



## TCWGlobal Privacy Policy

Last modified: December 1, 2022

### **Introduction**

WMBE Payrolling Inc. dba TCWGlobal and its affiliates (“TCWGlobal,” “we,” “us” or “our”) respect your privacy and take your privacy seriously. We are committed to handling personal information responsibly and in compliance with applicable laws. This policy describes the types of information we may collect from you or that you may provide when you visit the website [www.tcwglobal.com](http://www.tcwglobal.com) (our "**Website**") and our practices for collecting, using, maintaining, protecting, and disclosing that information.

While we may provide answers to privacy questions at [www.tcwprivacy.com](http://www.tcwprivacy.com) in order to be helpful, this Privacy Policy is the exclusive source of our specific privacy practices relating to our Website.

This policy applies to information we collect:

- On this Website.
- In email, text, and other electronic messages between you and this Website.
- When you interact with our advertising and applications on third-party websites and services, if those applications or advertising include links to this policy.

It does not apply to information collected by:

- Us offline or through any other means, including on any other website operated by Company or any third party; or
- Any third party including through any application or content (including advertising) that may link to or be accessible from or on the Website

Please read this policy carefully to understand our policies and practices regarding your information and how we will treat it. If you do not agree with our policies and practices, your choice is not to use our Website. By accessing or using this Website, you agree to this privacy policy. This policy may change from time to time. Your continued use of this Website after we make changes is deemed to be acceptance of those changes, so please check the policy periodically for updates.

### **Children Under the Age of 16**

Our Website is not intended for children under 16 years of age. No one under age 16 may provide any personal information to or on the Website. We do not knowingly collect personal information from children under 16. If you are under 16, do not use or provide any information on this Website or through any of its features, or provide any information about yourself to us, including your name, address, telephone number, or email address. If we learn we have collected or received personal information from a child under 16 without verification of parental consent, we will delete that information. If you believe we might have any information from or about a child under 16, please contact us at [privacy@tcwglobal.com](mailto:privacy@tcwglobal.com).

California residents under 16 years of age may have additional rights regarding the collection and sale of their personal information. Please see “Your States Privacy Rights” section for more information.

### **Information We Collect About You and How We Collect It**

We collect several types of information from and about users of our Website, including information:

- By which you may be personally identified, such as name, e-mail address, and telephone number ("**personal information**");
- That is about you but individually does not identify you, such as company name, profession, position, title;
- Other information you may provide to us, such as through our “Contact Us” feature; and/or
- About your internet connection, the equipment you use to access our Website, and usage details.

We collect this information:

- Directly from you when you provide it to us.
- Automatically as you navigate through the site. Information collected automatically may include usage details, IP addresses, and information collected through cookies and other tracking technologies.
- From third parties, for example, our business partners.

#### *Information You Provide to Us*

The information we collect on or through our Website may include:

- Information that you provide by filling in forms on our Website. This includes information provided at the time of requesting further services. We may also ask you for information when you enter a contest or promotion sponsored by us, and when you report a problem with our Website.
- Records and copies of your correspondence (including email addresses), if you contact us.
- Your responses to surveys that we might ask you to complete for research purposes.

You also may provide information to be published or displayed (hereinafter, "**posted**") on public areas of the Website, or transmitted to other users of the Website or third parties (collectively, "**User Contributions**"). Your User Contributions are posted on and transmitted to others at your own risk. Although, please be aware that no security measures are perfect or impenetrable. Additionally, we cannot control the actions of other users of the Website with whom you may choose to share your User Contributions. Therefore, we cannot and do not guarantee that your User Contributions will not be viewed by unauthorized persons.

#### *Information We Collect Through Automatic Data Collection Technologies*

As you navigate through and interact with our Website, we may use automatic data collection technologies to collect certain information about your equipment, browsing actions, and patterns, including:

- Details of your visits to our Website, including traffic data, location data, and other communication data and the resources that you access and use on the Website.
- Information about your computer and internet connection, including your IP address, operating system, and browser type.

The information we collect automatically is only statistical data and does not include personal information. It helps us to improve our Website and to deliver a better and more personalized service, including by enabling us to:

- Estimate our audience size and usage patterns.
- Store information about your preferences, allowing us to customize our Website according to your individual interests.
- Speed up your searches.
- Recognize you when you return to our Website.

