



Global Workforce Privacy Notice

March 2024

1. Introduction

WD-40 Company and its affiliated entities (collectively, “WD-40 Company,” “we,” or “us”) value the trust of our workforce and are committed to transparency regarding our handling of Personal Information (as defined under applicable data protection regulations in your relevant jurisdiction). This Global Privacy Notice (“Notice”) applies to job applicants (“Candidates”), current and former employees (collectively, “Employees”) and, where applicable, to current and former workers and contractors who provide services to us (collectively, “Non-Employee Workers”).

The purpose of this Notice is to explain what Personal Information we collect, access, use, store, transfer and disclose (together, “process”) about you and why, in connection with recruitment, employment, post-employment, and engagement.

2. Who Is Responsible for Your Personal Information

Each WD-40 Company affiliated entity that processes your Personal Information is responsible for looking after it in accordance with this Notice, our internal standards and procedures, and the requirements of applicable data protection laws. The WD-40 Company affiliated entity that processes your Personal Information is the one that you apply/applied to, that employs/employed you, or that engages/engaged you (usually referred to as the controller of your personal information). Please see the chart in Section 16 below for a list of the relevant WD-Company affiliated entities.

3. Personal Information We Process

Category of Personal Information	Examples
Personal Details	name, employee or other worker identification number, work and home contact details (email, phone numbers, physical address), language(s) spoken, date and place of birth, national identification number (if permitted by applicable local law), social security number, driver’s license information, other government issued identification or registration numbers, gender, gender identity, marital/civil partnership status, domestic partners, dependents, emergency contact information, and in some instances, personal details of other individuals (such as your family members).
Immigration Details	citizenship, immigration status, passport data, details of residency and work permit.
Compensation, Payroll, and Expenses	base salary, bonus, benefits, information related to insurance policy when provided by us, compensation type, changes in compensation, details on stock options, stock grants and other awards, currency, pay frequency, effective date of then-current compensation, salary reviews, bank account information, working time records (including vacation and other absence records, leave status, hours worked and department standard hours), pay data, expenses and invoices, card/account number and the card/account use information, and termination date.
Benefits Information	the benefits you register for, expense records (such as details of out of pocket expenses, corporate credit cards, company cars or private cars where an allowance is claimed and mobile phone costs), medical leave information, medical certificates, information required to confer special benefit status (such as information concerning pregnancy status and age of children, etc.) where applicable, your use of company equipment and resources, and travel preferences.
Employment Information	description of position(s), job title, corporate status, management category, job code, salary plan, pay grade or level, compensation history where permissible



	under applicable law, job function(s) and subfunction(s), company name and code (legal employer entity), branch/unit/department, employee number, user name, location, employment status and type (including if you are a contractor), full- time/part-time, terms of employment or engagement, contractual terms, work history, hire/re-hire and termination date(s) and reason, length of service, retirement eligibility, promotions and disciplinary records (including allegations of misconduct, breaches of laws or company policy violations, grievances, information relating to internal investigations and interviews, reports, and disciplinary actions taken), special work environment requests, accident information, date of transfers, travel preferences, use of company equipment and resources, electronic corporate device tags or registration numbers, and reporting manager(s) information.
Talent Management Information	details contained in letters of application and resume/CV (previous employment background, education history, professional qualifications, language and other relevant skills, certification(s), certification expiration dates), information necessary to complete a background check and/or credit check (to the extent permitted in your jurisdiction), criminal records, background check records, credit check records, roles performed and applied for, details on performance management ratings, skills and experience, development programs planned and attended, e-learning programs, performance and development reviews and discussion ratings and comments, including dates for the foregoing, willingness to relocate, feedback expressed about you, and information that you have shared with us to populate employee biographies or to respond to surveys and questionnaires, unless specifically gathered anonymously.
Shareholdings and Positions	Details of any shares of common stock or directorships.
Audio/Visual Data	audio, electronic, photographic, visual or similar data including videos, photographs, or audio recordings.
Usage Data	Information to access company systems or applications such as IT system ID, LAN ID, email account, instant messaging account, mainframe ID, previous employee ID, previous manager employee ID, system passwords, employee status reason, branch state, country code, previous company details, previous branch details, previous department details, audio or video recordings of you, and electronic content produced by you using our IT systems.
Sensitive Information	We may also collect certain Personal Information that is deemed “sensitive” under local law, such as information about health, medical information, disability status, financial information, religious beliefs, ethnicity, gender identity, political opinions or trade union membership, sexual life and orientation, biometric information, passwords or information about criminal records or civil litigation history. We will only process Sensitive Personal Information with your consent and where permitted by applicable governing law.

