

Effective Date: December 20, 2023

WFL (UK) LIMITED PRIVACY POLICY

Introduction

WFL (UK) Limited and its subsidiaries and affiliates (collectively, “we”, “us” or “our”), along with our parent entity, World Kinect Corporation (“WKC”) and its subsidiaries, affiliates, and related entities (collectively, “WKC,” “we,” or “us”) recognizes the importance of data privacy, and this Privacy Policy sets forth the terms and conditions with respect to how we process personal information. This Privacy Policy describes, among other issues, the types of personal information that we collect, the purposes for which we use it, the types of third parties with whom we share it, and any rights and responsibilities you may have with respect to such personal information.

This Privacy Policy applies to the personal information you provide us when you (i) visit any website that we own, license, or otherwise operate and that links to this Privacy Policy (each, a “**Site**”), (ii) purchase or receive products or services from us or through the Site, or (iii) visit our offices or otherwise contact or engage with us. For purposes of this Privacy Policy, the Site and all products and services sold or furnished by WKC through a Site shall be referred to collectively as the “**Services**.”

PLEASE READ THIS PRIVACY POLICY CAREFULLY AS IT DESCRIBES YOUR RIGHTS, RESPONSIBILITIES, AND LIABILITIES. BY ACCESSING OR USING THE SERVICES OR OTHERWISE PROVIDING US WITH PERSONAL INFORMATION, YOU ARE CONSENTING TO THE TERMS OF THIS PRIVACY POLICY, OUR [TERMS & CONDITIONS](#), ANY APPLICABLE COOKIE POLICY AVAILABLE ON THE SITE, AND ANY OTHER SUPPLEMENTAL TERMS POSTED ON OUR SITE.

You must be at least sixteen (16) years of age to access the Services. WKC is headquartered in the United States (U.S.), and the personal information you provide to WKC may be processed and stored in the U.S.. For more information on our data transfer practices, please see Section 9 (Data Retention and Localization).

1. Scope

This Privacy Policy applies to personal information that WKC receives during its business operations as a “**data controller**” - which means we determine the purpose and means of processing such personal information. For purposes of this Privacy Policy, the term “**personal information**” means any information that, alone or in conjunction with other information or data, identifies or is linked to a particular individual or household and that is subject to, or otherwise afforded protection under, a data protection law, statute, or regulation. The term “personal information” does not include anonymized or de-identified data that is not attributable to a particular individual or household and that is not otherwise subject to a data protection law, statute, or regulation. WKC may anonymize or de-identify personal information, and such data is not subject to this Privacy Policy, and WKC may use such data for any purpose.

Covered Websites and Applications. This Privacy Policy also applies to (i) our websites, online applications that run on smart phones, tablets, mobile device applications (“apps”), and other online services that we offer and (ii) that link to this Privacy Policy and/or otherwise be governed by this Privacy Policy. Such websites, online applications, and other online services to which this Privacy Policy applies include, but are not limited to, those found below in “Covered Websites and Applications”.

2. The Types and Categories of Personal Information We Collect

WKC collects personal information in order to provide our Services, comply with our legal obligations, promote our business interests, and for the other reasons set forth in this Privacy Policy. When you do not provide personal information to WKC, we may not be able to provide you the Services or to complete a transaction you requested. Generally, we collect the following types and categories of personal information during our business operations:

Personal Information	
Category	Description/Examples
Personal Identifiers	Identifiers, such as your name, alias, address, email address, account name, date of birth, gender, and telephone number.
Registration Data	Information provided when you register for an account to use the Site, including usernames and passwords.
Online Identifiers (For more information, see “Technical Data” below)	Persistent identifiers that can be used to recognize you or your device over time and across different services, including a device identifier, an Internet Protocol (IP) address, cookies, beacons, pixel tags, mobile ad identifiers, and similar technology.
Travel Identifiers	Passport number, driving license information, Social Security number or other national ID number, personal description and/or photograph, professional licenses and/or certifications, and visa/immigration information.
Commercial Information	Records of the Services you purchased, obtained, or considered, financial and/or credit card information, or your other purchasing or consuming histories or tendencies with respect to our Services.

