



WFS PRIVACY POLICY

EFFECTIVE DATE: NOVEMBER 1, 2020



Introduction

World Fuel Services Corporation, its subsidiaries and affiliates (collectively, “we”, “us” or “our”), are committed to safeguarding the privacy and personal information of our customers and business partners. This Privacy Policy explains how we may collect, use, process, share, and store personal information about you, including through designated third-party service providers, and the choices that are available to you regarding this information. Please read this Privacy Policy carefully to understand our views and practices regarding your personal information and how we will treat it.

In addition to information kept in hardcopy, this Privacy Policy also applies to our websites, online applications that run on smartphones, tablets, mobile device applications (“apps”), and other online services that we offer which may link to this Privacy Policy and/or otherwise be governed by this Privacy Policy. Such websites, online applications, and other online services to which this Privacy Policy applies (collectively the “sites” or “websites” and each a “site” or “website”) include, but are not limited to, those found below in [Covered Websites and Applications](#).

Please note also that our websites may contain links to other websites. If you follow a link to any of these other websites, you should read their own privacy policies. We are not responsible for the content or privacy practices of those sites, and this Privacy Policy does not apply to any information that may be collected from you or shared by you on those sites.





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General Disclosures

Please note that most of our public-facing websites are hosted in the United States. If you are visiting the sites from a country outside of the U.S., please note that by providing your information it may be transferred to, stored and/or processed in the U.S. and other countries, including but not limited to the U.K., Costa Rica, Australia, Singapore and various European Economic Area (EEA) members states (such as Denmark, France, Germany, Greece, Hungary, Ireland, Norway, and Sweden) where key data centers, servers, and/or groups of employees are located and operate. If you are from outside of the U.S., please see the provisions under our Specific Jurisdiction Information for additional information. If you are outside the US and do not wish to allow the transfer of your personal information to the U.S., you should not use these sites and you should opt-out of the collection of cookies. View our [World Fuel Services Cookies Policy](#) to learn more.

We take your privacy and the protection of your personal information seriously. To that end, we always endeavor to store, process and disclose your personal information in accordance with applicable law; we will work to make it clearer when we collect personal information and will explain what we intend to do with it; we do our best to protect your privacy through the appropriate use of information security measures.



What personal information do we collect about you?

INFORMATION YOU GIVE US

We collect information about you when you open an account with us, purchase our products and services and/or remit payment for services. We also collect information about you using cookies, and if you interact with us via phone, social media, websites, or apps. Where you are providing us personal information about another person, such as a family member, coworker, or third party corporate contact, you agree that you will have obtained and will maintain all necessary consents and authorizations necessary to share that information with us.

The types of information that you may give us vary depending on the specific entity with which you are doing business and/or the particular services requested. For example, you may be purchasing aviation, land or marine fuel products and/or related services, engaging with us to provide energy management services, using our trip planning services and/or related products, utilizing our software offerings, or using our payment solutions technology. The information you may give us could include categories such as, but not limited to, your name, work or personal address, e-mail address, phone number, date of birth, gender, financial and/or credit card information, passport number, driving license information, Social Security number, national ID number, personal description and/or photograph, professional licenses and/or certifications, visa/immigration information, as well as customer data, payment data, employee data and/or website user data.



SENSITIVE INFORMATION

We will only collect sensitive information about you with your consent and/or where necessary to comply with applicable laws. What qualifies as sensitive information may differ based on applicable law, but it is generally understood to mean personal information relating to your racial or ethnic origin, political persuasion, membership in trade or professional associations, sexual preferences, criminal record, genetics, or health. For example, we may need to collect certain categories of sensitive information regarding your health records or ethnicity to process a visa application or to assist you in gaining access to certain governmental facilities. By providing us this information, you agree that you have given us your consent to collect, store, use, and transfer it for the purposes provided and as may be permitted under applicable law. You agree further that you will not send us and will not disclose to us any sensitive categories of information unless required by us to provide the services for which you have contracted with us. Where you are providing us sensitive information about another person, you agree that you will have obtained and will maintain all necessary consents and authorizations necessary to share such information with us.