Unless stated otherwise at the time of collection of your Personal Information, you are obliged to provide your Personal Information as may be required by us. If you do not provide us with the requested information, we may not be able to or continue your engagement or provide you with employment or certain employment benefits.



4. Sources Of Personal Information

We will only collect and process Personal Information with your consent and to the extent permitted by law in the jurisdiction in which you work. Where we are legally allowed to, we may also collect additional information from third parties.

We obtain Personal Information from a variety of sources, including:

- Directly from you;
- Third-parties who undertake background checks on our behalf;
- Third-party online recruiting and application platforms;
- Recruitment agencies or specialist search organizations;
- Any websites, intranet sites and online portals made available by us for use on or through computers or mobile devices, which you access and use in the course of your employment or engagement;
- The software applications made available by us for use on or through computers and mobile devices, which you access and use in the course of your employment or engagement, including wearable devices; and
- Our social media content, tools, and applications, which you access and use in the course of your employment or engagement.

We limit the collection, use and retention of Personal Data to that which is germane for the intended purposes for which it was collected or authorized by you and take reasonable steps to ensure that all Personal Data is reliable, accurate, complete and current. We depend on you to keep Personal Data reliable, accurate, complete and current and will rely on you to maintain the integrity of all Personal Data you provide to us. Please note that Employees may access, modify and rectify their Personal Data stored on internal solutions, such as WorkDay etc.

5. Why We Process Personal Information And The Legal Basis For Doing So

The Personal Information we collect about you depends on your circumstances, your role, the law and whether you are a Candidate, Employee or Non-Employee Worker. Below you can find information about the purposes and types of Personal Information we handle for Candidates, Employees and Non-Employee Workers.

Purpose of Processing Your Personal Information	Examples	Legal Basis for Processing
Managing and Administering the Workforce	Managing work activities and personnel generally, including recruitment, assessing suitability for employment, assessing suitability for engagement as a Non-Employee Worker, appraisals, performance management, promotions and succession planning, rehiring, administering salary, administering benefits, payment administration and reviews, wages and other awards such as stock options, stock grants and bonuses, healthcare where permitted by applicable governing law, retirement and savings plans, training, leave, managing sickness leave, transfers, secondments, honoring other contractual benefits, providing employment references, loans, performing workforce analysis and planning, performing Employee and Non-Employee Worker surveys, performing background checks (including	• It is in our legitimate interests where it is not overridden by your interests or fundamental rights and freedoms • Needed to perform a contract with you or prepare to enter into a contract with you, including to establish, manage, or terminate employment or managing post-employment relationships • Needed to comply with legal requirements • As may be permitted under applicable law, and to the extent an alternative valid justification does not apply, with your consent



	using your Personal Information, where permitted by applicable governing law, to undertake: ID checks, address verification, education and/or professional qualification verification, employment history verification, criminal or conduct checks, credit/bankruptcy/financial integrity checks, adverse media search directorship search, regulatory checks (e.g. bribery and anti-corruption compliance), sanctions screening against sanction lists to identify criminal or fraudulent activity, terrorist watch-list search), investigating and managing disciplinary matters (including non-compliance with the Code of Conduct) and fraud, grievances and terminations, reviewing employment decisions, making business travel arrangements, managing business expenses and reimbursements, planning and monitoring of training requirements and career development activities and skills, administering apprenticeship and internships, creating and maintaining one or more internal Employee and Non-Employee Worker directories, and promoting diversity and preventing discrimination.	
Maintaining Business Continuity	Ensuring business continuity (including contacting you using your personal contact details (e.g. personal email addresses or mobile phone numbers)), facilitating communication with you at one of our offices, when travelling, during working from home absent an emergency, protecting the health and safety of employees and others, safeguarding IT infrastructure, office equipment and other property, and facilitating communication with you and your nominated contacts in an emergency via any means we deem necessary to reduce any risk to you or others (for example by contacting you using your personal contact details by calling or sending SMS text messages).	• It is in our legitimate interests where it is not overridden by your interests or fundamental rights and freedoms • Needed to comply with legal requirements • As may be permitted under applicable law, and to the extent an alternative valid justification does not apply, with your consent
Managing and Improving Our Business and Operations	Operating and managing IT and communications systems, managing product and service development, improving products and services, managing and securing company premises and other assets, allocating company assets and human resources, strategic planning, project management, business continuity, compilation of audit trails and other reporting tools, maintaining records relating to business activities, budgeting, financial management and reporting, communications, managing mergers, acquisitions, sales, re-organizations or disposals and integration with purchasers.	• It is in our legitimate interests where it is not overridden by your interests or fundamental rights and freedoms • As may be permitted under applicable law, and to the extent an alternative valid justification does not apply, with your consent



