Brink's Entity Processing their Personal Data or responsible for such Processing, (2) why Brink's will use their Personal Data, (3) information about the Data Subjects' data protection right(s); and (4) any additional information that will help ensure fair and transparent Processing in accordance with applicable law.



## F.2.

### PURPOSE LIMITATION

Personal Data shall be collected for one or more specified, explicit and legitimate purpose(s) and not further Processed in any manner that is incompatible with the original purpose(s) for which it was collected. Personal Data cannot be used for new, different or incompatible purposes from that disclosed when it was first obtained unless Data Subjects are informed of the new purposes and they have consented to the Processing of their Personal Data for such purposes, where necessary.

## F.3.

### DATA MINIMIZATION

Personal Data shall be adequate, relevant and limited to what is necessary in relation to the purposes for which it is Processed.

Brink's Personnel may only Process Personal Data when performing their job duties requires it, and shall ensure that, in amount and type, any Personal Data collected is necessary for and proportionate to the intended purposes.

## F.4.

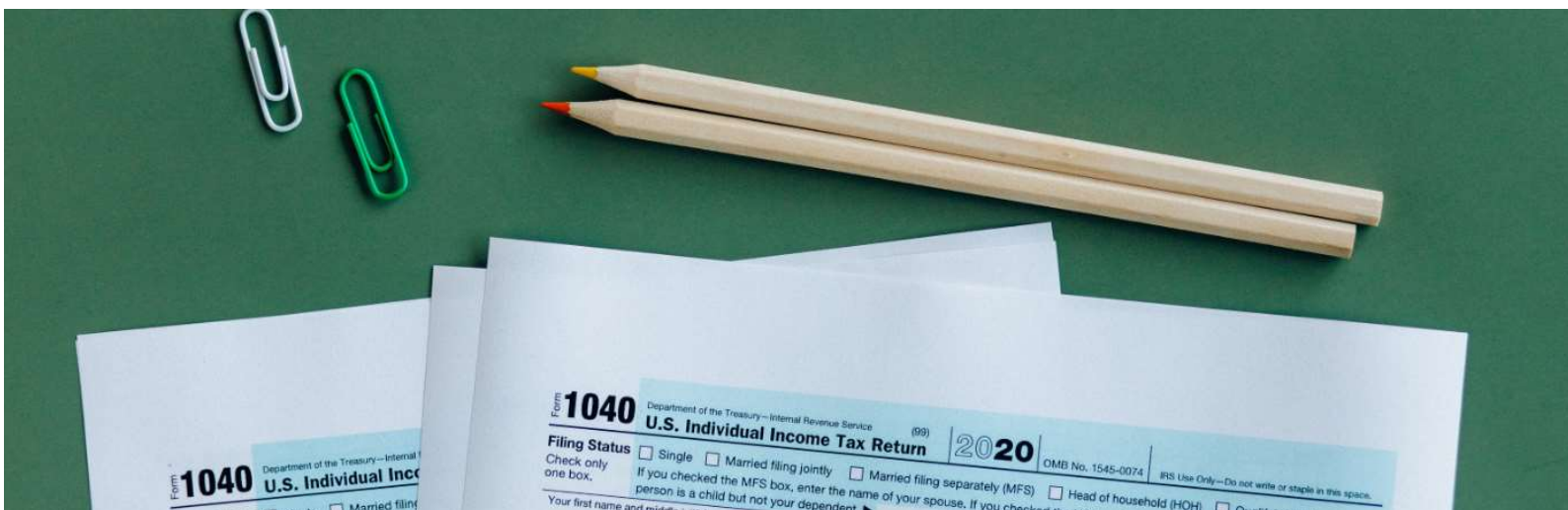
### ACCURACY

Personal Data shall be recorded as accurately as possible and, where necessary, updated to ensure it fulfills the legitimate purpose(s) for which it is Processed.

## F.5.

### STORAGE LIMITATION

Personal Data shall not be kept in a form which permits identification of Data Subjects for longer than needed for the purposes for which it was originally collected or for compatible further Processing in accordance with applicable law.





## F.6.

### PROTECTING PERSONAL DATA

Personal Data shall be safeguarded by appropriate technical and organizational safeguards designed to protect against Personal Data Breaches.

