

Brandes Investment Partners, L.P. Online Privacy Policy

This Online Privacy Policy describes how Brandes Investment Partners, L.P. and/or its affiliates or subsidiaries (“Brandes”, “we”, “our”, or “us”) uses and shares the information we collect or receive from or about you when you visit <https://www.brandes.com> (the “Website”). This Online Privacy Policy (“Privacy Policy”) does not apply to other third-party website and applications accessed by or through our Website.

If you have any questions or concerns about our Privacy Policy, or our practices with regards to information we collect from or about you, please contact us at privacy@brandes.com.

Please read our Privacy Policy carefully. By using our Website, you consent, where required, to the collection, use and sharing of your information, including your personal information, as described below.

Information about how we collect, use and share non-public personal information of current, former and prospective clients, shareholders and investors is discussed in our Consumer Privacy Notice.

If you are a California resident, please read our [California Notice at Collection and Privacy Notice](#) as it may govern some of the personal information we collect about you.

Information We Collect

We collect information about you in various ways. For example, you may provide information directly to us, we may collect certain information about you automatically through your use of our Website or we may receive personal information about you from other sources. Some of the information you provide to us or that we collect is “personal information.” The personal information that you provide and that we collect or receive from you depends on the context of your interaction with us and our Website, the choices you make when you use our Website, and the products and features that you use.

Information You Provide To Us

When you interact with us or our Website, we may collect or receive information about you. For example, you may provide information to us when you:

- **Express an interest in obtaining information about us or our products or services, communicate with us, or when you use our Website.** This information may include your name, contact details, sales information, and employment-related and other information.
- **Subscribe to our mailing lists, client alerts or newsletters.** This information may include your name, contact details, geolocation information, and employment-related and other information.
- **Register for an event or webinar.** This information may include your name, contact details, employment-related information, travel details, dietary preferences and other information.
- **Participate in a survey or questionnaire.** This information may include your name, employment-related information, and your feedback regarding our Website, products and services, and webinars, seminars and other events that we host or sponsor.

Information Collected and Received From Other Sources

We may collect and receive information about you from other sources. For example, you may interact with our content on social media networks like LinkedIn (“Social Media Platforms”), or you may click on a Social Media Platform icon on our Website. As a result, we may collect or receive information from or about you via Social Media Platforms. Please remember that the manner in which Social Media Platforms use, store, and disclose your information is governed by the policies of such third parties. Brandes is not responsible for the privacy practices or other actions of any Social Media Platforms that may be enabled via our Website.

Some information that we receive from other sources may be combined and linked with information such that it is personal information.

Information We Collect Automatically

When you use our Website, we may automatically collect certain information about you. Automatically collected information may, for example, include the following:

- Your IP address or mobile device identifier.
- The type of browser and operating system you are using.
- The domain name of your Internet service provider.
- Information regarding your downloads on and use of our Website.
- Information collected via cookies and other tracking technologies. This includes information about the content you view and the features you access on our Website. For more information, please see “Online Tracking” below.
- Information regarding when you access and how you use our Website. This includes information regarding the duration of your engagement with certain aspects of the Website

This information may be combined and linked with information from other sources.

How We Use Information

We may use the information collected pursuant to this Privacy Policy in the following ways:

- To present our Website and its contents to you and to operate our Website.
- To deliver the information, products or services you have requested from us.
- To fulfill any other purpose for which you provide it.
- To reach out to you about and market or promote new information, products or services to you that we believe you may be interested in.
- To communicate with you, including to notify you about changes to our Website or products or services.
- To help us improve our Website and deliver a better and more personalized experience. This includes by enabling us to estimate and analyze our audience size and usage patterns, store information about your preferences, speed up your searches and recognize you when you visit our Website.
- To carry out our obligations and enforce our rights arising from any contracts entered into with you. This includes as we believe is necessary or appropriate to protect, enforce or defend the legal rights, privacy, safety or property of Brandes, its employees or agents, or other users or to comply with applicable law.
- For legal and compliance purposes.
- To help us develop new products and services.
- In any other way we may describe when you provide the information, or otherwise at your direction or with your consent.
- As permitted by law or as we may notify you.

How We Share Information

We may share the information that we collect pursuant to this Privacy Policy, as follows:

- With our affiliates.
- With our service providers, business partners and vendors. These third parties may include companies that host our Website, provide web analytics, data processing, advertising, email distribution and other services. These third parties may use your information as is necessary or appropriate for the performance of the services they provide to us, or as otherwise contractually permitted.
- When you request any of our products or services. We will share your information to the extent necessary to fulfill your request.
- When required to do so by law. For example, in response to a court order or a subpoena. We also may disclose such information in response to a law enforcement agency’s request.

