

# Privacy Policy

Zurn Elkay Water Solutions Corporation, 511 W Freshwater Way, Milwaukee, WI 53204, USA; email: [dataprivacy@zurn.com](mailto:dataprivacy@zurn.com) (“Zurn” or “Company”) and each of its affiliates and subsidiaries (collectively the “Zurn Group”) take data privacy seriously. This Zurn Data Privacy Policy (“Privacy Policy”) informs our business partners (including customers, vendors and suppliers), job applicants and website users how we as controllers / responsible entities for data processing collect and process personal data and provides other information to our data subjects.

## Definitions:

As this Privacy Policy shall cover the transparency and information obligations stemming from various national and state data protection laws as applicable to the Zurn Group, the terms and terminology used within this Privacy Policy shall be interpreted in light of the respective terminology used and defined by the applicable data protection law. For example:

Personal data	shall refer to (i) any information relating to a data subject to the extent the GDPR applies, and (ii) any personal information as defined in the CCPA to the extent the CCPA applies, and (iii) to any similarly defined data or information as specified in other applicable data protection laws to the extent other data protection laws apply.
Data subject	shall refer to (i) any identified or identifiable natural person to the extent the GDPR applies, and (ii) to any natural person who is a California resident, however identified, including by any unique identifier to the extent the CCPA applies (consumer), and (iii) to a similarly defined natural or legal person as specified in other applicable data protection laws to the extent other data protection laws apply.
Controller	shall refer to (i) any natural or legal person, public authority, agency or other body which, alone or jointly with others, determines the purposes and means of the processing of personal data to the extent the GDPR applies, and (ii) to any for-profit entity doing business in California and falling under the term ‘business’ as defined in the CCPA to the extent the CCPA applies, and (iii) to a similarly defined natural or legal person as specified in other applicable data protection laws to the extent other data protection laws apply.

Processor	shall refer to (i) a natural or legal person, public authority, agency or other body which processes personal data on behalf of a controller to the extent the GDPR applies, and (ii) a service provider as defined in the CCPA to the extent the CCPA applies, and (iii) to a similarly defined natural or legal person as specified in other applicable data protection laws to the extent other data protection laws apply.
GDPR	shall refer to the EU General Data Protection Regulation as amended from time to time
CCPA	shall refer to the California Consumer Privacy Act of 2018 as amended from time to time

## 1. Controller: *Who is the Controller for your Personal Data*

The responsible controller within the Zurn Group will depend on the processing activities that apply to you. For example,

- if you are a website user and visit a webpage of the Zurn Group (“Zurn Website”), the Controller is the affiliate of the Zurn Group identified on the webpage.
- If you are a customer, vendor, supplier or business partner and you interact with an affiliate of the Zurn Group for business reasons, the Controller is the affiliate of the Zurn Group with whom you interact.
- if you are a job applicant and you submitted your application, the affiliate of the Zurn Group who offers the job to which you apply is the Controller.

In the following, the term “Controller”, “we”, “us” or “our” refers to the affiliate of the Zurn Group that acts as the controller for the particular processing activities as explained above.

If you have any questions as to who the Controller of your personal data is, please contact us via the contact details set out in section 7.

## 2. Categories of Personal Data and Processing Purposes and Sources of Personal Data: *What personal data do we process about you, why and from where?*

Depending on whether you are a customer, vendor, supplier, business partner, job applicant and/or website user the Controller may process the following categories of personal data for the identified processing purposes:

### 2.1 Website Metadata

As a website user, you may use our Zurn Websites without actively providing any personal data. In this case, we will collect only the following metadata resulting from your usage of our Zurn Websites: browser type and version, operating system and interface, website from which you are visiting (referrer URL), webpage(s) you visit on our Zurn Websites and activity on those Zurn Websites, date and time

of Zurn Websites' access, device identifier or MAC address and internet protocol (IP) address. This personal data includes Internet or other Electronic Network Activity Information under the CCPA. Further personal data may be collected through cookies, see section 6 below.

The metadata will be used to enable your access to our Zurn Websites. to improve our services as well as the quality of our Zurn Websites. We will analyze user behavior in anonymized form to prevent fraud and misuse of our IT systems, as well as to ensure physical, IT, and network security.

Our website is not intended for use by those under the age of 16 and we do not knowingly collect, use, process or otherwise disclose information about children under the age of 16.

