

Updated March 19, 2025

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.

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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.

This Privacy Statement 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 Privacy Statement and any translation thereof, the English version will prevail.

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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, X (formerly 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.

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 which will only be adequate and necessary for the purposes described below. If you do not provide us with the requested information, we may not be able to provide you with the services or information you require or fulfill the purposes described below.

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.

Your personal information may be transferred to the third parties outside of your country of residence for the aforesaid purposes. 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 other countries may be different from the laws in your country of residence. When making these transfers, we will take steps designed to ensure that your personal information is adequately protected and transferred in accordance with the requirements of relevant data protection laws.

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: When you access the website, we (and third-party companies we work with) may collect and store certain information by using technologies such as server logs, cookies, web beacons, clear gifs, tags, e-tags, flash cookies, log files, pixels, code, Javascript packages, mobile advertising IDs (such as Facebook ID or Google's Advertising ID), cross-device linking, and similar technologies. The information collected includes information about your activities on our Sites, IP address, browser or operating system type and version, device IDs, and demographic or inferred-interest information, as well as information or communications you have submitted to us through the Sites.

We may use this information to understand general usage and volume statistics, how users navigate to and around our Sites, what content is viewed or accessed, and which services have been obtained. We may also use these technologies to keep track of your preferences and profile information and to allow third parties to provide analytics and advertising services and serve advertisements on our behalf across the Internet and in mobile applications. For example, our advertising partners may use the fact that you visited our Site to target advertising to you on other websites and mobile apps on your current device or on other devices you use. They may match your browsers or devices if you log into the same online service on multiple devices. These third-parties partners may use this information for our and their own advertising, analytics, attribution, and reporting purposes.

To learn more about interest-based advertising, tracking technologies, and how to opt out, please visit <http://www.aboutads.info/choices>. You can disable the sharing of your personal information for cross-contextual behavioral advertising or targeted advertising through online tracking technology by clicking on the Manage Cookies [link on our website footer](#) and disabling all cookies that are not strictly necessary.

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/>.

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. If you would like to opt out, Google provides a an opt-out tool which is available at <https://tools.google.com/dlpage/gaoptout>.

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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.

10. How to Update Your Information

You have the right to, at any time, request access to, and request us to make correction of your personal information. To access, 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.

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

Consequences of deleting your information

Please note that certain jurisdictions, as explained below, allow you to delete your information/the right to be forgotten. Please note that if we delete your personal information, many of our services will not work the same. Some examples include, but are not limited to:

- **Returns:** We will not have the ability to look up your receipt or order in our system. In order to process a return or refund, we will require proof of purchase from the customer or end user and if the customer or end user is unable to provide proof of purchase, the transaction will be treated as an unreceipted return in accordance with our return policy.
- **Customer Service:** Our ability to handle customer service requests may be limited. We will not have the ability to look up prior orders or account information and may request proof of purchase in order to service your needs.
- **Online Account & Shopping:** Your online account will no longer exist. Your shopping cart items, order history, saved addresses, saved recipes and any other saved preferences in your online account will no longer be available.
- **Marketing Communications:** We will no longer be able to provide you with any marketing communications directly from our us, including personalized marketing communication such as information about new products, services and offers tailored to your interests.
- **Opt Outs:** Previous opt-out requests will not be saved.

If you wish to make multiple requests under this section, we recommend sending the deletion request last, as we will not be able to fulfill your other requests once we have deleted your information.

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 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.

Sale or Sharing of Personal Information: In the preceding 12 months, we have “sold” or “shared” (as those terms are defined in the CCPA) the following categories of personal information: identifiers, commercial information, geolocation data, internet or electronic usage data, and inferences. We do not knowingly collect, 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.

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, marketing/analytics/advertising partners
Inferences	service providers, affiliates, 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 and limitations, the CCPA affords California consumers the following rights:

- 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.
- The right to request that we provide you with a copy of your personal information.
- The right to request that we delete your personal information.

