

PRIVACY POLICY

This policy describes how World Wide Technology, LLC and our affiliates (collectively, “we,” “us,” “our,” “World Wide Technology”) collect, use, and share personal information.

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Types of personal information we collect

The following provides some examples of the type of information that we collect and the purposes for which we use that information.

Context	Types of personal information and purpose for collection	Primary purpose for collection and use of personal information
Account Registration	We collect your name and contact information when you create an account.	We have a legitimate interest in providing account related functionalities to our customers.
Contingent Workforce	If you become engaged to work for a WWT customer or WWT as a contingent worker, we may collect personal information necessary to process your engagement. This may include, among other things, your tax identification number, birth date or, in some countries, your religion. We may collect your education or employment history to evaluate you for an engagement or your bank or credit account information to pay or reimburse you. Use of WWT systems also may be monitored for security purposes.	We use information about contingent workers to perform our obligations under the engagement or to end an engagement. In some contexts, we are also required by law to collect information about contingent workers. We also have a legitimate interest in using your information to have efficient staffing and work force operations. Customers may require certain information about employees or contractors before they access their property or systems, or as part of a customer audit.
Client Contact Information	We collect the name, and contact information, of our clients and their employees with whom we may interact.	We have a legitimate interest in contacting our clients and communicating with them concerning normal business administration such as projects, services, and billing.

Demographic Information	We collect personal information from you, such as your age, photo, or location.	We have a legitimate interest in understanding our website and mobile device users and customers and providing tailored services.
Distance Information	When you use one of our Apps, we collect your location from the GPS, Wi-Fi, and/or cellular technology in your device.	We have a legitimate interest in understanding our website and mobile device users and providing tailored services. In some contexts, our use also may be based upon your consent.
Email Interconnectivity	If you receive email from us, we may use tools to capture information related to when you open our message, click on any links or banners it contains and make purchases.	We have a legitimate interest in understanding how you interact with our communications to you.
Employment	If you apply for a job posting, or become an employee, we will collect personal information necessary to process your application or perform our contract of employment. This may include, among other things, your tax identification number, birth date or, in some countries, your religion. We may collect your education or employment history to evaluate you for a position or your bank or credit account information to pay or reimburse you. In some locations, we may have collected an algorithm from a fingertip scan or we may have collected biometric or similar information to perform our employment contract. Employee use of company systems also may be monitored for security purposes. Providing this information is required for employment.	We use information about current employees (and any covered dependents) to provide benefits, perform our contract of employment, or the anticipation of a contract of employment with you, or to process a termination. In some contexts, we are also required by law to collect information about our employees. We also have a legitimate interest in using your information to have efficient staffing and work force operations. Customers may require certain information about employees or contractors before they access their property or systems, or as part of a customer audit.
Feedback/Support	If you provide us feedback or contact us for support we will collect information you provide, such as your name and email address and any other content that you send to us.	We have a legitimate interest in receiving, replying to, and acting upon, your feedback or issues.
Mailing List	When you sign up for one of our mailing lists, and when you are registered for an account, we will collect your email address or postal address.	We share information about our products and services with individuals that consent to receive such information. We also have a legitimate interest in sharing information about our products or services with third parties.
Mobile Devices	We collect information from your mobile device such as unique identifying information broadcast from your device or hardware and software specifications. We may also ask you if you would like to share your location information from your mobile device.	We have a legitimate interest in identifying unique visitors, and in understanding how users interact with us on their mobile devices.

