

WHIRLPOOL CORPORATION PRIVACY NOTICE

Last Updated: May 2022

This privacy notice ("**Privacy Notice**") describes the types of information that Whirlpool Corporation, with registered office in 2000 North, M63, Benton Harbor, MI, USA ("**Whirlpool**", "we" or "us"), collects, uses, and shares about suppliers, vendors, and service providers ("**Suppliers**", "you" or "your") through Whirlpool Corporation's Global Vendor Master database, global supplier portals, commodity management, product development, part approval, quality, schedule release, accounts payable, invoicing and other business-to-business services made available to Suppliers (together, the "**Services**").

By using the Services, you acknowledge that your information will be handled as described in this Privacy Notice. You acknowledge that you will only provide information and use the Services acting in your capacity as an employee, owner, director, officer, or contractor of a company, partnership, sole proprietorship, non-profit or other legal entity, and that your communications and transactions with Whirlpool occur solely within the context of Whirlpool providing the Services to the entity that you represent and in context of your entity's business relationship with Whirlpool.

Whirlpool will act as data controller pursuant to the General Data Protection Regulation no. 2016/679, as amended and/or supplemented from time to time ("**GDPR**") and any other applicable data protection laws ("**Data Protection Laws**").

Certain provisions of this Privacy Notice may only apply to Suppliers located in, or that process personal data of data subjects located in, the European Union, UK, and Switzerland. In addition, certain provisions of this Notice only apply to residents of California ("**California Suppliers**").

Information We Collect

We collect information you provide to us directly and information about your activities when you use the Services (collectively, "**Personal Data**").

Information You Provide Directly To Us. By registering on and/or using any of the Services, you will be providing Whirlpool with contact details and other information required to enable Whirlpool to identify and contact you, enable you to connect to and utilize the Services, enable you to execute your existing supply contract, and enable you to fulfil business-to-business functions with Whirlpool. Information we collect may include:

- Contact information, such as your name and surname, full name of your entity, address of your offices, email address, phone number, etc.
- Whirlpool account information, including your user name, account number, and password
- Information about your business-to-business relationship with Whirlpool, including good or services you are providing to Whirlpool
- Other information that you choose to share with us

Usage Information. We and our service providers may use technologies that collect information about how you interact with the Services ("**Usage Information**"). Usage Information may include: (i) your device ID and IP address; (ii) the type of browser or operating system you use; (iii) the physical location of your device (as determined, for example, using satellite, cell phone tower, and WiFi signals); and (iv) other information about your online sessions, such as the URL you came from to get to the Supplier Platform, the date and time you visited, and which aspects of Services you utilize.

We and our service providers may use cookies, web beacons, and similar technologies to collect Usage Information. Cookies are small text files that we may store on your computer to help us identify your computer the next time you visit or to enable some functions on the Services. We may use such information to measure the effectiveness of the Services. For any further information referring to cookies, please refer to our Cookies Policy (if any) at our portals. If you are not comfortable with our use of cookies, please review your browser software to learn how it may be set to notify you when you receive a cookie or to reject all cookies. However, disabling cookies altogether may limit the functionality of the Services and may impair your ability to log on and use the Services.

Purposes of the collection, legal basis and use of information

We will use the information we collect about you to:

- **Allow you to utilize the Services and execute business-to-business functions with Whirlpool.** Whirlpool will process your information on the basis of pre-contractual measures adopted on your request and/or measures that are necessary for performance of a contract.
- **Provide, support, maintain, and improve the Services,** including to troubleshoot and repair the Services, upgrade the Services, and better understand how the Services are used for research and development purposes. Whirlpool will process your information on the basis of its legitimate interest to improve the effectiveness of its supply chain operations.
- **Communicate with you about aspects of your business-to-business relationship with Whirlpool.** Whirlpool will process your information on the basis of pre-contractual measures adopted on your request and/or necessity for performance of a contract.
- **Verify requests made pursuant to this Privacy Notice.** Whirlpool will process your information based on necessity for compliance with legal obligations.

Whirlpool may also process the information we collect as we believe necessary: (1) if we determine a policy violation has occurred, to enforce our rights, or to enforce agreements; (2) if we believe such processing is necessary to identify, contact, or bring legal action regarding the rights and property of Whirlpool or its affiliates; (3) to provide security for our systems and to enforce our rights or protect against unauthorized access to our systems or other inappropriate use of our services, products, or other services; (4) to comply with laws, regulations, court orders and subpoenas or similar requests for information by authorities; (5) to protect your safety and the safety of others; and (6) to assist us in fraud prevention or investigation; all on the basis of its legitimate interest in the continuation of its commercial activities and the protection of its rights. We may also process the information we collect in other ways that we notify you about at the time of collection.