COOKIES AND WEBSITE USAGE

Our websites may use cookies to distinguish you from other users of our websites. This helps us to improve the functionality and content of the websites, including keeping our websites and records safe and secure and to facilitate usage by you.

Similarly, some of our websites might use various analytics systems to help identify problems with our websites and/or to improve website usability and the overall customer experience. This may include recording of mouse clicks, movements and scrolling activity.

Depending on the WFS entity and website, we may use performance and/or targeting cookies such as Google Analytics, Hotjar, Lucky Orange, and/or Eloqua. For more information regarding our use of cookies, please review the [World Fuel Services Cookie Policy](#), as well as the information contained in the banners of our various websites, which provide the ability to turn on/off various cookies.

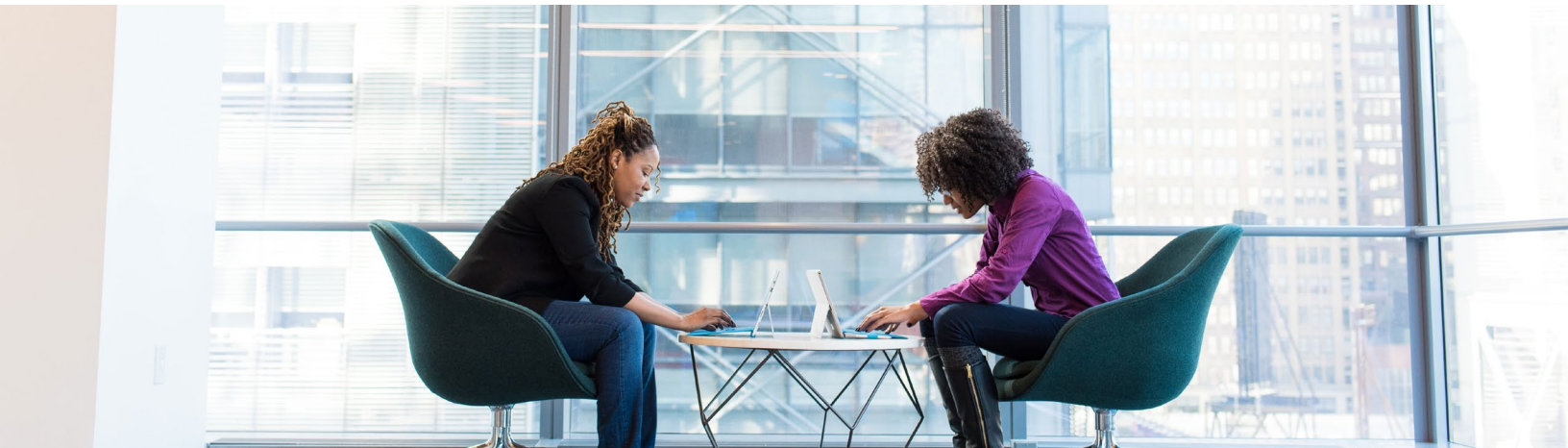
Where we have given you a password to access certain parts of our websites, or where you have chosen one for yourself, you are responsible for keeping that password confidential and for maintaining an adequate level of complexity. We ask you not to share a password with anyone.

Unfortunately, the transmission of information via the internet is not completely secure. Although we will do our best to protect your personal data, we cannot guarantee the security of your data transmitted to/from our websites -- any transmission is at your own risk.



INFORMATION WE RECEIVE FROM OTHER SOURCES

We may receive information about you if you use any of the other websites we operate or the other services we provide. We also work closely with third parties (including, for example, business partners, sub-contractors, payment and delivery services, advertising networks, analytics providers, marketing lead generation companies, corporate contact information providers, and credit reference agencies) and may receive information about you from them.



CHILDREN'S ONLINE PRIVACY PROTECTION ACT (COPPA) COMPLIANCE AND RELATED INFORMATION

The Children's Online Privacy and Protection Act (COPPA) regulates the online collection of information from persons under the age of 13. Please note that our websites are not intended for children under 13 years of age and we do not knowingly solicit data online from, or market online to, children under 13 years of age. If you are under the age of 13, please do not supply any personal information through the sites. Instead, please have your parent or guardian contact us immediately using the information provided under [How to Contact Us](#), so that we can remove such information from our files.

