

Workato Website Privacy Policy

Updated: October 18, 2023

This Privacy Policy explains how Workato ("we", "us") collects, uses, shares, and protects the personal information we collect about individuals ("you", "yours") when you use the websites we operate and the services we provide.

This Privacy Policy does not apply to our processing of the personal information of business customers who are subscribers to Workato's business integration and automation Service, or end users who access the Workato Services through a third party which has an embedding or Original Equipment Manufacturer ("OEM") license agreement with Workato. We process those subscribers' or OEM users' information in our capacity as a service provider/processor. Our processing of that information is governed by our agreement with our business customers.

Please read this Privacy Policy before you submit any personal information to Workato and contact us if you have any questions. By providing personal information to us, you agree to the practices described in this Privacy Policy. If you do not agree to the terms of this Privacy Policy, please do not provide personal information to us.

1. Definitions

- **A. Services** or **Service** refers to the Sites as well as Workato's application integration and automation platform, tools, mobile applications, documentation, educational systems, and related services.
- B. Sites include www.workato.com and other websites under the workato.com domain.
- C. Users include visitors who use or otherwise interact with the Sites.

2. Personal Information We Collect

We collect personal information about you when you provide information directly to us, when third parties such as our business partners or service providers provide us with personal information about you or when personal information about you is automatically collected in connection with your use of our Sites. The following subsections describe the types of data we collect:

A. Contact and Related Information

We may collect contact information and related personal information, relating to website visitors from various sources, including offline marketing activities. This personal information may include:

- Name
- Phone number
- Role/Title
- Company name
- Physical Address
- Additional/substitute email addresses
- Social media ids and profiles
- Photographs you submit to us
- IP address
- Device id
- Browsing and/or search history

For example, we may collect this information when you:



- Provide contact information online, for example to download or subscribe to Workato content, register for a Workato event, attend a webinar or take a course.
- Visit a website and the information is supplied to us by a cookie or other tracking technology. A
 cookie is a small text file that collects and tracks certain technical information. See our <u>Cookie</u>
 <u>Policy</u> for a description of the information collected from cookies and related tracking technologies,
 and your rights and options with respect to these technologies.

B. Billing Information

For all paying Users such as enrollees in events or courses, as applicable, we maintain a record of the purchasing, invoices, billing and payment information.

For Users who pay by credit card, our third-party payment processor as listed on <u>our subprocessor page</u> will process your credit card information. We will collect and associate the payment information with a Subscription ID but we do not store any payment card information ourselves. If you have questions about how our processor or subprocessor protects the data it receives from Users, please refer to its websites as listed in https://www.workato.com/legal/sub-processors.

C. Form, Email and Chat Data

You may voluntarily submit to us, and we will retain and process information from Web forms and other online communication systems including email and chat applications. This may include personal information, such as your name, job title, company name, address, phone number, email address.

The Sites offer publicly accessible blogs and community forums, to which you may submit content. If you elect to post in a public area of our Sites, any Personal Information or other content that you voluntarily disclose becomes available both to Workato and to the public.

D. Usage Data

Workato automatically collects and stores non-identifiable and aggregated data, statistics and metrics derived from Users' activities when they visit Workato's Sites. For example, we use Google Analytics, a web analytics service provided by Google, Inc. ("Google"). Google Analytics uses cookies to help us analyze how users use the Site and enhance your experience when you use the Site. For more information on how Google uses this information, click here. Please review our Cookie Policy for more information about cookies and similar technologies.

Workato also maintains system log files which may include internet protocol addresses, browser, internet service provider, pages visited within Workato's Sites, referring/exit pages, search terms, operating system, date/time stamp, and clickstream data.

E. Summary

In particular, we have collected the following categories of personal information from consumers within the last twelve (12) months:

Category	Examples	Collected
A. Identifiers.	A real name, alias, postal address, unique personal identifier, online identifier, Internet Protocol address, email address, account name, Social Security number, driver's license number, passport number, or other similar identifiers.	YES (real name, alias, IP address, and email address have been collected)
B. Personal information categories listed in the California Customer	A name, signature, Social Security number, physical characteristics or description, address, telephone number, passport number, driver's license or state identification card number, insurance policy number, education,	YES (name, physical characteristics in the form of a



