

Updated September 15, 2022

## PRIVACY STATEMENT

This Privacy Statement describes how WD-40 Company and its affiliates (collectively “WD-40,” “we,” and “us”) collect, use and disclose personal information we collect when you visit or use our websites or mobile applications (each a “Site” and collectively “Sites”), contact our customer service team, engage with us on social media, participate in our sweepstakes or contests or otherwise interact with us (collectively, our “Services”). By using our Sites and Services, you consent to the collection, processing, use, and disclosure of your personal information in accordance with this Privacy Statement.

[Click here to download a copy of this Privacy Statement.](#)

This Privacy Statement does not apply to information collected in connection with employment from job applicants, current and former employees and, where applicable, to current and former workers and contractors who provide services to us.

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### 1. Information We Collect

We collect different categories of personal information depending on your interaction with us. The key categories and types of personal information that we may collect and process are set out below.

- **Contact Information:** When you create an account on our Sites, sign up for our newsletter or mailing list, enter a contest, redeem a promotion, or enter a sweepstake, or otherwise communicate or interact with us, we may collect your name, title, email address, mailing address, telephone number, birthdate, occupation and hobbies.
- **Identifiers:** When you visit our Sites, we may collect your IP address, user name, account number, password and other security information for authentication and access.
- **Geolocation Data:** When you visit our Sites, we may collect the general region or area from which you access our site.
- **Usage Data:** When you visit our Sites, we may collect data concerning your Internet or other electronic activity including browsing and click history, device types, operating system, browser settings, IP address, language settings, and Site use data including information about how you navigate the Site, other websites, and the Internet.

- **Social Media Profiles:** When you interact with us or our Sites through various social media networks, such as when you like us on Facebook or when you follow us or share our content on Facebook, Twitter, Snapchat, LinkedIn, Instagram or other sites, we may receive information from those social networks including your profile information, user ID associated with your social media account, and any other information you allow the social network to share with third parties.
- **User Generated Content:** When you contact us directly, e.g., by email, phone, mail or by completing an online form or by participating in an online chat, we will record your comments and opinions. We will also record comments and opinions you express when responding to surveys, entering sweepstakes or taking part in promotions we run.
- **Audio/Visual Data:** When you visit one of our offices or event booths, participate in one of our promotions or contests, or submit photos or videos to us, we may collect audio, electronic, photographic, visual or similar data including videos, photographs, or audio recordings.
- **Commercial Information:** When you inquire about our products or provide us information regarding products you purchased, we may collect records of products or services purchased, obtained or considered, or other purchasing or consuming histories.
- **Inferences:** We combine information we obtain from different sources with publicly available information, including to create inferences about you. For example, we may combine information we have with information that we have collected: (i) offline and online, (ii) across other third-party sites, (iii) across devices, such as computers and mobile devices, and (iv) from a third party. We may also use information from the categories described above in order to create a profile about you, to reflect your preferences, characters, behavior and attitudes.

We **do not** collect or process personal information pertaining to your racial or ethnic origin, political opinions, religion or philosophical beliefs, health or medical condition, criminal background, trade union membership, genetic or biometric data, sexual life or orientation (referred to as "sensitive personal information"). We ask that you not send nor disclose, any sensitive personal information to us. We may, however, ask you to disclose to us information related to your health or medical condition when necessary to analyze and address incidents with our products or packaging. Furthermore, we will process such information if you communicate it to our agents during a call or you are voluntarily expressing consent through a communication or any other means.

## 2. How We Use Your Information

We use your personal information for the following purposes:

- **Inquiries and Requests:** We use your contact information, identifiers, and commercial information to respond to your inquiries, complaints and suggestions.  
Legal Basis for Processing: Our legitimate interests to handle, adequately and in a timely manner, customers' inquiries, complaints and suggestions regarding the Sites and Services.
- **Analytical Purposes:** We use your identifiers, usage data, geolocation data, commercial information, social media profiles, user generated content, and inferences to analyze preferences, trends and statistics.  
Legal Basis for Processing: Our legitimate interests to improve our Sites and Services and evaluate the performance of our employees and contractors and your consent.
- **Marketing Purposes:** We use your contact information, identifiers, commercial information, usage data, geolocation data, social media profile, user generated content, audio/visual data, and inferences to send you our newsletter, improve our marketing efforts, create

social media posts or advertisements, and provide you with information about us, including personalized marketing communications.