How do we use your personal information?

We use your information as permitted by the applicable law to provide you with information, process orders for products and services that you request from us, and administer or otherwise carry out our obligations in relation to any agreement you have with us. We retain your information for the period necessary to serve a legitimate purpose or as required by law. Examples of when and how we may need to use your data, including transferring it to affiliated entities and/or selected third-party service providers, includes but is not limited to the following:

- **Responding to inquiries**

We may use your contact information, purchase history, account preferences, payment details, location, etc. to help answer your sales and/or delivery-related questions, or to identify a product or service that is best suited to your needs or that is most convenient to your physical location.

- **Contract fulfillment**

We may use your contact information and billing details to execute our agreements with you and to maintain and/or assess our ongoing commercial relationship with you. Depending on the products and services requested, we may need to utilize your personal contact information, date of birth, passport details, visa/immigration information, sensitive information, payment details, health information, location, etc. to fulfill our contractual duties and provide the requested services.

- **Product and service development and enhancement**

We may use information such as your website activity, purchase history, account preferences, travel history, etc. to better understand the usage of our products and services and to help identify areas for development and enhancement.

- **Marketing**

We may also use this information to provide you with information about goods or services that we feel may be of interest to you. You may opt-out of receiving marketing and promotional messages from us if those messages are powered by us, by following the instructions found in those messages. If you decide to opt-out you will still receive non-promotional communications relevant to your use of our goods or services. You can manage your preferences directly here: [**WFS User Data and Communications Preference Center**](#).

If at any time you wish us to stop using your information for any of the above purposes, please contact us using the methods explained below. We will stop the use of your information for such purposes as soon as it is reasonably possible to do so.

How do we share your personal information?

WE DO NOT SELL YOUR INFORMATION

We do not sell the personal information of any customer or vendor to third parties, and we also do not allow the third parties with whom we share your personal information to sell it. We do not sell the personal information of minors under sixteen (16) years of age. While we may be permitted to sell anonymized and de-identified data, as defined by applicable laws, such data can no longer identify an individual.



HOW WE MAY SHARE/DISCLOSE YOUR INFORMATION WITH THIRD PARTIES

We may share your personal information with other members of our group of companies and with selected third parties for the performance of any contract that we have entered into with them or with you, as well as to determine your satisfaction with the services and/or products that we may be providing to you. These third parties will not use your personal information for any other purposes than what we have agreed to with them, and we request those third parties to implement adequate levels of protection in order to safeguard your personal information.

Since we are a global company, the data that we collect from you may be transferred to, and stored at, a destination outside of the country in which you reside (e.g. outside the U.S., U.K., EEA, Australia, Singapore, etc.). For example, it may be processed by staff operating outside the EEA who work for us, our subsidiaries, or for one of our suppliers in relation to the fulfillment of your order (e.g. in the U.S. or Costa Rica). While the information is under our control, we seek to ensure that your personal information receives the same level of protection as it would have it stayed within your home country, including seeking to ensure that it is kept secure and used only in accordance with our instructions and for legitimate purposes.

CORPORATE TRANSACTIONS

In the event we go through a business transition, such as a merger, assignment, acquisition of another company, or sale of part or all of our assets (including due to a sale in connection with a bankruptcy), we may disclose your personal information to third parties and your personal data held may be among one of the assets transferred. We will require any such purchaser, assignee or other successor business entity to honor the terms of this Privacy Policy or those at least equal to it.

**AGGREGATED, ANONYMIZED OR DE-IDENTIFIED INFORMATION**

We may also automatically collect non-personal information about you such as the type of internet browsers you use or the website from which you linked to our website. We may also aggregate details that you have submitted to us. You cannot be identified from this information and it is only used to assist us in providing effective services, including in connection with the websites.

In some circumstances, we may anonymize your personal information (so that it can no longer be associated with you) for research or statistical purposes, in which case we may use this information indefinitely without further notice to you. This allows the specific information collected (name, email, address, phone number, etc.) to become anonymous but allows us to keep the transaction or engagement data. For example, we will not be able to tell if John Smith registered for an event, but we will be able to tell that a person registered for an event and maintain headcount and transactional history. This will allow us to maintain a level of information that helps us develop and improve our site's products and services.

