



## TCWGLOBAL'S PRIVACY POLICY FOR WEBCENTER

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 Privacy Policy Statement sets forth the ways we collect information from and about you, and what we do with the information, so that you may better decide whether to utilize WebCenter. WebCenter is a Tempworks integrated third-party software that TCWGlobal uses for online time and expense tracking system. This policy applies to users of the services, software, and website. By utilizing WebCenter, an integrated third-party software, you agree to this Privacy Statement in addition to any other agreements we might have with you. Please review the policy carefully to understand our policies and practices regarding your information and how we will treat it. While we may provide answers to privacy questions on at [www.tcwglobal.com](http://www.tcwglobal.com) in order to be helpful, this Privacy Policy is the exclusive source of our specific privacy practices for TCWGlobal's use of WebCenter.

### 1. INFORMATION WE MAY COLLECT

We may collect Personal Information directly from Workers, Client Companies, or Vendors. We collect, process, and transfer Personal Information through electronic processes. We have established routine processing for certain functions such as processing for regular payroll, benefits administration, and vendor management.

#### a. INFORMATION YOU PROVIDE TO US

When you sign up for an account and use our Services, you give us personal identification information and other data.

#### 1. For Workers this can include the following:

- a. Personal identifiers, such as your first and last name, your address, your email address, telephone number, date of birth, social security number, driver license number, passport number, and/or other government identification numbers, immigration and work authorization status, signature, and username and/or account name. TCWGlobal collects this information to make an employment and/or job-related decision that involves you, to fulfill or meet the reason you provided the information as a job applicant or employee, to provide you with employment, to manage your employment relationship with us and for general employee administration and processing (including employee payroll and benefits administration), and to create, maintain, and secure your employee records and personnel file.
- b. Financial information such as banking information for direct deposit, debit card number, credit card number, tax selections, pay rate, and payroll deduction information. TCWGlobal collects this information for employment related HR processes (including employee payroll and benefits administration), processing work-related claims (for example, insurance or payment claims), and all related accounting and auditing.



- c. Benefit selection and related information such as your benefit selection, social security number or other government identification number, date of birth, health insurance information, policy number, and selections. TCWGlobal collects this information to administer benefit related claims and for employment related HR processes.
- d. Protected classification and diversity information such as age, race, color, national origin, citizenship, marital status, physical or mental disability, sex (including gender, gender identity, gender expression), and veteran or military status. TCWGlobal collects this information to comply with local, state, and federal laws and regulations and for diversity initiatives.
- e. Professional and employment-related information such as current or past employment history, employee status and title, job evaluations, employment status, job assignments, hours worked, training and development information, performance evaluation information, disciplinary and counseling information, background check information, drug test results, driving records, and termination information. TCWGlobal may collect this information to make an employment and/or job related decision that involves you, to fulfill or meet the reason you provided the information as a job applicant or employee, to provide you with employment, to assess qualifications for a particular job or task, for education, training, and development requirements, and to gather evidence for disciplinary action or termination, for other human resource administration purposes, and to administer and process employee benefits.
- f. Education information such as education history. TCWGlobal may collect this information to evaluate and make an employment and/or job-related decision that involves you, to provide you with employment, to assess qualifications for an engagement.
- g. Health and Safety Information such as health conditions, if relevant to your employment, job restrictions, workplace accident and illness information, and health insurance policy information. TCWGlobal collects this information to maintain a safe workplace, assess your working capacity and make necessary accommodations, administer health and Worker's Compensation programs, and comply with applicable laws.
- h. Beneficiary Information of your beneficiaries, such as name and contact information, relationship to you, birth date, social security or other government identification number, and any other information necessary to process any benefits claims. TCWGlobal collects this information to administer and process any related benefit claims.
- i. Emergency Contact Information of person(s) you designate as your emergency contact(s) such as their name and contact information, and their relationship to you. TCWGlobal collects this information to maintain contact information should an emergency involving you arise during your employment.



2. For Vendors: This can include your name, email, work phone number, and additional company information.
3. For general system users: This can include your name, email, and additional company-related information such as your department and office location.

#### b. INFORMATION FROM THIRD PARTIES

For Workers, we may collect and receive information about you, including personal information and financial account information, from third parties, such as financial institutions, our service providers, our clients, and/or partnering vendors.

#### c. INFORMATION FROM USE OF WEBCENTER

WebCenter may from time to time engage third parties to track and analyze non-personally identifiable usage and volume statistical information from users of WebCenter to help us administer our software and improve its quality. These third parties may use cookies to help track visitor behavior. Such cookies will not be used to associate individual website visitors to any personally identifiable information. All data collected by such third parties on behalf of us is used only to provide us with information on usage and is not shared with any other third parties.

## 2. HOW WE USE YOUR INFORMATION

We use the Information you share and data we collect about you primarily for the legitimate interest of administering our business; (i) for registration and to manage your profile and listings, including to facilitate your access to and use of WebCenter; (ii) to enable us to publish your submitted content; (iii) to respond to your questions and requests regarding customization or use of WebCenter; (iv) to improve our product and service; (v) to resolve disputes and troubleshoot problems; (vii) to prevent prohibited activities or breach of agreements; (viii) to enforce our policies; and as otherwise described to you at the point of collection or as part of our separate service agreements.

