

# WHIRLPOOL CORPORATION PRIVACY STATEMENT

Updated November 27, 2013

# Whirlpool Corporation services

This Privacy Statement applies to your use of InsideAdvantage.com website portal ("Portal").

By registering on and/or using this Portal, you will be submitting to Whirlpool Corporation contact details and other information that is required to enable us to identify and contact you and to enable you to utilize all services, information, tools, and data made available through this Portal ("Services").

Your data will be processed through electronic systems operated by Whirlpool Corporation and will be accessible by Whirlpool Corporation employees within Whirlpool's Global Information Systems function responsible for operating the Services. Your data may be accessible to external information technology services providers who are instructed to carry out specific services relating to the operation and maintenance of the Services and may therefore have access to your data incidental to carrying out their service activity. Such service providers are engaged by Whirlpool Corporation and operate under the guidance and responsibility of Whirlpool Corporation.

#### Location and transfer of data

Your data will be stored on computer systems located in the USA. The data will be replicated on other computer systems located in the USA and in other countries on which the Services are operated and will be accessible to employees in Whirlpool's Global Information Systems and other Whirlpool Corporation functions in your region responsible for managing our relationship with your company and for operating and maintaining the Services. Your data may therefore be communicated to other Whirlpool Corporation subsidiaries and affiliates worldwide. Accordingly, your data may be transferred for the above purposes outside of your territory (in case of Europe, outside the European Union).

Transfer of your data may also occur in the event that Whirlpool Corporation sells a part of its business, but only as necessary in connection with the sale. Your information may also be shared between Whirlpool Corporation subsidiaries and affiliates and with official bodies: (1) if we determine a violation of 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; and (4) to assist us in fraud prevention or investigation.

#### Cookies, web beacons, and log files

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 our web sites. Whirlpool Corporation's third party service providers and business partners may also use cookies to collect non-personal information from visitors to our sites. We may use such information to measure the effectiveness of our marketing campaigns and web sites. 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 may limit some functionality and your experiences on our web sites.

Web beacons – web beacons are miniscule electronic image files that can be embedded within a web page or included in an e-mail message, and are usually invisible to the human eye. When used, web beacons (also known as "clear GIFs" or "tracking pixels") may tell us such things as: how many people are coming to our web sites, whether they are one-time or repeat visitors, which pages they've viewed and for how long, how well certain online advertising campaigns are converting, and other similar web site usage data. When used in an e-mail, web beacons can tell us the time the e-mail was opened, if and how many times it was forwarded, and what links users click on from within the e-mail message. Based on this information, we can adjust the content, products, services, and promotions we provide you to



better meet your interests, as well as make you aware of Whirlpool Corporation products, services, and/or special offers in which you may be interested.

Log Files – these are files that record web activity and gather non-personal statistics about your visit to or use of our web sites. Log files may help us capture, among other things: (1) your IP Address, which is a unique set of numbers assigned to your computer by your Internet Service Provider (ISP) (note that, depending on your ISP, the number assigned to your computer can be different every time you connect to the Internet); (2) the type of browser and operating system you use; and (3) other information about your online session, such as the URL you came from to get to our web site and the date and time you visited our web site. In addition to using this information to better understand how our web sites are used, we may use information captured through log files such as an IP Address (together with your personal information) to troubleshoot technical problems, maintain online safety and security, and if necessary, prohibit or restrict access to our Online Services by certain users.

Interest-based Advertising – We allow trusted third parties to place advertisements for our products and services on sites operated by others. These trusted third parties will use cookies and web beacons to measure the effectiveness of our ads and to determine the display of content and advertising to you based on your interests both on our site and other sites that you may visit. To support this interest-based advertising solution, we and the companies we have contracted with may use anonymous information about your visits to our and other web sites. The information collected and used by this process is always anonymous and does not enable any third party to identify you individually. If you would prefer not to receive our interest-based advertising, you can opt out of this activity at the Digital Advertising Alliance (DAA) website (http://www.aboutads.info) by clicking here.

## How your information is protected

All Whirlpool Corporation Services are compliant with applicable privacy laws in your territory (including, in the European Union, the EU Directive 95/46/EC on the protection of personal data and its further modifications as implemented in the relevant countries).

Whirlpool Corporation will process your personal data and, if any, your sensitive data ("**data**") in accordance with all applicable laws. Your data will be protected, not accessible to the public or other suppliers, and subject to security measures which are compliant with the European privacy law mentioned above.

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:	By E-mail:
Chief Privacy Officer	whirlpool_privacy@whirlpool.com
Whirlpool Corporation	
2000 N. M-63	
MD 8522	
Benton Harbor, MI 49022	

## EU and Swiss Safe Harbor

Whirlpool complies with the U.S. – E.U. Safe Harbor framework and the U.S. - Swiss Safe Harbor framework as set forth by the U.S. Department of Commerce regarding the collection, use, and retention of data from the European Union and Switzerland respectively. Whirlpool has certified that it adheres to the U.S – EU and Swiss – EU Safe Harbor Privacy Principles of notice, choice, onward transfer, security, data integrity, access, and enforcement. Information regarding both the E.U. and Swiss Safe Harbor Frameworks can be found at: <u>http://export.gov/safeharbor</u>.

#### Updating your information

You have the right to access your data at any time as well as to request, at any time: (1) confirmation as to whether or not data concerning you exists, is being processed and/or transferred and information as to the data being processed; (2) details of any entity to which your data may be communicated and who may get to access your data; (3) that your data be updated or corrected, or erased, anonymized or



blocked if it has been processed unlawfully; (4) certification that the operations indicated in point (3) above were notified to any person or entity to which your data has been communicated.

You will further have the right to object on legitimate grounds to the processing of your data, provided you are aware that this may affect the functionality and use of the Services. You may write to the Privacy Officer identified above in order to exercise both the rights indicated in this Privacy Statement and any other rights provided by applicable laws.

## Your acceptance of our privacy practices

By using this Portal you agree to the terms of this Privacy Statement. This Privacy Statement applies only to information provided by or collected from Trade Customers or potential Trade Customers of Whirlpool Corporation and is not intended to describe data handling procedures for information collected by other linked web sites or business partners.

We reserve the right to change or update this Privacy Statement at any time.