Suppliers may decide not to provide some non-mandatory personal information but should recognize that by doing so, Whirlpool may not be able to fulfill and properly execute the Services.

Where we are relying on consent to process your personal data, you have the right to revoke the consent to the processing of your personal data freely and at any time.

Special Categories of Data

Depending on your jurisdiction and where permitted by law, we may also capture some special categories of Personal Data about you (e.g. information relating to your racial or ethnic origin, religious or philosophical beliefs, trade union membership, physical or mental health or condition, sexual orientation, political opinions, disability and invalidity, pregnancy, membership to protected categories), where this has been provided or made publically available by you or can be inferred from materials you provide to us. As far as it is permitted under applicable laws, Whirlpool may process special categories of Personal Data in support of its diversity and inclusion objectives. You are invited not to submit Personal

Data included in the above special categories. In jurisdictions where we collect special categories of Personal Data and where a basis for processing is required, this data is processed based on your explicit consent.

Processing methods

Your data and information will be processed through electronic systems operated by Whirlpool and will be accessible by Whirlpool employees within Whirlpool's Information Systems function responsible for operating the Services, employees within Whirlpool's Global Strategic Sourcing function responsible for overseeing and administering the Services, and other employees that have a need to access information from the Services in order to oversee and administer business-to-business relationships. Your data may be accessible from external information technology service providers who are instructed to carry out specific activities relating to the operation and maintenance of the Services and may therefore have access to your data incidental to carrying out their service activity.

Data sharing and transfer of data

Information we collect may be shared with:

- Other Whirlpool affiliated entities
- Other Suppliers or vendors (e.g., vendor management service providers, IT service providers, or other service providers)
- Law enforcement or governmental authorities to comply with laws, regulations, court orders, subpoenas, and similar requests

We may also share the information we collect in the following circumstances:

- Business transfers. We may transfer your data in the event that Whirlpool sells all or a part of its business, but only as necessary in connection with the sale
- Legal Disclosure. We may share your information as we believe necessary: (1) to enforce our rights, if we determine a violation of this Privacy Notice or the terms of use of any service has occurred; (2) if we believe such disclosure is necessary to identify, investigate or pursue action with regard to any injury or interference with the rights and property of Whirlpool Corporation or any subsidiaries and affiliates; (3) to respond to judicial process and in cooperation with law enforcement agencies, or as otherwise required by law; (4) to assist us in the prevention or investigation of fraud or other legal compliance breaches; and (5) to protect your safety and the safety of others.
- Aggregate, De-identified, Anonymized and Pseudonymized Information. When you use the Services, we may share aggregate or de-identified information about users with third parties for analytics, research or similar purposes.

Any transfer of your personal data outside of your local jurisdiction will be carried out in compliance with applicable Data Protection laws. Transfers of personal data outside the EEA (both within and outside Whirlpool Group) are carried out based on the following suitable safeguards in accordance with Data Protection Laws:

- a) When the European Commission or local competent authority has issued an adequacy decision; or
- b) appropriate safeguards have been provided by or to the Whirlpool group company exporting your personal data including but not limited to standard data protection clauses. Without prejudice to the foregoing, transfer based on standard data protection clauses is featured by additional organizational and technical measures, designed to ensure an adequate level of protection of your personal data.

Data Retention

With reference to the business relationship between Whirlpool and you, your personal data and information provided will be retained by Whirlpool as long as necessary to perform and manage the Services, any agreements between you and Whirlpool, and to fulfill any applicable legal and regulatory requirements. After such time, your Personal Data will be deleted or anonymized. For more information on the applicable retention periods, please contact us using the contact information provided below.

Cookies

Cookies are small text files that we may store on your computer to help us identify your computer the next time you visit or to enable some functions on the Services. We may use such information to measure the effectiveness of the Services.

For any further information referring to cookies, please, refer to our Cookies Policy (if any) at our portals. If you are not comfortable with our use of cookies, please review your browser software to learn how it may be set to notify you when you receive a cookie or to reject all cookies. However, disabling cookies altogether may limit the functionality of the Services and may impair your ability to log on and use the Services.

How your information is protected

The security of your data is a priority for us. Whirlpool has put in place appropriate security measures designed to prevent your Personal Data from being accidentally lost, used or accessed in an unauthorised way, altered or disclosed. Whirlpool has implemented appropriate technical and organizational measures designed to prevent unauthorized access to your information. These measures include policies, procedures and technical elements relating to data access controls. Such measures are reasonably designed to help protect your personal information from loss, unauthorized access, disclosure, alteration or destruction. Whirlpool will process your personal data in accordance with all applicable Data Protection Laws.