- The right to opt-out of the sale of your personal information.
- The right to opt-out of the sharing of your personal information for cross-context behavioral advertising
- The right to direct us to limit the use or disclosure of your sensitive personal information to only the purposes specified in the CCPA.
- The right to correct inaccurate personal information that we hold about you.
- The right to not be discriminated against for exercising any of your CCPA rights.

Exercising Your Rights: 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. 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.

Global Privacy Control and Opt-Out Preference Signals: Some browsers or browser extensions also allow you to tell websites not to share your information for cross-contextual behavioral advertising through the “Global Privacy Control” or other opt-out preference signals. If you have enabled Global Privacy Control or an opt-out preference signal on your browser or extension, we will honor such requests that can be recognized by our Site by disabling analytics and advertising technologies. Please note that we may not be readily able to associate an opt-out preference signal with other personal information such as your email address. You will also only be opted out of online sales or sharing of personal information, and will need to turn it on for each browser you use. Refer to the “Exercising Your Rights” above if you would like to extend your opt-out request beyond the online advertising practices described above.

Texas

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

We set forth above the categories of personal data we process, the purpose for processing personal data, the categories of personal data shared, and the categories of third parties with whom personal data is shared.

Your Rights

Subject to certain exceptions and limitations, Texas consumers have the following rights:

- The right to request that we confirm whether or not we are processing your personal data and to access your personal data.
- The right to obtain a copy of your personal data in a portable and, to the extent technically feasible, readily usable format that allows data portability.

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- The right to correct inaccurate personal data that we hold about you.
- The right to request that we delete your personal information.
- The right to opt out of the processing of the personal data for purposes of (i) targeted advertising/cross-context behavioral advertising, (ii) the sale of personal data, or (iii) automated decision-making or profiling in furtherance of decisions that produce legal or similarly significant effects concerning you.

Exercising Your Rights

To exercise any of your 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 and you must inform us which right you would like to exercise. 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.

Appealing Our Decision. 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. You may exercise your appeal rights by emailing us at privacy@wd40.com. Please include your full name, the basis for your appeal, and any additional information to consider.

Global Privacy Control and Opt-Out Preference Signals: Some browsers or browser extensions also allow you to tell websites not to share your information for cross-contextual behavioral advertising through the “Global Privacy Control” or other opt-out preference signals. If you have enabled Global Privacy Control or an opt-out preference signal on your browser or extension, we will honor such requests that can be recognized by our Site by disabling analytics and advertising technologies. Please note that we may not be readily able to associate an opt-out preference signal with other personal information such as your email address. You will also only be opted out of online sales or sharing of personal information, and will need to turn it on for each browser you use. Refer to the “Exercising Your Rights” above if you would like to extend your opt-out request beyond the online advertising practices described above.

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

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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 ("Right to be Forgotten");
- 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.

Where you wish to exercise your Right to be Forgotten, you may do so by:

- (1) submitting a request via email to privacy@wd40.com with the subject line 'Data Deletion Request'; or
- (2) by completing our consumer rights request form (accessed here – [Consumer Rights Request - WD-40 UK](#)).

To process your request efficiently, please include the following details: (a) your full name; (b) email address; (c) a clear statement requesting the deletion of your personal data; (d) the ground(s) for deletion (i.e. the reason you believe your data should be deleted); and (e) any relevant details to help us locate your data. Without sufficient information we may not be able to process your request.

To exercise any of your other privacy rights, enumerated above, please click [here](#) or call us at 1-877-906-1824. For such requests, you must provide us with your name, email address, phone number, and mailing address and you must inform us which right you would like to exercise. 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. 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.

We expect to respond to your request within one (1) month of receipt of a fully completed request and verification of identity. If your request is complex or involves multiple records, we may extend this period by up to two (2) additional months, in which case we will inform you of the extension and the reasons for it.

Mexico

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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. 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.

