

This **Privacy Notice for California Residents** supplements the information contained in our privacy policy above and applies solely to all visitors, users, and others who reside in the State of California (“consumers” or “you”). We adopt this notice to comply with the California Consumer Privacy Act of 2018 (CCPA) and any terms defined in the CCPA have the same meaning when used in this notice.

1. Information We Collect

WF collects information that identifies, relates to, describes, references, is capable of being associated with, or could reasonably be linked, directly or indirectly, with a particular consumer or device (“**personal information**”). In particular, WF has collected some if not all of the following categories of personal information from its consumers within the last twelve (12) months:

Category	Examples
A. Contact Information and Identifiers.	A real name, alias, postal address, unique personal identifier, online identifier, Internet Protocol address, email address, account name, Social Security number, driver's license number, passport number, or other similar identifiers.
B. Personal information categories listed in the California Customer Records statute (Cal. Civ. Code § 1798.80(e)).	A name, signature, Social Security number, physical characteristics or description, address, telephone number, passport number, driver's license or state identification card number, insurance policy number, education, employment, employment history, bank account number, credit card number, debit card number, or any other financial information, medical information, health insurance information, or benefits information. Some personal information included in this category may overlap with other categories.

<p>C. Protected classification characteristics under California or federal law.</p>	<p>Age, race, color, ancestry, national origin, citizenship, religion or creed, marital status, medical condition, physical or mental disability, sex (including gender, gender identity, gender expression, pregnancy or childbirth and related medical conditions), sexual orientation, veteran or military status, genetic information (including familial genetic information).</p>
<p>D. Commercial information.</p>	<p>Records of personal property, products or services purchased, obtained, or considered, or other purchasing or consuming histories or tendencies.</p>
<p>E. Biometric information.</p>	<p>Genetic, physiological, behavioral, and biological characteristics, or activity patterns used to extract a template or other identifier or identifying information, such as, fingerprints, faceprints, and voiceprints, iris or retina scans, keystroke, gait, or other physical patterns, and sleep, health, or exercise data.</p>
<p>F. Internet or other similar network usage activity.</p>	<p>Browsing history, search history, information on a consumer's interaction with a website, application, or advertisement.</p>
<p>G. Geolocation data.</p>	<p>Precise physical location or movement. Data about a particular individual or device.</p>
<p>H. Sensory data.</p>	<p>Audio, electronic, visual, thermal, olfactory, or similar information.</p>
<p>I. Professional or employment-related information.</p>	<p>Current or past job history or performance evaluations.</p>

<p>J. Non-public education information (per the Family Educational Rights and Privacy Act (20 U.S.C. Section 1232g, 34 C.F.R. Part 99)).</p>	<p>Education records directly related to a student maintained by an educational institution or party acting on its behalf, such as grades, transcripts, class lists, student schedules, student identification codes, student financial information, or student disciplinary records.</p>
<p>K. Inferences drawn from other personal information.</p>	<p>Profile reflecting a person's preferences, characteristics, psychological trends, predispositions, behavior, attitudes, intelligence, abilities, and aptitudes.</p>

Personal information does not include information that is publicly available information from government records, de-identified or aggregated consumer information, and information excluded from the CCPA’s scope such as health or medical information covered by the Health Insurance Portability and Accountability Act of 1996 (HIPAA), and its implementing regulations (collectively, “HIPPA”) and the California Confidentiality of Medical Information Act (CMIA) or clinical trial data nor does it include personal information covered by certain sector-specific privacy laws, including the Fair Credit Reporting Act (FCRA), the Gramm-Leach-Bliley Act (GLBA) or California Financial Information Privacy Act (FIPA), and the Driver’s Privacy Protection Act of 1994.

WF obtains the categories of personal information listed above from the following categories of sources:

- Directly from you. For example, from forms you complete or products you purchase.
- Indirectly from you. For example, from observing your actions on our website.
- From WF clients, insurance carriers and third party administrators.
- From consumer reporting agencies.

