



# Privacy Policy (USA)



**Your partner in Medical and Life Science fluid components and solutions**  
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## INTRODUCTION

At The West Group USA, INC. privacy is a top priority, and we are firmly committed to guarding the confidence you have placed in us to use, responsibly and professionally, any personal information you provide. We will not share your personal information with anyone except to comply with the law, provide, maintain, and improve our Services, or protect our rights.

This Privacy Policy applies to all personal information we collect through our website and during any interactions you may have with us, including when you request information or purchase goods and/or services from us (“Services”).

The purpose of this Privacy Policy is to notify you:

- what personal information we collect;
- how we use that personal information;
- with whom that personal information may be shared;
- the choices you have regarding its collection, use, and disclosure;
- the security measures we use to protect your personal information from loss, misuse or alteration;
- how you may access or correct your personal information.

In this Privacy Policy, “TWG USA,” “we,” “us,” and “our” refer to The West Group USA, Inc., which is the entity providing the Services. “You” and “your” refer to the individual interacting with us. The term “personal information” shall refer to both personal information (as defined under U.S. law) and personal data (as defined under the GDPR/UK GDPR). GDPR/UK GDPR obligations shall apply only when we are processing personal information of individuals located in the EU/UK. If you access the Services from outside the United States, you acknowledge that your personal information will be transferred, stored in and processed in the United States.

We may update this Privacy Policy from time to time and will provide notice of any material changes. Your continued use of the Services after any update constitutes acceptance of the revised policy.

Please read this Privacy Policy carefully as it will help you make informed decisions about sharing your personal information with us.

## HOW DO WE COLLECT YOUR PERSONAL INFORMATION?

We collect most personal information directly from you.

Under the applicable US, EU or UK privacy laws, you have the right to know what personal information we collect.

We may collect personal information in the following ways:

1. **Direct Interactions.** When we speak to you on the phone or when you correspond with us by post or email, fill out a form on our website, contact us through social media or otherwise (for example, at a trade show or exhibition).
2. **Automated Technologies and Interactions.** When you interact with our website, we will collect your IP address and other information about your equipment, browsing actions and patterns. We collect this personal information by using cookies and other similar technologies. Some of these technologies may be considered “sharing” of personal information under the CPRA; please refer to our Cookie Policy on our website for more details.
3. **Internal Systems and Processes**



- A. Our security cameras record images in the car parks and some business areas. For more information about our use of cameras, please contact us using the details in the “Contact Information” section of this Privacy Policy.
- B. Through monitoring and management of our technical systems, such as our computer networks and connections, communications, and email systems.
- C. We store personal information on our computer systems and as physical documents.

## DO WE USE PERSONAL INFORMATION FROM OTHER SOURCES?

We may also collect personal information:

1. From publicly accessible sources or professional online databases (including but not limited to company registers or LinkedIn).
2. Directly from a third party
  - A. credit reference agencies;
  - B. marketing and telemarketing agencies;
  - C. customer due diligence providers.

## DEVICE IDENTIFIERS

We may use device identifiers in our Services. A device identifier is an alphanumeric string that uniquely identifies a device to us. A device identifier may deliver information to us or to a third-party partner about how you browse and use the Services.

### Cookies and Beacons

A cookie is a data file placed on a device when it is used to visit our website. Web beacons consist of a small string of software code on your browser that works with cookies to monitor usage. Cookies, and beacons may be used for many purposes, including, without limitation, remembering you and your preferences, tracking your visits to our website and personalizing your experiences with our website. You can set your browser to refuse all or some browser cookies, or beacons or to alert you when websites set or access cookies or beacons. If you disable or refuse cookies, please note that some parts of this website may become inaccessible or not function properly. For more information about the cookies we use, please see our Cookie Policy on our website.

### Embedded Scripts

An embedded script is programming code that is designed to collect information about your interactions with our website, such as the links you click on. The code is temporarily downloaded onto your device from our web server or a third-party service provider. It is active only while you are connected to our website and is deactivated or deleted thereafter.

### Third Parties' Use of Personal Identifiers and Device Identifiers

The Services may include third-party advertising, links to other sites, and other content from third-party businesses. These third-party sites, businesses, advertisers, or advertising companies working on their behalf, may use device identifiers and personal identifiers to measure the effectiveness of their ads, personalize or optimize advertising content and to track users who link from their respective websites to the Services.