Business Contact Data	Information related to employees, owners, directors, officers, or contractors of a third-party organization (e.g., business, company, partnership, sole proprietorship, nonprofit, or government agency) with whom we conduct, or possibly conduct, business activities.
Health and Disability Data	You may furnish us with health-related information in the event we undertake health screening, or accommodate a disability when you engage with us.
Marketing and Communications Data	Information with respect to your marketing preferences and your subscriptions to our publications and alerts.
Internet and Electronic Network Data	Data pertaining to your access or use of the Site, including browsing history, search history, and information regarding your interaction with the Site or advertisements embedded on the Site or other third-party websites, and information derived from any device that connects to our WiFi services.

Your Feedback	Information you provide about our Services, which may include data gathered from any WKC surveys or reviews submitted by you.
Visitor Information	Information an individual provides when visiting any physical location or premises of WKC (e.g., visitor logs and registries, vehicle and parking information, security camera recordings).
Geolocation Data	Information about the general city, state, or region in which a user of the Site is located.
Inferences	Inferences drawn from some of the personal information categories identified herein and used to create a consumer profile reflecting your purchasing and marketing preferences, characteristics, and behavior.

3. Technical Data

When you access the Site, we collect certain data automatically using technical means and tools. This data relates to your device, as well as your experience on the Site and other websites, including the following:

Usage and Device Data. When you access and use the Site, we automatically collect details of your access to and use of the Site, including traffic data, usage logs and other communication data, and the resources that you access and use on or through the Site (e.g., browsing history, search history). We may also collect information about your device and internet connection, including the device’s unique identifier (e.g., device type, IMEI, Wi-Fi MAC, IP address), operating system, browser type, and mobile network information. The Site may collect “diagnostic” data related to your use of the Site, such as crash data and logs, performance data (e.g., launch time, hang rate, or energy use), and any other data collected for the purposes of measuring technical diagnostics.

Cookies and Tracking Data. We use “cookies” and other tracking technologies within the Site. A cookie is a small file placed on your device. It may be possible to refuse to accept cookies by activating the appropriate setting on your device. However, if you select this setting, some parts of the Site may become inaccessible or not function properly. In addition, the Site may contain small electronic files known as web beacons (also referred to as clear gifs, pixel tags, and single-pixel gifs) that permit us to analyze data on your use of the Site (e.g., recording the popularity of certain content and verifying system and server integrity). The Site may collect data about the advertisements you have seen or engaged. View our [WFL \(UK\) Limited Cookies Policy](#) to learn more.

Site Monitoring. Please be aware that we, and our service providers and partners, use cookies and other tracking technologies within the Site to monitor and record any and all activities and communications to, from,

and on, the Site in order to safeguard, improve, and analyze usage of, the Site, for targeted advertising and marketing, and for the other purposes listed in this Privacy Policy. For the avoidance of doubt, you hereby acknowledge, agree, and consent to, such monitoring and recording by us and our service providers and partners.

Non-Cookie Technologies. Our Site may deploy “Non-Cookie Technologies” to support our digital advertising programs. These technologies often include browser cache, locally stored objects, or the creation of a statistical identifier wherein an identifier, much like a cookie identifier, is calculated based on the characteristics of a browser or device that distinguishes it from other browsers or devices. These identifiers are calculated either from the data your browser or device shares automatically with the Site or with additional data specifically requested from your browser or device. For more information, see https://thenai.org/wp-content/uploads/2021/07/NAI_BeyondCookies_NL.pdf.

4. Sources of Information

We collect the personal information identified herein directly from you when you use our Services, through automated means when you are using the Site, and from third parties, as follows:

First Party / Direct Collection. We collect personal information directly from you when you use our Services (e.g., registering accounts, completing purchases, signing up for subscriptions), when you provide a Product Review (as defined below), or whenever you directly engage with us, such as when you visit our offices or premises or otherwise contact us.

Automated Collection. As described above, we may collect information and data, such as usage data and cookies, through automated means when you use the Site (see “Technical Data” above).

Third-Party Sources. We collect personal information from third parties, such as publicly available databases, social networking providers, advertising companies, our service providers, and third-party references.

5. How We Use your Information / Purpose of Collection

We may use the personal information we collect about you in order to perform our Services, comply with our legal obligations, and promote our business interests.

How Your Personal Information Is Used
Provide, operate, maintain, improve, and promote our Services, including optimization of offerings presented to you.
Enable you to access and use our Services and fulfill your transactions.