2. Use of Personal Information

WF may use, or disclose the personal information we collect for one or more of the following business purposes:

- To fulfill or meet the reason you provided the information. For example, if you share your name and contact information to request a price quote or ask a question about our products or services, we will use that personal information to respond to your inquiry. If you provide your personal information to purchase a product or service, we will use that information to process your payment and facilitate delivery. We may also save your information to facilitate new product orders or process returns.
- To provide you with support and to respond to your inquiries, including to investigate and address your concerns and monitor and improve our responses.
- To create, maintain, customize and secure your account with us.
- To provide, support, personalize and develop our Website, products and services.
- To process your requests, purchases, transactions and payments and prevent transactional fraud.
- To personalize your Website experience and to deliver content and product and service offerings relevant to your interests, including targeted offers and ads through our Website, third-party sites, and via email or text message (with your consent, where required by law).
- To help maintain the safety, security, and integrity of our Website, products and services, databases and other technology assets, and business.
- For testing, research, analysis, and product development, including to develop and improve our Website, products, and services.
- To respond to law enforcement requests and as required by applicable law, court order, or governmental regulations.
- As appropriate, to protect WF's rights or property or to protect the rights or property of you, our customers or others.

- As described to you when collecting your personal information or as otherwise set forth in the CCPA.
- To evaluate or conduct a merger, divestiture, restructuring, reorganization, dissolution or other sale or transfer of some or all of WF’s assets, whether as a going concern or as part of bankruptcy, liquidation, or similar proceeding, in which personal information held by WF about our Website users is among the assets transferred.

We will not collect additional categories of personal information or use the personal information we collected for materially different, unrelated, or incompatible purposes without providing you notice.

3. Sharing Personal Information

WF may disclose your personal information to a third party for a business purpose. When we disclose personal information for a business purpose, we take reasonable steps to ensure that the third party who receives the information protects it. As needed, and when required by law, when we disclose personal information for a business purpose, we will enter into a contract that describes the purpose and requires the recipient to both keep that personal information confidential and not use it for any purpose except performing the contract. [The CCPA prohibits third parties who purchase the personal information we hold from reselling it unless you have received explicit notice and an opportunity to opt-out of further sales.]

We share your personal information with the following categories of third parties:

- Our affiliates
- Third parties to whom we need to disclose your information in connection with products or services we provide you
- Service providers, co-brokers, managing general underwriters and managing general agents

- Insurance carriers
- Governmental agencies for licensing purposes
- Third party claims adjusters

4. Disclosures of Personal Information for a Business Purpose

In the preceding twelve (12) months, WF has disclosed the following categories of personal information for a business purpose.

Category A: Identifiers.

Category B: California Customer Records personal information categories.

Category C: Protected classification characteristics under California or federal law.

Category D: Commercial information.

Category F: Internet or other similar network activity.

Category I: Professional or employment-related information.

Category K: Inferences drawn from other personal information

5. Sales of Personal Information

In the preceding twelve (12) months, WF has not sold personal information.

6. Your Rights and Choices

The CCPA provides consumers (California residents) with specific rights regarding their personal information. This section describes your CCPA rights and explains how to exercise those rights.

Access to Specific Information and Data Portability Rights

You have the right to request that WF disclose certain information to you about our collection and use of your personal information over the past 12 months. Once we receive and confirm your verifiable consumer request, we will disclose to you:

- The categories of personal information we collected about you.

- The categories of sources for the personal information we collected about you.
- Our business or commercial purpose for collecting or selling that personal information.
- The categories of third parties with whom we share that personal information.
- The specific pieces of personal information we collected about you.
- The disclosures for a business purpose, identifying the personal information categories that each category of recipient obtained.

Deletion Request Rights

You have the right to request that WF delete any of your personal information that we collected from you and retained, subject to certain exceptions. Once we receive and confirm your verifiable consumer request (see Exercising Access, Data Portability and Deletion Rights), we will delete (and direct our service providers to delete) your personal information from our records, unless an exception applies.

We may deny your deletion request if retaining the information is necessary for us or our service provider(s) to:

- Complete the transaction for which we collected the personal information, provide a good or service that you requested, take actions reasonably anticipated within the context of our ongoing business relationship with you, or otherwise perform our contract with you.
- Detect security incidents, protect against malicious, deceptive, fraudulent, or illegal activity, or prosecute those responsible for such activities.
- Debug products to identify and repair errors that impair existing intended functionality.
- Exercise free speech, ensure the right of another consumer to exercise their free speech rights, or exercise another right provided for by law.