With respect to Workers, as a timekeeping and expense reporting platform, WebCenter does contain some of their private information which we will respect, keep private, and secure. We may have social security number, date of birth, address, phone number, email, etc. We may utilize this information to send emails, monitor timekeeping activities, provide employee benefits, comply with employment related laws, prepare W2s. The only entities that may have your information are: TCWGlobal, a third-party staffing agency (if they found you an engagement), integrated third-party software, and a client company.

We take steps to ensure that the Personal Information we process is reliable for its intended use, is accurate, up-to-date and complete, and is limited to the Personal Information required to carry out the purposes of the processing, as described in this Statement. Where appropriate, we may ask you to ensure that your Personal Information that we hold is accurate and up to date.

We process workers' sensitive personal information if it is needed for legitimate business objectives and to the extent permitted or required to comply with applicable law. Sensitive Personal Information will not be collected, processed or transferred, except where adequate privacy protection mechanisms are in place and after having first obtained your informed explicit consent, if required by law.



### 3. OUR DISCLOSURE OF YOUR PERSONAL INFORMATION TO THIRD PARTIES

WebCenter and TCWGlobal may use third party vendors. Such vendors are necessary and have been vetted accordingly. WebCenter may be required to transmit, store, or share information with those third-party vendors to conduct business. TCWGLOBAL DOES NOT SHARE THIS INFORMATION FOR MARKETING PURPOSES. Such vendors include, but are not limited to: API's for verifications, ACH verification, location validation, API's or EDI to integrate with end client system, benefit portals, timekeeping integrations etc. When we engage another vendor to perform such functions, we may provide them information, including personal data, in connection with their performance of such functions.

If we have received your personal data and subsequently transfer that information to a third-party agent or service provider for processing, we remain responsible for ensuring that such third-party agency or service provider processes your personal data to the standards required by our privacy commitments.

We may disclose your personal data to the following categories of recipients:

(i) TCWGlobal affiliates: The Company may disclose your personal data to other TCWGlobal entities to fulfill the purposes described in this Notice. Within TCWGlobal affiliate entities, access to, use of and other processing of personal data will generally be limited to individuals who have a need to know the information for the purposes described in this Notice, which may include personnel from: Human Resources, IT, Compliance, Legal, Information Security, Finance and Accounting and Internal Audit. Most personnel within TCWGlobal will have access to your business contact information such as name, position, telephone number, work address and email address.

(ii) External service providers, such as (1) payroll and tax administrators, pensions and benefits providers and administrators, human resources administrators, IT systems and support providers, account monitoring services, financial institutions, telecommunications providers, insurance companies; (2) accountants, auditors, lawyers and other outside professional advisors; and (3) other third parties engaged to assist us in carrying out business or human resources activities. (4) data verification services to ensure your data is accurate and to reduce errors. We do not allow third party service providers to use or disclose your personal information except as necessary to perform services on our behalf or to comply with legal requirements.

(iii) Local authorities: TCWGlobal may share your personal data with local governmental, regulatory, supervisory and/or judicial agencies or other public or official bodies, as permitted or required under applicable law.

(iv) Business investors: Your personal data may be disclosed to potential investors and their advisors, auditors and legal counsel in connection with a corporate restructuring, sale or assignment of assets, merger, divestiture or other changes of control or financial status of the Company (including a reorganization, dissolution, or liquidation).

(v) Other third parties: Your personal data may be disclosed to third parties in circumstances where we are required to do so by law, regulation or legal process (such as a court order or subpoena), or when we believe disclosure is necessary in order to achieve any purpose disclosed under this Notice.

### 4. SECURITY AND DATA INTEGRITY



TCWGlobal maintains technical, physical, and administrative security measures to protect information received from our workers, clients, suppliers, vendors, investors, and those individuals who utilize WebCenter and browse and/or use our websites against loss, misuse, unauthorized access, disclosure, or alteration, and will only transfer your sensitive data via a protected channel or in an encrypted format. TCWGlobal is SOC 2 Type 2 certified.

Workers, Clients, and Vendors are expected to follow the company's privacy and security policies and procedures, as well as applicable laws, when accessing and handling all Personal Information as well as confidential information provided to us. When we retain a third-party service provider, that provider will be required to (i) use measures to protect the confidentiality and security of the Personal Information and (ii) process the Personal Information only as directed by TCWGlobal.

WebCenter requires unique usernames and passwords that must be entered each time a user logs on. These safeguards help prevent unauthorized access, maintain data accuracy, and ensure the appropriate use of data.

For purposes of our compliance with EU-U.S. Data Privacy Framework Principles (EU-U.S. DPF) and the UK Extension to the EU-U.S. DPF, we confirm that we are subject to the jurisdiction of the United States Federal Trade Commission (FTC), and to its investigatory and enforcement powers.