Your rights

To the extent this is provided for under the applicable Data Privacy Laws for your location, you may have the right to:

- **be informed** on the purposes and methods of the processing of your Personal Data
- **request access** to your Personal Data. This enables you to receive a copy of the Personal Data Whirlpool holds about you. For California Suppliers, your request may seek the categories of personal information we collected about you, the categories of sources from which we collected the personal information, the categories of personal information we sold or disclosed our business or commercial purpose for collecting and selling your personal information, the categories of third parties with whom we shared your personal information, and the specific pieces of personal information we collected about you
- **request the update or correction** of your Personal Data that is incomplete or inaccurate
- **object to processing** of your Personal Data on grounds relating to your particular position where Whirlpool is relying on legitimate interests (or those of a third party). In some cases, we may demonstrate that we have compelling legitimate grounds to process your information which override your rights and freedoms
- **request the restriction of processing** of your Personal Data. This enables you to ask Whirlpool to suspend the processing of Personal Data about you in the cases and within the limits of applicable Data Protection Laws
- **receive in a structured, commonly used and machine-readable format** Personal Data concerning you and provided by you, as well as to transmit those Personal Data to another controller, in the cases and within the limits of applicable Data Protection laws

- **request erasure or deletion** of your Personal Data, in the cases and within the limits of applicable Data Protection Laws. We may deny certain requests, or fulfil a request only in part, based on our legal rights and obligations. For example, we may retain personal information as permitted by law, such as for tax or other record keeping purposes, to maintain an active account, and to process transactions and facilitate customer requests
- **withdraw given consent** to the processing of your Personal Data and/or special categories of Personal Data at any time, without prejudice to the lawfulness of the processing based on your consent before its withdrawal
- lodge a complaint in front of the competent national data protection or judicial authority.

You may write to the Privacy Officer identified below above in order to exercise both the rights indicated in this Privacy Notice and any other rights provided by applicable laws. Where appropriate or required by law, we will take reasonable steps to verify your identity prior to responding to your requests. The verification steps may vary depending on the sensitivity of the personal information and whether you have an account with us. If you designate an authorized agent to make a request on your behalf, please ensure the authorized agent identifies him/herself as an authorized agent.

If you have an unresolved privacy or data use concern that we have not addressed satisfactorily, you have the right to contact the competent national data protection or judicial authority. You also may contact our U.S.-based third party dispute resolution provider (free of charge) at <https://feedback-form.truste.com/watchdog/request>.

Data Controller details and contacts

The data controller of your data will be Whirlpool Corporation, with registered office in 2000 North, M63, Benton Harbor, MI, USA. The Chief Privacy Officer can be contacted as follows.

By Postal Mail:

Chief Privacy Officer
Whirlpool Corporation
2000 N. M-63
MD 2533
Benton Harbor, MI 49022

By E-mail:

whirlpool_privacy@whirlpool.com

Additional Information for California Suppliers

In this section, we provide additional information to Suppliers who are California residents (“California Suppliers”) about how we handle their personal information, as required under the California Consumer Privacy Act (“CCPA”).

California Suppliers have the right to make Access and Deletion requests as set forth above. We will not discriminate against you because you exercise these rights. Whirlpool does not “sell” Supplier personal information as defined under CCPA. We also want our California Suppliers to know the following regarding our data collection, use, and disclosure of personal information:

- We collect and use the following categories of personal information for the business and commercial purposes described in this Privacy Notice: Identifiers; contact information; commercial information; internet or other electronic network activity information; and inferences.
- We collect and use these categories of personal information for the business and commercial purposes described in the “Purposes of collection” section above.

- We collect these categories of personal information from the sources described in the “Information We Collect” section above, including from you and your devices.
- We disclose each of these categories of personal information for our business and commercial purposes as described in this Privacy Notice to the categories of parties described in the “Data Sharing” section above.

Changes to Privacy Notice

We keep this Privacy Notice under regular review. We may update this Privacy Notice to reflect changes to our privacy practices. We encourage you to periodically review our Privacy Notice for the latest information on our privacy practices.

IMPORTANT NOTICE

By providing your data and information to Whirlpool and conducting business with Whirlpool, you acknowledge the content of this Notice.

*You may be required by your Whirlpool contact to acknowledge this notice through paper format. If requested, please return a signed copy of this form **to your Whirlpool contact** by scanned email attachment (or by post or courier if you are not able to send electronically). Privacy questions can be directed to whirlpool_privacy@whirlpool.com.*

I UNDERSTAND and ACKNOWLEDGE the content of this Privacy Notice

Title: _____

Signed: _____

Name: _____

Company: _____

Dated: _____