

Privacy Notice

Effective Date: December 31, 2019



1. Introduction

Worldwide Facilities, LLC and its operating companies (“WF”) respects your privacy and is committed to protecting your personal information.

This Privacy Notice describes how WF handles the personal information that we collect or that you otherwise provide to us when communicating with us or accessing our services:

- Online through this website (the “Site”), any software application made available by us (the “Mobile App”), and our social media pages available from the Site (“Social Media Pages”) (collectively, the Site, Mobile App, and Social Media Pages are referred to as “WF Online Services”); and
- Through other avenues such as your application(s), contracts or other agreement(s) with WF, claim forms and related or supporting documentation, e-mails, facsimiles, telephone calls and other communication with WF or third parties involved in our business with you.

This Privacy Notice set forth your rights in relation to your personal information which WF collects, uses, and discloses.

By visiting or using the any of the WF Online Services, you accept the policies and practices stated in this Privacy Notice. Any reference in this notice to the term “we”, “us” or “our” shall mean WF.

2. Information on WF

WF is a corporation that does business in the State of California. WF’s place of business is located at 725 S. Figueroa Street, 19th Floor, Los Angeles, California 90017.

3. What personal information do we collect?

WF collects various kinds of personal information which you provide directly and indirectly, depending on your relationship with us -- whether as an individual agent or broker, a policyholder, claimant, employee, or other person with whom we transact business. The categories of personal information that we collect, and have collected in the past 12 months, about you and/or your dependents include:

- **General identification and contact information**

Your name and any alias; home and work addresses; telephone numbers; email addresses; date of birth; gender; race/national origin; marital and family status/history; physical traits; educational history; professional licenses and affiliations; employment history and job titles; relationship to the policyholder, insured or claimant; date and cause of death, injury or disability; and passwords for WF Online Services.

- **Government-issued identification numbers**

Identification numbers include Social Security or tax identification number; driver’s or other license numbers such a militarily identification number; and passport number.

- **Financial information**

Bank account or other financial account numbers and account details; payment card numbers; income; assets (including investments and real property); liabilities; credit history and credit score; history of insolvency; and other financial information.

- **Health and medical information**

Current or former physical or mental or medical condition; health status; genetic and biometric data; injury or disability details; medical procedures performed; personal habits such as smoking or drug and/or alcohol consumption; medication information; and medical insurance information.

- **Information that allows WF to provide you with products, services or support**

Details about your business and status as an insurance agent or broker; your status as owner, director, shareholder, member or partner, or other ownership or management interest in an organization; policy and claim numbers; prior accident or loss history; facts and information as to the cause for prior or present claims/coverage; photographs or video recordings received in the course of business such as claims processing; location and identification of insured property such as property address, vehicle license plate, identification number, registration number, or safe deposit box location and number; age categories of individuals you wish to insure; other insurance you hold; and other data in activity notes and emails based on our past communications with you.

- **Other sensitive information**

In the course of doing business with you, we may obtain sensitive information about you, such as your business history and partners, history of civil claims and lawsuits, criminal record, job performance, data regarding sex life or sexual orientation, philosophical or religious beliefs, or preferences for medical treatment.

- **Your preferences**

We record your preferred form of communication and marketing and note the interest you express in our products or services.

- **Social media account information**

When you use our Mobile App or follow our Social Media Pages, WF may receive personal information from your other social media account(s), including personal information that is part of your profile relating to those accounts or your friends' profiles. Please review the applicable privacy policies for your social media accounts. We are not responsible for the data collection or the privacy practices of any social media accounts.

- **Information from Other Sources**

We may also collect personal information about you from other sources, including commercially available sources and our business affiliates or partners.

4. How do we use the personal information collected?

We use and disclose, and have used and disclosed in the past 12 months, your personal information in the ordinary course of conducting our business for the following reasons:

Business communications. We use your personal information in communications with you and others for business purposes such as:

- To provide you with information that you seek from us about our products, services or support;
- To communicate with you regarding your account or your business or employment relationship with us;
- To inform you of changes to any of the WF Online Services or any product, service or support we offer.

Business operations. We use and disclose your personal information in operating our business such as:

- To process your applications and transactions, including payments;
- To carry out our obligations and enforce our rights under any contract between you and us;
- To conduct and manage general business operations including compliance with
- internal policies and procedures such as those related to audit; accounting and finance; billing and collection; information technology systems; product development; data storage; website hosting; risk management, detection and prevention of fraud and other security incidents; and records and information retention;
- To allow you to use the interactive features of the WF Online Services;
- To research and run data analytics in order to evaluate and improve our products, services and business operations and develop new or improved features, products, services or support;
- To verify a consumer's identity and process a request to know or delete personal information, as permitted by law;
- To obey all applicable laws;
- To comply with legal and regulatory obligations and legal process such as court orders and subpoenas for information
- To respond to lawful inquiries from governmental, regulatory and other authorities;
- In any other way we may describe when you provide the information; and
- For any other purpose for which you give consent.