Process and complete transactions, and send you related information, including purchase confirmations and invoices.
Send you messages and communications related to our Services (e.g., responses to your comments, questions, and requests, customer services).
Furnish technical notices, updates, security alerts, and support and administrative messages to you about our Services.
Provide you promotional and marketing communications (e.g., information about our Services, features, surveys, newsletters, offers, promotions, and events).
Research, monitor and analyze trends, usage, and activities in connection with our Services to promote our business interests.
Investigate and prevent fraudulent transactions, unauthorized access to or use of our Services, Site cybersecurity, and other illegal activities.
Personalize our Services, including providing features or advertisements that match your interests and preferences.
WKC may collect and use your personal information for any other purpose for which we obtain your consent.

6. Sharing Information / Third-Party Disclosures

We share your personal information as described below and in this Privacy Policy, and as permitted by applicable law.

Category of Recipient	Purpose of Disclosure
Intra-Group	We may share your personal information with our parent company, and our affiliates, and subsidiaries.
Service Providers	We share personal information with third parties in connection with the delivery of our Services (e.g., credit card processing, customer service, business analytics, fraud prevention, legal compliance services, and advertising and marketing).
Distributors and OEMs	In some circumstances, we act as a reseller of products and services. In the event you purchase a product through us or inquire about a purchase that is provided by a third-party distributor or OEM (and we are only acting as the reseller), then we will forward your personal data to the third-party or OEM so they can facilitate your purchase or seek to answer your inquiry.

Business Partners	We may share your personal information with third parties that distribute our products and marketing materials.
Business Restructuring	Circumstances may arise where, for strategic or other business reasons, we decide to sell, buy, divest, merge or otherwise reorganize our businesses. We may disclose your personal information to the extent reasonably necessary to proceed with the negotiation or with the completion of a merger, acquisition, divestiture or sale of all or a portion of our assets.
Legal; Compliance; Legitimate Interests	We may disclose personal information (i) if required by law or government order, or with a legal process, (ii) to protect and defend our rights or property, or (iii) in urgent circumstances, to protect the health and personal safety of any individual. In addition, we may disclose your personal information with any third party when we believe such disclosure is necessary to defend or protect our legal, regulatory, or business interests.

Consent	In addition to the reasons for disclosure set forth herein, we may also disclose your personal information upon your consent.
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In the event that you facilitate a transaction with WKC or request information from or otherwise engage with us, and such activities require WKC to share your personal information with a service provider or other third party, you hereby consent to such disclosure and/or direct WKC to intentionally disclose your personal information to the service provider or third party.

7. Social Media/ Platform Data Rights

We may engage with you on various social media platforms (e.g., Facebook, Twitter, LinkedIn, Instagram). If you contact us on a social media platform for customer support or for other reasons, we may contact you via the social media’s direct message tools. Those communications to and from us are governed by this Privacy Policy. However, your use of a social media platform is also subject to the policies and terms of the relevant social media platform. Certain social media platforms may also automatically provide us with your personal information, the information we receive will depend on the terms that govern your use of the social media platform(s) and any privacy settings you may have set. The Site includes social media features and widgets (e.g., the “Facebook Like” button, the “Share This” button) or interactive mini-programs that run on the Site. These features may collect your IP address and which Site page you are accessing and may set a cookie to enable the feature to function properly. Social media features and widgets are either hosted by a third party or hosted directly on the Site. Your interactions with these features are governed by the privacy statement of the relevant social media platform that provides them.

According to the terms and conditions governing certain social media platforms, you may request that the information, data, or other content we obtain from or through the social media platform (“**Platform Data**”) be deleted or modified. If you would like Platform Data related to you deleted or modified, please contact us in accordance with the “Contact Us” section below and (i) identify the social media platform at issue and (ii) the Platform Data that you would like deleted and/or modified, and if modified, the modification to said Platform Data. We may also delete Platform Data if requested by the social media platform.

8. Links to Other Websites; Your Direct Third-Party Disclosures

As a resource to you, the Site may include links to third-party websites or provide you the opportunity to disclose information directly to third parties (e.g., credit card processors). Our Privacy Policy does not apply to such third-party websites or organizations. You assume all privacy, security, and other risks associated with providing any data, including personal information, to third parties via the Services. For a description of the privacy protections associated with providing information to third parties, you should refer to the privacy statements, if any, provided by those third parties.

9. Data Retention and Localization

The period during which we retain your personal information varies depending on the purpose for the data processing. For example, we retain personal information for as long as needed to provide you with our Services, to facilitate transactions you have requested, to comply with our legal obligations (e.g., tax filings), to engage in marketing activities, and for as long as is necessary to defend our legal or business interests. In all other cases, we retain your personal information for as long as is needed to fulfill the purposes outlined in this Privacy Policy.