We do not have access to or control over such identifiers that these third parties may use. We are not responsible for the privacy practices or the content of these third-party sites. You are encouraged to review the privacy policies of the different sites you visit. Some third-party advertising companies may provide a mechanism to opt-out of their technology.

For more information about the opt-out process, you may visit the Network Advertising Initiative website, available at: [http://www.networkadvertising.org/managing/opt\\_out.asp](http://www.networkadvertising.org/managing/opt_out.asp)

## WHAT PERSONAL INFORMATION DO WE COLLECT?

Personal information (also referred to as “personal data” under the GDPR/ UK GDPR) means any information about an individual from which that person can be identified. Under California law, personal information includes information that identifies, relates to, describes, is reasonably capable of being associated with, or could reasonably be linked, directly or indirectly, with a particular consumer or household. Personal Information does not include anonymized data (GDPR / UK GDPR), deidentified or aggregated data (CCPA/CPRA), or publicly available information lawfully obtained from government records.

In respect of suppliers and customers (past, current, and prospective) and their employees, the personal information we collect may include the following categories (we do not routinely collect every type of information listed):

- **Identifiers**  
Name, company name, job title, email/post address, phone number, bank details, account numbers;
- **Identifiers and Characteristics of Protected Classifications**  
Vehicle registration number, image (which may reveal characteristics such as race, age, or disability status), and information collected on you as a visitor to our premises. This may include information collected on you if you have an accident on any of our premises;
- **Commercial Information and Financial Information**  
Billing information, transaction, and payment information, records of products or services purchased; Information about products and services you have purchased from us; Information to enable us to undertake credit or other financial checks;
- **Information about how you use our IT, communication, and other systems (if applicable)**  
Information on your equipment, including but not limited to internet protocol (IP) address, your login data, browser type and version, time zone setting and location, browser plug-in types and versions, operating system and platform, browsing history, search history, and information regarding your interaction with our website or advertisements;  
Time zone setting and location information derived from your IP address or device;  
Your preferences in receiving marketing from us and our third parties and your communication preferences, and inferences drawn from the above information to create a profile about your preferences and characteristics.

We may also collect your responses to surveys, competitions, and promotions.

We may also collect, use and share statistical or demographic data for any purpose (“aggregated data”). Aggregated data could be derived from your personal information but is not considered personal information under California law where it cannot reasonably be used to directly or indirectly reveal your identity. For example, we may aggregate your use of our website to calculate the percentage of users accessing a specific website feature. However, if we combine or connect aggregated data with your personal information so that it can directly or indirectly identify you, we treat the combined data as personal information which will be used in accordance with this privacy policy. California residents should note that we do not “sell” or “share” (as those terms are defined under the CCPA) aggregated data.

## SENSITIVE PERSONAL INFORMATION

Sensitive personal information (also referred to as “special category personal data” under the GDPR/UK GDPR) includes personal information that reveals Social Security number, driver's license number, passport number, financial account information, precise geolocation, racial or ethnic origin, religious or philosophical beliefs, union membership, genetic data, biometric data for identification purposes, health data, sex life or sexual orientation data, or citizenship or immigration status).

We will ensure that we are permitted to collect sensitive or special category personal information under the applicable privacy laws;

- we have your explicit consent (and for California residents, we will limit the use and disclosure of your sensitive personal information to purposes authorized under CCPA Section 1798.121);
- the processing is in the public interest or in the interest of public health; or
- the processing is necessary to establish, exercise or defend legal claims.

We do not routinely collect sensitive or special category personal information.

## HOW AND WHY WE USE YOUR PERSONAL INFORMATION

We will only use your personal information when the law allows us to.

Most commonly, we will use your personal information in the following circumstances:

- Where we need to perform the contract that we are about to enter or have entered into with you.
- Where it is necessary for our legitimate interests (or those of a third party) and your interests and fundamental rights do not override those interests. A legitimate interest is when we have a business or commercial reason to use your information, so long as this is not overridden by your own rights and interests. We will carry out an assessment when relying on legitimate interests, to balance our interests against your own.
- Where we need to comply with a legal obligation.

