

Carlisle Companies Inc	Revision Date: 2024-04-15
Privacy Notice	Effective Date: 2018-05-25

1. Purpose

On behalf of all of its wholly-owned subsidiaries Carlisle Companies Incorporated (collectively, "Carlisle" or "we" or "us" or "our") provides this *Privacy Notice* to explain our practices regarding the processing of certain individually identifiable information about visitors of this website and contact persons of our corporate customers and suppliers ("Personal Data"). As such, this *Privacy Notice* applies to Personal Data that we collect via our websites, as well as through trade shows and other offline means (e.g., submitted forms or orders, information needed to determine eligibility), where applicable. If you are a California resident, please click here to review the privacy notice applicable to you.

2. Summary of Information Practices

2. Summary of Inform	ation Practices
Collection	As a business-to-business ("B2B") organization, we collect your Personal Data to carry out our commercial relationships.
Use	We use your Personal Data to perform transactions, respond to requests, manage accounts, maintain business operations, operate and optimize our website, improve our products or services, provide relevant marketing, and fulfill other business and compliance obligations.
Sharing	We share your Personal Data, as necessary, to perform transactions, respond to requests, manage accounts, maintain business operations, operate and optimize our website, improve our products or services, provide relevant marketing, and fulfill other business and compliance obligations.
Marketing Choices	You have control over how we use your Personal Data for direct marketing (and other limited) purposes.
Cookies	We use and allow certain third parties to use cookies on our website, and provide choices on the use of such cookies, including third-party targeting and advertising. You can choose for us not to share your Personal Data with other sites by rejecting advertising cookies in your cookie settings.
Data Subject Rights	With respect to your Personal Data, in some jurisdictions, you may be entitled to request access, rectification, erasure, restriction of processing, or portability, where required by applicable law.
Data Security	We maintain technical and organizational measures to protect Personal Data from loss and unauthorized access, use, destruction, modification, or disclosure.
Cross-Border Data Transfers	We provide appropriate protections for cross-border transfers of Personal Data, where required by applicable law.
Other Information	We provide other information via this <i>Privacy Notice</i> regarding the legal basis for collecting and processing Personal Data, the



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	consequences of not providing Personal Data, automated decision-making, do not track ("DNT") signals, data retention, third-party websites, employee and contractor privacy issues, and changes to this <i>Privacy Notice</i> .
Contact Us	Please contact us as detailed below with any questions or comments regarding this <i>Privacy Notice</i> .

3. Collection of Personal Data

We collect the following categories of Personal Data:

- 3.1. **Basic information:** Name and contact information (e.g., mailing address, email address, telephone number), date of birth, gender, job title and responsibilities, company, trade union or associated membership information, and any other Personal Data that you submit to us during the course of business.
- 3.2. **Registration information:** Data required to fulfill requests to receive newsletters, download or subscribe to content, register for conferences, and create website accounts and passwords.
- 3.3. **Marketing information:** Data gathered from individual participation in trade shows, seminars, and conferences, as well as credentials, product or service interests, and preferences.
- 3.4. Compliance information: Government identifiers and eligibility data.
- 3.5. **Transaction information:** Billing and account information.
- 3.6. **Job applicant information**: Data provided by job applicants via our website or offline means in connection with employment opportunities.
- 3.7. **Device information:** Internet Protocol (IP) address, unique device identifier (UDID), location, information collected through cookies and similar technologies, and data about usage of our website. Note, however, that we do not consider device information to be Personal Data except where we can link it to you as an individual, or where applicable law provides otherwise.

4. Use of Personal Data

We collect your Personal Data for the following purposes:

Processing Purposes	Category(ies) of Personal Data
Performing transactions and responding	Basic information
to your requests, including providing	 Registration information



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customer service and addressing customer satisfaction issues	Transaction informationDevice information
Managing customer and supplier accounts and relationships, and maintaining our business operations	 Basic information Registration information Transaction information Device information
Making our website more intuitive and easier to use	Device information
Improving our product, including performing analysis and research and development	Marketing informationDevice information
Protecting the security and effective functioning of our website and information technology systems	 Basic information Registration information Transaction information Device information
Providing relevant marketing	 Basic information Registration information Marketing information Transaction information Device information
Addressing our compliance and legal obligations and exercising our legal rights	 Basic information Registration information Compliance information Transaction information Device information
Considering individuals for employment and contractor opportunities, and managing onboarding procedures	Job applicant information

5. Sharing of Personal Data

We share your Personal Data with the following categories of recipients for the following purposes:

5.1. Carlisle Companies Incorporated (or its subsidiaries): We share your Personal Data with Carlisle Companies Incorporated or its wholly-owned



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subsidiaries, as necessary in order to carry out the purposes identified above, in particular to centralize administration and business management. Note that the list of our subsidiaries can be found on our corporate website at: www.carlisle.com/our-businesses/default.aspx.

