

# PRIVACY POLICY

Last updated: January 18, 2022

This Privacy Policy includes important information about your personal data and we encourage you to read it carefully.

WiP cares about the security and privacy of the personal data that is entrusted to us.

This Privacy Policy describes the “Personal Data” that we collect about you in connection with various media products and services that link to this Privacy Policy, including how we use it, how we share it, your rights and choices, and how you can contact us about our privacy practices. This Privacy Policy also outlines your data subject rights.

“WiP”, “we”, “our” or “us” means the entity responsible for the collection and use of personal data under this Privacy Policy.

“Personal Data” means any information that relates to an identified or identifiable individual, and can include information about how you engage with our Media Services (e.g. device information, IP Address).

“Media Services” means the products and services covered by this Privacy Policy.

“Sites” means websites covered by this Privacy Policy. Collectively, we refer to Sites and other services covered by the Privacy Policy as “Media Services”.

## 1. Personal Data That We Collect And How We Use and Share It.

See below for further information on the legal bases which we rely on for using (processing) your Personal Data.

### a. Personal Data That We Collect

When you visit our Media Services, we generally receive your Personal Data either from you providing it to us or through our use of cookies and similar technologies.

- **Forms.** When you choose to fill in a form on our Media Services or on third party websites featuring our advertising (e.g. LinkedIn or Facebook), we will collect the information included in the form, usually your contact information and other information provided by you in connection with that form related to our Media Services.
- **Forums and Discussion Groups.** Where our Media Services allow you to post content, we will collect Personal Data that you provide in connection with the post.
- **Contact information.** When you purchase products or services from us or subscribe to Media Services, we will collect your contact information, which may include your name, phone number, shipping address, and email address.

### b. How We Use and Share Your Personal Data

- **Delivering products and services.** We will use your Personal Data in the delivery of our Media Services.
- **Communications.** We may communicate with you using the contact information we have about you (e.g. using email, phone, text message or videoconference) to provide information about our Media Services, invite you to participate in our events or surveys, or otherwise communicate with you for marketing purposes, provided that we do so in accordance with applicable law, including any consent or opt-out requirements. For example, when you submit your contact information to us or when we collect your business contact details through our participation

at trade shows or other events, we may use the information to follow-up with you regarding an event, send you information that you have requested on our products and services and include you on our marketing information campaigns.

- **Personalization.** We use Personal Data about you that we gather from cookies and similar technologies to measure engagement with the content on the Media Services, to improve relevancy and navigation, to personalize your experience and to tailor content about us and our Media Services to you.
- **Improving and Developing our Services.** We use analytics on our Sites to help us analyze your use of our Sites and Media Services and diagnose technical issues, which may include the use of cookies to help analyze traffic to our website. We also use the Personal Data we collect to improve our Media Services and to develop new Media Services and support our efforts to make them more relevant to you and more useful.
- **Advertising.** When you visit our Media Services, we (and our service providers) may use Personal Data collected from you and your device to target advertisements for Media Services to you on our Sites and other sites you visit (“interest-based advertising”), where allowed by applicable law, including subject to any consent requirements. WiP does not sell or rent Personal Data to marketers or unaffiliated third parties. If you choose to submit Personal Data to us to participate in an offer, program or promotion, we will use the Personal Data you submit to administer the offer, program or promotion. Based on your permission or opt-out, we may also use that Personal Data and Personal Data you make available on social media to market to you.
- **Harm Prevention and Security.** We collect and use Personal Data to help us to detect bad actors across our Media Services and otherwise seek to secure our Media Services and other services against unauthorized access, use, modification or misappropriation of Personal Data, information and property. We may collect information from you, and about you, from third parties. For example, to protect our Media Services, we may receive information from third parties about IP addresses that malicious actors have used.
- **Compliance with Legal Obligations.** We use Personal Data to meet our contractual and legal obligations.
- c. **Personal Data Sharing.** In addition to the ways described above, we share Personal Data in the following ways:
  - **Affiliates.** We share Personal Data with other affiliated entities. When we share with these entities, it’s for purposes identified in this Privacy Policy.
  - **Service Providers or Processors.** In order to provide Media Services to you and to communicate, market and advertise our Media Services, we will rely on others to provide us services. Service providers (also known as “processors”) provide a variety of critical services, such as hosting (storing and delivering), analytics to assess the speed, accuracy and/or security of our Media Services, customer service and subscription management. We authorize such service providers to use or disclose the Personal Data to perform services on our behalf and to comply with applicable legal requirements. We require such service providers to contractually commit to protect the