We generally do not rely on consent as the legal basis for processing your personal information. However, where required by law, we will obtain your consent before sending third-party marketing communications or any text message (SMS) marketing that falls under the Telephone Consumer Protection Act (TCPA) or California's restrictions on automated calling and announcing devices. For our own email marketing, we may contact you in accordance with the CAN-SPAM Act, which allows us to send marketing emails without prior consent, provided that you are always given a clear and easy way to opt out. You may opt out of any marketing communications from us at any time by using the unsubscribe link in our emails or contacting us using the details in the “Contact Information” section of this Privacy Policy. California residents may have additional rights regarding the sale or sharing of their personal information for targeted advertising. Please see the “California Privacy Rights” section for more information.

We have set out below how we use your personal information and the legal bases we rely on for each purpose. In some cases, more than one lawful basis may apply. Where relevant, we also explain our legitimate interests. If you would like more details about the specific legal basis we rely on for a particular purpose, please contact us using the details in the “Contact Information” section of this Privacy Policy. GDPR / UK GDPR lawful bases apply only to individuals located in the EU/UK. For U.S. residents, we process personal information for ‘business purposes’ as defined by applicable U.S. law.

Purpose/Activity	Lawful basis for processing including basis of legitimate interest
Providing products and/or services to you, including to process and deliver your order including: a) Manage payments, fees, and charges b) Collect and recover money owed to us	To perform our contract with you or to take steps at your request before entering a contract. It may also be necessary for our legitimate interests (to recover debts due to us).
To manage our relationship with you which will include: a) Notifying you about changes to our terms or privacy policy b) Asking you to leave a review or take a survey	To perform our contract with you and in some circumstances to comply with our legal obligations. It may also be necessary for our legitimate interests (to keep our records updated and to study how customers use our products/services).
To enable you to partake in a prize draw, competition or complete a survey.	To perform our contract with you and in some circumstances, it is necessary for our legitimate interests (to study how customers use our products/services, to develop them and grow our business).
To administer and protect our business and this website (including troubleshooting, data analysis, testing, system maintenance, support, reporting and hosting of data).	Necessary for our legitimate interests (for running our business, provision of administration and IT services, network security, to prevent fraud and in the context of a business reorganization or group restructuring exercise). Further, it may also be necessary for us to comply with our legal obligations.
To deliver relevant website content and advertisements to you and measure or understand the effectiveness of the advertising we serve to you.	Necessary for our legitimate interests (to study how customers use our products/services, to develop them, to grow our business and to inform our marketing strategy).
To use data analytics to improve our website, products/services, marketing, customer relationships and experiences.	Necessary for our legitimate interests (to define types of customers for our products and services, to keep our website updated and relevant, to develop our business and to inform our marketing strategy).
To make suggestions and recommendations to you about goods or services that may be of interest to you.	Necessary for our legitimate interests (to develop our products/services and grow our business).
Preventing and detecting crime or fraud against you or us or at our business premises.	For our legitimate interests or those of a third party, i.e. to minimize fraud that could be damaging for you and/or us.
Conducting checks to identify our customers and verify their identity.	To comply with our legal and regulatory obligations.
Other activities necessary to comply with professional, legal, and regulatory obligations that apply to our business, e.g., under health and safety law.	To comply with our legal and regulatory obligations.

Gathering and providing information required by or relating to audits, enquiries, or investigations by regulatory bodies.	To comply with our legal and regulatory obligations.
Statistical analysis to help us manage our business, e.g., in relation to our financial performance, customer and supplier base, product range or other efficiency measures.	For our legitimate interests or those of third party, i.e. to be as efficient as we can in conducting our business.
To administer and protect our business and this website (including troubleshooting, data analysis, testing, system maintenance, support, reporting and hosting of data).	Necessary for our legitimate interests (for running our business, provision of administration and IT services, network security, to prevent fraud and in the context of a business reorganization or group restructuring exercise). Further, it may also be necessary for us to comply with our legal obligations.
Monitoring of website traffic and repeat visitor status.	For our legitimate interests or those of a third party, i.e. to promote our business to existing, prospective and former customers likely to be able to pay for our products and services.
Preventing unauthorized access and modifications to office premises and systems.	For our legitimate interests or those of a third party, i.e. to prevent and detect criminal activity that could be damaging for you and/or us. To comply with our legal and regulatory obligations.
Updating and enhancing customer and supplier records.	Necessary for our legitimate interests (to develop our products/services and grow our business).
Updating and enhancing customer and supplier records.	To perform our contract with you or to take steps at your request before entering into a contract. To comply with our legal and regulatory obligations. For our legitimate interests or those of a third party, i.e. making sure that we can keep in touch with our customers about existing orders and new products.
Statutory returns.	To comply with our legal and regulatory obligations.
Marketing our services to existing and former customers, existing and former suppliers, and third parties with whom we have had no previous dealings.	For our legitimate interests or those of a third party, i.e., to promote our business to existing, prospective and former customers.
Testing of products and services.	For our legitimate interests or those of a third party, i.e., quality management.

