

## **DATA PRIVACY POLICY**

This policy is issued by Woodward, Inc. ("Woodward") on behalf of itself, its branches and its affiliates identified as controllers in the section "Controllers" below. Woodward is committed to protecting the personally identifiable information ("Personal Data") of its members, individuals, customers, and suppliers. Personal Data means any information that identifies or is capable of being associated with an individual. It is Woodward's intention to comply with the applicable laws and data privacy regulations of the countries in which it does business, including the California Consumer Privacy Act ("CCPA"), EU General Data Protection Regulation (EU) 2016/679 and the Swiss Federal Act on Data Protection ("FADP").

### **Purpose**

Woodward collects and processes Personal Data of its employees ("Members"), customers and supplier for the purpose of the performance of its contractual obligations, to further its legitimate interests, and to comply with all applicable laws to which Woodward and the affected Members, customers and suppliers in the EU, Switzerland, Asia Pacific and the U.S. are subject. Woodward uses Personal Data only for the purpose for which the data was originally collected.

### **Quality, Proportionality, and Retention of Personal Data**

Woodward only processes Personal Data relevant for its proposed use. Reasonable measures are taken to ensure that the information is reliable for its intended use, accurate, complete and current. Woodward will adhere to this Principle of Data Quality and Proportionality for as long as the Personal Data is retained by Woodward.

All Personal Data will be retained by Woodward only as long as necessary to fulfill the purpose for which it was collected and is subject to minimum retention schedules as may be mandated by law.

### **Legal Basis for Use of Member Personal Data**

Personal Data of Members is processed if necessary:

- To enable Woodward to initiate, perform or terminate employment contracts;
- to achieve compliance with legal and regulatory obligations;
- in furtherance of the legitimate interests as a controller or by a third party processor acting on behalf of Woodward (to the extent such legitimate interests are not overridden by our Members, customers or supplier's interests, fundamental rights or freedoms); and/or
- pursuant to prior consent in relation to Personal Data that is entirely voluntary and not necessary or required to be given under another legal basis.

If Personal Data is processed on consent, the Member has the right to withdraw consent at any time, without affecting the lawfulness of processing based on consent before such withdrawal.

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## **Processing of Member Personal Data**

The Personal Data Woodward processes from its Members may include among other things, subject to statutory permission or consent as set out below: Member Number; the number assigned to company-provided identification cards ("ID Badges"), Member contact information (name, phone#, email, and address); current position (job code); title; employment history (Woodward and previous employment); education history, department number (past and present); supervisor (past and present); gender; citizenship; nationality; pay rate, variable (performance and incentive) compensation information; date of hire; service years; date of birth; benefit information; performance reviews; emergency contact details; photographs and electronic images, voice recordings, temperature readings and other biometric information, passports and Green Cards, Social Security Number, contact details of family members and dependents; personal bank account data, and electronic identifying data such as activity logs, unique device identifiers, and geolocation data.

The data obtained from Members may be used if and as far as necessary for business purposes and Woodward's legitimate interests such as: global headcount reporting; staffing; performance management; compensation reviews; payroll; benefits, audits; company-managed investigations; trade and regulatory compliance; ethics investigations; mergers, acquisitions and divestitures; budgeting; workforce management; international assignments; reporting for business/management review and decision-making; Environmental Health and Safety; Member recognition; disaster recovery and emergency response planning; facility access and security; the Member directory for internal company use; succession planning; Member development; and Member surveys. Certain Personal Data, including Member Personal Data, may be transmitted to third parties for background check, income verification, health and safety purposes, and other similar purposes. In some cases, Woodward may have additional basis for processing including consent and contractual necessity.

In addition to the information that Woodward collects from Members directly, Woodward may also receive information about Members from other sources, including third parties, business partners, our affiliates, or publicly available sources.

## **Special Categories of Personal Data**

Except as required or permitted by applicable law or regulation, or as set forth above, Woodward does not process sensitive Personal Data about a Member's medical or health conditions; racial or ethnic origin; political opinions; religious or philosophical beliefs; trade union membership; sexual orientation; or gender identity.

## **Legal basis for Use of Customer, Supplier and Other Third-Party Personal Data**

Personal Data is processed:

- to enable Woodward's performance of its business contracts;
- to achieve compliance with a legal and regulatory obligations;

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- to further legitimate interests as a controller and or by a third party processor acting on behalf of Woodward (to the extent such legitimate interests are not overridden by our Members, customers or supplier's interests, fundamental rights or freedoms); and/or
  - pursuant to consent in relation to Personal Data that is entirely voluntary and not necessary or required to be given under another legal basis.