Order Placement	We will collect your name, billing address, shipping address, email address, phone number, and possibly credit card number when you place an order on behalf of your company.	We use your information to perform our contract to provide our customers with products or services.
Partner Promotion	We collect information that you provide as part of a co-branded promotion with another company.	We have a legitimate interest in fulfilling our promotions.
Surveys	When you participate in a survey we will collect additional information that you provide through the survey. If the survey is provided by a third-party service provider, the third party's privacy policy applies to the collection, use, and disclosure of your information.	We have a legitimate interest in understanding your opinions and collecting information relevant to our organization.
Third Party Tracking	We may participate in behavior-based advertising. This means that a third party may use technology (e.g., a cookie) to collect information over time about your use of our website and other websites so that they can provide advertising about products and services tailored to your interests. That advertising may appear either on our websites, or on other websites. You can opt-out of behavior-based cookies on our website.	We have a legitimate interest in engaging in behavior-based advertising.
Web logs	<p>We collect information from you when you visit our website, including your browser type, operating system, Internet Protocol (IP) address (a number that is automatically assigned to your computer when you use the Internet), domain name, click-activity, referring website, and/or a date/time stamp for your visit. In addition to information stored by our servers, we may also use cookies and clear GIFs.</p> <p>“Cookies” are small pieces of information that a website sends to your computer’s hard drive while you are viewing a web site. We may use both session cookies (which expire once you close your web browser) and persistent cookies (which stay on your device until you delete them). Among other things, cookies allow us to provide you with a more personal and interactive experience. Persistent cookies may be removed by following instructions provided by your browser. If you choose to disable cookies some areas or features of our websites may not work properly.</p>	We have a legitimate interest in monitoring our networks and the visitors to our websites. Among other things, it helps us understand which of our products or services is the most popular.
Conferences and Events	If you sign up for a conference or event, we collect your name, contact information, and in some cases other pertinent information (such as dietary preferences).	We use your information to complete your registration and where applicable, honor your choices. We also have a legitimate interest in providing you with information and services associated with the event or conference.
Coronavirus health pandemic (COVID)	We may collect temperature readings and record illness symptoms to prevent virus spread.	We have a legitimate interest in protecting the health, wellbeing, and safety of our employees.

In addition to the personal information that we collect from you directly, we may also receive information about you from other sources, including third parties, business partners, our affiliates, or publicly available sources.

How we use and process your personal information

In addition to the uses described above, we use your personal information in the following ways:

- To identify you when you visit our websites or use one of our mobile apps.
- To perform our obligations under a contract.
- To provide the products and services you request.
- To improve our services and product offerings.
- To conduct analytics.
- To respond to your inquiries related to support, employment opportunities, or other requests.
- For internal administrative purposes, as well as to manage our relationship with you.

Although the sections above describe our primary purpose in collecting your information, in many situations, we have more than one purpose. For example, if you complete an online purchase we may collect your information to perform our contract with you, but we also collect your information because we have a legitimate interest in maintaining your information after your transaction is complete so that we can quickly and easily respond to any questions about your order. As a result, our collection and processing of your information is based in different contexts upon your consent, our need to perform a contract, our obligations under law, and/or our legitimate interest in conducting our business.

How we share your personal information

In addition to the specific situations discussed elsewhere in this policy, we disclose personal information in the following situations:

- **Affiliates and acquisitions.** We may share your personal information with our corporate affiliates (*e.g.*, parent company, sister companies, subsidiaries, joint ventures, or other companies under common control). If another company acquires, or anticipates acquiring, our company, business, or our assets, we will also share your personal information with that company, including at the negotiation stage.
- **Other disclosures with your consent.** We may ask if you would like us to share your information with other unaffiliated third parties who are not described elsewhere in this policy.
- **Other disclosures without your consent.** We may disclose personal information in response to subpoenas, warrants, or court orders, or in connection with any legal process, or to comply with relevant laws. We may also share your personal information in order to establish or exercise our rights, to defend against a legal claim, to investigate, prevent, or take action regarding possible illegal activities, suspected fraud, safety of person or property, or a violation of our policies.
- **Service providers.** We may share your personal information with service providers. Among other things service providers may help us to administer our website, conduct surveys, administer employee payroll and benefits or assist us with other tasks necessary to perform our contract of employment, and provide technical support.
- **Suppliers.** We may share your personal information with our suppliers.