Legal Basis for Processing: Your consent

- **Offers and Promotions:** We use your contact information, identifiers, commercial information, usage data, social media profiles, audio/visual data, user generated content, geolocation data, and inferences to allow you to participate in promotions, contests, special events, prize draws and other offers/promotions (e.g., for sending you reminder emails or prize notifications and transferring your personal information to fulfillment partners).

Legal basis for Processing: The processing of your personal information for this purpose is based on performance of the relevant promotion terms and conditions and your consent.

- **Maintenance and Improvement of the Sites and Services:** We use your contact information, commercial information, identifiers, user generated content, social media profiles, geolocation data, audio/visual data, and usage data to improve our Services and Sites, provide and maintain functionality on our Sites, and help us diagnose technical and service problems and administer our Sites.

Legal Basis for Processing: Our legitimate interests to improve our Sites and Services and evaluate the performance of our employees and contractors.

- **Security and Fraud Prevention:** We use your contact information, identifiers, commercial information, social media profiles, user generated content, geolocation data, usage data, audio/visual data, and inferences to protect our Sites and Services; protect us, our affiliated companies, our employees, and others; and to prevent fraud, theft and misconduct.

- Legal Basis for Processing: Our legitimate interests to protect our organization and to prevent fraud, theft and misconduct.

- **Legal:** We use your contact information, identifiers, social media profiles, commercial information, user generated content, geolocation data, usage data, audio/visual data, and inferences to comply with our legal obligations, including reporting requirements, and defend us in legal proceedings, and protect us and our property, employees, and others through legal proceedings.

Legal Basis for Processing: Our legitimate interests to protect our organization and to comply with our legal obligations.

### 3. Sharing and Disclosure of Information

We will share personal information in the below circumstances or as otherwise described in this Privacy Statement.

**Service Providers:** We may share personal information with vendors and service providers who support the operation of the Services, the Sites, and our business and who need access to such information to carry out their work for us (including, for example, web hosting, analytics, email delivery, marketing, insurance, storage and warehouse services, customer support services, and the administration, judging and prize fulfillment aspects of promotions, competitions and sweepstakes). In some cases, the vendor or service provider may directly collect the information from you on our behalf.

**Affiliates:** We may share personal information with and among our parent company, subsidiaries, affiliates, or their successors or assigns.

**Marketing/Analytics/Advertising Partners:** We may share personal information with third-party marketing, analytics or advertising partners, including social media platforms and networks, for commercial purposes such as sending you marketing emails and advertisements.

**Professional Advisors:** We may share information with professional advisors, such as lawyers, bankers, auditors, and insurers, where necessary in the course of the professional services that they render to us.

**Government Entities:** We share information with regulatory and government entities including government, administrative, law enforcement and regulatory agencies; tax authorities; corporate registries; and other public agencies or authorities if we think we should in order to comply with any applicable law, regulation, legal process or other legal obligation. This includes cooperating with law enforcement when we think it is appropriate, obtaining legal remedies or limiting our damages, and to enforcing or protecting our contracts, legal rights or the rights of others, including by responding to claims asserted against us.

**Corporate Transaction Recipients.** We may share information with potential investors, purchasers, merger partners, and their advisors in the event we: (i) sell or transfer, or are considering selling or transferring, all or a portion of our business or assets; or (ii) are considering or engaging in any reorganization, conversion, merger, sale, joint venture, assignment, transfer or disposition of all or any portion of our ownership interest, business or operations.

**With Your Consent or At Your Direction.** We may share information with third parties whenever you consent to or direct such sharing.

**Other Reasons:** We may share information for other reasons we may describe to you.

## 4. Marketing Communications

You can opt out of marketing or advertising emails and newsletters by using the "unsubscribe" link or mechanism noted in communications you receive from us. You may also request to opt out of marketing or advertising emails by contacting us through one of the methods specified in the Contact Us section of this Privacy Statement. Once we process your request, we will cease using the information for such purposes at no charge to you.

## 5. Security

We follow generally accepted industry standards to protect the personal information submitted to us and have implemented reasonable technical, organization, administrative and physical measures to protect personal information. However, no method of transmission over the Internet or method of electronic storage is 100% secure. Therefore, we cannot guarantee its absolute security and encourage you to use websites and share information with caution.