- 5.2. Certain third parties: We share your Personal Data with certain third parties, as detailed below, to enable such third parties to perform functions under our instructions. We require such parties, by contract, to provide reasonable security for your Personal Data and to process such data only on our behalf.
 - 5.2.1. Suppliers and service providers: We share your Personal Data with suppliers and service providers to carry out the purposes identified above, in particular to make our website or products or services available to you, or to provide assistance with logistics, mailing services, or regulatory compliance.
 - 5.2.2. Auditors, advisors, and financial institutions: We share your Personal Data with auditors for the performance of audit functions, with advisors for the provision of legal and other advice, and with financial institutions in connection with payment and other transactions.
- 5.3. Certain acquiring or acquired entities: We share your Personal Data with any corporate purchaser or prospect, to the extent permitted by law, as part of any merger, acquisition, sale of company assets, or transition of service to another provider, as well as in the event of insolvency, bankruptcy, or receivership in which your Personal Data would be transferred as an asset of Carlisle.

Carlisle may also disclose your Personal Data to comply with any subpoena, court order or other legal process, or other governmental request. We may also share your Personal Data to establish or protect our legal rights, property, or safety (or the rights, property, or safety of others), or to defend against legal claims.

6. Marketing Choices

You have control regarding our use of your Personal Data for direct marketing. If you no longer wish to receive any direct marketing communications, you can opt-out at any time.

7. Cookies

The Carlisle Data Subject Requests portal is hosted on an authorized third party website with a cookie consent management solution for compliance to applicable privacy law or regulation

8. Data Subject Rights

Depending on where you reside, you may have certain rights afforded to you, including the right to obtain confirmation that we maintain certain Personal Data about you (and the right to verify its content, origin, and accuracy), as well as the right to: (1) request access to your Personal Data; (2) request rectification of your Personal Data; (3) request erasure of your Personal Data; (4) request restriction of processing of your Personal Data; (5) request portability of your Personal Data; (6) **object to the processing of your Personal Data**; and/or (7) request to opt out of targeted advertising, the sale of your Personal Data, and/or profiling. In particular, you have the right to object to our use of your Personal Data

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for direct marketing purposes, and certain other purposes, at any time. You also have the right to lodge a complaint with the competent data protection supervisory authority. Note, however, that we may retain certain Personal Data as required or permitted by applicable law. For information on how to exercise your rights, please see the "Contact Us" section below.

- 8.1. Right of access: Under certain circumstances, you have the right to obtain from us confirmation as to whether or not Personal Data about you is processed and, where that is the case, to request access to such Personal Data. The access information includes, inter alia, the purposes of the processing, the categories of Personal Data, the recipients or categories of recipients to whom the Personal Data has been or will be disclosed, the sources of the Personal Data, the duration of retention of the Personal Data, and the technical security measures put in place to safeguard the Personal Data in case of transfer outside the EEA. However, this is not an absolute right and the interests of other individuals may restrict your right of access. Most such information is set out in this *Privacy Notice*, but supplementary information will be provided where necessary. In addition to access, you have the right to obtain a copy of your Personal Data. Note that, for additional copies requested by you, we may charge a reasonable fee based on administrative costs.
- 8.2. **Right to rectification:** Under certain circumstances, you have the right to obtain from us the rectification (i.e., correction) of inaccurate Personal Data about you. Depending on the purposes of the processing, you have the right to request completion of incomplete Personal Data about you, including by means of providing a supplementary statement.
- 8.3. Right to erasure/deletion ("right to be forgotten"): Under certain circumstances, you have the right to obtain from us the erasure of Personal Data about you. In such cases, we will erase, or render permanently unintelligible, such Personal Data.
- 8.4. **Right to restriction of processing:** Under certain circumstances, you have the right to obtain from us the restriction of processing of Personal Data about you. In such cases, the respective data will be marked and may only be processed by us for certain purposes.
- 8.5. **Right to data portability:** Under certain circumstances, you have the right to receive your Personal Data in a structured, commonly used, and machine-readable format for purposes of transmitting the data to another entity.
- 8.6. **Right to object:** Under certain circumstances, you have the right to object, on grounds relating to your particular situation, to Carlisle's processing of Personal Data about you. Where such right applies, we will no longer process the relevant Personal Data. This is not an absolute right and does not apply in certain situations (e.g., processing is necessary to comply with applicable EU or Member State law or defend legal claims).
- 8.7. Right to Opt Out of Targeted Advertising, the Sale of Personal Data and/or Profiling: Under certain circumstances, you have the right to direct us to opt out your Personal Data from being used for Targeted Advertising, selling your Personal Data, or profiling, including any form of automated processing of your