Your choices

You can make the following choices regarding your personal information:

- **Changes to your personal information.** We rely on you to update and correct your personal information (*e.g.*, through your account settings). Note that we may keep historical information in our backup files as permitted by law. All requests to correct your personal information must be directed to the contact in the “How you may contact us regarding your personal information” section below.
- **Deletion of your personal information.** Typically, we retain your personal information for the period necessary to fulfill the purposes outlined in this policy, unless a longer retention period is required or permitted by law. Any biometric or similar information we collect, if any, will be deleted no later than the first anniversary of the date the purpose for collecting the identifier expires unless a different period is required by law. Some users may have the right to request that we delete their personal information. All deletion requests must be directed to the contact in the “How you may contact

us regarding your personal information” section below. We may also decide to delete your information if we believe that the information is incomplete, inaccurate, or that our continued use and storage are contrary to our obligations to other individuals or third parties. When we delete personal information, it will be removed from our active database, but it may remain in archives where it is not practical or possible to delete it. You should note, in certain situations, and to the extent permitted by law, we may keep your personal information to comply with our legal obligations, resolve disputes, enforce any of our agreements, and/or for another one of our business purposes.

- **Revocation of consent or objections.** You may revoke consent to processing (where our processing is based upon consent), or object to our processing (where our processing is not based upon your consent) by contacting us at the address described in the “How you may contact us regarding your personal information” section below. If you revoke your consent / object, we may no longer be able to provide you services.
- **Access to your personal information.** If required by law, upon request, we will grant reasonable access to the personal information, that we hold about a user, including, in some cases providing a copy of such information. All access requests must be directed to the contact in the “How you may contact us regarding your personal information” section below.
- **Online tracking.** We do not recognize the "Do Not Track" signal.

Please note, in some cases we may limit or deny a request to exercise any of the foregoing choices if the law permits or requires us to do so, or if we are unable to adequately verify your identity.

How we protect personal information

No method of transmission over the Internet, or method of electronic storage, is fully secure. While we use reasonable efforts to protect your personal information from unauthorized access, use, or disclosure, we cannot guarantee the security of your personal information. In the event that we are required by law to inform you of any unauthorized access to your personal information we may notify you electronically, in writing, or by telephone, if permitted to do so by law.

Some of our websites permit you to create an account. When you create an account you will be prompted to create a password. You are responsible for maintaining the confidentiality of your password, and you are responsible for any access to or use of your account by someone else that has obtained your password, whether or not such access or use has been authorized by you. You should notify us of any unauthorized use of your password or account.

How you may contact us regarding personal information

If you would like to make a request to exercise your applicable privacy rights described in the “Your choices” section above, or if you have any questions, comments, or complaints concerning our privacy practices, please use either the “Complete Privacy Request Form” below, or the phone number if you are in the United States. We will attempt to respond to all requests or refer you to the appropriate party. If you are not satisfied with our response, and are in the European Union, you may have a right to lodge a complaint with your local supervisory authority. If you are in the United States, and you are not satisfied with our response, you may have a right to appeal our decision. To appeal our decision, you may contact us using the contact information below and including “Appeal” in the subject of the message.

World Wide Technology, LLC
1 World Wide Way
Attn: Privacy Department
St. Louis, Missouri 63146
United States

[Complete Privacy Request Form or via email at \[privacyservices@wwt.com\]\(mailto:privacyservices@wwt.com\)](#)

In the United States, you can also call 1-800-432-7008 and ask for the Privacy Department.

Please note, as required by law, and to protect your personal information, we must be able to verify your identity before we can process your request. We may conduct the identity verification process by email or phone, and will ask you to provide information such as your name, contact information, and any additional relevant information based on your relationship with us.

Designation of an authorized agent. In certain circumstances, you may designate an authorized agent to submit a request to access or delete your personal information on your behalf. If you choose to use an authorized agent to submit a request, you must provide the authorized agent with signed permission to do so. We will also ask you to verify your own identity directly with us.

Information for authorized agents: If you are an authorized agent submitting a request on behalf of an individual, you must attach a copy of a completed Authorized Agent Designation Form signed by the individual indicating that you have permission to submit the request on his or her behalf. If we do not receive all required information, we may deny the request.