- security and confidentiality of such Personal Data.
- **Others with Consent.** In some cases we may not provide a service, but instead refer you to, or enable you to, others to get services. In these cases, we will disclose the identity of the third party and the Personal Data that will be shared with them, and seek your consent to share the information.
- **Corporate Transactions.** In the event that we enter into, or intend to enter into, a transaction that alters the structure of our business, such as a reorganization, merger, sale, joint venture, assignment, transfer, change of control, or other disposition of all or any portion of our business, assets or stock, we may share Personal Data with third parties in connection with such transaction. Any other entity which buys us or part of our business will have the right to continue to use your Personal Data, but subject to the terms of this Privacy Policy.
- **Compliance and Harm Prevention.** We share Personal Data as we believe necessary: (i) to comply with applicable law, (ii) to enable payments; (iii) to enforce our contractual rights; (iv) to secure or protect the Media Services, rights, privacy, safety and property of us, you or others, including against other malicious or fraudulent activity and security incidents; and (v) to respond to valid legal requests from courts, law enforcement agencies, regulatory agencies, and other public and government authorities, which may include authorities outside your country of residence. Please Note: We do not monitor forums for disclosure of Personal Data by others, if you need assistance, please contact us as identified below.

## 2. Legal Basis for Processing Personal Data.

For the purposes of the General Data Protection Regulation, we rely upon a number of legal grounds to enable our processing of your Personal Data in connection with our Media Services.

- a. Contractual and Pre-Contractual Business Relationships. We process Personal Data for the purpose of entering into business relationships with you and to perform the respective contractual obligations that we have with you. Activities include:
  - Creation and management of accounts and account credentials;
  - Accounting, auditing, and billing activities (as applicable); and
  - Processing of payments, including fraud detection and prevention, optimizing valid transactions, communications regarding such payments, and related customer service (as applicable).
- b. Legal Compliance. We may process your Personal Data in order to comply with laws associated with the identification and reporting of illegal and illicit activity.
- c. Legitimate Business Interests. Where allowed under applicable law, we rely on our legitimate business interests to process your Personal Data, including the following:
  - Determine eligibility for and offer other products and services;
  - Respond to inquiries, send service-related notices and provide customer support;
  - Promote, analyze, modify and improve our Media Services, systems, and tools, and develop new products and services, including reliability of the Media Services;
  - Manage, operate and improve the performance of our Media Services by understanding their effectiveness and optimizing our digital assets;
  - Analyze and advertise our Media Services;
  - Conduct aggregate analysis and develop business intelligence that enable us to operate, protect, make informed decisions, and report on the performance of, our business;
  - Share Personal Data with third party service providers

- that provide services on our behalf and business partners which help us operate and improve our business;
- Enable our network and information security, including our Media Services; and
- Share Personal Data among our affiliates.

- d. Consent. We may rely on consent to collect and process Personal Data from time to time. When we process Personal Data based on your consent, you have the right to withdraw your consent at any time without affecting the lawfulness of processing based on such consent before the consent is withdrawn.

## 3. Your Rights.

You may have choices regarding our collection, use and disclosure of your Personal Data:

### a. Opting out of receiving electronic communications from us

If you are a WiP subscriber and you no longer wish to receive marketing-related emails from us, you may opt-out here.

### b. Your data protection rights

Depending on your location and subject to applicable law, you may have the following rights described here with regard to the Personal Data we control about you:

- The right to request confirmation of whether we process Personal Data relating to you, and if so, to request a copy of that Personal Data;
- The right to request that we rectify or update your Personal Data that is inaccurate, incomplete or outdated;
- The right to request that we erase your Personal Data in certain circumstances provided by law;
- The right to request that we restrict the use of your Personal Data in certain circumstances, such as while we consider another request that you have submitted (including a request that WiP make an update to your Personal Data);
- The right to request that we export your Personal Data that we hold to another company, where technically feasible;
- Where the processing of your Personal Data is based on your previously given consent, you have the right to withdraw your consent at any time; and/or
- Where we process your information based on our legitimate interests, you may also have the right to object to the processing of your Personal Data. Unless we have compelling legitimate grounds or where it is needed for legal reasons, we will cease processing your information when you object

### c. Process for exercising data protection rights

To exercise your data protection rights please email [info@worksinprogress.com](mailto:info@worksinprogress.com)