DISCLOSURE OF INFORMATION FOR LEGAL PURPOSES

We may be under a duty to disclose or share your personal information for various other reasons, such as to comply with a legal obligation; to enforce or apply our terms of use and other agreements; or to protect the rights, property, or safety of our companies, our customers, or others. This could include, for example, exchanging information with a law enforcement agency or regulator; or with companies and organizations for the purposes of fraud protection and credit risk reduction. Note that in certain jurisdictions we may also be permitted to use or disclose certain forms of government identifiers in compliance with local laws, such as under Australian law where we may be authorized to do so by or under an Australian law or a court/tribunal order, and/or when reasonably necessary to fulfill our obligations to a federal, state or territorial government agency.

How do we store and protect your personal information?

We seek to store your information only for the period required to serve a legitimate purpose or as required by law. In general, storage may be for the duration of our commercial relationship, for as long as you can bring a claim against us and for us to be able to defend ourselves, and/or for any period required by tax and other applicable laws and regulations. We will take a range of reasonable measures to protect your personal information and to store it in a secure environment, whether that is in paper and/or electronic form. We will also take reasonable steps to protect any personal information from misuse, loss and/or unauthorized access, modification, or disclosure.



Potential rights under country-specific data privacy laws

Multiple countries have instituted their own data privacy laws that mandate certain rights. The rights that you may exercise under certain key jurisdictions are found below.

If you are eligible and wish to exercise the rights granted under any other applicable data privacy law (e.g. a subject access request), you may contact us using the details found below. Please note that we may not always be able to fulfill your request as there may be legitimate purposes, such as certain legal or statutory obligations, that require us to retain your information as stored or if we believe the change would cause the information to be incorrect.



Complaints

Please be aware that when we receive a formal written complaint regarding the processing of personal data, we try to resolve it directly with the person who has made the complaint. However, as necessary, we will work with the appropriate regulatory authorities, including local data protection authorities, to resolve any complaints regarding our processing of personal data that we cannot resolve with a complainant directly.

If you are dissatisfied with how we have dealt with your personal information, or you have an issue with our compliance with applicable privacy laws, you may contact us using the contact details below. We will acknowledge your complaint and aim to resolve it as quickly as possible and within applicable statutory deadlines.

You may ultimately choose to raise your concern with the applicable data privacy regulator. Information on which agencies to contact in certain key jurisdictions are highlighted below.



Updates to our Privacy Policy

As appropriate, we may make changes to this Privacy Policy that will be posted online and, where appropriate, be sent to you by e-mail. Please check back frequently to remain aware of any updates or changes to this Privacy Policy. We display an effective date on this Privacy Policy so that it will be easier for you to know when there has been a change. Your use of our sites and our services constitutes acceptance of the provisions of this Privacy Policy and your continued usage after such changes are posted constitutes acceptance of each revised Privacy Policy. If you do not agree to the terms of this Privacy Policy or any revised Privacy Policy, please exit the sites immediately. If you have any questions about this Privacy Policy, the practices of the sites or your dealings with the sites, you can contact us by using the information provided below.



How to contact us

We encourage you to first visit our [WFS Privacy Center](#), which contains additional information regarding our policies and procedures. If you have additional questions, or believe you are eligible to submit a subject access request or exercise a right available to you under specific national, provincial or state laws, you can reach us by email at privacy@wfscorp.com, using the [web form](#) provided through our [WFS Privacy Center](#), or contacting us by post at:

World Fuel Services Corporation
Attn: Privacy Administrator, Legal Department
9800 NW 41st Street
Miami, Florida 33178
U.S.A.

You may also reach us toll-free in the United States at +1.888.549.0965, or by visiting the WFS Compliance Hotline at www.wfscpliance.com, where you will find other country-specific toll-free numbers and an online portal through which you can begin the process by sending us relevant information and requests.