- Comply with the California Electronic Communications Privacy Act (Cal. Penal Code § 1546 et. seq.).
- Engage in public or peer-reviewed scientific, historical, or statistical research in the public interest that adheres to all other applicable ethics and privacy laws, when the information’s deletion may likely render impossible or seriously impair the research’s achievement, if you previously provided informed consent.
- Enable solely internal uses that are reasonably aligned with consumer expectations based on your relationship with us.
- Comply with a legal obligation.
- Make other internal and lawful uses of that information that are compatible with the context in which you provided it.

Exercising Access, Data Portability, and Deletion Rights

To exercise the access, data portability, and deletion rights described above, please submit a verifiable consumer request to us by:

1. Calling (833) 306–0287
2. Contacting us at complaints@wwfi.com

Only you, or a person registered with the California Secretary of State that you authorize to act on your behalf, may make a verifiable consumer request related to your personal information. You may also make a verifiable consumer request on behalf of your minor child.

You may only make a verifiable consumer request for access or data portability twice within a 12-month period. The verifiable consumer request must:

- Provide sufficient information that allows us to reasonably verify you are the person about whom we collected personal information or an authorized representative.
- Describe your request with sufficient detail that allows us to properly understand, evaluate, and respond to it.

We cannot respond to your request or provide you with personal information if we cannot verify your identity or authority to make the request and confirm the personal information relates to you. We will only use personal information provided in a verifiable consumer request to verify the requestor's identity or authority to make the request.

Response Timing and Format

We endeavor to respond to a verifiable consumer request within forty-five (45) days of its receipt. If we require more time, we will inform you of the reason and extension period in writing. We will deliver our written response by mail or electronically, at your option. Any disclosures we provide will only cover the 12-month period preceding the verifiable consumer request's receipt. The response we provide will also explain the reasons we cannot comply with a request, if applicable. For data portability requests, we will select a format to provide your personal information that is readily useable and should allow you to transmit the information from one entity to another entity without hindrance.

We do not charge a fee to process or respond to your verifiable consumer request unless it is excessive, repetitive, or manifestly unfounded. If we determine that the request warrants a fee, we will tell you why we made that decision and provide you with a cost estimate before completing your request.

Personal Information Sales Opt-Out and Opt-In Rights

You have the right to direct us to not sell your personal information at any time (the "right to opt-out" of sales). The CCPA defines a "sale" as disclosing or making available to a third party personal information in exchange for monetary or other valuable consideration. While we do not disclose personal information to third parties in exchange for monetary compensation, we do disclose or make available personal information to third parties in order to receive certain services or benefits from them. Opt-out rights can be exercised by going to our Cookie Notice. We do not sell personal information about California residents who we know are

younger than 16 years old without opt-in consent. The personal Information disclosed may fall into the following category: Identifiers and Internet and other Similar Network Activity.

To exercise the right to opt-out, you may indicate your preferences by submitting your request to the following link: <https://www.wffi.com/do-not-sell-my-personal-information/>

7. Non-Discrimination

WF will not discriminate against you for exercising any of your CCPA rights. Unless permitted by the CCPA, we will not:

- Deny you goods or services.
- Charge you different prices or rates for goods or services, including through granting discounts or other benefits, or imposing penalties.
- Provide you a different level or quality of goods or services.
- Suggest that you may receive a different price or rate for goods or services or a different level or quality of goods or services.

8. Other Privacy Laws

California's "Shine the Light" law (Civil Code Section § 1798.83) permits users of our Website that are California residents to request certain information regarding our disclosure of personal information to third parties for their direct marketing purposes. To make such a request, please send us an email ([hyperlink](#)).

9. Changes to Our Privacy Notice

WF reserve the right to amend this privacy notice at our discretion and at any time. When we make changes to this privacy notice, we will post the updated notice on the Website and update the notice's effective date. Your continued use of our Website following the posting of changes constitutes your acceptance of such changes.

10. Contact Information

If you have any questions or comments about this notice, the ways in which WF collect and uses your information described below [and in the Privacy Policy], your choices and rights regarding such use, or wish to exercise your rights under California law, please do not hesitate to contact us as follows:

1. Calling (833) 306-0287
2. Contacting us at complaints@wwfi.com