



This Privacy Policy applies to any visitor or user (hereinafter referred to as "You") of the website located at [www.WALA-MARKETING.com](http://www.WALA-MARKETING.com), "the Site" that WALA, LLC owns and controls.

WALA is sensitive to the issue of confidentiality in online dealings and is committed to transparency regarding its protection of individual privacy. This Privacy Policy is intended to inform users about the general approach WALA uses in collecting, using and disseminating user information via the Site.

### **What Personal Information May Be Collected?**

At WALA, it is our policy to create website content that demonstrates our respect for visitors' privacy and allows us to understand our visitors. We may request personal information from you, including your name, business address, email address or telephone number, when you interact with the Site, such as to respond to your requests or to enable you to register to use certain features of this Site.

When we do collect personal information, we will use it for the purposes indicated in this policy.

Our Site may provide links to other websites that may have their own personal information collection practices. To the extent that you provide personal information to websites that link to or from our Site, different rules may apply to the use and disclosure of that information. To the extent that the Site includes third-party advertisements, the privacy policy of the advertiser providing the advertisement will govern the use of your personal information collected during your access to the advertisement. WALA does not control linking practices of advertisers or sponsors and does not monitor or claim responsibility for any content or privacy practices of such websites. Once you have left our Site, you must read the privacy policy of the advertiser or sponsor to see how your personal information will be handled.

### **Other Types of Information That May Be Collected**

#### **IP Addresses**

An internet protocol address, or IP address, is automatically assigned to your computer when you access the internet, and is used by web servers to identify your computer. When you access our Site, we may log your computer's IP address, however, your personal identity will remain unknown to us, except as described in this Privacy Policy. We log the IP addresses for system administration, for auditing the use of our Site, and for collecting statistical information for marketing and other purposes.

#### **Cookies or Tracers**

We may place information on your computer to allow us to identify you. This information is known as a "cookie." We use cookies to view information about your activities on our Site, such as your preferences or which pages you have visited on the Site. A cookie does not allow our Site to collect any personal information that you have not otherwise disclosed (except as described below). By understanding how and when our visitors use the Site, we can continually improve our Site, as well as our products and services. Your browser may have controls that allow you to refuse all cookies or indicate when a cookie is being sent.

We use tracking scripts or "tracers" that recognize a unique identifier from a cookie placed on your computer by another non-WALA website. These are used by WALA to gauge the success of our own advertising. For instance, we may use a tracer to determine whether you visit our employment page after visiting a career site where WALA placed a banner advertisement. We do not use tracers to gather information on your use of the internet unrelated to WALA, or to determine your personal information, and you remain anonymous to WALA unless you choose to provide personal information, except as explained in Section

### **Web Beacons**

Web beacons are small files that we may place on our Site, which count the number of unique users that have visited a specific page on the Site and the number of times a given page has been displayed. This information is collected generally in the aggregate and is not linked to any personal information (except as described below).

### **Pixel Tags**

We may use "pixel tags," or short pieces of code, to better measure the effectiveness of our content. These also allow social networks and other services to deliver content to you based on your visit to our website.

### **Custom URLs**

We may track your visit by providing you with a unique universal resource locator, or URL, via an e-mail, a letter or other communication. When you use this unique URL, our website registers the visit. We use this information to measure the effectiveness of our advertising and other content.

### **What Happens If I Register?**

Registration may be allowed or required on the Site. Together, the provisions of this Privacy Policy and any additional conditions presented to you upon registration govern our use of information you provide during registration. In addition to the uses described above, WALA may collect registration data in order to monitor compliance with this Privacy Policy and to set up access permissions to certain other pages on the Site.

### **Do-Not-Track**

Our information collection practices operate as described in this Privacy Policy independent of any "do-not-track" choice you make.

### **Use and Sharing of Information**

WALA and its subsidiaries and affiliates may use and disclose your personal information only as set forth herein, except where the terms of a separate privacy policy apply.

Generally, your personal information will not be shared with third parties not affiliated with WALA. For more information about your rights and choice, see Section 5. Your Privacy Choices/Updates to Your Information.

Anonymous data collected using cookies, tracers, and web beacons may be analyzed in the aggregate to determine collective user characteristics, to understand user traffic patterns, sales information and user behavior on the Site. Such information also may be shared in the aggregate with third parties for

advertising purposes, to enhance our Site, to enhance our products and services, and to analyze how and where best to use our resources.