Miscellaneous

The following additional information relates to our privacy practices:

- **Transmission of personal information to other countries.** Your personal information may be processed in jurisdictions, like the United States, where privacy laws may be less stringent than the laws in your country. By submitting your personal information to us you agree to the transfer, storage and processing of your information in such jurisdictions. Nonetheless, where possible we take steps to treat personal information using the same privacy principles that apply pursuant to the law of the country in which we first received your information by either:
 - Contracting with the receiving company with clauses approved by the European Union authorities as providing adequate protection or through the use of Binding Corporate Rules;
 - Sharing the data with companies in countries considered by the European Commission as having suitably high standards of data protection legislation; or
 - Entering into Standard Contractual Clauses.

If you would like more information concerning our attempts to apply the privacy principles applicable in one jurisdiction to data when it goes to another jurisdiction you can contact us using the contact information above.

- **Third party applications/websites.** We have no control over the privacy practices of websites or applications that we do not own.
- **Changes to this privacy policy.** We may change our privacy policy and practices over time. To the extent that our policy changes in a material way, the policy that was in place at the time that you submitted personal information to us will generally govern that information.
- **Additional information for California residents.** California law indicates that organizations should disclose whether certain categories of information (including “sensitive” categories of information) are collected, transferred for valuable consideration (i.e., “sold”), disclosed for targeted advertising purposes (i.e., “shared”), or disclosed for an organization’s “business purpose” as those terms are defined under California law. You can find a list of the categories of information that we collect and how we share such information [here](#). Please note that because this list is comprehensive it may refer to types of information that we share about people other than yourself. We do not discriminate against California consumers who exercise any of their rights described in this policy.

California Information Collection and Sharing Disclosure

The following chart describes the categories of personal information we collect, transfer for consideration, or disclose for a “business purpose” as those terms are defined under California law (or were collected or disclosed in the past 12 months). Note that while a category may be listed, that does not necessarily mean that we have personal information in that category about you. For example, while we disclose bank account numbers for our business purpose in paying our employees (e.g., direct deposit), we do not collect or transfer bank account numbers of individuals that submit questions on our website’s “contact us” page. Note, we do not sell personal information.

Categories of personal information that we collect	Categories of Recipients	
	Disclosures for a Business Purpose	Sharing for Targeted Advertising
Identifiers – such as name, postal address, phone number, unique personal identifier, online identifier, internet protocol (IP) address, device ID, email address, account name, signature, social security number, driver’s license number, passport number, or other similar identifiers.	<ul style="list-style-type: none"> • Service providers • Product and service fulfillment companies • Internet service providers • Social networks • Payment processors and financial institutions • Government entities, law enforcement, lawyers, auditors, consultants and other parties as required by law • Data analytics providers 	<ul style="list-style-type: none"> • Advertising networks
Financial information – such as bank account number, credit or debit card number, or other financial information.	<ul style="list-style-type: none"> • Service providers • Payment processors and financial institutions • Government entities, law enforcement, lawyers, auditors, consultants and other parties as required by law 	<ul style="list-style-type: none"> • N/A
Medical / health insurance information – such as information from a healthcare provider regarding an individual’s medical history, mental or physical condition, or treatment; an individual’s insurance policy number or subscriber identification number, any unique identifier used by a health insurer to identify the individual, or any information in the individual’s application and claims history.	<ul style="list-style-type: none"> • Service providers • Government entities, law enforcement, lawyers, auditors, consultants and other parties as required by law 	<ul style="list-style-type: none"> • N/A
Protected characteristics – such as race, gender, physical or mental disability, and religion.	<ul style="list-style-type: none"> • Service providers • Government entities, law enforcement, lawyers, auditors, consultants and other parties as required by law 	<ul style="list-style-type: none"> • N/A