Credit reference checks via external credit reference agencies.	For our legitimate interests or those of a third party, i.e., to ensure our customers are likely to be able to pay for our products and services.
External audits and quality checks, i.e. for ISO accreditation and the audit of our accounts.	For our legitimate interests or those of a third party, i.e., to maintain our accreditations so we can demonstrate we operate at the highest standards. To comply with our legal and regulatory obligations.
Exercise or defend legal claims	For our legitimate interests or those of a third party, i.e., to enable us to either bring or defend ourselves in legal proceedings.

## MARKETING

We may use your personal information to send you updates (by email, text message, telephone, post or through social media) about our Services, including exclusive offers, promotions or new products and/or services. We will always treat your personal information with the utmost respect and never sell it to organizations outside our group for marketing purposes. You have the right to opt out of receiving marketing communications at any time by using the “unsubscribe” link in emails or by contacting us using the details in the “Contact Information” section of this Privacy Policy.

**For California residents:** Marketing communications may, in some circumstances, constitute “sharing” of personal information under the CCPA. You have the right to opt out of receiving marketing communications at any time by using the “unsubscribe” link in emails or by contacting us using the details in the “Contact Information” section of this Privacy Policy.

We may ask you to confirm or update your marketing preferences if you request further Services from us or if there are changes in the law or our business structure.

## CHANGE OF PURPOSE

We will only use your personal information only for the purposes for which it was collected, unless we reasonably determine that we need to use it for another purpose that is compatible with the original one. If you would like an explanation of how any new purpose is compatible with the original purpose, please contact us using the details in the “Contact Information” section of this Privacy Policy.

If we need to use your personal information for a purpose that is not related to the original one, we will inform you and explain the legal basis that allows us to do so. Please note that, where required or permitted by law, we may process your personal information without your knowledge or consent, provided we do so in accordance with applicable legal requirements.

## DISCLOSURES OF YOUR PERSONAL INFORMATION

We routinely share personal information with:

- companies within our group;
- third parties we use to help deliver our Services to you (payment service providers, warehouses and delivery companies);
- other third parties we use to help us run our business (marketing agencies, market research

- companies or website hosts);
- credit reference agencies;
- our insurers and brokers;
- our bank;
- our IT helpdesk and support provider and other third-party data processors for the supply, maintenance and security of our IT and telephone systems;
- our professional advisors and consultants;
- our distributors, agents, and business partners;

We only allow our service providers and other third parties to handle your personal information if we are satisfied they take appropriate measures to protect your personal information.

We also impose contractual obligations on service providers relating to:

- use of your personal information only as instructed by us;
- prohibition on selling your personal information to third parties;
- secure storage and handling;
- retention and destruction in accordance with our instructions; and
- compliance with applicable privacy laws.

We may also need to:

- share personal information with external auditors (in relation to ISO accreditation and the audit of our accounts);
- disclose and exchange personal information with law enforcement agencies, government entities, and other regulatory bodies to comply with our legal and regulatory obligations, including responding to lawful subpoenas, court orders, legal process, and governmental requests;
- share personal information with other third parties as part of a reference request; and
- share some personal information with other parties, such as potential buyers of some or all of our business or during a restructuring. We will provide notice to you as required by applicable law, including under the CCPA. Usually, information will be anonymized, but this may not always be possible. However, the recipient of the information will be bound by confidentiality obligations.

If you would like more information about who we share our data with and why, please contact us by using the details in the “Contact Information” section of this Privacy Policy

## LINKS TO OTHER WEBSITES

Please note that our websites may contain links to other websites that are not under our control, and we are not responsible for the privacy practices or content of those third-party sites. If you click on a link on our website that takes you to another site, your personal information will then become subject to the privacy policy of that website. We encourage you to review the privacy policies of any third-party sites you visit.