Covered Websites and Applications

As noted above, this Privacy Policy also applies to our websites, apps, and other online services that we offer which may link to this Privacy Policy and/or otherwise be governed by this Privacy Policy. Such websites, apps, and other online services to which this Privacy Policy applies (collectively the “sites” or “websites” and each a “site” or “website”) include, but are not limited to:

World Fuel Services Corporation (wfscorp.com, aviation.wfscorp.com, marine.wfscorp.com, wmf-marinefuels.com, aviation.wfscorp.com, wfscapricing.com, ir.wfscorp.com, wfsmasters.com, drive4wfs.com, worldfuelrewards.com, coltinternational.com, TripView, Online Flight Planning (OFP), BunkerLine);

Air Elite Network (airelitenetwork.com);

Alta Lubricants (altalubricants.com);

Amstar (amstargas.com); Ascent (ascent1.com);

Avinode (avinode.com, paynode.com, schedaero.com);

AvPOS (avpos.com);

Ecuacentair (Ecuacentair.com);

FBO Manager (fbomanager.com);

GibOil (giboil.com, golubricants.es);

Gulf Canada (gulfcanda.com);

Henty Oil (hentyoil.com, hentyoil.co.uk);

Indianhead Oil (indianheadoil.com);

Kinect Consulting (kinectconsulting.com);

Kisch Oil (kischoil.com);

MH Aviation (mhaviation.co.za);

MyFBO (myfbo.com);

MyWorld Portals (www. myworld.air.wfscorp.com, myworld.marine.wfscorp.com, myWorld Commercial Aviation Portal, myWorld Business and General Aviation (BGA) Portal, myWorld iPad app);

NCS Fuel (ncsfuel.com);

PetroAir (petroair.com);

Spire Flight (spireflights.com);

Tamlyn Shipping (tamlyn-shipping.co.uk);

Terrana (terranacombustiveis.com.br);

Trackmyelectricity (trackmyelectricity.com);

Total Aviation Software (totalaviationsoftware.com);

TotalFBO (totalfbo.com);

Watson (watsonfuels.co.uk, tankscout.co.uk, watsonfuelcards.co.uk, directoil.co.uk, watsonboilerservice.co.uk);

World Kinect Energy Services (world-kinect.com, kinectenergy.com, texor.com, usenergyservices.com, ktminc.com, bergen-energi.com, altafuels.com, beachfrontenergy.com, ux-online.com, gotoapp.com, carterenergy.com, associatedpetroleum.com, carterenergy.com, cngatwork.com, lakesideoil.com, mexicoenergia.com, whatwillfuelthefuture.com, thelubricantcompany.co.uk, thelubricantcompany.co.za, westernpetro.com, orchardenergy.co.uk);

Yacht Fuel (yachtfuel.com);

XISOT (xisot.com);

and Xtenergy (xtrenergy.ca).

Specific Jurisdiction Information

EUROPEAN UNION GENERAL DATA PROTECTION REGULATION (“GDPR”)

Under the EU General Data Protection Regulation (“GDPR”), if you are a citizen or resident of a European Economic Area (“EEA”) country or Switzerland, you may have certain rights regarding your personal information, including:

- **Right to** access information maintained about you;
- **Right to** ensure your data is accurate and complete;
- **Right to** erasure, or the right to be forgotten;
- **Right to** restriction or suppression of personal data;
- **Right to** data portability;
- **Right to** withdraw the consent if consent was previously provided; and
- **Right to** raise a complaint to the Information Commissioner’s Office.

If you make a request of us under the above rights, we expect to be able to respond to your request without charge as a general matter. However, we reserve the right to collect a reasonable charge when you request the transcription, reproduction or transmission of such information. We will notify you, following your request for transcription, reproduction or transmission of the appropriate amount that will be charged. You will then have the opportunity to withdraw your request after notification of the charge.



We rely on the following legal grounds to process your personal information, namely:

- **Performance of a contract**

We may need to collect and use your personal information, including sensitive information, to enter into a contract or to perform a contract that you, your company, or some other intermediary acting on your behalf has with us.

- **Legitimate interests**

We may use your personal information for our legitimate interests to improve our products and services. Consistent with our legitimate interests and any choices that we offer or consents that may be required under applicable laws, we may use technical information as described in this Privacy Policy and use personal information for our marketing purposes.