Australia

'Personal information' should be read as 'personal information' as defined in the *Privacy Act 1988* (Cth) (Privacy Act).

Sensitive information. We will only collect personal information related to your 'health or medical condition' (as set out in section 1 of this policy) with your consent.

Marketing, Offers, Promotions, Advertising Partners. We will only provide you with Marketing and Offers and Promotions (as set out in section 2 of this policy) with your consent. We will only provide your personal information to Advertising Partners who assist us with marketing (as set out in section 2 of this policy) where you have consented to receiving marketing materials from us.

Targeted and Third-party Analytics and Advertising: If you wish to opt out of direct marketing in the form of targeted advertising (as set out in section 6 of this policy) you may need to change the ad settings in your social media account, your browser, or by visiting Your Online Choices: <https://www.youronlinechoices.com/ie/your-ad-choices>.

Access and correction of information about you. You have a right to access the personal information that we hold about you, and can ask that we correct that personal information. If you believe we are holding information about you that is inaccurate, incomplete, irrelevant or misleading, you can ask us to correct it. If you would like to access your personal information, or request us to update or correct it, you can do so by contacting us in writing and verifying your identity. We will do our best to respond to your request within 30 days. We will only refuse access in exceptional circumstances, and if this is the case, we will advise you of our reasons for doing so.

Safeguards. Whenever your personal information is transferred outside Australia, we will:

- ensure that the third-party recipient of the personal information is located in a territory that has laws or binding rules that protect the personal information in a way that, overall, is at least substantially similar to the way in which the Australian Privacy Principles at Schedule 1 to the Privacy Act protects such personal information and there are mechanisms available to the you to enforce such laws or binding rules; and/or
- take reasonable steps to ensure the overseas recipient does not breach the Australian Privacy Principles.

Privacy Complaints. If you have a complaint about our compliance with the Australian Privacy Principles or in relation to how we deal with a request to access or correct your personal information, you may contact us using the details in section 11 "Contact Us" above. We will use reasonable efforts to respond your complaint within a reasonable time (usually within 30 days). If we are unable to satisfactorily resolve your privacy concerns, you can contact the Office of the Australian Information Commissioner on their website www.oaic.gov.au.

Mainland China

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

Personal Information Processor: The Personal Information Processor of your personal information is: Wu Di (Shanghai) Industrial Co., Ltd.

Collection and Use of Personal Information

We will, in accordance with the principles of lawfulness, legitimacy, necessity, and good faith, collect the information generated by your use of our Services or your visit of our Sites, the information provided by you on your own initiative, and the personal information legally collected from third parties in accordance with the provisions of the PRC Personal Information Protection Law and other applicable laws and administrative regulations or your consent.

We may collect and use sensitive personal information only to the extent necessary for the purposes described in the Privacy Statement. We will obtain your separate consent for processing your sensitive personal information and adopt strict security measures when processing your sensitive personal information.

Unless otherwise stipulated by the laws and administrative regulations, we will only store your personal information for the shortest time necessary to achieve the purposes of processing.

Legal Basis for Processing

We rely upon at least one of the following legal bases to process your personal information:

- You have consented to our processing your personal information;
 - The processing is necessary to perform a contract with you;
 - The processing is necessary to fulfil our legal obligations;
 - The processing is necessary to address public health emergencies or to protect the life, health, and property safety of natural persons in urgent situations;
 - In accordance with legal provisions, your personal information that you have disclosed or that has been legally made public will be processed within a reasonable scope; or
- Other circumstances as stipulated by the laws and administrative regulations.