## ENTERING OR VISITING OUR OFFICE PREMISES

When visiting our US locations (Sites) all visitors are required to sign in using our hard-copy visitor logbook for security and health and safety purposes. By signing in, you consent to the collection and processing of your personal information as described in this notice.

### Personal information we collect:

The visitor logbook may record the following information:

- name
- occupation and/or employer



- c) e-mail address (if provided)
- d) date and time of signing in and out
- e) any other information you choose to provide as part of the sign-in process

This information may be considered “personal information” under applicable U.S. state privacy laws, including the California Consumer Privacy Act (CCPA).

### Why we collect your information:

We collect and process this information because it is necessary to comply with our legal and health and safety obligations while you are on our Sites and for our legitimate interests, including:

- a) ensuring the security of the Sites and controlling access;
- b) supporting any legal or regulatory processes that may arise from access to the Sites, including health and safety matters or civil/employment proceedings.

### Storage and Retention:

The hard-copy visitor logbook is stored securely onsite and is retained for a 12-month period or as long as required by applicable law.

## HOW LONG WILL YOU USE MY PERSONAL INFORMATION FOR?

We will only retain your personal information for as long as reasonably necessary to fulfill the purposes we collected it for, including the purposes of satisfying any legal, regulatory, tax, accounting or reporting requirements under applicable U.S. federal and state law. We may retain your personal information for a longer period in the event of a complaint or if we reasonably believe there is a prospect of litigation in respect to our relationship with you.

To determine the appropriate retention period for personal information, we consider the amount, nature and sensitivity of the personal information, the potential risk of harm from unauthorized use or disclosure of your personal information, the purposes for which we process your personal information and whether we can achieve those purposes through other means, and the applicable U.S. federal and state legal, regulatory, tax, accounting, or other requirements.

In some circumstances we will 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. Anonymized information is not considered personal information under U.S. privacy laws.

Please contact us using the details in the “Contact Information” section of this Privacy Policy for information on specific retention periods for different categories of personal information and requests of deletion of your personal information.

## INTERNATIONAL TRANSFERS

It is sometimes necessary for us to share your personal information outside the United States:

- with our offices or other companies within our group located outside the United States;
- with your and our service providers located outside the United States;
- if you are based outside the United States;

Whenever we transfer your personal information outside the United States, we ensure appropriate

safeguards are in place and will only transfer your personal information to a country or international organization where:

- the UK government or, where the EU GDPR applies, the European Commission has decided the particular country or international organization ensures an adequate level of protection of personal information (known as an “adequacy decision”);
- there are appropriate safeguards in place, together with enforceable rights and effective legal remedies for data subjects; or
- a specific exception applies under the relevant privacy laws.

Please contact us using the details in the “Contact Information” section of this Privacy Policy if you want further information on the specific mechanism used by us when transferring your personal information.

## HOW DO WE PROTECT YOUR PERSONAL INFORMATION?

We have put in place appropriate technical and organizational security measures to prevent your personal information from being accidentally lost, used, accessed in an unauthorized way, altered or disclosed. We regularly review the personal information collection, storage and processing practices, including physical security measures. We further limit access to your personal information to only those employees, agents, contractors, and other third parties who require it for legitimate business purposes. Such individuals and entities may process your personal information solely in accordance with our instructions and are subject to strict confidentiality duties. Our employees will never proactively reach out to you and ask for any personal account information, including your password.

We have put in place procedures to deal with any suspected personal information breach and will notify you and any applicable regulator of a breach where we are legally required to do so.

Where we have given you (or where you have chosen) a password which enables you to access certain parts of our Service, you must take reasonable steps to keeping this password confidential. We ask you not to share a password with anyone. If you think that any of your passwords might have been compromised, then please let us know immediately.

All personal information transferred is encrypted, but it cannot be guaranteed to be 100% secure in the event you use untrusted networks. As a result, we cannot guarantee the security of any personal information you transmit, and you do so at your own risk. If you have any further questions on this issue, please refer to our Terms of Use on our website. We expressly disclaim any liability that may arise should any other individuals obtain the personal information you submit.