The technologies we use for this automatic data collection may include:

- **Cookies (or browser cookies).** A cookie is a small file placed on the hard drive of your computer. You may refuse to accept browser cookies by activating the appropriate setting on your browser. However, if you select this setting you may be unable to access certain parts of our Website. Unless you have adjusted your browser setting so that it will refuse cookies, our system will issue cookies when you direct your browser to our Website.

### **How We Use Your Information**

We use information that we collect about you or that you provide to us, including any personal information:

- To present our Website and its contents to you.
- To provide you with information, products, or services that you request from us.
- To fulfill any other purpose for which you provide it.
- To allow you to participate in interactive features on our Website.
- In any other way we may describe when you provide the information.
- For any other purpose with your consent.

For more information, see “Choices About How We Use and Disclose Your Information” section.

### **Disclosure of Your Information**

We may disclose aggregated information about our users, and information that does not identify any individual, without restriction.

We may disclose personal information that we collect or you provide as described in this privacy policy:

- To our subsidiaries and affiliates.
- To contractors, service providers, and other third parties we use to support our business and who are bound by contractual obligations to keep personal information confidential and use it only for the purposes for which we disclose it to them.
- To a buyer or other successor in the event of a merger, divestiture, restructuring, reorganization, dissolution, or other sale or transfer of some or all of TCWGlobal's assets, whether as a going concern or as part of bankruptcy, liquidation, or similar proceeding, in which personal information held by TCWGlobal about our Website users is among the assets transferred.
- To fulfill the purpose for which you provide it.
- For any other purpose disclosed by us when you provide the information.
- With your consent.

We may also disclose your personal information:

- To comply with any court order, law, or legal process, including to respond to any government or regulatory request.
- If we believe disclosure is necessary or appropriate to protect the rights, property, or safety of TCWGlobal, our customers, or others.

### **Choices About How We Use and Disclose Your Information**

We strive to provide you with choices regarding the personal information you provide to us. We have created mechanisms to provide you with the following control over your information:

- **Tracking Technologies and Advertising.** You can set your browser to refuse all or some browser cookies, or to alert you when cookies are being sent. To learn how you can manage your Flash cookie settings, visit the Flash player settings page on Adobe's website. If you disable or refuse cookies, please note that some parts of this site may then be inaccessible or not function properly.

We do not control third parties' collection or use of your information to serve interest-based advertising. However these third parties may provide you with ways to choose not to have your information collected or used in this way. You can opt out of receiving targeted ads from members of the Network Advertising Initiative ("NAI") on the NAI's website (<https://thenai.org/opt-out/>).

Residents of certain states, such as California, Nevada, Colorado, Virginia and Utah may have additional personal rights and choices. Please see "Your State Privacy Rights" for more information.

### **Your State Privacy Rights**

State consumer privacy laws may provide their residents with additional rights regarding our use of their personal information. To learn more about California residents' privacy rights, please review the following separate notices:

TCWGlobal's Privacy Notice for California Residents

## TCWGlobal's California Employee and Job Applicant Privacy Notice Regarding the Collection of Personal Information

Both policies can be found at [www.tcwprivacy.com](http://www.tcwprivacy.com)

California's "Shine the Light" law (Civil Code Section § 1798.83) permits California residents to request certain information regarding our disclosure of their information to third parties for the third parties for direct marketing purposes. To make such a request, please contact us by sending an email to [privacy@tcwglobal.com](mailto:privacy@tcwglobal.com) or write us at: 3545 Aero Court, San Diego, CA 92123.

Colorado, Connecticut, Virginia, and Utah each provide their state residents with rights to:

- Confirm whether we process their personal information.
- Access and delete certain personal information.
- Data portability.
- Opt-out of personal data processing for targeted advertising and sales.

Colorado, Connecticut, and Virginia also provide their state residents with rights to:

- Correct inaccuracies in their personal information, taking into account the information's nature processing purpose.
- Opt-out of profiling in furtherance of decisions that produce legal or similarly significant effects.

To exercise any of these rights please send an email to [privacy@tcwglobal.com](mailto:privacy@tcwglobal.com) or call 888-388-887. To appeal a decision regarding a consumer rights request please file an appeal either emailing [privacy@tcwglobal.com](mailto:privacy@tcwglobal.com) or by mailing the appeal to: 3545 Aero Court, San Diego, Ca 92123. A member of the TCWGlobal compliance department will respond in writing to the appeal within 45 days of receipt disclosing the outcome of the appeal and the explanation for the decision. If there are any concerns regarding the results of an appeal, the consumer has the right to contact the State Attorney General.