WKC is based in the U.S. and most Sites are hosted in the U.S. If you are visiting the Sites from a country outside of the U.S., please note that by providing your information it may be transferred to, stored and/or processed in the U.S. and other countries, including but not limited to the U.K., Costa Rica, Australia, Singapore and various European Economic Area (EEA) members states (such as Denmark, France, Germany, Greece, Hungary, Ireland, Norway, and Sweden) where key data centers, servers, and/or groups of employees are located and operate. WKC also uses service providers that store personal information on our behalf in the U.S. and in other third countries. Please be aware that the U.S., and these other third countries, may not provide the same level of protection of personal information as in your country, state, or other jurisdiction of residence or nationality, and when transferred to the U.S. or elsewhere, your personal information may be accessible by, or otherwise made available to, local government authorities and officials pursuant to judicial and/or administrative orders, decrees, and demands, and/or other domestic laws, statutes, and regulations. By continuing to provide us such information, you hereby acknowledge and agree that your personal information will be transferred to, and stored in, the U.S. and in such other third countries.

10. Security

We seek to protect the security of your personal information and use a variety of security technologies and procedures to help protect your personal information from unauthorized access, use, or disclosure. HOWEVER, NO INFORMATION SYSTEM CAN BE FULLY SECURE, AND WE CANNOT GUARANTEE THE ABSOLUTE SECURITY OF YOUR PERSONAL INFORMATION. MOREOVER, WE ARE NOT RESPONSIBLE FOR THE SECURITY OF PERSONAL INFORMATION YOU TRANSMIT TO THE SITE AND/OR THE SERVICES OVER NETWORKS THAT WE DO NOT CONTROL, INCLUDING THE INTERNET AND WIRELESS NETWORKS, AND YOU PROVIDE US WITH ANY PERSONAL INFORMATION AND DATA AT YOUR OWN RISK. TO THE EXTENT PERMITTED BY LAW, WE SHALL NOT BE LIABLE OR OTHERWISE RESPONSIBLE FOR ANY DATA INCIDENT OR EVENT THAT MAY COMPROMISE THE CONFIDENTIALITY, INTEGRITY, OR SECURITY OF YOUR PERSONAL INFORMATION CAUSED BY A THIRD PARTY. The safety and security of your personal information also depends on you. Where we have given you (or where you have chosen) a username and password to access our Services, you are responsible for maintaining the security and confidentiality of those credentials and not revealing them to others. You must contact us immediately (and in any event within twenty-four (24) hours) if you have reason to believe that your username or password to our Services has been compromised. You acknowledge and agree that we may contact you via email or other electronic communications in the event we are legally required to notify you of a data security incident or event related to your personal information.

11. No Data Collected from Children

The Site is not directed at, nor intended for use by, children. As a result, if you are under the age of sixteen

(16), you are prohibited from accessing or using the Services (including the Site) or with providing us with your personal information.

12. Publicly Posted Information; Product Reviews

You may, from time to time, have the ability to submit via the Site a comment on, provide an opinion about, rate, or otherwise discuss our Services (a **“Product Review”**). In other circumstances, you may directly provide us feedback on our business, our business sector, or the Services (**“Feedback”**). Any information or content you post in a Product Review or in your Feedback may be available to other users of the Site (and our social media platforms) and may be retrievable by third-party search engines, and third parties may also be able to download or share your Product Review and Feedback to social media websites or elsewhere. We recommend that you guard your privacy and anonymity and not upload any information in your Product Review and Feedback that you wish to remain confidential. Any third party with access to your information via the Site will be permitted to use the information in the same manner as if you submitted the information directly to that third party. Publicly posting any information on the Site is entirely voluntary on your part, and we recommend you carefully consider the information you choose to make publicly available. As between you and WKC, any and all Product Reviews and Feedback shall be considered our confidential and proprietary information. In order for WKC to utilize such Product Reviews and Feedback, you grant to WKC a non-exclusive, perpetual, irrevocable, worldwide, royalty-free license, with the right to sublicense, under all relevant intellectual property rights, to use, publish, and disclose such Product Reviews and Feedback in any manner we choose and to display, perform, copy, make, have made, use, sell, and otherwise dispose of WKC’s and our sub-licensees’ products or services embodying such Product Reviews and Feedback in any manner and via any media we choose, without reference to the source. WKC shall be entitled to use Product Reviews and Feedback for any purpose without restriction or remuneration of any kind with respect to you and/or your representatives.