### **Monitoring and Compliance**

Although WALA is under no obligation to monitor the Site, we may monitor, store, review and share with third parties any information, including your personal information, obtained on or through the Site, including if it is needed or requested to satisfy any applicable governmental law, regulation, investigation or proceeding. WALA may also disclose your personal information (1) where such disclosure is required by law; (2) to protect WALA's legal rights to the extent authorized or permitted by law; or (3) in an emergency where the health or safety of you or another individual may be endangered. Additionally, we may use IP addresses to identify a particular user if we believe it is needed to enforce compliance with the terms of this policy or to protect our company, employees, Site, or customers.

WALA may transfer personal information in connection with the sale or acquisition of one or more of our businesses or subsidiaries to a different company that agrees to offer equivalent safeguards for the use and disclosure of such information.

### **Security of Personal Information**

We maintain administrative, technical and physical safeguards designed to protect the personal information you provide on the Sites against accidental, unlawful or unauthorized destruction, loss, alteration, access, disclosure or use. While WALA makes extensive effort to prevent unauthorized access to personal information, the security of information transmitted via the internet cannot be guaranteed. Any information disclosed online can potentially be collected and used by others aside from the intended recipient. Thus, WALA cannot warrant that your personal information will not be disclosed to or accessed by unauthorized parties.

### **Your Privacy Choices/Updates to Your Information**

We offer you certain choices in connection with the personal information we collect from you. To update your preferences, ask us to remove your information from our mailing lists or submit a request, please contact us as indicated below. To the extent provided by law, you may request access to the personal information we maintain about you or request that we correct, amend, delete or block the information by contacting us at the contact addresses indicated below. Where provided by law, you may withdraw any consent you previously provided to us or object at any time on legitimate grounds to the processing of your personal information, and we will apply your preferences going forward.

We may need to retain your personal information, to enforce the terms of this Privacy Policy, resolve disputes, or provide information to satisfy applicable investigations or proceedings. Additionally, your personal information may be retained in back-up files created by our network's back-up systems. However, we will not keep your information longer than is necessary to achieve these purposes.

To exercise your privacy choices, please click the opt-out link on the email you received or contact us via email at [PrivacyPolicy@WALA.com](mailto:PrivacyPolicy@WALA.com). Please indicate if you would prefer that we use a different email address or communication method. Restricting our contact methods may make it more difficult for us to keep you informed about new products, services and websites that can benefit you. These choices do not apply to transactional or relationship

### **External Links**

Occasionally, you will find links from our Site to independently owned, controlled, and/or managed websites whose content we believe will be of possible interest and value to our visitors.

In many cases, these links represent cooperative projects or mutual links established with the organizations connected with these sites. We don't control the content of the sites accessed by you via these links. These other sites may send you their own cookies, collect data, or solicit personal information. While we identify sponsor and advertiser areas of our Site, we do not control these cookies or the content of these third parties.

Once you leave our servers (you can generally tell on which site you are by checking the URL in the location bar on your browser), the use of any information you provide is governed by the privacy policy of the operator of the site you are visiting. That policy may differ from ours. If you can't find the privacy policy of any of these sites via a link from that site's home page, you should contact that website operator directly for more information.

### **EU Personal Data Collection, Use, and Disclosure**

**EU Employee Data:** WALA may collect, use and process EU Employee Data for the following purposes: general business administration; workflow management, such as assigning, managing, and administering projects; compensation, including stock plan administration, compensation analysis, and benchmarking; payroll processing; performance management; succession planning; IT helpdesk and support services; benefits administration (e.g., health and medical benefits, leave entitlements, and pensions); administration of company compliance hotline; monitoring of the use of company technology; conducting internal investigations (e.g., compliance with local/US law and company policies); exercising a right or obligation imposed by law or contract (e.g., mandatory reporting obligations); and data hosting. WALA transfers EU Employee Data to the following types of third parties: talent management and learning providers, payroll providers, ethics investigations providers, financial transaction messaging providers, advisors and auditors, employee onboarding providers, invoicing and expense reporting services providers, mobility services providers, benefits and other work-related allowances providers, network and IT support and services providers, and customer software providers document management systems providers, and human resources information systems providers. The Company provides to EU employees a notice about the collection, use, and disclosure of their EU Employee Data through internal company policies.