Nevada residents who wish to exercise their sale opt-out rights may submit a request by contacting TCWGlobal at: 888-388-8873 or [privacy@tcwglobal.com](mailto:privacy@tcwglobal.com). However, please know we do not currently sell data triggering that statute's opt-out requirements.

### **Request to Delete/Right to be Forgotten**

If you would like to submit a "request to delete," "request to be forgotten," or have a question regarding what personal information has been collected, please send an email to [privacy@tcwglobal.com](mailto:privacy@tcwglobal.com) or call 888-388-8873. We will confirm receipt of request in 10 days and respond within 45 days. TCWGlobal will log any requests received. Please note there are exceptions which allow a business to not delete information in certain situations. Those include when the information is necessary to:

- Complete a transaction.
- Provide a good/service the consumer has requested.
- Perform a contract.
- Detect security incidents.

- Protect against “malicious, deceptive, fraudulent, or illegal” activities.
- Prosecute people responsible for “malicious, deceptive, fraudulent, or illegal” activities.
- “Debug to identify and repair errors that impair existing intended functionality.”
- Ensure the exercise of free speech.
- Ensure the business can exercise “another right provided for by law.”
- Comply with a legal obligation.

TCWGlobal will make you aware of whether any of these exceptions exists and what information will be held in our response to you.

### **International and US Data Transfers**

Your personal information may be transferred outside the European Union to locations in the U.S. and other countries that have different data protection laws than those in the country in which you are based and that may not have been granted an adequacy decision by the European Commission. TCWGlobal has executed Standard Contractual Clauses approved by the European Commission to ensure that your personal data is protected when transferred outside of the EEA. You can request to consult a copy of these Standard Contractual Clauses by contacting us.

In this regard, TCWGlobal complies with the EU-U.S. Privacy Shield Framework as set forth by the U.S. Department of Commerce regarding the collection, use, and retention of personal information transferred from the European Union to the United States. TCWGlobal has certified to the U.S. Department of Commerce that it adheres to the Privacy Shield Principles. If there is any conflict between the terms in this privacy policy and the Privacy Shield Principles, the Privacy Shield Principles shall govern. To learn more about the Privacy Shield program, and to view our certification, please visit <https://www.privacyshield.gov/>

If you are utilizing the Website from outside of the United States, you understand and agree that your information and data may be transferred, stored, and used in the United States where our servers are located.

### **Do Not Sell Notice**

Please be advised that we do not and have not sold any personal information in the last 12 (twelve) months. Likewise, we do not have any future plans to sell personal information. However, we respect your privacy and understand that you will want to ensure your personal information is not sold. Any questions regarding our practices or request for your information to not be sold can always be sent to [privacy@tcwglobal.com](mailto:privacy@tcwglobal.com).

### **Changes to Our Privacy Policy**

It is our policy to post any changes we make to our privacy policy on this page. If we make material changes to how we treat our users' personal information, we will notify you by through a notice on the Website home page. The date the privacy policy was last revised is identified at the top of the page. You are responsible for ensuring we have an up-to-date active and deliverable email address for you, and for periodically visiting our Website and this privacy policy to check for any changes.

### **Contact Information**

To ask questions or comment about this privacy policy and our privacy practices, contact us at:

WMBE Payrolling Inc. dba TCWGlobal  
Attn: Privacy Office  
9475 Chesapeake Dr  
San Diego, CA 92123  
privacy@TCWGlobal.com  
(888)388-8873

We will investigate any complaints received and do our best to resolve them with you as soon as possible. You can also submit a user access request to obtain any of your personal data which will be processed within 30 days.

### **Complaints and Dispute Resolution**

In compliance with the Privacy Shield Principles, TCWGlobal commits to resolve complaints about our collection or use of your personal information. EU individuals with inquiries or complaints regarding our Privacy Shield policy should first contact TCWGlobal.

TCWGlobal has further committed to cooperate with the panel established by the EU data protection authorities (DPAs) with regard to unresolved Privacy Shield complaints concerning human resources data transferred from the EU in the context of the employment relationship.

For other complaints or concerns regarding your personal data under this Privacy Policy, please reach out utilizing the contact information above. We will respond within 30 days. If you still believe that your complaint or dispute has not been resolved, you can invoke binding arbitration (if permitted with respect to your complaint). The location of the arbitration will be in the United States.