13. Your Responsibilities

You are permitted, and hereby agree, to only provide personal information to WKC if such personal information is accurate, reliable, and relevant to our relationship and only to the extent such disclosure will not violate any applicable data protection law, statute, or regulation or infringe upon a person’s data privacy rights or privileges.

IF YOU PROVIDE PERSONAL INFORMATION (INCLUDING PERSONAL INFORMATION CONCERNING A THIRD PARTY) TO WKC, YOU EXPRESSLY REPRESENT AND WARRANT TO WKC THAT YOU HAVE THE FULL RIGHT AND AUTHORITY TO PROVIDE WKC WITH SUCH PERSONAL INFORMATION (INCLUDING PERSONAL INFORMATION CONCERNING A THIRD PARTY) AND THAT WKC’S USE AND PROCESSING OF SUCH PERSONAL INFORMATION AS SET FORTH HEREIN WILL NOT VIOLATE ANY PERSON’S RIGHTS OR PRIVILEGES, INCLUDING RIGHTS TO PRIVACY. YOU HEREBY AGREE TO FULLY AND COMPLETELY INDEMNIFY WKC FOR ANY CLAIMS, HARM, OR DAMAGES THAT MAY ARISE FROM YOUR PROVISION OF PERSONAL INFORMATION (INCLUDING PERSONAL INFORMATION CONCERNING A THIRD PARTY) TO WKC.

14. Updating Your Information

It is important that the personal information that you provide to us is accurate and reliable. In certain circumstances, you may have the ability to directly edit your account to update and change your personal information (e.g., name, telephone number, email, address), and you must do so when such changes are warranted. You may review, update, or modify your personal information, including profile and contact information, at any time by logging into your WKC account. You may request deletion of your personal information or WKC account by emailing privacy@WKCcorp.com.

15. Your Privacy Rights

Depending on applicable law, you may be entitled the following data privacy rights and privileges:

- **Right to Know**. You may have the right to know about what personal information WKC collects and processes about you, including the types and categories of personal information we collect and process, the sources of such personal information, our retention criteria, with whom we share your personal information, cross-border data transfers, and how to file complaints and inquiries.
- **Access Rights**. You may have the right to ask us whether we process any of your personal information and, if so, receive access to such personal information. When complying with an access request, we will also provide you with additional information, such as the purposes of the processing, the categories of personal information concerned as well as any other information necessary for you to exercise the essence of this right.
- **Rectification**. You may have the right to have your personal information corrected/rectified in case of inaccuracy or incompleteness. Upon request, we will correct inaccurate personal information about you and, taking into account the purposes of the processing, update any incomplete personal information, which may include the provision of a supplementary statement.
- **Erasure**. You may have the right to have your personal information erased, which means the deletion of your personal information by us. However, your right to erasure is subject to statutory limits and prerequisites (e.g., where your personal information is no longer necessary in relation to the initial purposes for which it was processed, your personal information was processed unlawfully).
- **Restriction of Processing**. You may have the right to obtain the restriction of the processing of your personal information, which means that we suspend the processing of your personal information for a certain period of time. Circumstances which may give rise to this right include situations where the accuracy of your personal information is contested, but we need time to verify the inaccuracy (if any) of your personal information.
- **Data Portability**. You may have the right to request we provide you with your personal information in a structured, commonly used and machine-readable format and to have such data transmitted directly to another controller, where technically feasible.
- **Right to Object**. You may have the right to object to the processing of your personal information, which means you may request we no longer process your personal information. This only applies in case the “legitimate interests” ground (including profiling) constitutes the legal basis for processing (see below

“Legal Basis for Processing”). However, at any time (and free of charge) you can object to having your personal information processed for direct marketing purposes.