Brink's maintains safeguards appropriate to our size, scope and business, our available resources, the amount and sensitivity of Personal Data that we Process on our own behalf or on behalf of others, and the identified risks to our systems and data.

This includes without limitation the use of encryption and Pseudonymization where applicable. Brink's Information Security and Compliance team will regularly evaluate and test the effectiveness of those safeguards to help ensure security of Personal Data. Brink's Personnel are responsible for protecting the Personal Data held by Brink's and must ensure compliance with such safeguards.

As part of the safeguards implemented by Brink's, access to Personal Data shall be limited to those who need to access it to perform their job duties. Brink's Personnel may only share Personal Data held by Brink's with another employee, agent or representative of Brink's Entities if (1) the recipient has a job-related need to know the information, and (2) sharing the Personal Data complies with this Policy.

Personal Data we hold may be shared with third parties, such as our service providers, if:

- they have a need to know the information for the purposes of providing the contracted services;
- sharing the Personal Data complies with this Policy and the Privacy Notice provided to the Data Subject and, if required by applicable law, the Data Subject has consented to the sharing of his or her Personal Data;
- when acting on our behalf, the third party has agreed to Process Personal Data only for the purposes defined and agreed by Brink's, and in accordance with Brink's instructions; and
- the third party has agreed to comply with the required data security standards, policies and procedures and put adequate security measures in place.





## F.7.

### TRANSFER LIMITATION

As Brink's operates internationally, Personal Data may be Transferred to another person or organization in a country other than that in which it was collected.

Any cross-border Transfers of Personal Data shall take place in compliance with applicable law and this Policy. Where necessary, Brink's will take reasonable steps to ensure that the recipient will provide an adequate level of data protection as required by applicable law.

## F.8.

### REPORTING A PERSONAL DATA BREACH

Brink's has put in place procedures to address Personal Data Breaches and will notify Data Subjects and/or applicable regulators where legally required or otherwise appropriate.

If you know or suspect that a Personal Data Breach has occurred, do not attempt to investigate the matter yourself. Immediately contact Information Security at:

[ITSecurityTeam@brinksinc.com](mailto:ITSecurityTeam@brinksinc.com)

All evidence relating to the Personal Data Breach must be preserved.

## F.9. DATA SUBJECT'S RIGHTS AND REQUESTS

Data Subjects may have certain rights or choices regarding how Brink's handles their Personal Data.

This may include the right to request and, if applicable, obtain (1) access to their Personal Data, and (2) rectification or erasure of their Personal Data, or the right to object to the use of their Personal Data for certain purposes (such as direct marketing).

Brink's has processes in place to address Data Subjects' rights requests available to them under applicable law, while ensuring the protection of Personal Data. Brink's shall verify the identity of an individual requesting access to their Personal Data or for action to be taken on their Personal Data. Where the request is made by a third party (other than the Data Subject), Brink's Personnel shall not disclose Personal Data to such third party without verifying that the third party is authorized to act on behalf of the Data Subject.

Any employee/job applicant Data Subject requests shall be forwarded to the local HR Representative / Department Head immediately upon receipt. Any customer Data Subject requests shall be forwarded to the local Business Representative / Customer Support immediately upon receipt.

The HR and Business Representatives will promptly inform the DPO (or designee) of any Data Subject requests and of the action undertaken to handle it.



## G. ACCOUNTABILITY

Each Brink's Entity is responsible for implementing this Policy within its area of activity in accordance with applicable law. To this end, Brink's Entities will maintain appropriate technical and organizational measures in an effective manner to ensure compliance with the Principles set forth in this Policy, including measures to restrict and monitor access to Personal Data, regularly train Brink's Personnel in this Policy, Implementing Documentation and any other applicable privacy or security measures, and establish data protection practices as may be practical and/or required under the circumstances.

Brink's will regularly test the privacy measures implemented to ensure proper use and protection of Personal Data.

## H. ANNUAL REVIEW

Brink's reserves the right to change this Policy at any time. Brink's Global DPO will monitor and periodically assess this Policy to ensure it complies with applicable law. Notwithstanding the foregoing, this Policy will be formally reviewed and updated as appropriate at least once annually by Brink's Global DPO. In the event the Policy requires changes due to regulatory or other requirements, then the Policy will be promptly amended to reflect such changes.