Complying with Legal Requirements, Regulatory Requirements, and Internal Policies and Procedures	Complying with legal and other requirements, such as income tax and national insurance deductions, record-keeping and reporting obligations, performing background checks, conducting audits, compliance with government inspections and other requests from government or other public authorities, complying with guidance issued by our regulators, and responding to legal process such as subpoenas.	• It is in our legitimate interests where it is not overridden by your interests or fundamental rights and freedoms • Needed to comply with legal requirements
Pursuing Legal Rights	Pursuing legal rights and remedies, defending litigation, and managing any internal complaints or claims, conducting investigations, and enforcing internal policies and procedures.	• It is in our legitimate interests where it is not overridden by your interests or fundamental rights and freedoms • As may be permitted under applicable law, and to the extent an alternative valid justification does not apply, with your consent • Needed to comply with legal requirements
Monitoring Workers and Systems	Monitoring of Employees – which includes systematic and repetitive surveillance, tracking, analyzing, observing and/or reviewing an individual – designed to ensure compliance with internal policies, laws and for fraud and crime prevention including monitoring of: (i) electronic and verbal communications, including telephone, email, instant messaging, and other electronic messages, (ii) use of and access to information systems and technology made accessible by us, including internet usage and activity, IT hardware and software content, and other company resources, and (iii) our premises, including via Closed Circuit Television and building access logs.	• It is in our legitimate interests where it is not overridden by your interests or fundamental rights and freedoms • Needed to comply with legal requirements • Needed to perform a contract with you or prepare to enter into a contract with you, including to establish, manage, or terminate employment or managing post-employment relationships • As may be permitted under applicable law, and to the extent an alternative valid justification does not apply, with your consent
Health and Safety Support	Processing information about absence or (where required or permitted by applicable law) medical information regarding physical or mental health or condition in order to assess eligibility for incapacity or permanent disability related remuneration or benefits; determine fitness for work; facilitate a return to work; make adjustments or accommodations to duties or the workplace; and make management decisions regarding employment or engagement, or continued employment or engagement, or redeployment, conduct-related processes, providing support in work related injuries, illness, and providing any accessibility	• It is in our legitimate interests where it is not overridden by your interests or fundamental rights and freedoms • Needed to perform a contract with you or prepare to enter into a contract with you, including to establish, manage, or terminate employment or managing post-employment relationships • Needed to comply with legal requirements



	support you may need, (including where applicable, you make us aware in your health declaration upon joining us and as updated by you when appropriate) and contacting your emergency contact if ever needed.	As may be permitted under applicable law, and to the extent an alternative valid justification does not apply, with your consent
Equal Opportunities Monitoring	In some countries we may, subject to local laws, process information about your ethnicity, disability, age, religion/belief, gender and sexual orientation. This information is used to comply with equality and diversity requirements as an employer and to help us improve our employment practices. Access to this information is strictly limited.	- It is in our legitimate interests where it is not overridden by your interests or fundamental rights and freedoms - Needed to comply with legal requirements - Needed to perform a contract with you or prepare to enter into a contract with you, including to establish, manage, or terminate employment or managing post-employment relationships - As may be permitted under applicable law, and to the extent an alternative valid justification does not apply, with your consent

In some jurisdictions, your implied consent (such as continuing your employment or engagement with us after receipt of this Notice) is a valid basis for processing your Personal Information. If you are located in one of those jurisdictions, for processing done on the basis of “your consent” as set out above, you imply your consent to the relevant WD-40 Company affiliate entity that processes your personal information in accordance with this Notice. You may refuse or withdraw consent to certain of the identified purposes at any time by contacting our Privacy Officer. If you refuse to consent or withdraw your consent, we may not be able to or continue your engagement or provide you with employment or certain employment benefits.