**EU Job Applicant Data:** WALA may collect, use and process EU Employee Data for the following purposes: general business administration; evaluation of job applicant for employment position; administration of job application and employee onboarding process; conducting internal investigations (e.g., compliance with local/US law and company policies); exercising a right or obligation imposed by law or contract (e.g., mandatory reporting obligations); and data hosting. WALA transfers EU Job Applicant Data to the following types of third parties: job application management providers, employee onboarding providers, document management systems providers, and human resources information systems providers. The Company provides to EU job applicants notice about the collection, use, and disclosure of their EU Job Applicant Data through internal company policies.

**EU Customer Data:** The Company collects and processes the following categories of EU Customer Data: name; personal/work contact information, photograph (where permitted by applicable law), employee, contractor, or government identification, country of origin, nationality, content of communications, computer usage information related to an EU Customer's use of its own company equipment, systems, and other resources, Internet Protocol (IP) address or other device location information of a desktop, laptop or other devices used by or on behalf of an EU Customer to access EU Customer's computer or telecommunications network onsite or through a remote connection, and other personal data

incidentally accessed on EU Customer's equipment or systems in connection with its managed security and professional services. The Company will use and otherwise process EU Customer Data in the United States for the following purposes: general business administration; managed security and professional services; speech recognition and call center analytics; customer support; direct marketing (e.g., email, text message, postal mail, behavioral advertising); fulfillment of requests; tracking payment of order; customer relationship management; responding to inquiries; and exercising a right or obligation imposed by law or contract (e.g., mandatory reporting obligations). WALA transfers EU Customer Data to the following types of third parties: financial transaction messaging providers, and legal advisors.

EU Business Partner Data: The Company collects and processes the following categories of EU Business Partner Data: name; address, professional contacts or organizations, date of birth, photograph, applicable ID number (passport or national ID), qualifications, work history, job title, educational history, prohibited party or other criminal background information. The Company will use and otherwise process EU Business Partner Data in the United States for the following purposes: general business administration; account management; IT helpdesk and support services; direct marketing (e.g., email, text message, postal mail); exercising a right or obligation imposed by law or contract (e.g., mandatory reporting obligations); and vendor management. The Company transfers EU Business Partner Data to the following types of third parties: ethics investigations providers, financial transaction messaging providers, legal advisors, document management systems providers, screening and escalation services providers, and network and IT support providers.

### **Rights of EU Data Subjects**

If you are an EU data subject, you have the right to access your own EU Personal Data subject to certain limitations, such as where the legitimate rights of other persons would be infringed or where the burden or expense of providing access would be disproportionate. If you wish to exercise such rights, please contact us as described below.

### **Choices of EU Data Subjects**

Individual customers have the right to exercise choice (opt-out) from our use of their EU Customer Data for direct marketing purposes. To exercise this right, please or follow the instructions in any direct marketing message you may have received. We do not otherwise use or disclose EU Customer Data in a manner that is subject to choice requirements under the Framework. We describe the choices for EU Employee Data and EU Job Applicant Data through internal company policies.

### **Recourse, Enforcement, and Liability**

Please contact us as specified below if you have any questions, need access to your EU Personal Data, or otherwise need assistance. We remain responsible for our collection, use and disclosure of EU Personal Data in accordance with the Framework. We also are responsible for third party agents that are processing such data on our behalf, unless we prove that we are not responsible for the event giving rise to the damage. In certain situations, we may be required to disclose EU Personal Data in response to lawful requests by public authorities, including meeting national security or law enforcement requirements.

If you have an unresolved concern about EU Personal Data that we have not addressed satisfactorily, we have committed to cooperate with the panel established by the EU Data Protection Authorities to serve as our independent dispute resolution body for the Framework. We are also subject to the investigatory and enforcement powers of the Federal Trade Commission with respect to the Framework. In addition, under certain conditions, more fully described on the Privacy Shield [website](#), EU data subjects may

invoke binding arbitration for non-monetary issues when other dispute resolution procedures have been exhausted.

**Contact Us**

Please contact us using the contact information under "Dispute Resolution/Contact Information" below if you have any questions related to the Privacy Shield, wish to exercise your rights of access, or wish to seek other assistance as described above.

**Changes to This Privacy Policy**

Changes to this Privacy Policy, will post on this page, with a new effective date at the top. If we make material changes to our Privacy Policy that could affect the personal information you previously submitted to us, we will provide you notice and an appropriate opportunity to consent.

**Dispute Resolution/Contact Information**

If you have any questions or concerns regarding WALA's privacy policy or its use of personal information, please contact us at [PrivacyPolicy@WALA.com](mailto:PrivacyPolicy@WALA.com) or:

Compliance Officer  
WALA  
PO Box 570  
Bristol NH 03222