## YOUR LEGAL RIGHTS (GDPR/UK GDPR)

Under certain circumstances, you have rights under applicable privacy laws in relation to your personal information.

**Request access** to your personal information (commonly known as a “data subject access request”). This enables you to receive a copy of the personal information we hold about you and to check that we are lawfully processing it.

**Request correction** of the personal information that we hold about you. This enables you to have any incomplete or inaccurate personal information we hold about you corrected, though we may need to verify the accuracy of the new personal information you provide to us.

**Request erasure of your personal information** which enables you to ask us to delete or remove personal information where there is no good reason for us continuing to process it. You also have the right to ask us to delete or remove your personal information where you have successfully exercised your right to object to processing (see below), where we may have processed your information unlawfully or where we are required to erase your personal information to comply with local law. Note, however, that we may not always be able to comply with your request for an erasure for specific legal reasons which will be notified to you, if applicable, at the time of your request.

**Object to processing** where we are relying on a legitimate interest (or those of a third party) and there is something about your situation which makes you want to object to processing on this ground as you feel it impacts on your fundamental rights and freedoms. You also have the right to object where we are processing your personal information for direct marketing purposes. In some cases, we may demonstrate that we have compelling legitimate grounds to process your personal information which override your rights and freedoms.

**Request restriction of processing** of your personal information.

This enables you to ask us to suspend the processing of your personal information in the following scenarios:

- Where you want us to establish the personal information's accuracy.
- Where our use of personal information is unlawful, but you do not want us to erase it.
- Where you need us to hold the personal information even if we no longer require it as you need it to establish, exercise or defend legal claims.
- You have objected to our use of your personal information, but we need to verify whether we have overriding legitimate grounds to use it.

**Request the transfer** of your personal information to you or to a third party. We will provide you, or a third party you have chosen, with your personal information in a structured, commonly used, machine-readable format. Note that this right only applies to automated information which you initially provided consent for us to use or where we used the information to perform a contract with you.

**Withdraw consent** at any time where we are relying on consent to process your personal information. However, this will not affect the lawfulness of any processing carried out before you withdraw your consent. If you withdraw your consent, we may not be able to provide certain Services to you. We will advise you if this is the case at the time you withdraw your consent.

If you wish to exercise any of the rights set out above, please contact by contacting us using the details in the "Contact Information" section of this Privacy Policy.

**No fee is usually required** to access your personal information (or to exercise any of the other rights). However, we may charge a reasonable fee if your request is clearly unfounded, repetitive or excessive. Alternatively, we could refuse to comply with your request in these circumstances.

**What we may need from you** to help us confirm your identity and ensure your right to access your personal information (or to exercise any of your other rights). This is a security measure to ensure that personal information is not disclosed to any person who has no right to receive it. We may also contact you to ask you for further information in relation to your request to speed up our response.

We will not discriminate against you for exercising any of your applicable data privacy rights.

We will not:

- Deny you our goods and/or services
- Charge different prices or rates for goods and/or services, including through granting discounts or other benefits, or imposing penalties.
- Provide you with a different level or quality of goods and/or services.

- Suggest that you may receive a different price or rate for goods and/or services or a different level or quality of goods and/or services.

## CONTACT INFORMATION

We try to meet the highest standards when processing personal information. For this reason, we take any requests, complaints or enquiries we receive very seriously. This Privacy Policy does not provide exhaustive details of all aspects of our processing of personal information. However, we are happy to provide any additional information or explanation needed.

If you would like to make a query, request, or complain about the way we have processed your personal information you can contact us directly:

- By emailing us at [DPO@westgroup.co.uk](mailto:DPO@westgroup.co.uk);
- By telephoning us on +18774729801;
- By writing to us at the following address: The West Group USA, Inc. 2360 Crist Road, Suite B800, Garland, Texas, 75040.

## CALIFORNIA PRIVACY RIGHTS NOTICE

This Section applies to natural persons who are California residents, as defined in Cal. Civ. Code 1798.140(g). We adopt these provisions to comply with the California Consumer Privacy Act of 2018, as amended by the California Privacy Rights Act of 2020 ("CCPA" or "CPRA") and other California privacy laws. Any terms defined in the CCPA have the same meaning when used in this Privacy Policy.

