



GLOBAL ENTERPRISE POLICY ON PRIVACY

PURPOSE

At Whirlpool Corporation, we are committed to acting with integrity in all that we do including complying with applicable privacy and data protection laws in all countries where we do business. This commitment reflects the value we place on earning and keeping the trust of our employees, customers, business partners and others who share their personal information with us. The purpose of this policy is to explain Whirlpool's expectations of privacy practices.

DEFINITIONS

- A **Data Subject Request** is a request made to Whirlpool by an individual to access, modify, or delete their personal data.

PRIVACY COMMITMENT

To uphold our commitment, Whirlpool will:

- Adopt reasonable and effective measures to ensure the protection of consumer and employee information, especially when sensitive data is involved.
- Collect and use personal data strictly for identified necessary, legitimate, and informed business or legal purposes, limiting the data processing to the minimum needed to achieve such purposes.
- Ensure transparency by providing appropriate notice and obtaining necessary consent when legally required from individuals regarding our data collection practices.
- Take reasonable steps to ensure that data is accurate, complete, current, and reliable for its intended use.
- Share personal data with third parties only where permissible by law and pursuant to proper privacy, data protection, and security controls, either through contract or other means, ensuring compliance with Whirlpool's privacy policy and adequate protection of personal information.
- Ensure compliance with relevant data protection laws and frameworks relating to the transfer of personal data across jurisdictions, including transfers within Whirlpool.

- Respond appropriately to Data Subject Requests for the exercise of applicable data-related rights.
- Formulate and maintain policies, procedures, and guidance to continuously uphold our commitment to privacy on a global, regional, and local scale.
- Integrate privacy considerations into the design of products, projects, and processes.
- Implement guidelines for the retention and deletion of personal data in compliance with applicable legal requirements and business needs.
- Conduct regular privacy training and awareness programs for employees to ensure their understanding and compliance with the privacy policy.

QUESTIONS

Should you have any questions or require further information regarding this policy, contact your People Leader, the Global Data Privacy Officer or the Chief Compliance Officer.

Failure to comply with this policy may result in appropriate disciplinary action, up to and including termination of employment.

REVISION HISTORY

This Policy replaces and supersedes GCP-4 Privacy.

<u>Rev. #</u>	<u>Effective Date</u>	<u>Description of Change</u>	<u>Approved By</u>
01	11-01-2010	Original Release	
02	01-01-2024	Template update	Chief Executive Officer
03	01-01-2025	Updated to new policy format	Ethics & Compliance Steering Committee

Global Policy Document Number: GEP-2 Privacy

Policy Owner (Functions): Legal

Policy Owner (Role): General Counsel