Any concerns, complaints, or disputes regarding Personal Data for Woodward's customers or suppliers should be forwarded to Woodward's local supplier/customer contact or manager or to the data protection officer, if applicable.

Concerns, complaints or disputes that cannot be resolved by contacting a local Woodward Supplier/Customer contact or manager, can be submitted to Woodward's Ethics Helpline (below) or Legal & Compliance Department as identified in Appendix A.

Woodward's Ethics Helpline:

<https://secure.ethicspoint.com/domain/media/en/gui/19830/index.html>

Telephone: +1-888-325-7915

Woodward will reasonably cooperate with the EU Data Protection Authorities or Swiss Federal Data Protection and Information Commissioner, data privacy authorities in China as applicable, in addressing disputes that cannot be resolved directly. Any person whose Personal Data is in possession of or being processed by Woodward may have the right to file a complaint with any regulatory agency within their jurisdiction.

### **Processing of Customer, Supplier and Other Third-Party Personal Data**

The Personal Data Woodward processes from its customers and suppliers may include among other things: contact information (name, titles, business address, business phone#, business fax# and business email); customer/supplier status; shipping information; e-business; web ID's and web preferences; supplier ownership information; supplier accounts payable information; business bank account numbers; and tax information.

Personal Data obtained from customers and suppliers is used for purposes such as: contacting customers/suppliers; accounting/accounts receivable; sales agreements; purchasing agreements; determining applicable discounts; trade and regulatory compliance; accessing e-business sites; marketing; addressing quality issues; training, operation of physical plants and equipment, facility security, IT operations and security, audit, risk management, product improvements, exercising and defending legal rights and product shipment.

### **Disclosure of Personal Data**

Woodward may disclose Personal Data to the following third parties:

- you, and where appropriate, your family and agents,
- our agents,
- to government authorities in response to a lawful request, including to meet national security or law enforcement requirements, if required by law,
- service providers

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- credit reference services
  - corporate affiliates
  - accountants, auditors, financial advisors, lawyers, accreditation bodies
  - entities that acquire, or intend to acquire, Woodward or the assets of Woodward,
  - the public, if you choose to post information on a publicly available portion of our site,
  - our partners, if you decide to enter a contest or sweepstakes that is sponsored by a third party, and
  - in other unanticipated circumstances, with your consent.

If Personal Data is being transferred to a third party for processing on Woodward's behalf, such third parties will be subject to binding contractual obligations to only process the Personal Data in accordance with Woodward's prior instructions, use measures to protect the confidentiality and security of the Personal Data, and in compliance with any additional requirements under applicable law.

Woodward does not sell Personal Data to third parties. For purposes of compliance with certain laws and regulations, this statement also covers Personal Data of minors under sixteen (16) years of age.

### **International Transfer of Personal Data**

Woodward conducts business on an international basis, and therefore may be required to transfer Personal Data between Woodward's international business operations, affiliated companies, customers, suppliers, governments of other countries. Where Woodward transfers Personal Data to other countries, it will be done on the basis of adequacy decisions, Standard Clauses approved by EU Data Protection agencies or relevant data privacy authorities in other jurisdictions, or other valid transfer mechanism.

### **Cookies and Third Party Tracking**

Woodward may use cookies and clear GIFs on our website. "Cookies" are small pieces of information that a website sends to your device while you are viewing a website. Woodward may use both session Cookies (which expire after you close your browser) as well as persistent Cookies (which will be saved on your device to provide us with data regarding your interests and to improve our marketing efforts. Such Cookies also include those for behavior-based advertising. This means that a third party may use technology (e.g., a Cookie) to collect information about your use of our website so that they can provide advertising about products and services tailored to your interests. Persistent Cookies may be removed by following instructions provided by your browser.

Please find information on our use of Cookies and third party tracking in our [Cookie Policy](#).

### **Direct Marketing**

All potential and existing customers will only receive product marketing via e-mail communications if Woodward obtained their prior consent. If you are an existing customer Woodward may send you product marketing e-mails if Woodward obtained your electronic

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contact details, in the context of the sale of a product or a service for similar products or services provided that you clearly and distinctly were given the opportunity to object to such direct marketing when your contact details were collected and on the occasion of each message in case you have not initially refused such use. Therefore, all potential and existing customers have the option to opt-out of product marketing telephone and e-mail communications and call lists at any time and any contact occasion.