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Personal Data to evaluate, analyze or predict personal aspects concerning your identified or identifiable economic situation, health, personal preferences, interests, reliability, behavior, location or movements.

9. Data Security

We maintain technical and organizational measures to protect your Personal Data against loss and unauthorized access, use, destruction, modification, or disclosure, appropriate to the level of risk and sensitivity of the Personal Data. However, no degree of preventive security measures can guarantee against compromise; you also have an important role in protecting your Personal Data. You should not share your user name or password with anyone, and you should not reuse passwords across more than one website. If you have any reason to believe that your user name or password has been compromised, please contact us as detailed below.

10. Cross-Border Data Transfers

We transfer your Personal Data to various jurisdictions as necessary for the purposes described herein, including to jurisdictions that may not provide the same level of data protection as your home country. We provide appropriate protections for cross-border transfers as required by applicable law for international data transfers. With respect to transfers originating from the European Economic Area ("EEA"), we implement standard contractual clauses approved by the European Commission, and other appropriate solutions to address cross-border transfers as required by applicable law. Where required by such laws, you may request a copy of the suitable mechanisms we have in place by contacting us as detailed below.

11. Other Information

- 11.1. **Legal Basis for Processing Personal Data.** We rely on the following legal grounds for the processing of Personal Data:
 - 11.1.1. Performance of a transaction with you (e.g., responding to your requests);
 - 11.1.2. Compliance with legal obligations (e.g., keeping records to substantiate a tax liability);
 - 11.1.3. Consent, as permitted by applicable law (e.g., for the purposes of sending direct marketing communications or using certain cookies); and,
 - 11.1.4. Legitimate interest of Carlisle (or its subsidiaries) or other third parties (e.g., preventing misuse of IT systems, addressing logical security, conducting intended mergers and acquisitions). Note that, as a B2B organization, we typically collect and process limited Personal Data about customer contacts and individuals acting in their business capacities as part of our overall effort to reduce the privacy impact on individuals.
- 11.2. Consequences of Not Providing Personal Data. You are not required to provide all of the Personal Data defined in this *Privacy Notice* in order to use our website or to interact with us offline. If you do not provide certain Personal Data, however, certain functionality will not be available to you, and we may not be able to respond to your requests, perform a transaction with you, or provide you



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with marketing that we believe you would find valuable.

- 11.3. Automated Decision-Making Without Human Intervention. We do not use automated decision-making without human intervention, including profiling, in a way that produces legal effects or otherwise significantly affects you.
- 11.4. Do Not Track ("DNT") Signals Sent via Browsers. Carlisle generally seeks to honor DNT signals sent by the third party organization, Global Privacy Control. Given the rapidly evolving online ecosystem, we cannot promise that we honor other DNT signals.
- 11.5. Retention of Personal Data. We retain Personal Data collected and processed for marketing purposes for as long as you accept marketing communications from us but, upon request, we will securely delete such data in accordance with applicable law. We retain Personal Data collected and processed for all other purposes for no longer than the period necessary to fulfill the purposes outlined herein, and as otherwise needed to address tax, corporate, compliance, and litigation (and other legal rights) obligations.
- 11.6. **Third-Party Websites.** This website contains links and references to other websites administered by unaffiliated third parties; any such third-party websites are not governed by this *Privacy Notice*. When you follow a link to visit a third-party website, you will be subject to the privacy and security practices of the unaffiliated third-party administrator. We encourage you to familiarize yourself with the privacy and security practices of any such third parties before providing Personal Data on their websites.
- 11.7. **Employee and Contractor Privacy Issues.** Employees and contractors are informed about our privacy and security practices through internal company policies and procedures.
- 11.8. **Changes to** *Privacy Notice.* We may update this *Privacy Notice* from time to time as our business (including privacy and security practices) changes, or as required by law. The effective date of our *Privacy Notice* is provided herein, and we encourage you to visit our website periodically to stay informed about our privacy and security practices. We will post the most current version of our *Privacy Notice* on our website and ask for your consent to the changes, as required by law.