## **2.2 Contact details**

If you contact us through a portal on a Zurn Website, you will be asked to provide the following personal data: name, company, title, address, email address, telephone number, and fax number. We process such personal data to answer your queries or information requests. This personal data includes Identifiers under the CCPA.

## **2.3 Newsletter and product catalogues**

If you request our newsletter or product catalogues, we collect and process the following personal data: name, title, company name, email address, postal address (if requesting postal mails), and your voluntary request to receive marketing emails or postal mails. This personal data includes Identifiers under the CCPA. We process such personal data to provide you with the requested emails or postal mails, as well as to analyze your interests for marketing purposes, to distribute additional marketing materials and to analyze the success of our marketing activities, customer segmentation and customer profiling, lead generation to the extent permitted by applicable law.

## **2.4 Portal users**

If you request access to an online portal we operate, in addition to the information described in Section 2.1 of this policy, we collect and process the following personal data: name, title, company name, email address, portal access username, portal access password and your voluntary request to receive access to such portal. This personal data includes Identifiers under the CCPA. We process such personal data to facilitate your access to the portal, to protect the security of our systems and infrastructure, to meet regulatory and legal obligations, to establish or defend legal claims, and to meet contractual obligations. We may also use such information to analyze your interests for marketing purposes, to distribute additional marketing materials and to analyze the success of our marketing activities, customer segmentation, customer profiling, lead generation, to the extent permitted by applicable law.

## **2.5 plumbSMART™ and inSpec users**

To the extent provided to us, we collect and process the following personal data of plumbSMART™ and inSpec users: name, email address, company postal address. This personal data includes Identifiers under the CCPA. We process this information to facilitate the connected device operation and meet our contractual obligations.



## 2.6 Business Partners

To the extent provided to us, we collect and process the following personal data of current and potential business partner contacts: name, title, function, company name, company email address, company postal address, and any voluntary requests for communications from us. This personal data includes Identifiers under the CCPA. We process this information to facilitate business partner engagements, to protect the security of our systems and infrastructure, to meet regulatory and legal obligations, to establish and defend legal claims, and to meet contractual obligations.

## 2.7 Visitors to Our Premises

To the extent provided to us, we collect and process the following personal data of visitors to our premises: name, title, company name, function, company email address, company postal address, identity of visitor's Zurn contact, date and duration of visit, vehicle information, and information necessary to facilitate in-person visits in accordance with government and/or health regulator direction or advice, including, with visitor consent where necessary, temperature and only in accordance with applicable law. This personal data includes Identifiers and Health Information under the CCPA. Our premises may also be subject to CCTV, biometric or other security solutions that may capture images and/or audio of visitors, in accordance with applicable law. We process this information to facilitate such in-person visits, to protect our company, employees and visitors, to meet regulatory and legal obligations, to establish and defend legal claims, and to meet contractual obligations.

## 2.8 Job Applicants

If you apply for a position with us, in addition to the information described in Section 2.1 above (to the extent applicable), we collect and process the following categories of personal data from or about job applicants:

- **Identifiers**, including full name, contact information (e.g., personal and/or business address, personal and/or business phone/fax numbers, email addresses), user name and password (if using an applicant portal), citizenship / residency information, age (to the extent necessary); marital status, religious belief (if voluntarily provided by you)
- **Certain categories of sensitive information and data (to the extent permitted by applicable law)**, including facial photographs (if voluntarily provided by you), Characteristics of Protected Classifications (as defined under the CCPA), including gender, ethnicity, nationality, disability information, and military and veteran status (each only to the extent voluntarily provided by you with your express consent);
- **Professional or employment-related information**, including languages spoken and skills, software experience, professional memberships, summaries of strengths and technical areas of expertise, pre-Company work history information (e.g., previous employers and positions held, dates, locations, supervisors, responsibilities, salary), resume and cover letter information, references and information obtained from them, and related background check (to the extent permitted, and in accordance with applicable law);
- **Education information**, including education, and certificates and degrees obtained; and
- **Other information**, including any other information reasonably necessary for us to carry out our legal or regulatory obligations.

We use such personal data to facilitate the collection, administration and processing of your application, to determine your suitability for the role for which you have applied or for similar roles within our company, to conduct background checks (in accordance with applicable law) as part of your application, and to complying with applicable laws, company policies and employment-related requirements. Where required by law, we will provide an additional job applicant notice.