If local laws require an opt-in for marketing communications, Woodward is committed to respecting the customer's preferences, as set out in the customer's consent declaration.

### **Online Tracking**

Woodward does not currently recognize automated browser signals regarding tracking mechanisms, which may include "Do Not Track" instructions.

### **Access to Your Personal Data**

You may have the right to request access to your Personal Data and information regarding the nature, processing and disclosure of such Personal Data. If required by law, upon request Woodward will grant reasonable access to the Personal Data held by Woodward about the individual submitting the request. California residents may be entitled to request a list of categories of Personal Data disclosed to third parties.

### **Changes to Your Personal Data**

Where it is applicable, you may have the right to request a correction of your Personal Data, as set out in Art. 16 GDPR.

### **Restriction of Processing Your Personal Data**

Where it is applicable, you may have the right to request restriction of the data processing, where one of the grounds set out in Art. 18 GDPR applies.

### **Transfer of Control of Your Personal Data**

You may have the right to have your Personal Data that Woodward processes or controls transferred to yourself or another controller, as set out in Art. 20 GDPR, to the extent applicable.

### **Deletion of Your Personal Data**

You may have the right to request that Woodward delete your Personal Data, on legitimate grounds, as set out in Art. 17 GDPR. Woodward may also decide to delete your Personal Data if Woodward believes that the data is incomplete, inaccurate, or that our continued use and storage are contrary to our obligations to other individuals or third parties. When Woodward deletes Personal Data it will be removed from our active database, but it may remain in archives where it is not practical or possible to delete it. In addition, Woodward

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may keep your Personal Data as needed to comply with our legal obligations, resolve disputes, and/or enforce agreements

### **Right to Object to the Processing of Your Personal Data**

You may have the right to object as set out in Art. 21 GDPR, on grounds relating to your particular situation, to the processing of your Personal Data at any time, if Woodward processes your Personal Data on the legal base of legitimate interest. Woodward will not process your Personal Data, unless Woodward can demonstrate compelling legitimate grounds for the processing which override your interests, rights and freedom or the processing is required for the establishment, exercise or defense of legal claims.

### **Exercising Your Rights**

Members can exercise their rights through their local HR Department. Customers and suppliers can address written requests and questions about your rights to the contacts listed in Appendix A. You may request a copy of the Personal Data that Woodward holds about you, and exercise other rights as described above.

Note that, as required by law, Woodward will require you to prove your identity. Woodward may verify your identity by phone call or email. Depending on your request, Woodward will ask for information such as your name, email address, or other information. Woodward may also ask you to provide a signed declaration confirming your identity. Following a request, Woodward will use reasonable efforts to supply, correct or delete personal information about you in our files.

In some circumstances, you may designate an authorized agent to submit requests to exercise certain privacy rights on your behalf. Woodward will require verification that you provided the authorized agent permission to make a request on your behalf. You must provide us with a copy of the signed permission you have given to the authorized agent to submit the request on your behalf and verify your own identity directly with us. If you are an authorized agent submitting a request on behalf of an individual you must attach a copy of the following information to the request:

1. A completed Authorized Agent Designation Form indicating that you have authorization to act on the consumer's behalf.
2. If you are a business, proof that you are registered with the Secretary of State to conduct business in California.

If Woodward does not receive both pieces of information, the request will be denied. Please note, you will not be subject to discriminatory treatment by us for exercising your privacy rights.

### **Data Security**

Woodward takes reasonable and appropriate security measures to safeguard the Personal Data of Members, suppliers and customers. Woodward has initiated processes and procedures designed to help protect the confidentiality, integrity and recoverability of Personal Data from loss, misuse, unauthorized access, disclosure, alteration and

destruction. Woodward takes reasonable measures to prevent data corruption and unauthorized access to information maintained in its database. Persons who have access to Human Resource Information System ("HRIS") and customer/supplier databases containing Personal Data only have permissions to view the information they need to do their jobs. The system administrator and Human Resources control access to personal electronic information via user permissions.

In the event that Woodward is required by law to inform you of a breach to your Personal Data Woodward may notify you electronically, in writing, or by telephone, as permitted by law.

### **Enforcement**

Woodward conducts internal compliance reviews as part of an internal self-audit process and provides appropriate training to Members that have access to the Personal Data of Members, customers, or suppliers.