### d. Jurisdiction-specific provisions

- **EEA and UK.** To exercise your rights, you may contact us at [info@worksinprogress.co](mailto:info@worksinprogress.co). If you are a resident of the EEA, you may direct your questions or complaints to the Office of the Data Protection Commission. If you are a resident of the UK, you may direct your questions or concerns to the UK Information Commissioner's Office.
- **United States - California.** If you are a consumer located in California, we process your personal information in accordance with the California Consumer Privacy Act (CCPA). You have a right to receive notice of our practices at or before collection of personal information. This section provides additional details about the personal information we collect and use for purposes of CCPA.
  - How We Collect, Use, and Disclose your Personal Information. The Personal Data We Collect section further describes the personal information we may

have collected about you, including the categories of sources of that information. We collect this information for the purposes described in the How We Use Personal Data section. We share this information as described in the How We Disclose Personal Data section. Your CCPA Rights and Choices. As a California consumer and subject to certain limitations under the CCPA, you have choices regarding our use and disclosure of your personal information:

- Exercising the right to know: you may request that we disclose to you the personal information we have collected about you. You also have a right to request additional information about categories of their personal information collected, sold, or disclosed; purposes for which this personal information was collected or sold; categories of sources of personal information; and categories of third parties with whom we disclosed this personal information.
- Exercising the right to delete: you may request that we delete the personal information we have collected from you, subject to certain limitations under applicable law.
- Exercising the right to opt-out from a sale: We do not sell Personal Data as defined by the CCPA and have not done so in the past 12 months.
- Non-discrimination: The CCPA provides that you may not be discriminated against for exercising these rights.

To submit a request to exercise any of the rights described above, please contact us using the methods described in the Contact Us section below. You may designate, in writing or through a power of attorney, an authorized agent to make requests on your behalf to exercise your rights under the CCPA. Before accepting such a request from an agent, we will require the agent to provide proof you have authorized it to act on your behalf, and we may need you to verify your identity directly with us.

Further, to provide or delete specific pieces of personal information we will need to verify your identity to the degree of certainty required by law. We will verify your request by asking you to send it from the email address associated with your account or requiring you to provide information necessary to verify your account.

An authorized agent may submit a request on your behalf by contacting us using the methods described in the Contact Us section below. We may still require you to directly verify your identity and confirm that you provided the authorized agent permission to submit the request.

#### **4. Security and Retention**

We make reasonable efforts to provide a level of security appropriate to the risk associated with the processing of your Personal Data. We maintain organizational, technical and administrative measures designed to protect Personal Data covered by this Privacy Policy against unauthorized access, destruction, loss, alteration or misuse. Personal Data is only accessed by a limited number of personnel who need access to the information to perform their duties. Unfortunately, no data transmission or storage system can be guaranteed to be 100% secure.

We retain your Personal Data as long as we are providing the Media Services to you or our Business Users (as applicable) or for a period during which we reasonably anticipate providing the Media Services. In cases where we keep Personal Data, we do so in accordance with any limitation periods and records retention obligations that are imposed by applicable law.

#### **5. International Data Transfers**

Personal Data may be stored and processed in any country where we do business. We may transfer your Personal Data to countries other than your own country, including to the United States. These countries may have data protection rules that are different from your country. When transferring data across borders, we take measures to comply with applicable data protection laws related to such transfer. Officials (such as law enforcement or security authorities) in those other countries may be entitled to access your Personal Data. Where applicable law requires a data transfer legal mechanism, we use standard contractual clauses if you are located in the European Economic Area ("EEA"), UK or Switzerland. Where applicable law requires a data transfer mechanism, we use one or more of the following: EU Standard Contractual Clauses with a data recipient outside the EEA or Switzerland, verification that the recipient has implemented Binding Corporate Rules, or other legal method available to us under applicable law.

#### **6. Updates and Notifications**

We may change this Privacy Policy from time to time to reflect new services, changes in our Personal Data practices or relevant laws. The "Last updated" legend at the top of this Privacy Policy indicates when this Privacy Policy was last revised. Any changes are effective when we post the revised Privacy Policy on the Media Services. To the extent permitted by law, we will provide you with disclosures and alerts regarding the Privacy Policy or Personal Data collected by posting them on the Media Services.

#### **7. Contact Us**

If you have any questions or complaints about this Privacy Policy, please contact us via [info@worksinprogress.com](mailto:info@worksinprogress.com)