<p>Commercial information – such as information about products or services purchased, obtained, or considered, or other purchasing or consuming histories or tendencies.</p>	<ul style="list-style-type: none"> • Service providers • Product and service fulfillment companies • Social networks • Payment processors and financial institutions • Government entities, law enforcement, lawyers, auditors, consultants and other parties as required by law • Data analytics providers 	<ul style="list-style-type: none"> • Advertising networks
<p>Network activity data– internet or other electronic network activity information, such as browsing history, search history, and information regarding an individual’s interaction with an internet website, application, or advertisement.</p>	<ul style="list-style-type: none"> • Service providers • Product and service fulfillment companies • Internet service providers • Social networks • Government entities, law enforcement, lawyers, auditors, consultants and other parties as required by law • Data analytics providers 	<ul style="list-style-type: none"> • Advertising networks
<p>Biometric information¹ – such as fingerprint, face print or voice print.</p>	<ul style="list-style-type: none"> • N/A 	<ul style="list-style-type: none"> • N/A
<p>Geolocation data – such as precise physical location.</p>	<ul style="list-style-type: none"> • Service providers • Internet service providers • Social Networks • Government entities, law enforcement, lawyers, auditors, consultants and other parties as required by law • Data analytics providers 	<ul style="list-style-type: none"> • N/A
<p>Electronic and sensory data – such as audio, electronic, visual, thermal, olfactory, or similar information (e.g., pictures, a recording of a customer service call, security video surveillance footage).</p>	<ul style="list-style-type: none"> • Service providers • Government entities, law enforcement, lawyers, auditors, consultants and other parties as required by law 	<ul style="list-style-type: none"> • N/A
<p>Professional/employment information – such as occupation and professional references.</p>	<ul style="list-style-type: none"> • Service providers • Government entities, law enforcement, lawyers, auditors, consultants and other parties as required by law 	<ul style="list-style-type: none"> • N/A
<p>Education information – such as information contained in education records.</p>	<ul style="list-style-type: none"> • Service providers • Government entities, law enforcement, lawyers, auditors, consultants and other parties as required by law 	<ul style="list-style-type: none"> • N/A
<p>Inferences – drawn from any of the information listed above to create a profile</p>	<ul style="list-style-type: none"> • Service providers • Social networks • Government entities, law enforcement, lawyers, auditors, consultants and other parties as required by law • Data analytics providers 	<ul style="list-style-type: none"> • Advertising networks

¹ While we have not collected biometric information, we have collected an algorithm from a fingertip scan from some individuals.

Sensitive Information Disclosure. The table below describes the categories of sensitive personal information we collect and why. Note that we do not “sell” sensitive personal information for purposes of cross-context behavioral advertising.

Category of Sensitive Personal Information	Purposes for which Information is Collected	Is information shared for the purpose of cross-context behavioral advertising
Government Identifiers (e.g., Social security, driver’s license, state identification card, or passport number).	<ul style="list-style-type: none"> We collect government identifiers from job applicants and employees in order to meet our obligations to our customers and employees (e.g., conduct background checks, withhold payroll taxes). 	<ul style="list-style-type: none"> No
Precise geolocation	<ul style="list-style-type: none"> We collect precise geolocation to support our customer’s use of some of our services, such as our mobility services. We also collect geolocation information in order to identify, detect and investigate fraudulent or unauthorized attempts to access our network and systems. 	<ul style="list-style-type: none"> No
Protected Characteristics	<ul style="list-style-type: none"> We collect protected characteristics from our employees in order to meet our legal obligations to our employees and to ensure a diverse and inclusive workplace. 	<ul style="list-style-type: none"> No
Content of Communications (e.g., Contents of an employee’s email).	<ul style="list-style-type: none"> We monitor the content of our employee’s email messages in order to prevent, detect, and investigate unauthorized attempts to access our systems or commit fraud. 	<ul style="list-style-type: none"> No
Biometric Information	<ul style="list-style-type: none"> While we have not collected biometric information, we have collected an algorithm from a fingertip scan from some individuals. 	<ul style="list-style-type: none"> No
Health-related information	<ul style="list-style-type: none"> We collect health related information from our employees to meet our obligations as an employer (e.g., provisioning health benefits). 	<ul style="list-style-type: none"> No

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