Any Member who violates Woodward's privacy or security policies is subject to disciplinary action, up to and including termination where permitted by applicable law. If a Member, customer, or supplier believes Woodward or a Woodward representative is not observing the principles stated within this policy, he/she should contact Woodward directly.

If you have any questions, comments, or complaints concerning our privacy practices please contact Woodward at the appropriate point of contact listed in Appendix A. Woodward will attempt to respond to your requests and to provide you with additional privacy-related information.

If you are a Woodward Member, please contact your local HR department for any requests for access, deletion, or modification of your personal data.

Concerns, complaints or disputes that cannot be resolved by contacting a local Woodward Human Resources Department, can be submitted to Woodward's Ethics Helpline or Legal & Compliance Department

Woodward's Ethics Helpline:

<https://secure.ethicspoint.com/domain/media/en/gui/19830/index.html>

Telephone: +1-888-325-7915

### **Questions and Reports of Possible Policy Violations**

Concerns, complaints, or disputes regarding Personal Data protection of a Woodward Member should be directed to the Member's local Human Resources Department, or to the data protection officer, if applicable.

Concerns, complaints or disputes that cannot be resolved by contacting a local Woodward Human Resources Department, can be submitted to Woodward's Ethics Helpline (below), to the Legal & Compliance Department, or to the contacts identified in Appendix A to this policy.

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Woodward's Ethics Helpline:

<https://secure.ethicspoint.com/domain/media/en/gui/19830/index.html>

Telephone: +1-888-325-7915

For Non-U.S. locations please see:

<https://secure.ethicspoint.com/domain/media/en/gui/19830/phone.html>)

Woodward's Legal & Compliance Department:

Woodward GmbH, Handwerkstraße 29, 70565 Stuttgart, Germany, +49 (711) 78954-0,  
or

Woodward, Inc., 1081 Woodward Way, Fort Collins, Colorado 80524, USA, +1 (970)  
482-5811;

or by e-mail to [Dataprotection@woodward.com](mailto:Dataprotection@woodward.com).

### **Lodging Complaints with Data Protection Authorities**

You may have the right to raise complaints with data protection authorities regarding the processing of your Personal Data by Woodward or on Woodward's behalf (for example, under Art. 77 GDPR). You may execute this right at a data protection authority in the member state of your place of residence, your job or the place of the presumed offence.

### **Accessibility**

This Privacy Policy may be accessed through audio readers.

### **Information for California Residents**

California Civil Code Sections 1798.115(c), 1798.130(a)(5)(c), 1798.130(c), and 1798.140 indicate that organizations should disclose whether certain categories of Personal Data are collected, "sold" or transferred for an organization's "business purpose" (as those terms are defined under California law). You can find a list of the categories of Personal Data that Woodward collects and shares here. Please note that because this list is comprehensive it may refer to types of Personal Data that Woodward shares about people other than yourself. If you would like more information concerning the categories of Personal Data (if any) Woodward shares with third parties or affiliates for those parties to use for direct marketing please submit a written request to us using the information in the "Contact Information" section below. Woodward does not discriminate against California residents who exercise any of their rights described in this Privacy Policy.

### **Notification of Change**

Woodward reserves the right to amend this policy at any time. Any changes made to this privacy policy will be posted to the internet, intranet, and other places Woodward deems appropriate. The date shown at the top of each page of this policy is both the effective date and the date this policy was last updated.



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Woodward's Corporate Vice President, General Counsel & Chief Compliance Officer must approve all changes to this policy and/or privacy practices. Any changes made to our privacy practices will be prominently posted on our Web Site.



Thomas A. Gendron  
Chairman of the Board,  
Chief Executive Officer  
and President

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## Appendix A: Points of Contact

### Woodward Legal & Compliance Department

Woodward, Inc.  
1081 Woodward Way, Fort Collins, Colorado 80524, USA  
+1 (970) 482-5811

Woodward German Holding GmbH & Co. KG  
Handwerkstraße 29, 70565 Stuttgart, Germany  
+49 (711) 78954

Email: [Dataprotection@woodward.com](mailto:Dataprotection@woodward.com).