12. Additional Information for California Consumers and Businesses

- 12.1.Under the California Consumer Privacy Act ("CCPA"), as amended by the California Privacy Rights Act ("CPRA") (collectively, "California Privacy Law"), we are required to provide specific disclosures about how we use and disclose your personal information ("consumers" in this section). This section covers how we have collected, used, disclosed and otherwise processed your personal information over the past 12 months, as well as additional rights you may have with respect to your personal information ("California Personal Information"). This section does not reflect our processing of California Personal Information where an exception under California law applies.
- 12.2. California Personal Information. Depending on your online and offline



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interactions with us, Carlisle may collect and process the following categories of California Personal Information:

- **Identifiers:** Name and contact information (e.g., mailing address, email address, telephone number), date of birth, gender, job title and responsibilities, company, and any other California Personal Information that you submit to us during the course of business.
- **Financial information:** including credit card number, bank account number, credit worthiness, and other financial-related information, such as your bank account number and other relevant payment-related information collected in support of a business transaction;
- Commercial data: products or services purchased, obtained or considered, other purchasing or consuming histories or tendencies, payment information, and/or transaction history.
- Internet or other electronic network activity information: including but not limited to, browsing history, search history, and information regarding an internet website application advertisement, Internet Protocol (IP) address, unique device identifier (UDID), information collected through cookies and similar technologies, and data about usage of our website.
- **Geolocation data:** including physical location information through the use of our website, services and/or products.
- Audio, electronic visual or similar information: including CCTV images in connection with secure use of company systems and facilities.
- Professional or employment-related information: including employment status, organization information, employment background, functional experience, leadership experience, background information commonly used for security screenings, qualifications.
- **Educational information:** including, in addition to identifiers and other data mentioned, education, training, degrees, and professional certifications;
- Inferences: drawn from information collected.
- Other information: including account information, trade union or associated membership information, information required to fulfill requests to receive newsletters, download or subscribe to content, register for conferences, and create website accounts and passwords, information gathered from individual participation in trade shows, seminars, and conferences, as well as product or service interests, and preferences.

Certain California Personal Information that Carlisle collects about you may be considered **sensitive personal information** within the meaning of California Privacy Law, including: financial account and credit card information (for billing and transactional purposes in connection with providing products and services) Carlisle only uses and discloses sensitive personal information as necessary in connection with the performance of services and the provision of goods, compliance with federal, state, or local laws, and as otherwise permitted by California Privacy Law.

12.3. **Sources.**



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Carlisle generally sources the categories of California Personal Information identified above directly from you (for instance, when you provide information as part of a business transaction or otherwise), third party reference agencies, distributors and intermediaries, data analytics providers, and social media networks.

12.4. Purposes of use. Carlisle uses California Personal Information for:

- Business purposes, including:
 - Performing transactions and responding to your requests, including providing customer service and addressing customer satisfaction issues;
 - Managing customer and supplier accounts and relationships, and maintaining our business operations;
 - Making our website more intuitive and easier to use;
 - Improving our product, including performing analysis and research and development;
 - Protecting the security and effective functioning of our website and information technology systems;
 - Addressing our compliance and legal obligations and exercising our legal rights;
 - Considering individuals for employment and contractor opportunities, and managing onboarding procedures;
 - Negotiating, concluding and performing contracts with customers (including the provision of financial services and advice);
 - Managing Carlisle accounts and records;
 - Negotiating, concluding and performing contracts with suppliers;
 - Communicating with individuals that are, or who represent, customers, suppliers or web users related to transactions;
 - Supporting Carlisle's corporate social responsibility activities;
 - Obtaining legal advice, including for legal proceedings and litigation and also in connection with the sale, purchase or merger of a business;
 - To provide the products, information and services you request;
 - For security, credit or fraud prevention purposes;
 - To provide you with effective customer service;
 - To provide you with a personalized experience when you use our Sites;
 - To contact you with information and notices related to your use of our Sites;
 - o To improve our products and services; and
 - For any other purpose identified in an applicable Privacy Notice or other agreement between Carlisle and you.
- Commercial purposes, including:
 - Advertising, marketing, and public relations (including direct marketing);
 - Market research and competitor analysis;



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- To display personalized advertising when you visit our Sites or a third party website;
- To contact you with special offers and other information we believe will be of interest to you;
- To invite you to participate in surveys and provide feedback to us;
- o To better understand your needs and interests; and
- To improve our marketing and promotional efforts.