In addition, please note that if Brandes or any of its affiliates, subsidiaries or lines of business is merged, acquired, divested, financed, sold, disposed of or dissolved, including through merger, consolidation, sale or divestiture of assets, the relevant customer database, including personal information we may possess about you and information collected pursuant to this Privacy Policy, may, in whole or in part, be sold, disposed of, transferred, divested, or otherwise disclosed as part of that transaction or proceeding.

Online Tracking

Cookies and Other Tracking Technologies

We and service providers or partners we engage may use cookies, web beacons, tracking pixels and other similar technologies to understand usage of the Website and improve our content and offerings. Cookies are bits of text that are placed on your computer's hard drive. Our website uses both session cookies and persistent cookies. A session cookie disappears after you close your browser. A persistent cookie remains after you close your browser and may be accessed every time you use our website.

We may use cookies and other tracking technologies in a variety of ways. For example, to:

- Enable us to provide our Website and its content to you.
- Provide us with information about which portions of our website are the most popular by enabling us to see what web pages a user visits and how much time a user spends on each page.

Google Analytics

Our Website may use Google Analytics, a web analytics service offered by Google. You may learn more about Google's practices with Google Analytics by visiting Google's privacy policy at <http://www.google.com/policies/privacy/partners>.

Your Choices

You can generally manage your cookie preferences through your web browser. Most web browsers will tell you how to stop accepting new cookies and how to disable existing cookies. Depending on your device and operating system, you may not be able to delete or block all cookies. For more information regarding how to manage your preferences, please consult the information made available by your particular browser or visit www.allaboutcookies.org. With respect to Google Analytics, you can also view Google's currently available opt-out options at <https://tools.google.com/dlpage/gaoptout> in an effort to opt-out of being tracked by Google Analytics. Please note that if you choose not to accept cookies, you may be unable to use certain features of our Website.

Social Media and Other Platforms

You may be able to access social media networks like Twitter or LinkedIn ("Social Media Platforms") directly or indirectly through our Website. As a result, we may collect and/or receive information from or about you when you interact with our social media pages, accounts or via posts you make on Social Media Platforms. If you choose to make any of your activities or other content available through a Social Media Platform, including on our pages, or you engage in other activities in connection with a Social Media Platform, your friends and followers on those Social Media Platform that you have enabled, and potentially the general public, will be able to view those contributions and activities. Please remember that the manner in which Social Media Platforms use, store, and disclose your information is governed by the policies of such third parties. Brandes is not responsible for the privacy practices or other actions of any Social Media Platforms that may be enabled via our Website.

Links to Third Party Websites

Our Website may contain links to third-party sites and services whose privacy practices may be different than ours. We also allow you to connect with other third-party sites and services. We are not responsible for the privacy practices of third-party sites and services and you should consult the other third-party sites' and services' privacy notices in order to better understand their privacy practices.

Security

We have put in place reasonable administrative, technical, and physical safeguards to help prevent unauthorized access, maintain data security and correctly use the information we collect from and about you. However, no system can be completely secure, and we do not guarantee that unauthorized disclosures and access will not happen. Although we take reasonable measures to safeguard against unauthorized disclosures of information, we cannot assure you that your personal information or other information will never be disclosed in a manner that is inconsistent with this Privacy Policy.

Children's Privacy

Our Website is not intended for users under the age of 16, and Brandes does not knowingly collect information from anyone under the age of 16. No one under the age of 16 is permitted to use this Website or provide Brandes with personal information.

Non-U.S. Visitors

Any information we obtain about you in connection with your use of our Website may be processed and stored in the United States or other countries.

Accessing and Correcting Your Personal Information

We take reasonable steps to accurately record the personal information that you provide to us pursuant to this Privacy Policy and any subsequent updates to such information. We encourage you to review, update, and correct the personal information that you provide to us pursuant to this Privacy Policy. Please contact us at privacy@brandes.com in order to do so.

Changes to this Privacy Policy

This Privacy Policy may be changed by Brandes at any time and such changes will apply to information we collected from you pursuant to a previous privacy policy. The revised Privacy Policy will be posted on the appropriate portion(s) of our Website and will indicate at the bottom when it was most recently updated. We encourage you to periodically check back to review this policy so that you know what information we collect, how we use it and with whom we share it.

How to Contact Us

If you have any questions or concerns about this Privacy Policy or its implementation, please contact us at privacy@brandes.com.

This Privacy Policy was last updated on June 16, 2023.