### Woodward Ethics Helpline

Website: <https://secure.ethicspoint.com/domain/media/en/gui/19830/index.html>  
Phone: +1-888-325-7915

For Non-U.S. locations please see:  
<https://secure.ethicspoint.com/domain/media/en/gui/19830/phone.html>

### Controllers

For the purposes of this policy the relevant controllers are:

Woodward, Inc.  
1081 Woodward Way, Fort Collins, Colorado 80524, USA

Woodward HRT, Inc.  
25200 West Rye Canyon Road, Santa Clarita, California 91355 USA

Woodward MPC, Inc.  
6300 West Howard Street, Niles, Illinois 60714, USA

Woodward FST, Inc.  
700 North Centennial Street, Zeeland, Michigan 49464, US

Woodward German Holding GmbH & Co. KG  
Handwerkstraße 29, D-70565 Stuttgart, Germany  
Data Protection Officer: Christian Kaiser, Helmholtzstraße 26, D-41747  
Viersen, Germany, e-mail: [Dataprotection@woodward.com](mailto:Dataprotection@woodward.com)

Woodward GmbH  
Handwerkstraße 29, D-70565 Stuttgart, Germany  
Data Protection Officer: Von Zur Mühlen'sche GmbH, BdSI, Alte Heerstraße 1,  
53121 Bonn, Germany, e-mail: [extdsb@vzm.de](mailto:extdsb@vzm.de), +49 228 96293-0

Woodward Kempen GmbH  
Krefelder Weg 47, D-47906 Kempen, Germany  
Data Protection Officer: Von Zur Mühlen'sche GmbH, BdSI, Alte Heerstraße 1,  
53121 Bonn, Germany, e-mail: [extdsb@vzm.de](mailto:extdsb@vzm.de), +49 228 96293-0

Woodward Aken GmbH  
Köthener Chaussee 46, D-06385 Aken (Elbe), Germany  
Data Protection Officer: Von Zur Mühlen'sche GmbH, BdSI, Alte Heerstraße 1,  
53121 Bonn, Germany, e-mail: [extdsb@vzm.de](mailto:extdsb@vzm.de), +49 228 96293-0

Woodward L'Orange GmbH  
Porsche Straße 8, 70435 Stuttgart, Germany  
Data Protection Officer: Christian Kaiser, Helmholtzstraße 26, D-41747  
Viersen, Germany, e-mail: [Dataprotection@woodward.com](mailto:Dataprotection@woodward.com)

Woodward Nederland  
B. V., South Point Building B, Scorpius 120-122, 2132 LR Hoofddorp

Woodward Poland  
Sp. z o. o., Ul. Skarbowa 32, 32-005 Niepolomice, Poland

Woodward Bulgaria  
EOD, 64 Hristofor Kolumb Blvd., Sofia Airport Center, Logistics Building B03,  
1592 Sofia, Bulgaria

Woodward International, Inc.  
5 Shawfarm Road, Prestwick, KA 9 2TR, United Kingdom

Woodward International, Inc.  
Lancaster Centre, Meteor Business Park, Cheltenham Road East, Gloucester,  
GL 2 9QL, United Kingdom

**Appendix B: California Information Sharing Disclosure**

California Civil Code Sections 1798.115(c), 1798.130(a)(5)(c), 1798.130(c), and 1798.140 indicate that organizations should disclose whether the following categories of personal information are collected, transferred for "valuable consideration," or transferred for an organization's "business purpose" (as those terms are defined under California law). Woodward does not "sell" your personal information. The table below indicates the categories of personal information Woodward collects and transfer in a variety of contexts.

<b>Categories of Personal Information We Collect</b>	<b>To Whom We Disclose Personal Information for a Business Purpose</b>
<p><b>Identifiers</b> – this may include real name, alias, postal address, unique personal identifier, online identifier, email address, account name, social security number, driver’s license number, passport number or other similar identifiers.</p>	<ul style="list-style-type: none"> <li>• Advertising networks</li> <li>• Affiliates or subsidiaries</li> <li>• Business partners</li> <li>• Data analytics providers</li> <li>• Data brokers</li> <li>• Government entities, as may be needed to comply with law or prevent illegal activity</li> <li>• Internet service providers</li> <li>• Joint marketing partners</li> <li>• Operating systems and platforms</li> <li>• Other Service Providers</li> <li>• Payment processors and financial institutions</li> <li>• Professional services organizations, this may include auditors and law firms</li> <li>• Social networks</li> </ul>