- Automated Decision Making. You may have the right to object to having us use your personal information to conduct automated decision making. However, WKC does not engage in any activity that subjects our customers, website users, survey participants, or others to a decision based solely on automated processing, including profiling, which produces legal effects, or similarly significant results, impacting them.
- Withdrawing Consent. You also may withdraw your consent at any time if we are solely relying on your consent for the processing of your personal information. However, this will not impact our legal basis to process such personal information prior to the withdrawal of your consent.
- Marketing Opt-Out. You have the right to opt out of receiving email marketing communications from us. You can object to further marketing at any time by selecting the "unsubscribe" link at the end of all our marketing and promotional update communications to you or by contacting us in accordance with the “Contact Us” section below or visiting the [WFL \(UK\) Limited Preference Centre](#).
- Do Not Share/Targeted Advertising Rights. You may have the right to opt out from having us disclose your personal information to third parties for targeted advertising purposes. This is sometimes referred to as the right to opt-out of the “sharing” of personal information for cross-contextual behavioral advertising purposes. To prevent your personal information from being used in these circumstances, please click on the cookie management icon of the site to set your cookie preferences.
- Do Not Sell My Personal Information. You may have the right to opt out of the “sale” of their personal information. However, WKC does not sell your personal information to third parties for profit or monetary or other valuable consideration, and therefore we do not provide opt-out request processes for the sale of personal information (because we do not undertake such activities).

We will facilitate your exercise of the rights that apply to you in accordance with applicable law. However, even if your personal information is not afforded protection under, or otherwise subject to, a data protection law, we may seek to accommodate any request or inquiry you may have with regard to our data processing activities. If you have questions about your rights or wish to exercise your rights, you can contact us at privacy@WKCorp.com, or otherwise in accordance with the “Contact Us” section listed below.

16. Privacy Appeals; Complaints

In certain jurisdictions, you may have the right to appeal a decision WKC has made with respect to your privacy request. To submit a privacy rights decision appeal, please email us at privacy@WKCorp.com with the subject line “ATTN: Privacy Appeals,” and describe the nature of your request, and the reason for requesting an appellate review.

Depending on applicable law, you may have the right to submit a complaint to a data protection authority responsible for overseeing our compliance with data protection law in your jurisdiction. Please see a list of potentially applicable regulatory authorities:

Australia

For Australia, the Office of the Information Commissioner may be contacted either via www.oaic.gov.au, by phone at 1300 363 992, or at GPO Box 5218 Sydney NSW 2001. Please note: Access and correction requirements in the Australia Privacy Act 1988 (Cth) operate alongside and do not replace other informal or legal procedures by which an Australian resident can be provided access to or correction of his or her personal information, such as Australia's Freedom of Information Act 1982.

EEA/UK/Switzerland

- For data protection authorities in the EU, please see here: https://edpb.europa.eu/about-edpb/about-edpb/members_en.
- For the data protection authority in Switzerland, please contact the Federal Data Protection and Information Commissioner (<https://www.edoeb.admin.ch/edoeb/en/home.html>).
- For the data protection authority in the UK, please contact the Information Commissioner's Office (www.ico.org.uk).

17.

The United States

- If you are a resident of Colorado, you may file privacy complaints with the Colorado Attorney General at: <https://coag.gov/file-complaint/>.
- If you are a resident of Connecticut, you may file privacy complaints with the Connecticut Attorney General at: <https://portal.ct.gov/DCP/Complaint-Center/Consumers—Complaint-Center>.
- If you are a resident of Virginia, you may file privacy complaints with the Virginia Attorney General at <https://www.oag.state.va.us/contact-us/contact-info>.

We would, however, appreciate the opportunity to address your concerns, so please feel free to contact us regarding any complaint you may have. We will not discriminate against individuals for exercising their data privacy rights or filing a privacy complaint.

18. Legal Basis for Processing (EEA/UK/Switzerland Only)

For purposes of the EU/UK GDPR, we can collect and process your data under one of the following legal bases:

- Consent. We can collect and process your data with your consent. For example, if you have given your consent to receiving marketing material from us at the point we collected your information.
- Contractual Obligations. We may collect and use your personal information, including sensitive information, to enter into a contract or to perform a contract that you, your company, or some other intermediary acting on your behalf has with us.
- Legal Compliance. If the law requires us to, we may need to collect and process your data, such as for tax

compliance purposes.

- Legitimate interest. We may use your data as required in the normal course of operating our businesses and services unless our legitimate interests are overridden by your rights.
- Vital interests. We may need to process your personal information if the processing is necessary to protect your vital interests (e.g., health and safety reasons if you attend a meeting at a WKC location).