Records statute (Cal. Civ. Code § 1798.80(e)).	employment, employment history, bank account number, credit card number, debit card number, or any other financial information, medical information, or health insurance information. Some personal information included in this category may overlap with other categories.	profile picture, telephone number, and employment have been collected)
C. Protected classification characteristics under California or federal law.	Age (40 years or older), race, color, ancestry, national origin, citizenship, religion or creed, marital status, medical condition, physical or mental disability, sex (including gender, gender identity, gender expression, pregnancy or childbirth and related medical conditions), sexual orientation, veteran or military status, genetic information (including familial genetic information).	NO
D. Commercial information.	Records of personal property, products or services purchased, obtained, or considered, or other purchasing or consuming histories or tendencies.	YES
E. Biometric information.	Genetic, physiological, behavioral, and biological characteristics, or activity patterns used to extract a template or other identifier or identifying information, such as, fingerprints, faceprints, and voiceprints, iris or retina scans, keystroke, gait, or other physical patterns, and sleep, health, or exercise data.	NO
F. Internet or other similar network activity.	Browsing history, search history, information on a consumer's interaction with a website, application, or advertisement.	YES
G. Geolocation data.	Physical location or movements.	NO
H. Sensory data.	Audio, electronic, visual, thermal, olfactory, or similar information.	YES
I. Professional or employment-related information.	Current or past job history.	YES
J. Non-public education information (per the Family Educational Rights and Privacy Act (20 U.S.C. Section 1232g, 34 C.F.R. Part 99)).	Education records directly related to a student maintained by an educational institution or party acting on its behalf, such as grades, transcripts, class lists, student schedules, student identification codes, student financial information, or student disciplinary records.	NO
K. Inferences drawn from other personal information.	Profile reflecting a person's preferences, characteristics, psychological trends, predispositions, behavior, attitudes, intelligence, abilities, and aptitudes.	YES

3. Sources of Collection

We obtain the categories of personal information listed above from the following categories of sources:

- Directly from you. You may voluntarily provide this information to us by submitting it. For example, from forms you complete or products and services you purchase.
- Indirectly from you. For example, from observing your actions on our Sites.



From third-party sources. In some cases, we may collect information about you from other sources, including third parties from whom we purchase personal information and from publicly available information, such as information published on social media sites, to the extent permitted by applicable law, and we may combine that information with personal information provided by you.

4. Use of Personal Information

A. Use by Workato

Workato collects and uses personal information for the following purposes:

- a) to fulfill or meet the reason you provided the information (For example, if you share your name and contact information to request a price quote or ask a question about our products or services, we will use that personal information to respond to your inquiry. If you provide your personal information to purchase a product or service, we will use that information to process your payment and facilitate delivery. We may also save your information to facilitate new product orders or process returns.);
- b) to send you marketing information (depending on whether you have opted out of receiving such communications. For further information, please review Section 7 ('Correcting, Updating or Deleting Your Information');
- c) to respond to inquiries you submit to us;
- d) to analyze usage of our Site for internal purposes, to improve our marketing and outreach to visitors and potential customers, and to improve the content and functionality of the Site;
- e) to comply with applicable laws, lawful requests, and legal process, such as to respond to subpoenas or requests from government authorities;
- f) to protect our intellectual property rights, your or others' privacy rights in connection with your use of our Sites, (including by making and defending legal claims);
- g) to audit our internal processes for compliance with legal requirements and internal policies; and
- h) to prevent, identify, investigate and deter fraudulent, harmful, unauthorized, unethical or illegal activity, including cyberattacks and identity theft.

If provided, Workato may use your cell phone number to call or text you in order to provide support to you.

B. Educational Certifications

When you participate in any program or request a certification in any educational offerings provided by Workato, we may, with your consent, display information about your participation in these programs and your completion of activities within them, for certification purposes. This information may be disclosed by Workato for marketing or promotional purposes and may be shared with other Users including the admin in your company, organization or team, who are also a part of the Services, as permitted by law.

5. Sharing

We may share your personal information by disclosing it to a third party for a business purpose. We only make these business purpose disclosures under written contracts that describe the purposes, require the recipient to keep the personal information confidential, and prohibit using the disclosed information for any purpose except performing the contract. In the preceding twelve (12) months, Company has disclosed personal information for a business purpose to the categories of third parties indicated in the chart below in subsection 5.C.

We do not sell personal information. In the preceding twelve (12) months, Company has not sold personal information.

A. Third-Party Service Providers

Workato shares personal information with its Affiliates and third-party service providers (such as learning management systems, support services, and hosting partners) to provide the necessary hardware,



software, networking, storage, and other services we use to operate the Site and maintain a high-quality User experience.

Workato may store personal information in internal third-party marketing, customer relationship management ("CRM") programs and mail-management software to facilitate interactions with Users or potential customers and for Workato's sales and marketing purposes.

In all situations where Workato discloses personal information to third parties acting as service providers or "agents" acting on behalf of Workato, Workato requires the recipient to adequately protect personal information and treat it as confidential.

