

# **Privacy Policy**

*Last Modified: June 4, 2018*

## **Overview**

This Privacy Policy describes how Bravo Group, Inc. (“Bravo”, “we”, “our”, or “us”) collects, uses, and shares personal information of our clients and users of this website, <https://bravogroup.us/> (the “Site”). We periodically update this Privacy Policy and reserve the right to change the provisions of this Policy or our privacy practices at any time. If you are a Bravo client, then you will receive notice when this Privacy Policy is modified. If not, then we encourage you to review this site periodically and we will alert you that changes have been made by updating the Effective Date of the Policy. Your use of the Site or Bravo’s services constitutes consent to any changes in this Policy as in effect on the date of such use.

## **Personal Information Defined**

Personal information means information that specifically identifies an individual person, such as name, mailing address, email address, phone number, or account number. It may also include other information about you, such as gender, date of birth, or other demographic information, or about your use of the Site, such as IP address or cookies, if that other information is linked to your personal information.

## **Your Rights to Access Your Personal Information**

You have the right to access personal information about you that Bravo has collected through this Site by sending a request for access to [info@thebravogroup.com](mailto:info@thebravogroup.com). You can also request that we correct or delete any such information by sending an email to the same address. To verify that the request is authentic, we may require that such request be sent from the email address associated with your personal information. While we will comply reasonably and promptly with your request, we may need to retain some of your information for our own recordkeeping or to fulfill a legal obligation. If you no longer desire our services, please contact us directly.

## **How Bravo Collects Your Personal Information**

Bravo collects personal information that you provide to us. For example:

- If you become our client, we may require you to provide your name, email address, phone number, and other information.
- If you apply for a job with Bravo, we may ask you to provide more detailed and sensitive personal information required for compliance with our hiring and equal opportunity policies and practices.
- Our website includes social media features, such as links to our Facebook, Google Plus, Instagram, LinkedIn, Twitter, YouTube, and Pinterest pages. Your interactions with these features are governed by the privacy policy of the company providing it.
- If you subscribe to one of our email newsletters, such as The Stream or Frontpage.

- If you provide information to us at a networking or industry event where Bravo employees are attending, exhibiting or sponsoring.

We also collect some of your information automatically when you visit this Site. For example, this Site collects your IP address and other online identifiers, and records the pages that you visit and other information about your activity on the Site.

Like many other websites, we ask you to allow us to use “cookies” to remember information about you and improve your browsing experience on our Site. If you reject cookies, you may still use our Site, but your ability to use some features or areas of our Site may be limited. We may also work with third-party providers who may use cookies on our Site. You can block cookies by activating the setting on your browser that allows you to refuse the setting of all or some cookies. For more information about cookies, including how to set your internet browser to reject cookies, please go to [www.allaboutcookies.org](http://www.allaboutcookies.org) or <http://www.networkadvertising.org>.

We also may be provided with your information by another business or organization that has collected it from you, such as our clients. Their collection of your information is governed by their own privacy policies.

### **How Bravo Uses Personal Information**

Bravo may use your personal information to:

- provide products and services;
- send requested product or service information;
- send marketing communications;
- send you emails or otherwise respond to questions, concerns, and customer support inquiries;
- send you surveys to gather feedback to improve our products and services;
- create demographic profiles of our clients and visitors to target our email alerts and website marketing; or
- to improve the services we offer you or the functionality of our Site.

Bravo does not sell personal information to third parties and does not transfer or share customers’ personal information between its clients. Bravo will share your personal information only:

- with your consent;
- to fulfill a legal obligation, including:
  - in response to lawful requests or legal process, including in response to law enforcement requirements; or
  - as part of a business transaction, sale or transfer, or bankruptcy proceeding;
- for protection of personal or public safety or to prevent illegal activities;
- to protect our own rights including enforcing our own policies, contracts, and terms of use.

Bravo may also use anonymous or pseudonymous personal information for internal purposes, such as to track the effectiveness of and improve its products, processes, or services. Bravo may also share anonymous or pseudonymous data with selected third parties.

### **How Bravo Protects Personal Information**

Bravo follows generally accepted standards to protect personal information and information submitted by our clients, both during transmission and once we receive it. Bravo maintains all client data in secure third-party data centers (*e.g., Google, Amazon, etc.*) and uses encryption to send, retrieve, and store this data. These measures are designed to protect visitor and client information from loss, misuse, or unauthorized alteration. Bravo employs various information security mechanisms and internal policies and procedures to protect information from disclosure to unauthorized third parties. Bravo routinely audits its practices and policies to meet industry standards for data protection.

Personal information provided to Bravo by its clients remains the property of its clients.

### **Data transfers from EU to US: Privacy Shield Requirements**

Bravo has applied for certification to transfer personal data from the EU to the US under the UE-US Privacy Shield framework. In this regard, Bravo has adopted a Privacy Shield Policy, which is available here: <http://bravogroup.us/wp-content/uploads/2018/05/Bravo-Privacy-Shield-Policy-A6346087-2-1.pdf>.

### **Contact Information**

To report any issues or concerns, or to contact Bravo with any questions regarding this Privacy Policy:

- Email us at [info@thebravogroup.com](mailto:info@thebravogroup.com);
- Call (888) 224-9955;
- Fax (717) 214-2205 or
- Send mail to 20 N Market Square, Suite 800, Harrisburg, PA 17101.