Marketing. WF uses and discloses your personal information to provide you with information relating to new or improved product, services or support such as:

- To tailor content we may send or provide you with personalized services when you use the WF Online Services, including to personalize our marketing and advertising to you; and
- To send you direct marketing, including newsletters, emails or other information that you have requested, or we think may interest you.

Do Not Send. WF uses and discloses your personal information to maintain a list of individuals who have unsubscribed from WF's mailings or electronic communications.

5. Who do we share your personal information with?

- Our subsidiaries and affiliates;
- Vendors, consultants, and other service providers, who (i) perform work or services for WF such as payment and application processing, technical support, data storage, webhosting, marketing or data analysis and need your personal information to perform said work services and (ii) have

agreed to maintain the confidentiality and security of the personal information they obtain from us;

- A third party in connection with complying with a court order, subpoena, discovery request or other applicable law or legal process;
- Governmental, regulatory or other legal authorities to respond to lawful requests for information
- Any entity that is needed to protect the rights and property of WF and our employees, agents, users and other third parties, including to enforce our agreements, policies and terms of use, and to protect against fraudulent, abusive, inappropriate, or unlawful use of our services and to protect the safety of WF, our users or any third party;
- A potential buyer (in the course of due diligence), actual buyer or successor of some or all of WF's assets;
- Any third party for any other purpose disclosed by us when you provided your information; and
- Any third party with your consent.

6. What personal information do we sell?

We do not sell any of your personal information or the personal information of minors under 16 years of age to third parties for their use in direct marketing, advertising, or promotion of their products or services.

7. What non-personal information do we collect?

When you use the Site or Mobile App, we and our authorized service providers collect certain non-personal information that does not reveal your specific identity. We collect this information through a variety of technologies, including the following:

Tracking Technologies

When you interact with our Site or Mobile App, WF automatically receives and records information on our logs from your browser. This includes your "cookie information." In addition, our servers (and/or third parties that we do business with) may automatically record information that your browser sends when you visit the Site or use the Mobile App. This information includes your device's IP address, browser type and the webpage you were visiting before you came to our Site, pages of our Site or Mobile App that you visit, the time spent on those pages, information you search for on our Site or Mobile App, access times and dates. We use this information to monitor and analyze use of the Site and the Mobile App.

In addition, we may use web beacons, pixel tags, clear GIFs or other technologies in the Site and Mobile App to count users who have visited our webpages, for related website statistics, and to compile tracking information related to our email marketing or other marketing campaigns.

Different Devices

If you use multiple devices such as your office and home computers, laptop, tablet and/or smart phone to access the Site or Mobile App, we may receive and collect device-specific information, including your hardware model, operating system version, unique device identifiers, phone number, physical location, and mobile network information.

Third-Party Analytics

We use third-party service providers and services, including but not limited to Google Analytics, to gather and analyze information about use of the WF Online Services. These service providers and services use tracking technologies such as cookies to collect personal information. If you want an explanation of how Google Analytics collects and processes data and how you can control the information that is collected about you, please visit this link (<https://policies.google.com/technologies/partner-sites>).

8. How your information is protected?

Consistent with applicable privacy and data security laws, WF has taken physical, technical, and organizational steps to safeguard your personal information. Despite these efforts, we cannot guarantee complete security of your personal information. We ask that you keep confidential and private all passwords used to connect with WF Online Services and encrypt any personal information that is sent to us over the internet. If you have reason to believe or know your login and password for the Site or your personal information has been compromised, please contact us at the email address or telephone number in Section 14 below.

9. How long do we keep your data?

We will retain your personal information for as long as it is reasonably necessary. The retention period will primarily be determined by relevant legal and regulatory obligations and/or duration of our business relationship with you, your employer or another associated party. We will securely delete or erase your personal information if there is no valid business reason for retaining your personal information.

In exceptional circumstances, we may retain your personal information for longer periods of time if we reasonably believe there is a prospect of a future complaint, dispute or litigation, or there is another valid business reason the data may be needed in the future.

10. Privacy of Children

WF's Site and Mobile App are not intended for children. We do not knowingly collect or solicit personal information from anyone under the age of 13 without parental consent. We do not knowingly allow anyone under the age of 13 to register for any services. If we learn that we have collected personal information from a child under age 13, we will delete that information as quickly as possible. If you believe that a child under 13 may have provided us personal information, please contact us at email address or telephone number in Section 14 below. We expect all information provided by online users to be truthful and correct regarding age and other information provided.

11. Changes to this Privacy Policy

WF reserves the right to modify this Privacy Policy at any time. We may update this Privacy Policy to take account of material changes in how we collect, use, store, or disclose your personal information, to comply with legal requirements, or for other business purposes. The Effective Date at the top of the page shows when this Privacy Policy was last revised.

Please review this Privacy Policy periodically so that you are informed of our current practices. You consent to any changes we make to this Privacy Policy if you continue to use any of the WF Online Services after we post a newly updated Privacy Policy on the Site.

12. Contact information regarding data protection

If you have any questions regarding this Privacy Policy, Worldwide Facilities' privacy practices, or your personal information, please contact us at complaints@wwfi.com or call (833) 306-0287.

This Privacy Policy was last updated on 12/31/2019