Sharing, Public Disclosure, and Cross-Border Transfer

For the purposes stated in the Privacy Statement, we may share your personal information with the following affiliates and third parties who have their own purposes and means of processing your personal information:

Recipients (Full legal name)	Contact information	Categories of personal information being shared	Purpose and means of the recipient's processing
上海光潏网络科技有限公司	阎阳:134-7877-2472	Name, address, phone #	Our SCRM system vendor has access to our sales leads contact collected from various marketing campaigns
上海纳魄信息服务有限公司	Siwen Luo:180-5927-8773	Name, address, phone #	Our Baidu SEO/SEM vendor has access to our sales leads contact in our Sites
上海月盈广告有限公司	Sixuan Lv:137-6442-7420	Name, address, phone #	Our WeChat vendor has access to some of our user's contact information to handle user complaint and gift shipping
上海八和广告有限公司	Chengzhen Li: 021-52950556	Name, address, phone #	Our website vendor has access to our sales leads contact in our Sites

上海注解有加文化传播有限公司	Dongli Lu: 131-2750-9389	Name, address, phone #	Our media agency has access to our Key Opinion Leader and Key Opinion Consumer contact information for sampling
长沙春朝冬遇文化传媒有限公司	Shengjie yang: 131-4682-6763	Name, address, phone #	Our advertising agency has access to our authorized list of sales leads contact for target marketing
China Construction Bank	Alston Zhong15821887028	Name, ID number, bank account	Our financial institution has access to employee data to set up employee bank account and to process reimbursement expenses.
China Merchants Bank	Shi Sheng Qi 021-38834600		Our financial institution has access to employee data to set up employee bank account and to process reimbursement expenses.
Distributor (Happy go)	Ao Chen 185 7066 6244	Name, address, phone number	Campaign and lucky draw activity as promotion needed.
China International Intellectech Corporation	T:0086-21-54594545-2227 Ms. Yuan	Name, Contact, Address, ID, Education	Employment
Ping An Pension Insurance Co., Ltd. Shanghai Branch	Tel: 021-62487262 Ms. Hu	Name, Contact, ID, Children's ID	Medical Insurance
Shanghai Homsom Travel (Group) Co., Ltd.	Tel: 021-64475082 Ms. He	Name, Contact, ID,	Travel booking

We generally do not transfer your personal information externally. If we need to transfer personal information due to merger, division, dissolution, bankruptcy, etc., we will inform you of the recipient's name and contact information, and, at the same time, we will require the recipient to continue to be bound by this Privacy Statement and assume the corresponding obligations and responsibilities. If

the recipient changes the original processing purpose and method, it shall obtain your consent again in accordance with laws and regulations.

We will not publicly disclose your personal information, except with your lawful consent.

Protection of Children's Personal Information

Generally, we will not process personal information of minors under the age of 14 (i.e., children). If we become aware that we have collected personal information of children without the prior consent of their parents or other guardians, we will remove such personal information of children from our files.

Your Rights

You have specific legal rights with regard to the personal information that you have provided to the Company, which include the following:

- the right to know and the right to decide on the processing of your personal information;
- the right to restrict or refuse the processing of your personal information by us;
- the right to consult and duplicate your personal information;
- the right to request us to correct or supplement your personal information where you find the information is incorrect or incomplete;
- the right to withdraw your consent to the processing of personal information based on your consent (but please note that your withdrawal of consent does not affect the validity of the processing of personal information that has been carried out based on your consent before the withdrawal);
- the right to request the transfer of personal information to your designated third party; and
- the right to delete your personal information under specific circumstances.

If you want to exercise your rights above, please email us at privacy@wd40.com and please inform of us of the right you would like to exercise. Please note that the rights above are subject to limitations and exceptions under applicable Chinese laws. We will respond to and comply with your request(s) consistent with applicable Chinese laws as soon as reasonably practicable. In order to protect the security of your personal information, before responding to your request for personal information rights, you may need to provide a written request, or otherwise prove your identity, and we have the right to verify your identity before processing your request. If you have unresolved concerns, you also have the right to complain to relevant supervisory authorities or where applicable, file a lawsuit with the court in accordance with applicable Chinese laws.

Brazil

If you are located in Brazil, your personal data was collected or being processed in Brazil, the following additional provisions apply to you, according to Law No. 13.709/2018 - Brazil's General Data Protection Law ('LGPD').