- **Consent**

Where required by applicable laws, we will rely on your consent for collecting your personal information. Except when otherwise permitted by law, we obtain the requisite consent prior to collecting and prior to using or disclosing your personal information. You may provide your consent to us orally, in writing, by electronic communication or any other means reasonably capable of conveying your consent. If necessary, we will obtain your express consent if we collect, use or disclose sensitive personal information in our capacity as a data controller. We may also share your data with third-party partners for whom you have given us consent. Your consent may be intrinsic to the circumstances such as in the case where you have already provided personal information to us and you maintain your relationship with us or where you provide our representatives with your phone number so that we can contact you. Except when otherwise permitted by law we will only use the data for the purpose for which it was given. From time to time, we may collect, utilize or disclose your personal information based on your consent and as otherwise permitted by law. When your consent is required, you may withdraw your consent at any time (unless withdrawing the consent would frustrate the performance of legal obligations) upon providing us a 30-day notice. However, the withdrawal of your consent may adversely affect our ability to provide our products and services to you and to maintain our relationship.

We will only process personal information for a specific purpose or for any other purposes specifically permitted by applicable data protection legislation.

If you are dissatisfied with how we have dealt with your personal information, please contact us at the details above so that we can try to find a solution. You may ultimately choose to raise your concern with the applicable data privacy regulator. For EEA countries and Switzerland, Data Protection Authority (DPA) contact details can be found [here](#). To contact the U.K. Information Commissioner's Office (ICO), please visit their website [here](#).



AUSTRALIA

Under the Australian Privacy Act 1988 (Cth), if you are an Australian resident, you may have certain additional rights regarding your personal information, including, for example, the right to access and correct the information that we hold about you, and a general requirement to ensure the quality and accuracy of the personal information collected. You may request access to any of the personal information we hold about you at any time, but we may charge a fee for our costs of retrieving and supplying the information to you. If any of the personal information we hold about you is incorrect, inaccurate, or out of date, you may request that we correct it. We will generally rely on you to ensure the information that we hold about you is accurate and/or complete.

Access and correction requirements in the Australia Privacy Act 1988 (Cth) operate alongside and do not replace other informal or legal procedures by which an Australian resident can be provided access to or correction of his or her personal information, such as Australia's Freedom of Information Act 1982.

If you are dissatisfied with how we have dealt with your personal information, please contact us at the details above so that we can try to find a solution. You may ultimately choose to raise your concern with the applicable data privacy regulator. For Australia, the Office of the Information Commissioner may be contacted either via www.oaic.gov.au, by phone at 1300 363 992, or at GPO Box 5218 Sydney NSW 2001.

BRAZIL

Under the Brazil General Data Protection Law (Lei Geral de Proteção de Dados Pessoais “LGPD”), Law No. 13,709/2018, if you are a Brazilian resident, you may have additional rights regarding your personal data, including:

- **The right** to confirmation of the existence of the processing of your personal data;
- **The right** to access your personal data;
- **The right** to correct incomplete, inaccurate or out-of-date personal data;
- **The right** to anonymize, block, or delete unnecessary or excessive personal data or personal data that is not being processed in compliance with the LGPD;
- **The right** to the portability of personal data to another service or product provider if you make an express request;
- **The right** to delete your personal data being processed;
- **The right** to information about public and private entities with which we have shared your personal data;
- **The right** to refuse consent for the processing of your personal data and information regarding the consequences if you refuse to give such consent;
- **The right** to revoke the consent previously given for the processing of your personal data.

If you make a request of us under the above rights, we expect to be able to respond to your request without charge as a general matter. However, we reserve the right to collect a reasonable charge when you request the transcription, reproduction or transmission of such information. We will notify you, following your request for transcription, reproduction or transmission of the appropriate amount that will be charged. You will then have the opportunity to withdraw your request after notification of the charge.

We may collect and process personal data where: (i) we have your consent to do so; (ii) where we need the personal data to perform a contract with you; (iii) to comply with one of our legal or regulatory obligations; (iv) to execute public policies provided in laws or regulations, or based on contracts, agreements, or similar instruments; (v) to exercise our rights in judicial, administrative or arbitration procedures; (vi) to protect the life or physical safety of the data subject or a third party; (vii) to protect credit; and/or (viii) where the processing is in our legitimate interests and not overridden by your privacy interests or other rights found in applicable laws.