### 3. Categories of Recipients and International Transfers: *Who do we transfer your personal data to and where are they located?*

In the preceding twelve (12) months, we have transferred and disclosed, and we further may transfer, your personal data to third parties for the processing purposes described above as follows. The personal data transferred may include Identifiers, Internet or other Electronic Network Activity Information, Health Information, Characteristics of Protected Classifications, Education Information and Professional and Employment-related Information and Sensitive Information:

- **Within the Zurn Group:** Affiliates within the Zurn Group may receive your personal data as necessary for the processing purposes described above. Depending on the categories of personal data and the purposes for which the personal data has been collected, different internal departments within the Zurn Group may receive your personal data. For example, our IT department may have access to your account data. Moreover, other departments within the Zurn Group have access to certain personal data about you on a need-to-know basis, such as the legal department, the finance department, or internal auditing. Depending on their processing activities, such affiliates may act as processors or as controllers.

The affiliates of the Zurn Group processing data are identified in Annex 1.

- **To service providers / processors:** Certain service providers (for a business purpose), whether affiliated or unaffiliated, may receive your personal data to process such data under appropriate instructions as necessary for the processing purposes described above as processors. Such service providers may include website service providers, marketing service providers, IT support service providers, cloud service providers, distributors, vendors and other service providers who support us in carrying out our business activities and maintaining our commercial relationship with you. Such service providers will act on our behalf and will be subject to contractual obligations to implement appropriate technical and organizational security measures to safeguard your personal data and to process your personal data only as instructed.

You can ask for further details of currently engaged service providers by contacting us as set out in Section 7 below.

- **Other recipients:** In compliance with applicable data protection law, we may transfer personal data to local or foreign law enforcement agencies, governmental authorities, judicial authorities, legal counsel, external consultants, or business partners. In case of a corporate merger or acquisition, personal data may be transferred to the third parties involved in the merger or acquisition.

Any access to your personal data is restricted to individuals with a need-to-know and only if required to fulfill their job responsibilities.

- **Sales.** We do not provide your personal information to others in exchange for money.



#### 4. Retention Period: *How long do we keep your personal data?*

Your personal data will be retained as long as necessary to provide you with the services and products requested. Your metadata will be deleted 26 months after your visit to the Zurn Website. Your newsletter registration data will be deleted after you inform us that you no longer want to receive marketing information from us. Your job applicant data will be deleted within the local statutory retention periods. If you are a customer or vendor contact, your data will be kept as long as we consider your company a customer of our products. In case of a deletion request, we may be required to delete all or certain of your personal data sooner.

If we are required by applicable law to retain your personal data, we will not delete them. We may also retain your personal data if we need your personal data to establish, exercise, or defend a legal claim, only on a need-to-know basis. To the extent possible and commercially and technically practicable, we will restrict the processing of your personal data for such limited purposes after the termination of the contractual relationship.

#### 5. Your Rights: *What rights do you have and how can you assert your rights?*

**Right to withdraw your consent:** If you have declared your consent regarding certain collecting, processing, and use of your personal data (in particular, regarding the receipt of direct marketing communication via email, SMS/WhatsApp, and telephone), you can withdraw this consent at any time. Such a withdrawal will not affect the lawfulness of the processing prior to the consent withdrawal. You can withdraw your consent as follows: send an email request to [dataprivacy@zurn.com](mailto:dataprivacy@zurn.com). Further, you can object to the use of your personal data for the purposes of marketing without incurring any costs other than the transmission costs in accordance with basic tariffs.

**Additional data privacy rights:** Pursuant to applicable data protection law, you may have the right to: (i) request access to your personal data; (ii) request rectification of your personal data; (iii) request erasure of your personal data; (iv) request restriction of processing of your personal data; (v) request data portability; and/or (vi) object to the processing of your personal data (including objection to direct marketing and profiling). Please note that these aforementioned rights might be limited under the applicable local data protection law.

**Further information on data privacy rights under CCPA:** Subject to certain exceptions and qualifications, as a California resident, you have the right to: (i) request access to your personal information; and (ii) request deletion of your personal information. Should you wish to request the exercise of your rights as detailed above with regard to your personal information, we will not discriminate against you by offering you different pricing or products, or by providing you with a different level or quality of products, based solely upon this request. Only you, or a person registered with the California Secretary of State that you authorize to act on your behalf may submit these requests.