## 5. INTERNATIONAL 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 Standard Contractual Clauses approved by the European Commission and International Data Transfer Agreements 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 or International Data Transfer Agreements by contacting us.

In the context of an onward transfer, TCWGlobal has responsibility for the processing of Personal Information it receives under the EU-U.S. Data Privacy Framework (EU-U.S. DPF) and the UK Extension to the EU-U.S. DPF and subsequently transfers to a third party acting as an agent on its behalf. TCWGlobal remains liable under the Principles if its agent processes such Personal Information in a manner inconsistent with the Principles unless TCWGlobal proves that it is not responsible for the event giving rise to the damage.

In this regard, TCWGlobal complies with the EU-U.S. Data Privacy Framework (EU-U.S. DPF) and the UK Extension to the EU-U.S. DPF, as set forth by the U.S. Department of Commerce. TCWGlobal has certified to the U.S. Department of Commerce that it adheres to the EU-U.S. DPF Principles with regard to the processing of personal data received from the European Union and the United Kingdom in reliance on the EU-U.S. DPF and the UK Extension to the EU-U.S. DPF. If there is any conflict between the terms in this privacy policy and the EU-U.S. DPF Principles and the UK Extension to the EU-U.S. DPF, the Principles shall govern. To learn more about the Data Privacy Framework (DPF) program, and to view our certification, please visit <https://www.dataprivacyframework.gov/>



If you are utilizing WebCenter 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.

## 6. OUR DATA RETENTION POLICIES

Data destruction is a part of the many programs and regulations that TCWGlobal adheres to. This idea of data destruction reduces the amount of data that is potentially vulnerable. The internal procedures for data destruction have been reviewed with our various software vendors to indicate whether the data is "deleted" or just "hidden" within the system. If the data can only be "hidden", then we will anonymize critical information such as SSN and remove ACH information.

We will retain any personal information only as long as necessary to fulfill the business purpose for which it was collected. We will also retain and use the information as long as necessary to comply with our legal obligations, resolve disputes, and/or enforce our agreements.

For specific details regarding TCWGlobal and its affiliates data retention policies please see our Document Retention Policy at <https://www.tcwglobal.com/privacy>.

Other countries not listed, please consult your local employer of record.

TCWGlobal purges all worker/wage and payroll files that are marked for deletion annually according to the above schedule. If data cannot be deleted, it will be anonymized.

## 7. AUTOMATED DECISION MAKING

WebCenter does not have any automated decision-making processes or systems.

## 8. CHILDREN'S PRIVACY

Webcenter is intended for general business audiences and is not designed to appeal to minors. We do not knowingly solicit or receive any information from anyone under the age of 16 without parent or guardian consent. If we learn we have collected or received personal information from a child under 16 without verification of parental or guardian consent, we will delete that information. If you are a parent or guardian and believe your child has provided us with personal information without your consent, please contact us immediately. The contact information is provided at the end of this privacy policy.

## 9. 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.tcwglobal.com/privacy](http://www.tcwglobal.com/privacy)



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 888-388-8873. 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.

#### 10. 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.

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

#### 11. 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).

#### 12. CHANGES TO OUR PRIVACY STATEMENT

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 Webcenter home page. The date the privacy policy was last revised is identified at the bottom 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 [tcwprivacy.com](http://tcwprivacy.com) and this privacy policy to check for any changes.

#### 13. CONTACT US

If you have any questions about this Privacy Statement, our practices, or the security of TCWGlobal’s use of WebCenter, please contact us at [privacy@tcwglobal.com](mailto:privacy@tcwglobal.com) or by calling (858)810-3000

Or:

WMBE Payrolling Inc  
Attn: Privacy Office  
3545 Aero Court  
San Diego, CA 92123

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 which will be processed within 30 days.

#### 14. COMPLAINTS AND DISPUTE RESOLUTION

In compliance with the EU-U.S. Data Privacy Framework (EU-U.S. DPF) and the UK Extension to the EU-U.S., TCWGlobal commits to resolve complaints about our collection or use of your personal information.





EU individuals with inquiries or complaints regarding our privacy policy should first contact TCWGlobal at:

WMBE Payrolling Inc dba TCWGlobal  
Attn: Privacy Office  
3545 Aero Court  
San Diego, CA 92123  
[privacy@tcwglobal.com](mailto:privacy@tcwglobal.com)  
(888)388-8873

In compliance with the EU-U.S. DPF and the UK Extension to the EU-U.S. DPF, StaffingNation and TCWGlobal commit to cooperate and comply respectively with the advice of the panel established by the EU data protection authorities (DPAs) and the UK Information Commissioner's Office (ICO) with regard to unresolved complaints concerning our handling of human resources data received in reliance on the EU-U.S. DPF and the UK Extension to the EU-U.S. DPF 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) as the method for dispute resolution in accordance with the requirements and procedures set forth in Annex I of the U.S. Data Privacy Framework. The location of the arbitration will be in the United States.