12.5. Disclosures

- We may disclose the categories of California Personal Information described above for the business purposes described above to:
 - Carlisle Companies Incorporated (or its subsidiaries);
 - Third party service providers that perform data processing activities on our behalf, and subject to appropriate privacy and security obligations;
 - o Auditors, advisors, and financial institutions;
 - Customers, distributors, and intermediaries in connection with the performance of transactions;
 - o Government and other authorities as required by law;
 - Potential purchasers and other parties in connection with the sale, purchase or merger of a business; and
 - Others to the extent necessary to comply with applicable law and as otherwise permitted under California Privacy Law.
- We may disclose Identifiers, Internet or other electronic network activity information, and Geolocation data for the commercial purposes described above to:
 - Third party service providers;
 - Social media and ad networks.

12.6. Retention

We retain your Personal Information for as long as needed or permitted in light of the purpose(s) for which it was obtained and for any additional period as required by applicable law or regulation, contract requirements, in support of legal proceedings, or audit requirements, in accordance with Carlisle's information management policy.

12.7. Your rights

Subject to certain exceptions detailed in the California Privacy Law, as a California resident, you have the right to: (i) know/request access to your California Personal Information that we collect and process about you, including specific pieces of California Personal Information that we have collected about you; (ii) request deletion of your California Personal Information; (iii) request correction of inaccurate California Personal Information; (iv) for sensitive personal information (as defined under California Privacy Law) that we collect, request that we limit our use and disclosure of your sensitive personal information to that use which is necessary to perform the services or provide the goods reasonably expected by an average consumer who requests such goods or services and as otherwise authorized under applicable laws; (v) request that we transfer your California

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Personal Information to another entity to the extent technically feasible, in a structured, commonly used, machine-readable format; (vi) request information about the California Personal Information about you that we have disclosed for a business purpose and the categories of persons to whom it was disclosed for a business purpose; and (vii) request information about the California Personal Information about you that we have "sold" or "shared" (as such terms are defined under California Privacy Law) and the categories of third parties to whom the California Personal Information was sold or shared.

12.8. Exercising Your rights

If you are a California resident and wish to request the exercise of these rights as detailed above or have questions regarding the California Personal Information collected or shared with third parties, please contact privacy@carlisle.com. When submitting your request, please include the specific nature of your request, referencing "Your California Privacy Rights," as well as your first and last name, email address, and zip code or mailing address. Carlisle may apply any exceptions or other conditions available under law when responding to correction, deletion, or other requests. Carlisle will generally fulfill requests for access, correction, and deletion within 45 days of receiving a valid request. Carlisle may extend the respond time by another 45 days by notifying the individual of the time extension.

12.9. Do Not Share

In addition to the above, California residents have the right to opt-out of the sharing of their California Business Information, as such terms are defined under California Privacy Law. To exercise this right, please utilize the "Do not sell or share my personal data" option on our website. In addition, we have configured our cookie management tool to honor opt-out preference signals sent by Global Privacy Control within the browser. Beyond GPC, Carlisle systems are configured to respond to certain other DNT signals, but we do not respond to all DNT signals or other mechanisms that indicate your preference for not having information collected over time and across different Web sites or digital apps following your visit to one of our Sites. Finally, we do not "sell" Personal Information about consumers that we know are younger than 16 years old without opt-in consent.

12.10. Authorized Agents

To the extent that you elect to designate an authorized agent to make a request on your behalf, they must provide appropriate documentation including written signed permission from you, proof of your identity, and verification of their identity; or a valid, designated power of attorney as defined under the California Probate Code.

12.11. Financial Incentive

Carlisle does not engage in providing financial incentives for the disclosure of Business Information.

12.12. Right to Non-Discrimination

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.



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13. Contact Us

Should you wish to contact Carlisle Companies Incorporated (i.e., parent company) Privacy Office, you may do so by emailing privacy@carlisle.com.