We collect personal information as described in this Privacy Policy. For clarity regarding compliance with the CCPA, we have collected the following CCPA categories of Personal Information from consumers within the preceding twelve (12) months:

Category	Examples	Collected
Identifiers	A real name, alias, postal address, unique personal identifier, online identifier, Internet Protocol address, email address, account name, Social Security number, driver's license number, passport number, California identification card number, or other similar identifiers.	YES
Personal information categories listed in the California Customer Records statute (Cal. Civ. Code § 1798.80(e))	A name, signature, Social Security number, physical characteristics or description, address, telephone number, passport number, driver's license or state identification card number, insurance policy number, education, employment, employment history, bank account number, credit card number, debit card number, or any other financial information, medical information, or health insurance information. Some personal information included in this category may overlap with other categories.	YES
Protected classification characteristics under California or federal law	Age (40 years or older), race, color, ancestry, national origin, citizenship, religion or creed, marital status, medical condition, physical or mental disability, sex (including gender, gender identity, gender expression, pregnancy or childbirth and related medical conditions), sexual orientation, veteran or military status, genetic information (including familial genetic information).	YES  We may incidentally capture or infer protected characteristics through CCTV footage, though we do not use this information to make decisions about individuals.

Commercial information	Records of personal property, products or services purchased, obtained, or considered, or other purchasing or consuming histories or tendencies.	YES
Biometric information	Genetic, physiological, behavioral, and biological characteristics, or activity patterns used to extract a template or other identifier or identifying information, such as, fingerprints, faceprints, and voiceprints, iris or retina scans, keystroke, gait, or other physical patterns, and sleep, health, or exercise data.	NO
Internet or other similar network activity	Browsing history, search history, information on a consumer's interaction with a website, application, or advertisement.	YES
Geolocation data	Physical location or movements.	NO
Sensory data	Audio, electronic, visual, thermal, olfactory, or similar information.	NO
Professional or employment-related information	Current or past job history or performance evaluations.	YES
Non-public education information (per the Family Educational Rights and Privacy Act (20 U.S.C. Section 1232g, 34 C.F.R. Part 99))	Education records directly related to a student maintained by an educational institution or party acting on its behalf, such as grades, transcripts, class lists, student schedules, student identification codes, student financial information, or student disciplinary records.	NO
Inferences drawn from other personal information	Profile reflecting a person's preferences, characteristics, psychological trends, predispositions, behavior, attitudes, intelligence, abilities, and aptitudes.	NO

Under the CCPA, personal information does not include:

- Publicly available information from government records.
- De-identified or aggregated consumer information.
- Information excluded from the CCPA's scope, such as:
  - Health or medical information covered by the Health Insurance Portability and Accountability Act of 1996 (HIPAA) and the California Confidentiality of Medical Information Act (CMIA) or clinical trial data;
  - Personal Information covered by certain sector-specific privacy laws, including the Fair Credit Reporting Act (FCRA), the Gramm-Leach-Bliley Act (GLBA) or California Financial Information Privacy Act (FIPA), and the Driver's Privacy Protection Act of 1994.

We may use or disclose personal information as specified above. We will not collect additional categories of personal information or use the personal information we collected for materially different, unrelated, or incompatible purposes without providing you with notice and, where required by law, obtaining your consent. As stated earlier, we may disclose your personal information to a third party for a business purpose.

In the preceding twelve (12) months, we have disclosed the following categories of personal information for a business purpose:

**Category:** Identifiers.

**Category:** California Customer Records personal information categories.

**Category:** Commercial Information.



**Category:** Professional or employment-related information.

**Category:** Internet or other similar network activity.

We may disclose your personal information for a business purpose to the following categories of third parties:

- Service providers
- Contractors and vendors
- Third parties to whom you or your agents authorize us to disclose your personal information in connection with services we provide to you
- Social media platforms (when you choose to share content)
- Business partners
- Affiliates and subsidiaries

In the preceding twelve (12) months, we have not sold personal information. We do not knowingly engage in selling personal information as defined under the CCPA.

### Your Rights and Choices.

The CCPA provides California residents with specific rights regarding their personal information, including but not limited to: (1) the right to know what personal information is collected, used, shared or sold; (2) the right to delete personal information held by businesses; (3) the right to opt-out of sale or sharing of personal information; (4) the right to correct inaccurate personal information; (5) the right to limit use and disclosure of sensitive personal information; and (6) the right to non-discrimination for exercising CCPA rights.