Data Controller:

Your data controller is WD-40 Company Brasil Ltda., legal entity, registered under CNPJ no. 02.260.769/0001-74, located at Av. Rui Barbosa, 6226, Suite C, Afonso Pena, São José dos Pinhais, State of Paraná, ZIP code: 83045-350.

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.

Commented [WD15]: For Mainland China you will need to have a consent page:

Consent Page

- ☐ I acknowledge and understand the content of this Privacy Statement and consent to the processing of my personal information in accordance with this Privacy Statement.
- ☐ In particular, I consent to the processing of my sensitive personal information in accordance with this Privacy Statement.
- ☐ I consent to the sharing of my personal information with other separate personal information processors as described in this Privacy Statement.
- ☐ I consent to the sharing of my personal information outside of mainland China as described in this Privacy Statement.

Personal sensitive data:

It is possible that we collect personal information related to your 'health or medical condition' according to section 1, that is, to the only scope of analyse and address incidents with our products or packaging.

Legal Basis for Processing Personal Data

We rely upon one of the following legal bases to process your personal information:

- You have consented to our processing your personal information;
- The processing is necessary to perform a contract with you or preliminary procedures related to a contract to which the holder is a party, at your request;
- The processing is necessary to fulfil our legal or regulatory obligations;
- The processing is necessary to protect the life or physical safety of the data subject or third party;
- The processing is necessary for the regular exercise of rights in judicial, administrative or arbitral proceedings, also according to the Legal purpose addressed on section 2; or
- Where necessary to meet our legitimate interests or third parties, except in the case of your fundamental rights and freedoms that require the protection of personal data.

Protection of Children's Personal Information

Generally, we will not process personal information of minors under the age of 14 (i.e., children). We are aware that the processing of personal data belonging to children and adolescents shall be done in their best interest. In case that consent was not collected from their parents or legal representatives, we will remove such personal data from our database.

Sharing and Disclosure of Information

To carry out WD-40 activities we may share personal data according to section 3. Additionally, as we believe to be necessary or appropriate, we can share your personal data (a) under applicable law, including laws outside your country of residence; (b) to comply with legal process; (c) to respond to requests from public and government authorities including public and government authorities outside your country of residence; (d) to enforce our terms and conditions; (e) to protect our operations; (f) to protect our rights, privacy, safety or property, and that of you or others; and (g) to allow us to pursue available remedies or limit the damages that we may sustain.

Security measures

According to section 5 of this privacy statement, we seek to use reasonable organizational, technical, and administrative measures to protect personal information within our organization. However, if you have reason to believe that your interaction with us is no longer secure (for example, if you feel that the security of any account you might have with us has been compromised), please immediately notify us of the problem by e-mailing us at privacy@wd40.com.

Data Retention Period

We will only retain your Personal Data for as long as necessary to fulfil the purpose for which the data was collected or upon your request, as explored in section 8. Also, the data can be stored by period: (a) legal possibility linked to legal relationship with you; (b) necessary for any contractual negotiation; (c) necessary to comply with legal or regulatory obligation; or (d) if there is another just

reason to store it. When the personal data we process is no longer needed, we will securely delete it or anonymize it so that it cannot be associated or traced back to you.

Data Transfers

Personal data may be shared with WD-40 commercial partners and service providers located outside the country, for example, for data storage on cloud servers located outside Brazil, and we may transfer your personal data as provided for in section 3. In such cases, the international data transfer will be carried out with third parties who contractually commit to and demonstrate compliance with applicable data protection legislation in accordance with Article 33 of the LGPD.

Your rights:

It is important for you to know that, as a data subject, you have the following rights:

- the right to confirmation of the existence of the data processing activity;
- the right to access your data;
- the right to anonymize, block, or delete unnecessary, excessive or treated data in non-compliance with the applicable laws on those jurisdictions;
- the right to data portability to another service or product provider;
- the right to elimination of personal data processed with your consent;
- the right to information from public and private entities with which we shared data use;
- the right to information about the possibility of not giving consent and about the consequences of the refusal;
- the right to revocation of consent;
- the right to opposition to the data processing activity; or
- the right to automated decision review.