**Contact details to exercise your data privacy rights:** To exercise your rights, please contact us as stated under Section 7 below.





## 6. Cookies and other tracking technologies

When you visit our Zurn Website, we will use cookies to ensure you get the best website experience. These cookies might process and store information about you, your preferences, or your device. There are several types of cookies that we use, as described below.

### Necessary Cookies

These cookies are necessary for the Zurn Website to function and cannot be switched off in our systems. They are usually only set in response to actions made by you in a request for services, such as setting your privacy preferences, logging in, or filling in forms.

You can set your browser to block or alert you about these cookies, but if you do, some parts of the Zurn Website will not work.

### Performance Cookies

These cookies allow us to count visits and traffic sources so we can measure and improve the performance of our Zurn Website. They help us to know which pages are the most and least popular and see how visitors move around the site.

### Functional Cookies

These cookies enable our Zurn Website to provide enhanced functionality and personalization. They may be set by us or by third party providers whose services we have added to our Zurn Websites.

### Targeting Cookies

These cookies may be set through our Zurn Websites by our advertising partners. They may be used by those advertising partners to build a profile of your interests and show you relevant advertisements on other sites. They can uniquely identify your browser and internet device.

## 7. Questions and Contact Information

If you have any questions about this Privacy Policy, please contact us at *Zurn Water Solutions Corporation, 511 W Freshwater Way, Milwaukee, WI 53204, USA*. If you want to exercise your rights as stated above in Section 5, please contact us at the above postal address or email [dataprivacy@zurn.com](mailto:dataprivacy@zurn.com).

If you want to exercise your rights under CCPA you may also contact us at the toll-free number 877-888-4807.

## 8. Changes to this Privacy Policy

We may update this Privacy Policy from time to time in response to changing legal, regulatory, or operational requirements. We will notify you of any such changes, including when they will take effect, by updating the Effective Date at the top of this page or as otherwise required by applicable law.

## Annex I

### Zurn Group Companies

Filiamat Composites Inc.	800 Rangeview Road, Mississauga, ON L5E 1G9, Canada
Hadrian Solutions ULC	965 Syscon Road, Burlington, ON L7L 5S3, Canada
Zurn Industries Limited	7900 Goreway Drive, #10, Brampton, Ontario L6T 5W6, Canada
Zurn India Private Limited	Manjeera Trinity Corporate, Survey 1050, Unit 1050, 11th Floor, Kukatpally, Hitec City Road, Hyderabad - 500072
Zurn Water Solutions FZE	P.O.Box 363900, Off - FZS1A F04/05- Jebel Ali Free Zone, South Dubai, U.A.E.
Hadrian Inc.	7420 Clover Ave, Mentor OH 44060, USA
InsureRXN, Inc.	c/o Willis Towers Watson Management, 100 Bank Street, Suite 500, Burlington, VT 05401, USA
Just Manufacturing LLC	511 W. Freshwater Way, Milwaukee, WI 53204, USA
ZEBS Global,. Inc.	511 W. Freshwater Way, Milwaukee, WI 53204, USA
Zurn Water Solutions Corporation	511 W. Freshwater Way, Milwaukee, WI 53204, USA
Zurn LLC	511 W. Freshwater Way, Milwaukee, WI 53204, USA
World Dryer Corporation	340 County Line Road, Bensenville, IL 60106, USA
Zurn Industries LLC	511 W. Freshwater Way, Milwaukee, WI 53204, USA
Zurn International, Inc.	511 W. Freshwater Way, Milwaukee, WI 53204, USA
Zurn PEX, Inc.	511 W. Freshwater Way, Milwaukee, WI 53204, USA
Elkay Manufacturing Company	1333 Butterfield Road, Suite 200, Downers Grove, IL 60515
Elkay Sales, Inc.	1333 Butterfield Road, Suite 200, Downers Grove, IL 60515
Elkay Plumbing Products Company	1333 Butterfield Road, Suite 200, Downers Grove, IL 60515
ByElkay.com Sales, Inc.	1333 Butterfield Road, Suite 200, Downers Grove, IL 60515
Elkay Mexico, Ltd.	1333 Butterfield Road, Suite 200, Downers Grove, IL 60515
Elkay Smartwell, LLC	1333 Butterfield Road, Suite 200, Downers Grove, IL 60515