We may rely on the following legal grounds to collect and/or process your personal data, namely:

- **Consent**

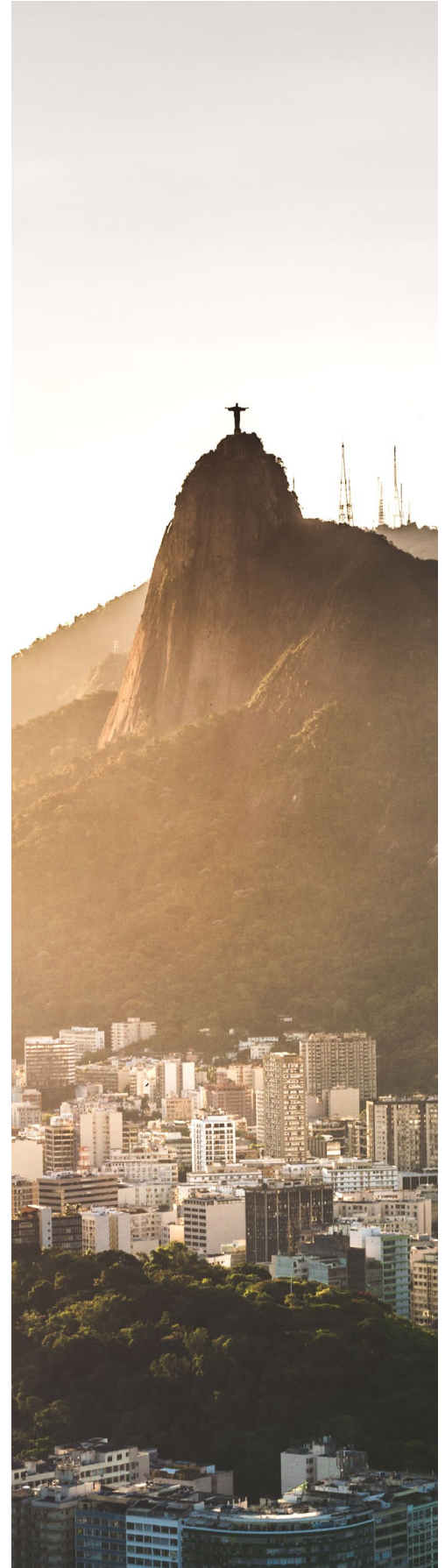
Where required by applicable laws, we will rely on your consent for collecting and/or using your personal data. Except when otherwise permitted by law, we obtain the requisite consent prior to collecting and prior to using or disclosing your personal data. You may provide your consent to us orally, in writing, by electronic communication or any other means reasonably capable of conveying your consent. If necessary, we will obtain your express consent if we collect, use or disclose sensitive personal data in our capacity as a data controller. We may also share your personal data with third-party partners for whom you have given us consent. Your consent may be intrinsic to the circumstances, such as in cases where you have already provided personal data to us and you maintain your relationship with us or where you provide our representatives with your contact details so that we can contact you. Except when otherwise permitted by law we will only use the data for the purpose for which it was given. From time to time, we may collect, utilize or disclose your personal data based on your consent and as otherwise permitted by law. When your consent is required, you may withdraw your consent at any time (unless withdrawing the consent would frustrate the performance of legal obligations) upon providing to us appropriate notice as provided under applicable law. However, the withdrawal of your consent may adversely affect our ability to provide our products and services to you and to maintain our relationship.

- **Contractual obligations**

We may need to collect and/or use your personal data, including sensitive personal data, to enter into a contract or to perform a contract that you, your company, or some other intermediary acting on your behalf has with us.

- **Legitimate interests**

We may need to collect and/or use your personal data to fulfill our legitimate interests or those of a third party, such as to improve our products and services. Consistent with our legitimate interests and any choices that we offer or consents that may be required under applicable laws, we may use technical information as described in this Privacy Policy and use personal data for our marketing purposes. We may fulfill such legitimate interests except where your fundamental rights and liberties prevail under applicable law.



- **Legal or regulatory**

We may need to collect and/or use your personal data to comply with one of our legal or regulatory obligations.