For any clarifications, requests, and/or to exercise you data subject rights, please email us at privacy@wd40.com and please inform us of the right you would like to exercise.

Data Protection Officer (DPO): you can contact WD-40 Data Protection Officer securely and confidentially at any time with any questions, concerns or any issues related to the protection of personal data by email (privacy@wd40.com).

Indonesia

If you are an Indonesian citizen or you reside in Indonesia, you are subject to the provisions of Law No. 27 of 2022 on Personal Data Protection (“**PDP Law**”).

Your Rights Under PDP Law

Under PDP Law, you have the following rights with regard to your personal information:

Right to Information	The right to obtain information regarding the identity of the requesting party, the legal basis for the request, the purpose of the request and use of their personal information, and the accountability of the party requesting the personal information.
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Right to Rectification of Personal Information	The right to complete, update, and/or correct any errors or inaccuracies in personal information in accordance with the purpose of personal data processing.
Right of Access to Personal Information	The right to access and obtain a copy of personal information in accordance with the provisions of applicable laws and regulations.
Right to Erasure and Destruction of Personal Information	The right to terminate the processing, delete, and/or destroy personal information in accordance with the provisions of applicable laws and regulations.
Right to Withdraw Consent to Processing of Personal Information	The right to withdraw consent for the processing of personal information, which has previously been given to us.
Right Relating to Automated Decision Making and Profiling	The right to object to decisions made solely based on automated processing, including profiling, that have legal or significant impacts.
Right Restrict Processing of Information	The right to suspend or restrict the processing of personal information proportionally in accordance with the purpose of personal data processing.
Right to Seek Compensation	The right to file a lawsuit and receive compensation for violations of personal data processing in accordance with the provisions of applicable laws and regulations.
Right to Data Portability	You have the right to obtain your personal information from us in a commonly used, machine-readable format and transfer it to another data controller, provided that both systems can communicate securely.

Exercising Your Rights

For any clarifications, requests, and/or to exercise your data subject rights, please contact us at privacy@wd40.com and please inform us of the right you would like to exercise.

Children

We do not knowingly collect or store any personal information from anyone under the age of 18. If we become aware that we have collected or stored personal information from an individual under age 18, 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.

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. Prior to the change of this Privacy Statement, we will notify you of the change. 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.

Japan

For residents of Japan, the following additional provisions apply to you under the Act on the Protection of Personal Information (APPI).

Sensitive Information:

We will collect personal information regarding your racial or ethnic origin, political opinions, religion or philosophical beliefs, health or medical condition, and criminal background as described in section 1 of this Privacy Statement only with the prior consent of the data subject.

Disclosure and Cross-Border Transfer:

Personal information shared with affiliates and third parties, as described in this Privacy Statement, requires the prior consent of the data subject, unless specific exceptions stipulated in the law apply. As a global company, we share personal information among our affiliates and transfer it outside your country of residence. By using our Sites or Services, you acknowledge that your personal information may be transferred to and processed in jurisdictions outside your own, where the data protection laws and regulations may differ from those in your country of residence. Under the APPI, transferring personal information to a recipient located outside Japan requires the prior consent of the data subject. However, this requirement does not apply if the recipient is located in a country deemed to provide an adequate level of data protection, such as the member states of the EEA or the UK.

Your Rights Over Your Personal Information:

You have specific legal rights with regard to the personal information that you have provided to us under the APPI, which include the following:

- the right to request notification of the purpose of use
- the right to request disclosure
- the right to request correction, addition, or deletion
- the right to request suspension of use
- the right to request erasure
- the right to request suspension of third-party provision

If you want to exercise your rights above, please email us at privacy@wd40.com and please inform us of the right you would like to exercise.