## 6. Cookies, Analytics, and Other Tracking Technology

**Cookies and Tracking Technology:** We want you to be aware that certain online tools exist to help us serve and recognize you when you visit our Sites. We receive and store certain types of information when you visit our Sites. When you access the Sites, we (including companies we work with) may place small data files on your computer or other device. These data files may be web beacons, cookies, clear gifs, pixel tags, e-tags, flash cookies, log files, or other local storage provided by your browser or associated applications. These tracking technologies, which are often referred to collectively as cookies, allow us to understand how users navigate to and around our Sites, view different pages, access content and request Services. We may use them, for example, to keep track of your preferences and profile information and collect general usage and volume statistical information. For more information about our use of Cookies on the Sites, including instructions on how opt out of certain types of cookies, please click Manage Cookies.

**Do Not Track Signals:** Some browsers have a “do not track” feature. It lets you tell websites you visit that you do not want them to track your online activity. These features are not yet uniform across browsers. Our Sites are thus not currently set up to respond to these signals. For more information on Do Not Track signals, please visit <https://allaboutdnt.com/>.

**Third-party Analytics and Advertising:** We allow others to provide analytics services and serve advertisements on our behalf across the Internet and in mobile applications. These entities may use cookies, web beacons, device identifiers and other technologies to collect information about your use of the Sites and other websites and applications, including your IP address, web browser, mobile network information, pages viewed, time spent on pages or in mobile apps, links clicked and conversion information. We use this information to, among other things, analyze and track data, determine the popularity of certain content, deliver advertising and content targeted to your interests, and better understand your online activity.

**Google Analytics:** We use analytics services provided by Google Analytics. If you would like more information on how Google uses data when you visit or use our Sites, please visit [www.google.com/policies/privacy/partners](http://www.google.com/policies/privacy/partners). If you would like to opt out, Google provides an opt-out tool which is available at <https://tools.google.com/dlpage/gaoptout>.

## 7. Links to Other Websites

Our Sites may include links to other websites or applications whose privacy practices may differ from ours. If you submit personal information to any of those websites or applications, your information is governed by their privacy statements. We encourage you to carefully read the privacy statement of any website you visit.

## 8. Retention of Information

We keep your personal information for as long as necessary to provide you with the Services, for legitimate and essential business purposes, such as making data-driven business decisions, complying with our legal obligations, and resolving disputes. Personal information is not kept for longer than is necessary for the purpose for which it was collected, held, and processed. The retention periods for personal information varies depending on whether that data is held as part of a legally required business record.

## 9. Children

We do not knowingly collect or store any personal information from anyone under the age of 13. If we become aware that we have collected or stored personal information from an individual under age 13, we will remove their personal information from our files. If you are a parent or guardian and believe we may have inadvertently collected personal information from your child, please notify us immediately by sending an email to [privacy@wd40.com](mailto:privacy@wd40.com).

## 10. How to Update Your Information

To change or update the information we hold and which relates to you please contact us, using the contact details at section 11.

## 11. Contact Us

If you have questions or concerns regarding our privacy practices or this Privacy Statement, you may contact by writing or emailing us at the address below:

WD-40 Company

Attn: Privacy  
Address: 9715 Businesspark Avenue, San Diego, CA 92131  
Email: [privacy@wd40.com](mailto:privacy@wd40.com).

## 12. Changes to this Privacy Statement

We may revise or update this Privacy Statement from time to time. The last updated date above indicates the most recent date of revision. The updated Privacy Statement will be posted on our Sites. Your continued use of the Services or Sites after we post a revised Privacy Statement signifies your acceptance of the revised Privacy Statement.

## 13. Country/Region/State Specific Provisions

### California

For residents of California, the following additional provisions apply to you.

**Shine The Light:** If you are a California resident, this section applies to you. The California Shine the Light law (Cal. Civ. Code § 1798.83) permits residents of California to request certain details about how their information is shared with third parties for the third parties' direct marketing purposes. If you are a California resident and would like to make such a request, please send an email to [privacy@wd40.com](mailto:privacy@wd40.com) and include "CA Shine the Light" in the subject line of your email.