6. Monitoring

WD-40 Company reserves the right to engage in monitoring of Candidates, Employees and Non-Employee Workers – which includes systematic and repetitive surveillance, tracking, analyzing, observing and/or reviewing an individual – designed to ensure compliance with internal policies, laws and for fraud and crime prevention including monitoring of: (i) electronic and verbal communications, including telephone, email, instant messaging, and other electronic messages, (ii) use of and access to information systems and technology made accessible by us, including internet usage and activity, IT hardware and software content, and other company resources, and (iii) our premises, including via Closed Circuit Television and building access logs. Such monitoring will be conducted in accordance with relevant regulations in your jurisdiction and may result in the collection of Personal Information. Depending on your jurisdiction, when using WD-40 Company’s equipment or resources, you should not have any expectation of privacy with respect to such use, whether for business or personal purposes.



7. Our Sharing of Personal Information

We sometimes need to make Personal Information available to other WD-40 Company affiliates and other unaffiliated parties for the purposes set forth above. We have set out below a list of the categories of parties who we share your Personal Information with.

Type of Party	Examples
WD-40 Company and its affiliated entities	Personal Information will be shared between and among WD-40 Company and its affiliated entities in accordance with the Data Transfer Deed of Agreement with an effective date of October 28, 2021. Access to Personal Information is required by policy to be limited to those who have a need to know the information for the purposes described above, and may include your managers and their designees, personnel in HR, IT, Compliance, Legal, Finance and Accounting and Internal Audit. All Employees and Non-Employee Workers within WD-40 Company will have access to your name, position and (i) business contact information, such as work telephone number, office postal address and work email address and (ii) personal contact information, such as personal cell phone number, home postal address and home email address to the extent you make such information generally available (e.g. via corporate directory).
Professional Advisors	Accountants, auditors, actuaries and administrators, lawyers, insurers, bankers, administrators or managers of provident fund schemes and other outside professional advisors in all of the countries in which WD-40 Company operates or seeks to operate.
Service Providers	Companies that provide products and services to WD-40 Company such as payroll, pension scheme and benefits providers; human resources services, background check providers (and those background check providers may in turn share Personal Information with other third parties, such as former employers, education institutions, etc.), performance management, training, expense management, IT systems suppliers and support; fraud prevention and similar agencies; third parties assisting with equity compensation programs, credit card companies, medical or health practitioners, trade bodies and associations, and other service providers.
Our Clients	Companies that we provide or promote products and services to.
Distribution and Other Business Partners	Intermediaries and agents, appointed representatives, distributors, affinity marketing partners, and other business partners.
Public and Governmental Authorities	Entities that regulate or have jurisdiction over WD-40 Company such as regulatory authorities, law enforcement, public bodies, and judicial bodies.
Other Third Parties	In connection with any proposed or actual reorganization, merger, sale, joint venture, assignment, transfer or other disposition of all or any portion of WD-40 Company or its affiliated entities, its business, assets or stock (including in connection with any bankruptcy or similar proceedings), or any other third party to whom you authorize us to share your Personal Information.

8. Where We Process your Personal Information

Due to the global nature of our business activities, for the purposes set out above (see section above “Why We Process Personal Information And The Legal Basis For Doing So”) we may transfer Personal Information to parties located in countries other than where you reside and which have a different data protection regime than is found in the country where you are based, including the United States, United Kingdom, India, Malaysia, Australia, Mexico, Brazil and Canada, and your Personal Information may be subject to the laws of such countries, and accessible to law enforcement and national security authorities of such countries. When making these transfers, we will take reasonable steps



designed to ensure that your Personal Information is adequately protected and transferred in accordance with the requirements of data protection law, including by putting in place appropriate data transfer mechanisms (such as contractual clauses).

If you consent to the disclosure of your Personal Information to a party located in a country other than where you reside, we are not required to ensure that the overseas party complies with the data protection laws of the country where you are based and we will not be accountable if the overseas party mishandles your information. You will consent to disclose information to an overseas party if you click 'I Agree' to the consent at the end of this Notice.