- **Legal or judicial**

We may need to collect and/or use your personal data to exercise our rights in judicial, administrative or arbitration procedures.

- **Safety and protection**

We may need to collect and/or use your personal data to protect the life or physical safety of you or a third party.

- **Credit**

We may need to collect and/or use your personal data to protect credit.

- **Public policies**

We may need to collect and/or use your personal data to support the execution of public policies provided in laws or regulations, or based on contracts, agreements, or similar instruments. To execute public policies provided in laws or regulations, or based on contracts, agreements, or similar instruments.

We will only process personal data for a specific purpose or for any other purposes specifically permitted by applicable data protection legislation. If you are dissatisfied with how we have dealt with your personal data, please contact us at the details above so that we can try to find a solution.



CALIFORNIA

If you are a California resident, you may have additional rights regarding your personal information under the California Consumer Privacy Act of 2018 (CCPA).

The types of personal information that we may collect from you will vary depending on the WFS entity and/or the services you may engage us to provide. The different categories of personal information we might collect include, but are not limited to: identifiers (e.g. contact information, government IDs, cookies); information protected against security breaches (e.g. name and financial account, social security number, user name and password, or medical information); protected classification information (e.g. race, gender); commercial information; internet/electronic activity; geolocation; audio/video data; professional or employment-related information; education information; biometrics; and inferences from the foregoing categories. WFS does not sell your personal information to third parties.

California residents who have provided their personal information to us have certain rights and may make various requests to exercise those rights under the CCPA. Qualifying individuals have the right to request: (i) information regarding the collection or disclosures and/or sale, if any, of their personal information to third parties; (ii) no more than twice every 12 month period, copies of personal information or the categories of personal information collected about them over the last 12 months; (iii) that we not sell their personal information to third parties, which we already do not do; and (iv) that such personal information be deleted under certain circumstances. Qualifying individuals also have the right not to be discriminated against because they exercised any of the rights provided for under the CCPA.

As a California resident, you have the right to designate an authorized agent to make a request under the CCPA on your behalf. By submitting sufficient and verifiable documentation (e.g. an agency form) along with your request, you can designate an authorized agent to make requests under the CCPA related to your personal information. To help better protect your personal data we can deny any request by an agent who does not submit sufficient proof that he or she has been authorized by you to act on your behalf.

If you are a California resident and otherwise qualify, you or your authorized agent can seek to exercise one of your CCPA consumer rights by sending your request through one of the mechanisms described above in this Policy ([see How to Contact Us](#)).





Do Not Track (“DNT”) is an optional browser setting that allows you to express your preferences regarding tracking across websites. Most modern web browsers give you the option to send a Do Not Track signal to the websites you visit, indicating that you do not wish to be tracked. However, there is no accepted standard for how a website should respond to this signal, so we do not take any action in response to this signal. We do not have a mechanism in place to respond to DNT signals. Instead, in addition to publicly available third-party tools, we offer you the choices described in this Privacy Policy to manage the collection and use of information about you.

We do track some activity across websites (e.g. your search terms, the website you visited before you visited or used the services and other clickstream data) and we may continue to collect information in the manner described in this Privacy Policy from web browsers that have enabled DNT signals or similar mechanisms.

We may need to collect additional information to verify the identity and legitimacy of the requesting party, and we will respond within 45 days of receiving such requests as required under the law. Such requests may be submitted to us using the contact details and methods described above.

If you are dissatisfied with how we have dealt with your personal information, please contact us at the details above so that we can try to find a solution. You may ultimately choose to raise your concern with the applicable data privacy regulator. For California, the Attorney General’s office may be contacted via the details provided [here](#).

NEVADA

Nevada law provides Nevada residents the ability to opt-out of the sale of their personally identifiable information that we collect. For your protection, we are required to collect certain information from you to verify your identity before we respond to any request submitted by you. The information you provide to verify your identity will only be used for verification purposes, and a record of your request, including certain information contained within it, will be maintained by us for our files.

If you are a Nevada resident and otherwise qualify, you can seek to exercise one of your consumer rights by sending your request through one of the mechanisms described in this Policy ([see How to Contact Us](#)).