#### **California Consumer Privacy Act (CCPA) Disclosures:**

Categories and sources of personal information we collect: In the preceding 12 months, we have collected the following categories of personal information: contact information, identifiers, social media profiles, user generated content, commercial information, geolocation data, usage data, audio/visual data and inferences. For details about the data points we collect and the categories of sources of such collection, please see section 1 above.

Purposes for which we use personal information: We collect personal information for the business and commercial purposes described in section 2 above.

Disclosure for a business purpose: In the preceding 12 months, we have disclosed the following categories of personal information for the business purposes set forth in section 3 above to the following categories of recipients:

| <i>Category of Personal Information</i> | <i>Categories of Recipients</i>   |
|---|---|
| Contact Information                     | service providers, affiliates, professional advisors, government entities   |
| Unique Identifiers                      | service providers, affiliates, professional advisors, marketing/analytics/advertising partners                      |
| Social Media Profiles                   | service providers, affiliates, professional advisors, marketing/analytics/advertising partners                      |
| User Generated Content                  | service providers, affiliates, professional advisors, marketing/analytics/advertising partners                      |
| Commercial Information                  | service providers, affiliates, professional advisors, government entities, marketing/analytics/advertising partners |
| Usage Data                              | service providers, affiliates, marketing/analytics/advertising partners   |
| Geolocation data                        | service providers, affiliates, marketing/analytics/advertising partners   |

|                   |   |
|-------------------|---|
| Audio/Visual Data | service providers, affiliates<br>marketing/analytics/advertising partners |
| Inferences        | service providers, affiliates<br>marketing/analytics/advertising partners |

For a more expansive description of the categories of recipients, please see section 3 above.

### Your Rights Under the CCPA

Subject to certain exceptions, the CCPA affords California consumers the following rights:

#### 1. The Right to Know About Personal Information Collected, Disclosed, or Sold

You have a right to request what personal information we have collected, used, disclosed and sold about you in the preceding 12 months. You can also request the specific pieces of personal information we have collected about you. You can also request the following categories of information:

- The categories of personal information we have collected about you.
- The categories of sources from which the personal information was collected.
- The business or commercial purpose for collecting or selling the personal information.
- The categories of third parties with whom we shared personal information.

#### 2. Right to Request Deletion of Personal Information

You can also request that we delete your personal information. We may not delete all of your personal information if one of the exceptions to the CCPA applies. Please note that if we delete your personal information, the Services provided may not maintain the same functionality. For example, your previous opt-out requests will not be saved and saved preferences and information will no longer be available.

#### 3. Right to Opt Out of Sale of Information

You have a right to opt out of the sale of your personal information. The CCPA defines a "sale" as disclosing or making available to a third party personal information in exchange for monetary or other valuable consideration. While we do not sell personal information for monetary value, we may disclose personal information to third parties, such as marketing/analytics/advertising partners, in such a way that may be considered a "sale" of personal information under the CCPA. We do not sell personal information of minors who we know are under 16 years of age.

#### 4. Right to Not Be Discriminated Against

You have a right to not be discriminated against for exercising any of your CCPA rights. We will not discriminate against you, deny you services, charge you a different price, or provide you with a lesser quality of services if you exercise any of your CCPA rights.

### Exercising Your Rights Under the CCPA

To exercise any of your CCPA 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.

Further, in order to verify your identity, we will provide a verification form to you at your email address. Please be aware that you must complete the verification form and submit it to us in order for us to match that information to the information we have in our systems and process your request. Additionally, some requests may be subject to additional identity verification procedure. 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](mailto:privacy@wd40.com).

**Other Consumer Rights Information:** Under California Civil Code Section 1789.3, we are required to provide California residents with the following information:

- The Site is owned and operated by WD-40 Company.
- Unless otherwise expressly stated, this Site is provided without charge.
- To file a complaint regarding this Site or to receive further information regarding use of this website, please contact us via email at [privacy@wd40.com](mailto:privacy@wd40.com). You also may contact the Complaint Assistance Unit of the Division of Consumer Services of California's Department of Consumer Affairs in writing at 400 R Street, Suite 1080, Sacramento, California 95814 or by telephone at (916) 445-1254 or (800) 952-5210.

### European Economic Area (EEA), the United Kingdom, and Switzerland

For residents of the European Economic Area (EEA), the United Kingdom, and Switzerland, the following additional provisions apply to you.