9. How We Secure Personal Information

We have implemented reasonable and appropriate administrative, technical and physical measures to protect the confidentiality, integrity and availability of your Personal Data, whether in electronic or tangible, hard copy form. We shall take reasonable steps to protect your Personal Data from loss, misuse and unauthorized access, disclosure, alteration and destruction where we transfer your Personal Information to third-party providers we only do so where we have the appropriate safeguards in place to protect your Personal Information.

10. How Long We Store Your Personal Information

- **Candidates:** We will retain your Personal Information only for as long as we need it for our legitimate interest or for the purpose of the recruitment process, in accordance with applicable law. If you become a WD-40 Company Employee or Non-Employee Worker, your Personal Information will become a part of your employment file and may be used later for the management of the employment relationship.
- **Employees and Non-Employee Workers:** We keep your Personal Information for as long as it is required in accordance with the purpose(s) for which it was collected, for the fulfilment of business purposes, or in accordance with applicable law. This will usually be the period of your employment or contract with us plus the length of any applicable statutory limitation period once that employment or contract period has ended. For example, data such as tax and benefits information may need to be kept for longer. Otherwise we will delete or anonymize it so that you cannot be identified and it can no longer be associated with you

Please note that retention periods may be extended in response to litigation, investigations, or similar proceedings.

11. Personal Information You Provide About Others

If you provide us with Personal Information about another person, we will process that information in accordance with this Notice. Before providing Personal Information about another person to us, you must (unless we agree otherwise) (a) inform the individual about the content of this Notice and any other applicable privacy notice provided to you; and (b) obtain their permission (where possible) to share their Personal Information with us in accordance with this Notice and other applicable privacy notices.

12. Your Personal Information Rights

The following is a summary of the data protection rights which may be available to you in connection with your Personal Information. **However, these rights only apply in certain jurisdictions/circumstances and are subject to certain legal exemptions.** There are instances where applicable law or regulatory requirements allow or require us to refuse your request in full or in part. In addition, Personal Information relevant to your request may have been destroyed, erased or made anonymous in accordance with our record retention obligations and practices.

To exercise any of the below rights, please click [here](#) or call us at 1-877-906-1824. For all requests, you must provide us with your name, email address, phone number, and mailing address. Failure to provide all of the foregoing information will prevent us from processing your request. We will verify your identity by matching the information we have collected against the information you have provided. If you have requested that we



correct your personal information, we may contact you to request additional information about the personal information that you believe is inaccurate, including supporting documentation. In order to designate an authorized agent to act on your behalf, you must send a signed, written authorization to us at privacy@wd40.com.

Right	Description
Right of Access to Personal Information	The right to receive a copy of the Personal Information we hold about you and information about how we use it.
Right to Access Category Information	The right to request that we tell you (i) what personal information we have collected about you, (ii) the sources of that information, (iii) the business or commercial purposes for collecting, selling or sharing the personal information; and (iv) the categories of third-parties to whom we have disclosed your personal information.
Right to Rectification of Personal Information	The right to ask us to correct Personal Information we hold about you where it is incorrect or incomplete. We take appropriate steps to ensure that Personal Information we collect is as accurate and complete as is reasonably required in connection with the purposes for which it was collected, used or disclosed. However, you are responsible for providing us with any changes to your Personal Information so that appropriate records may be accurately maintained.
Right to Erasure of Personal Information	This right is sometimes referred to as “the right to be forgotten.” This is the right to request that your Personal Information be deleted or removed from our systems and records.
Right to Restrict Processing of Personal Information	The right to request that we suspend our use of your Personal Information, including Personal Information relating to other persons who may be identified from that information. Where we suspend our use of your Personal Information, we will still be permitted to store your Personal Information, but any other use of this information while our use is suspended will require your consent, subject to certain exemptions.
Right to Opt Out of Sale or Sharing of Personal Information	The right to opt-out of the sale or sharing of your personal information for cross-contextual or targeted advertising.
Rights Relating to Automated Decision Making and Profiling	The right not to be subject to a decision which is based solely on automated processing (without human involvement) where that decision produces a legal or similarly significant effect.
Right to Data Portability	This right allows you to obtain your Personal Information in a format which enables you to transfer that Personal Information to another organization, if this is technically feasible. However, this right only applies in certain circumstances.
Right to Withdraw Consent to Processing of Personal Information	Where we have relied upon your consent to process your Personal Information, the right to withdraw that consent.
Right to Provide Instructions Regarding the Management of Your Personal Information After Your Death (only where such right applies under applicable law)	The right to inform us of instructions on how we manage the Personal Information we hold about you after your death.
Right to Appeal	If we refuse to take action on your request, you may appeal our decision within a reasonable period of time, not to exceed 90 calendar days from the date of your receipt of our response.