To exercise your CCPA rights, you may submit a verifiable consumer request to us by:

- By emailing us at [DPO@westgroup.co.uk](mailto:DPO@westgroup.co.uk);
- By telephoning us on +18774729801;
- By writing to us at the following address: The West Group USA, Inc. 2360 Crist Road, Suite B800, Garland, Texas, 75040.

**Verifiable Consumer Request:** Only you, or a person registered with the California Secretary of State that you authorize to act on your behalf, may make a verifiable consumer request related to your personal information. We will respond to verifiable consumer requests within 45 days of receipt or notify you if we require additional time (up to 90 days total).

**Deletion Request Rights.** You have the right to request that we delete any of your personal information that we collected from you and retained, subject to certain exceptions. We will deliver our written response electronically. Any disclosures we provide will only cover the 12-month period preceding receipt of your Verifiable Consumer Request.

**Exercising Access, Data Portability, and Deletion Rights.** You may only make a Verifiable Consumer Request for access or data portability twice within a 12-month period. The Verifiable Consumer Request must provide sufficient information that allows us to reasonably verify you are the person about whom we collected personal information or an authorized representative and describe your request with sufficient detail that allows us to properly understand, evaluate, and respond to it. We cannot respond to your request or provide you with personal information if we cannot verify your identity or authority to make the request and confirm the personal information relates to you.

**Non-Discrimination.** We will not discriminate against you for exercising any of your CCPA rights. Unless



permitted by the CCPA, we will not: (a) deny you goods or services; (b) charge you different prices or rates for goods or services, including through granting discounts or other benefits, or imposing penalties; (c) provide you a different level or quality of goods or services; or (d) suggest that you may receive a different price or rate for goods or services or a different level or quality of goods or services. However, we may offer you certain financial incentives permitted by the CCPA that can result in different prices, rates, or quality levels. Any CCPA-permitted financial incentive we offer will reasonably relate to your personal information's value and contain written terms that describe the program's material aspects. Participation in a financial incentive program requires your prior opt-in consent, which you may revoke at any time.

## CALIFORNIA ONLINE PRIVACY PROTECTION ACT

**Age Restriction.** We understand the importance of protecting children's privacy in the interactive online world. Our Services are not designed for, or intentionally targeted at, children under 16 years of age. We do not knowingly collect or maintain personal information relating to children under 16 years of age. If we learn that we have collected personal information from a child under 16 without verification of parental consent, we will delete that personal information as quickly as possible. If you believe that we might have any personal information from or about a child under 16, please contact us using the details in the "Contact Information" section of this Privacy Policy.

In compliance with the California Online Privacy Protection Act (CalOPPA), while we strive to offer you choice when using our Services, we do not currently respond to web browser "Do Not Track" signals or other mechanisms that provide consumers the ability to exercise choice regarding the collection of personal information about an individual consumer's online activities over time and across third-party websites or online services.

**Deidentification.** We may process personal information for the purpose of creating a deidentified data set in accordance with California law. We will maintain and use such deidentified information in deidentified form and will not attempt to reidentify the information, except as permitted by California law for testing our deidentification procedures. We may then process that deidentified data set for business purposes, including improving our Services, without further notice to you.

**Algorithmic Profiling.** We use algorithm-based technologies to personalize dynamic web content based on your explicit and/or implicit interests. We carry out general profiling such as segmentation, non-automated and automated decision-making based on profiling for the purpose of providing you with a more relevant experience and for the purposes of our legitimate interests as a commercial organization. Solely automated decision making is never used in any way that produces a legal or similarly significant effect. Depending on the laws of the country where you live, you may have rights related to our decision.

If you live in the EU, you may have rights regarding automated decisions. To exercise these rights, please contact us using the details in the "Contact Information" section. In some cases, we may be permitted to continue the decision-making process under applicable laws, and we will explain this if it applies. Otherwise, we will respond to your request as promptly as reasonably possible.

## CHANGES TO THE PRIVACY POLICY AND YOUR DUTY TO INFORM US OF CHANGES

We keep our Privacy Policy under regular review. Historic versions can be obtained by contacting us using the details in the "Contact Information" section of this Privacy Policy.

Please keep us informed if your personal information changes during your relationship with us.