**Controller:** The controller of your personal information is: WD-40 Company Limited

**Disclosure and Cross-Border Transfer:** Personal information that is shared with affiliates and third parties as described in this Privacy Statement is done pursuant to contracts that include the requisite protections under the GDPR or UK GDPR, as applicable. We are a global company, and your personal information will be shared among us and transferred outside of your country of residence. By using the Sites or Services, you acknowledge your personal information may be transferred to and processed in jurisdictions outside your own and that the data protection laws and regulations that apply to your personal information transferred to the United States or other countries may be different from the laws in your country of residence. In accordance with GDPR and UK GDPR, personal information that is transferred outside of the European Economic Area is conducted in accordance with compliant arrangements such as data transfer agreements that contain standard contractual clauses adopted by the European Commission that provide safeguards for such transfers or legally recognized certifications.

**Your Rights Over Your Personal Information:** You have the right to request that we:

- confirm whether we are processing your personal information;
- provide you or a third party that you designate with certain of your personal information in a commonly used, machine readable format;
- update or correct your personal information when it is inaccurate or incomplete;
- cancel or delete your personal information in certain circumstances;
- to limit processing of or stop processing your personal information in certain circumstances including for marketing activities and profiling for marketing activities and profiling for statistical purposes;
- or to revoke consent previously granted to the extent permitted by law.

To exercise any of these rights please contact us at [privacy@wd40.com](mailto:privacy@wd40.com).



You must use “GDPR Request” in the subject line of your email or letter. 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.

Further, in order to verify your identity, we will provide a verification form to you at your email address. Please be aware that you must complete the verification form and submit it to us in order for us to match that information to the information we have in our systems and process your request.

We encourage interested persons to raise any concerns using the contact information provided and we will investigate and attempt to resolve any matters related to the use and disclosure of your personal information.

## Mexico

For residents of Mexico, the following additional provisions apply to you.

**Data Controller:** Your data controller is WD-40 Co. Mexico, S. de R.L. de C.V.

**Use of Your Personal Data:** Personal data that we collect is used only for the purposes contained in section 1 of this Privacy Statement or as stated within materials you receive.

**Consent to Processing:** In accordance with the Federal Law on Protection of Personal Data Held by Private Parties and its accompanying regulations, you consent to the processing of your personal data in accordance with the provisions of this Privacy Statement unless you express your objection in the manner provided for under the Your Rights section of this Privacy Statement. We may process financial or asset information to provide you with our products and services for the purpose of fulfilling obligations under a legal relationship between you and us.

**Your Rights:** You have five (5) days after this Privacy Statement has been brought to your attention to refuse to allow the processing of your personal information for purposes that are different than those that are necessary pursuant to a legal relationship between you and us; otherwise, you are deemed to have consented to such processing. You also have the right to access your personal information; to rectify such information when it is inaccurate or incomplete; to cancel or delete your personal information; to oppose the use your information for a specific purpose; or to revoke consent previously granted to the extent permitted by law. If you cancel or revoke our ability to use certain personal information, we may not be able to provide certain goods and services to you.

To exercise any of the rights described above, please email us at [privacy@wd40.com](mailto:privacy@wd40.com). You must include in the email (a) your full name; (b) your contact information, including your mailing address, email address, and telephone number; (c) the right you wish to exercise; (d) proof of your identity or your legal representative; and (e) any other information, item or document that will assist us in locating your personal data.

We will respond to your request within twenty (20) days after receipt of your request and verification of your identity or any longer period permitted by law. We may contact you (i) to request additional information from you if we are not able to verify your identity from the information you provide in your email request; (ii) to inform you of the timeframe within which you will receive a response to your request; (iii) to provide you with directions on how you must submit your request, including the forms you can use to submit your application, if any, and; (iv) to inform you about how we will deliver to you the information you requested (which usually would be copies of documents or information).

**Data Transfers:** We may transfer your personal data as provided for in section 3 of this Privacy Statement. Such transfer is to third parties who are necessary for providing our goods and

Services to you, to our affiliates, or third parties that are necessary pursuant to our legal relationship with you or to protect our legal rights. We will seek your consent when required if such transfer is not for the stated purposes identified in this Privacy Statement.