If you think that we have processed your Personal Information in a manner that is not in accordance with data protection law, in accordance with applicable law, you may be able to complain to the data protection regulator or privacy commissioner where either the alleged infringement took place, or where you live or work.

13. How You Can Contact Us

If you'd like any more details, or you have comments or questions about our Notice, please contact WD-40 Company's Privacy Officer: Phenix Kiamilev.

Privacy Officer
9715 Businesspark Avenue
San Diego, CA 92131
U.S.A.
privacy@wd40.com

14. When this Notice was Last Updated

This Notice was last updated on March 28, 2024.

15. How You Will Be Notified Of Changes To This Notice

We review this Notice regularly and reserve the right to make changes at any time, including to account for changes in our business activities and legal requirements, and the manner in which we process Personal Information. We will inform you of the updates and where appropriate we will give reasonable notice of any changes by email.

16. Controller of Your Personal Information

The WD-40 Company affiliated entity that processes your Personal Information is the one that you apply/applied to, that employs/employed you, or that engages/engaged you (usually referred to as the controller of your personal information). Please see the chart below for the relevant entity which corresponds to your country of residence.

Country	Contact Information
Australia	WD-40 Company (Australia) Pty. Limited
United Kingdom	WD-40 Company Limited
United States	WD-40 Company
Malaysia	WD-40 Company (Malaysia) SDN. BHD.
Mexico	WD-40 Co. Mexico, S. de R.L. de C.V.
China	Wu Di (Shanghai) Industrial Co., Ltd.
Canada	WD-40 Company (Canada) Ltd.
Brazil	WD-40 Company Brasil Ltda.
All other jurisdictions	WD-40 Company

17. California Disclosures

This section only applies to you if you are a resident of the state of California.

Sale or Sharing of Personal Information. In the preceding 12 months, we have not "sold" or "shared," as those terms are defined in the California Consumer Privacy Act ("CCPA"), any personal information that we process in connection with your employment with us. We do not knowingly sell or share the personal information of minors under the age of 16.



Use or Disclosure of Sensitive Personal Information. In the preceding 12 months, we have not used or disclosed sensitive personal information for purposes to which the right to limit use and disclosure applies under the CCPA.

Disclosures for a Business Purpose. In the 12 months preceding the last updated date above, we have collected and disclosed the following categories of personal information to these categories of recipients for a business purpose:

- Identifiers: service providers, affiliates, clients, business partners, professional advisors, and governmental authorities.
- Characteristics of Protected Classifications Under California or Federal Law: affiliates, service providers, professional advisors, and government entities.
- Information described as personal information in California Civil Code § 1798.80(c): service providers, affiliates, clients, business partners, professional advisors, and governmental authorities.
- Internet or Electronic Usage Data: service providers, affiliates, professional advisors, and governmental authorities.
- Audio/Visual Data: service providers, affiliates, professional advisors, and governmental authorities.
- Education Information: service providers, affiliates, professional advisors, and governmental authorities.
- Professional or Employment Information: service providers, affiliates, professional advisors, and governmental authorities.
- Sensitive Personal Information: service providers, affiliates, professional advisors, and governmental authorities.
- Inferences: service providers, affiliates, and professional advisors.

18. Language Of This Notice

This Notice is issued in English language and translated into respective local languages where applicable local data protection law requires. In the event of any discrepancy or inconsistency between the English version of this Notice and any translation thereof, the English version will prevail.

I hereby acknowledge that I have read and understand this Notice. By clicking “I Agree”, I consent to the collection, use, processing, and disclosure of Personal Information in accordance with the Notice and further consent to the disclosure of my Personal Information to a party located in a country other than where I reside.

[\[\] I Agree](#)