<p><b>Additional categories of personal information described in the California Customer Records statute (Cal. Civ. Code § 1798.80(e))</b> – this may include signature, physical characteristics or description, state identification card number, insurance policy number, education, bank account number, credit card number, debit card number, and other financial information, medical information, and health insurance information.</p>	<ul style="list-style-type: none"> <li>• Advertising networks</li> <li>• Affiliates or subsidiaries</li> <li>• Business partners</li> <li>• Government entities, as may be needed to comply with law or prevent illegal activity</li> <li>• Internet service providers</li> <li>• Operating systems and platforms</li> <li>• Other Service Providers</li> <li>• Payment processors and financial institutions</li> <li>• Professional services organizations, this may include auditors and law firms</li> </ul>
<p><b>Characteristics of protected classifications</b> – this may include age, sex, race, ethnicity, physical or mental handicap, etc.</p>	<ul style="list-style-type: none"> <li>• Affiliates or subsidiaries</li> <li>• Business partners</li> <li>• Government entities, as may be needed to comply with law or prevent illegal activity</li> <li>• Internet service providers</li> <li>• Operating systems and platforms</li> <li>• Other Service Providers</li> <li>• Professional services organizations, this may include auditors and law firms</li> </ul>
<p><b>Commercial information</b> – this may include information about products or services purchased, obtained, or considered, or other purchasing or consuming histories or tendencies.</p>	<ul style="list-style-type: none"> <li>• Advertising networks</li> <li>• Affiliates or subsidiaries</li> <li>• Business partners</li> <li>• Data analytics providers</li> <li>• Data brokers</li> <li>• Government entities, as may be needed to comply with law or prevent illegal activity</li> <li>• Internet service providers</li> <li>• Joint marketing partners</li> <li>• Operating systems and platforms</li> <li>• Other Service Providers</li> <li>• Payment processors and financial institutions</li> <li>• Professional services organizations, this may include auditors and law firms</li> <li>• Social networks</li> </ul>
<p><b>Internet or other electronic network activity information</b> – this</p>	<ul style="list-style-type: none"> <li>• Advertising networks</li> <li>• Affiliates or subsidiaries</li> </ul>

<p>may include browsing history, search history, and information regarding an individual's interaction with an internet website, application, or advertisement.</p>	<ul style="list-style-type: none"> <li>• Business partners</li> <li>• Data analytics providers</li> <li>• Data brokers</li> <li>• Government entities, as may be needed to comply with law or prevent illegal activity</li> <li>• Internet service providers</li> <li>• Joint marketing partners</li> <li>• Operating systems and platforms</li> <li>• Other Service Providers</li> <li>• Payment processors and financial institutions</li> <li>• Professional services organizations, this may include auditors and law firms</li> <li>• Social networks</li> </ul>
<p><b>Geolocation data</b></p>	<ul style="list-style-type: none"> <li>• Advertising networks</li> <li>• Affiliates or subsidiaries</li> <li>• Business partners</li> <li>• Data analytics providers</li> <li>• Data brokers</li> <li>• Government entities, as may be needed to comply with law or prevent illegal activity</li> <li>• Internet service providers</li> <li>• Joint marketing partners</li> <li>• Operating systems and platforms</li> <li>• Other Service Providers</li> <li>• Payment processors and financial institutions</li> <li>• Professional services organizations, this may include auditors and law firms</li> <li>• Social networks</li> </ul>
<p><b>Audio, electronic, visual, thermal, olfactory, or similar information</b></p>	<ul style="list-style-type: none"> <li>• Affiliates or subsidiaries</li> <li>• Business partners</li> <li>• Government entities, as may be needed to comply with law or prevent illegal activity</li> <li>• Internet service providers</li> <li>• Operating systems and platforms</li> <li>• Other Service Providers</li> <li>• Professional services organizations, this may include auditors and law firms</li> </ul>

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<b>Professional or employment-related information</b>	<ul style="list-style-type: none"><li>• Affiliates or subsidiaries</li><li>• Business partners</li><li>• Government entities, as may be needed to comply with law or prevent illegal activity</li><li>• Internet service providers</li><li>• Operating systems and platforms</li><li>• Other Service Providers</li><li>• Payment processors and financial institutions</li><li>• Professional services organizations, this may include auditors and law firms</li></ul>
<b>Non-public education information</b> (as defined in the Family Educational Rights and Privacy Act)	<ul style="list-style-type: none"><li>• Affiliates or subsidiaries</li><li>• Government entities, as may be needed to comply with law or prevent illegal activity</li><li>• Internet service providers</li><li>• Operating systems and platforms</li><li>• Other Service Providers</li><li>• Professional services organizations, this may include auditors and law firms</li></ul>
<b>Inferences drawn from any of the information listed above</b>	