19. Brazil

Under the Brazil General Data Protection Law (Lei Geral de Protecao de Dados Pessoais “LGPD”), Law No. 13,709/2018, if you are a Brazilian resident, you may have additional rights regarding your personal data, including:

- The right to confirmation of the existence of the processing of your personal data.
- The right to access your personal data.
- The right to correct incomplete, inaccurate or out-of-date personal data.
- The right to anonymize, block, or delete unnecessary or excessive personal data or personal data that is not being processed in compliance with the LGPD.
- The right to the portability of personal data to another service or product provider if you make an express request.
- The right to delete your personal data being processed.
- The right to information about public and private entities with which we have shared your personal data.
- The right to refuse consent for processing of your personal data and information regarding the consequences if you refuse to give such consent.
- The right to revoke consent previously given for the processing of your personal data.

If you make a request of us under the above rights, we expect to be able to respond to your request without charge as a general matter. However, we reserve the right to collect a reasonable charge when you request the transcription, reproduction or transmission of such information. We will notify you, following your request for transcription, reproduction or transmission of the appropriate amount that will be charged. You will then have the opportunity to withdraw your request after notification of the charge.

We may collect and process personal data where: (i) we have your consent to do so; (ii) where we need the personal data to perform a contract with you; (iii) to comply with one of our legal or regulatory obligations; (iv) to execute public policies provided in laws or regulations, or based on contracts, agreements, or similar instruments; (v) to exercise our rights in judicial, administrative or arbitration procedures; (vi) to protect the life or physical safety of the data subject or a third party; (vii) to protect credit; and/or (viii) where the processing is in our legitimate interests and not overridden by your privacy interests or other rights found in applicable laws.

We may rely on the following legal grounds to collect and/or process your personal data, namely:

- **Consent** — Where required by applicable laws, we will rely on your consent for collecting and/or using your personal data. Except when otherwise permitted by law, we obtain the requisite consent prior to collecting and prior to using or disclosing your personal data. You may provide your consent to us orally, in writing, by electronic communication or any other means reasonably capable of conveying your consent. If necessary, we will obtain your express consent if we collect, use or disclose sensitive personal data in our capacity as a data controller. We may also share your personal data with third-party partners for whom you have given us consent. Your consent may be intrinsic to the circumstances, such as in cases

where you have already provided personal data to us and you maintain your relationship with us or where you provide our representatives with your contact details so that we can contact you. Except when otherwise permitted by law we will only use the data for the purpose for which it was given. From time to time, we may collect, utilize or disclose your personal data based on your consent and as otherwise permitted by law. When your consent is required, you may withdraw your consent at any time (unless withdrawing the consent would frustrate the performance of legal obligations) upon providing to us appropriate notice as provided under applicable law. However, the withdrawal of your consent may adversely affect our ability to provide our products and services to you and to maintain our relationship.

- **Contractual obligations** – We may need to collect and/or use your personal data, including sensitive personal data, to enter into a contract or to perform a contract that you, your company, or some other intermediary acting on your behalf has with us.
- **Legitimate interests** — We may need to collect and/or use your personal data to fulfill our legitimate interests or those of a third party, such as to improve our products and services. Consistent with our legitimate interests and any choices that we offer or consents that may be required under applicable laws, we may use technical information as described in this Privacy Policy and use personal data for our marketing purposes. We may fulfill such legitimate interests except where your fundamental rights and liberties prevail under applicable law.
- **Legal or regulatory** — We may need to collect and/or use your personal data to comply with one of our legal or regulatory obligations.
- **Legal or judicial** — We may need to collect and/or use your personal data to exercise our rights in judicial, administrative or arbitration procedures.
- **Safety and protection** — We may need to collect and/or use your personal data to protect the life or physical safety of you or a third party.
- **Credit** — We may need to collect and/or use your personal data to protect credit.
- **Public policies** – We may need to collect and/or use your personal data to support the execution of public policies provided in laws or regulations, or based on contracts, agreements, or similar instruments. To execute public policies provided in laws or regulations, or based on contracts, agreements, or similar instruments.

We will only process personal data for a specific purpose or for any other purposes specifically permitted by applicable data protection legislation. If you are dissatisfied with how we have dealt with your personal data, please contact us at the details above so that we can try to find a solution.

20. Do-Not-Track Signals

Some web browsers may transmit “do-not-track” signals to the website with which the user communicates. Because of differences in how web browsers incorporate and activate this feature, it is not always clear whether users intend for these signals to be transmitted, or whether they are even aware of them. Unless otherwise required by law, we currently do not take action in response to these signals.

