
Windward Employee Privacy Notice

Windward (“**We**”, “**Our**”, “**Us**”) respect its employees’ privacy. This privacy notice (“**Notice**”) describes the ways We collect and process Personal Information related to you and is applicable worldwide.

By “**Personal Information**”, We mean information related to you which identifies or can identify you.

Please take the time to read this Notice, and do not hesitate to contact Us if you have any questions regarding your privacy rights, or this Notice. You can contact Our privacy team at: privacy@wnwd.com.

Legal Basis for Processing Personal Information

If you are employed in a country that requires a legal basis for processing Personal Information related to you (such as Israel and the UK), then our legal basis for processing Personal Information that We collect and process about you is:

- ✓ If you are employed in a country that has adopted the General Data Protection Regulation (GDPR), or similar legislation (such as the UK), then the processing of Personal Information related to you is based on Our legitimate interests, to support the purposes of processing described in this Notice.
- ✓ If you are employed in a country that does not permit Us to rely on our legitimate interests, then the processing of Personal Information related to you is based on your consent.
- ✓ We further process Personal Information related to you, where it is necessary to comply with legal obligations such as immigrations and employment laws and regulations and in legal proceedings.

In certain circumstances, We will request you to explicitly consent to the processing of Personal Information related to you, even when We can rely on other lawful grounds of processing.

If We process Personal Information related to you based on your consent, you can withdraw your consent at any time with future effect (although it may have an effect on our ability to continue your employment with Us).

Withdrawing consent will not affect the lawfulness of any processing that we have conducted before your withdrawal and will have no effect on mandatory processing of your information under laws applicable to Us.

Why We Collect and Use Personal Information?

We collect and use Personal Information related to you primarily to manage Our employment relationship with you (the “**Purposes**”), including:

- ✓ Delivery of applicable compensation and benefit programs;
- ✓ HR practices, for example, salary, options, social benefits, hiring, promotion, education, travel arrangements, reports to the tax and other government authorities and discipline;
- ✓ Employees’ participation in Our recreational events and programs;
- ✓ Maintenance, oversight and development of our information systems;

- ✓ Defense against cyber-security attacks, unauthorized use, unlawful use or abuse of Our assets, services, intellectual property, other rights or interests and confidential information, and against other violations of laws, regulations and rights of others;
- ✓ Notification to family members or designated contacts in case of emergency; and,
- ✓ Compliance with applicable laws, regulations, and other legal obligations, response to subpoenas, discovery or other legal authority requests in the context of litigation or investigations.

What Personal Information Do We Collect and Use?

Where Our employees use Windward's assets or devices, usage information is captured to protect Our assets and rights. We record, collect, store and analyze Personal Information related to you, including:

- ✓ Personal information connected to your identity, such as: first name, surname, title, date of birth, place of birth;
- ✓ Contact information, such as: address (street, zip code, country), phone number, email address;
- ✓ Personal Information related to employment relationship, such as: salary, options, vacations, benefits, tax and pension-related information, performance-related data and recruitment history;
- ✓ Health related information, such as sick leaves records;
- ✓ Your use of, or access to, Windward-issued equipment, media, applications, network resources and IT services; and,
- ✓ Any data, content, or communications transmitted to or from, received or printed from, or created, stored or recorded on any of the above, including for personal use.

How We Collect Personal Information?

We collect Personal Information related to you in one or more of the following ways:

- ✓ Directly from you during the employment relationship.
- ✓ Through the application and recruitment process either directly from you, or from a recruitment service providers or consultants if they were involved.
- ✓ From third parties including former employers, or other information providers, and, subject to applicable laws, through background checks.

Who Has Access to Personal Information?

Personal Information related to you will be shared internally, including with members of the HR, Legal and Finance departments, your direct manager, senior management and IT staff if access to the Personal Information is necessary for performance of their roles.

How We Share Personal Information?

We do not sell, rent lease or otherwise commercialize Personal Information related to you. Our data sharing practices include:

- ✓ Sharing Personal Information with Our affiliates, suppliers and vendors, to fulfil the purposes of our processing in this Notice. Our authorized vendors provide us, for example, web site hosting, data analysis services, reviews and investigations, IT services, financial, Legal, HR, accounting, travel, salary and billing services, third party oversight and auditing.

- ✓ Sharing Personal Information with Institutions and authorities, if and when required by law, or to respond to legal process; protect our customers; protect lives; maintain the security of Windward; and to protect Our legal rights and interests.
- ✓ As part of a contemplated or actual corporate transaction consummated in connection with Our business, assets or stock (including investments, mergers, acquisitions, and in bankruptcy, dissolution, liquidation and similar proceedings).

Our contracts with third parties include provisions to protect Personal Information related to you and limit its use to the purposes described in this Notice.

What Are Your Choices and Rights?

We respect Our employees' rights. You may request Us to access, correct, delete or to obtain a copy of Personal Information related to you and, depending on applicable law, you may have additional rights available to you.

If you request to correct or delete Personal Information related to you, please note that We may still need to retain certain information for record-keeping purposes or to comply with legal or contractual requirements.

To exercise any of the abovementioned rights, please contact our privacy team at: privacy@wnwd.com. Upon your request and based on the rights afforded to you under applicable laws, We will respond to your request promptly.

How Do We Secure Personal Information?

We have implemented administrative, technical and organizational security measures as well as policies and procedures to protect Personal Information related to you. These measures and procedures are designed to protect information against risks such as temporary or permanent loss, destruction, and unauthorized or unlawful access, alteration, use or disclosure.

We require Our suppliers and vendors to apply similar security measures and procedures when they access or use Personal Information that they process on Our behalf.

International Compliance

We are a global company with sites in Israel, the United States and the UK. We transfer Personal Information related to you between these territories to operate our business efficiently, to improve performance, and to create redundancies in order to protect information in the event of an outage or other malfunctions.

Whenever We transfer Personal Information related to you beyond the country of origin, We will do so in accordance with applicable laws. If you are a resident in a jurisdiction where transfer of Personal Information related to you to another jurisdiction requires your consent, then you provide Us your appropriate consent to such transfer.

You can contact our privacy team at: privacy@wnwd.com for further information about data transfer.

For How Long Do We Retain Personal Information?

We retain personal information for the period necessary to fulfil the purposes, rights and obligations that this Notice outlines. We retain records relating to Our employees for a maximum of seven years

following the termination of the employment relationship except where a longer or shorter retention period is required by applicable law.

Some records relating to pensions, compensation plans, profit sharing or payroll may be retained for a longer period as they are subject to ongoing performance obligations. Our retention periods are based on criteria that include legally mandated retention periods, pending or potential litigation, Our intellectual property or ownership rights, contract requirements, operational directives or needs, and archiving.

When Personal Information related to you is removed from Our systems, it will be deleted or destroyed using appropriate security protocols so that it cannot be reconstructed or read.

How Do We Change this Notice?

From time to time, We will need to update this Notice. If the updates have minor if any consequences, they will take effect 7 days after we post the revised Notice subject to this section. If any change to this Notice materially affects you, We will use reasonable efforts to notify you in advance, such as by sending an email or posting a prominent notice of the changes. We will give you a reasonable period of time to object to any changes and we will seek affirmative consent if and where this is required by applicable data protection laws.

How to Contact Us

Please contact our privacy team at: privacy@wnwd.com for further information.