21. Persons with Disabilities

WKC strives to ensure that every person has access to information related to our Services, including this Privacy Policy. Please contact us if you would like this Privacy Policy provided in an alternative format, and we will seek to meet your needs.

22. Changes to the Policy

We reserve the right to amend this Privacy Policy at any time. We will notify you if this Privacy Policy is amended by updating the “Last Updated” section listed above. It is your responsibility to periodically review the Privacy Policy to determine whether any amendments have been made hereto. Your use of the Services, and continued use of the Services after any amendments are made to this Privacy Policy, signifies your consent to this Privacy Policy and any amendments hereto. We may, in our sole discretion, provide you communications, including via email or text messages, about changes to our Privacy Policy; however, such communications do not abrogate or otherwise limit your responsibility to periodically review the Privacy Policy to determine whether any amendments have been made hereto.

23. Covered Websites and Applications

As noted above, this Privacy Policy also applies to our websites, apps, and other online services that we offer which may link to this Privacy Policy and/or otherwise be governed by this Privacy Policy. Such websites, apps, and other online services to which this Privacy Policy applies include, but are not limited to: World Kinect Corporation (WKCcorp.com, aviation.WKCcorp.com, marine.WKCcorp.com, wmf-marinefuels.com, aviation.WKCcorp.com, WKCcaapricing.com, ir.WKCcorp.com, WKCmasters.com, drive4WKC.com, worldfuelrewards.com, coltinternational.com, TripView, Online Flight Planning (OFP), BunkerLine); Air Elite Network (airelitenetwork.com); Alta Lubricants (altalubricants.com); Amstar (amstargas.com); Ascent (ascent1.com); Avinode (avinode.com, paynode.com, schedaeroporto.com); AvPOS (avpos.com); Ecuacentair (Ecuacentair.com); FBO Manager (fbomanager.com); GibOil (giboil.com, golubricants.es); Gulf Canada (gulfcanda.com); Henty Oil (hentyoil.com, hentyoil.co.uk); Indianhead Oil (indianheadoil.com); Kinect Consulting (kinectconsulting.com); Kisch Oil (kischoil.com); MH Aviation (mhaviation.co.za); MyFBO (myfbo.com); MyWorld Portals (www.myworld.air.WKCcorp.com, myworld.marine.WKCcorp.com, myWorld Commercial Aviation Portal, myWorld Business and General Aviation (BGA) Portal, myWorld iPad app); NCS Fuel (ncsfuel.com); PetroAir (petroair.com); Spire Flight (spireflights.com); Tamlyn Shipping (tamlyn-shipping.co.uk); Terrana (terranacombustiveis.com.br); Trackmyelectricity (trackmyelectricity.com); Total Aviation Software (totalaviationsoftware.com); TotalFBO (totalfbo.com); Watson (watsonfuels.co.uk, tankscout.co.uk, watsonfuelcards.co.uk, directoil.co.uk, watsonboilerservice.co.uk); World Kinect Energy Services (world-kinect.com, kinectenergy.com, texor.com, usenergyservices.com, ktminc.com, bergen-energi.com, altafuels.com, beachfrontenergy.com, ux-online.com, gotoapp.com, carterenergy.com, associatedpetroleum.com, carterenergy.com, cngatwork.com, lakesideoil.com, mexicoenergia.com, whatwillfuelthefuture.com, thelubricantcompany.co.uk, thelubricantcompany.co.za, westernpetro.com, orchardenergy.co.uk); Yacht Fuel (yachtfuel.com); XISOT (xisot.com); and Xtenergy (xtenergy.ca).

24. Contact Us

We encourage you to first visit our [WFS Privacy Center](#), which contains additional information regarding our policies and procedures. If you have additional questions, or believe you are eligible to submit a subject access request or exercise a right available to you under specific national, provincial or state laws, you can reach us by email at privacy@wfscorp.com, using the [webform](#) provided through our [WFS Privacy Center](#), or contacting us by post at:

WFL (UK) Limited
Attn: Privacy Administrator, Legal Department
Callow Park, Callow Hill
Brinkworth, Chippenham
Wiltshire SN15 5FD
United Kingdom

You may also reach us toll-free in the United Kingdom at 0800 014 8126, or by visiting the WFS Compliance Hotline at www.wfscompliance.com, where you will find other country-specific toll-free numbers and an online portal through which you can begin the process by sending us relevant information and requests.

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