B. Other Information Sharing

In addition to the purposes described above, we disclose personal information to respond to subpoenas, court orders, on legal process, or to establish or exercise our legal rights or defend against legal claims. We may also share such personal information if we believe it is necessary in order to investigate, prevent, or take action regarding illegal activities, suspected fraud, situations involving potential threats to the physical safety of any person, or as otherwise required by law.

If we are involved in a merger, acquisition, financing due diligence, reorganization, bankruptcy, receivership, dissolution, sale of all or a portion of our assets, (collectively a "Transaction"), your personal information and other information may be shared in the diligence process with representatives or counterparties and others assisting with the Transaction and transferred to a successor or affiliate as part of that Transaction along with other assets.

Additionally, we may share information, including personal information with our Affiliates, which include Workato Europe, S.A., and Workato Pte. Ltd., and other Affiliates as updated from time to time for administrative, operational, support and marketing purposes.

C. Categories of Third-Party Recipients of Personal Information

Personal Information Category	Category of Third-Party Recipients		
	Business Purpose Disclosures	Sales	
A: Identifiers.	Affiliates, learning management systems, customer relationship management programs, mailmanagement software, and hosting partners	None	
B: California Customer Records personal information categories.	Affiliates, learning management systems, customer relationship management programs, mailmanagement software, and hosting partners	None	
C: Protected classification characteristics under California or federal law.	N/A	N/A	
D: Commercial information.	Affiliates, learning management systems, customer relationship management programs, mail-	None	



	management software, and hosting partners	
E: Biometric information.	N/A	None
F: Internet or other similar network activity.	Affiliates, learning management systems, customer relationship management programs, mailmanagement software, and hosting partners	None
G: Geolocation data.	N/A	N/A
H: Sensory data.	N/A	N/A
I: Professional or employment-related information.	Affiliates, learning management systems, customer relationship management programs, mailmanagement software, and hosting partners	None
J: Non-public education information.	N/A	N/A
K: Inferences drawn from other personal information.	Affiliates, learning management systems, customer relationship management programs, mailmanagement software, and hosting partners	None

6. Links to Other Websites

The Sites contains links to websites and applications, including websites and applications operated by affiliates and other third parties. We do not determine and we are not responsible for the privacy practices or content of websites and applications owned or operated by third parties. Your browsing and interaction on any third-party website or service, including those that have a link on our Site, are subject to that third party's terms and conditions and policies. We encourage you to read the privacy statements and other terms and conditions of third- party websites linked to the Sites.

7. Correcting, Updating or Deleting Your Information

We have established internal policies for the deletion of data that customers provide to us or that we obtain from other sources as describe in Section 3. We will also respond to requests to delete personal information that may be held within our systems, to the extent possible and with the limitation that some information may need to be retained for legal, accounting or archival purposes (see the "Data Retention" section of this Policy for details). Note that if you remove or request removal of information that you posted in a public area of the Service, copies may remain viewable in cached and archived pages of the Service, or if other Users have copied or saved that information. Therefore, in some cases, we may not be able to delete your personal information.

To request removal, deletion, correction or updates of your personal information, contact us at privacy@workato.com.



Moreover, if you are a Workato User and would like to opt-out of marketing communications from Workato please contact us at privacy@workato.com or follow the unsubscribe instructions included in the marketing emails. Users in the EU and some other jurisdictions have more specific and additional rights related to their personal information: see Sections 13-15 for more details.

8. Data Retention

Workato will retain your personal information for a period of time consistent with the original purpose of collection (see the "<u>Use of Personal Information</u>" section above) or as long as necessary to comply with our legal obligations, maintain accurate accounting, financial and other operational records, or to resolve disputes.

We determine the appropriate retention period for personal information on the basis of the amount, nature, and sensitivity of the personal information being processed, the potential risk of harm from unauthorized use or disclosure of the personal information, whether we can achieve the purposes of the processing through other means, and on the basis of applicable legal requirements (such as applicable statutes of limitation).

After expiry of the applicable retention periods, your personal information will be deleted.

9. Incident Management and data breach notification

If Workato becomes aware of and determines that an incident involving personal information qualifies as a breach of security leading to the misappropriation, accidental or unlawful destruction, loss, alteration, unauthorized disclosure of, or access to, personal information that compromises the security, confidentiality or integrity of such personal information, Workato will report such breach to the Workato User within 48 hours.

10. International Transfers

Workato may host and process User data in specific, non-U.S. locations. Some personal information may be transferred to the U.S. or other locations and processed there, including chat messages, and e-mails you send to us. Please refer to Section 15 below for further information applicable to Users in the EEA and the UK.

11. Security Measures

We seek to protect personal information using appropriate technical and organizational measures based on the type of personal information and applicable processing activity, as detailed on our Security page. However, no Internet or e-mail transmission is ever fully secure or error free. In particular, e-mail sent to us may not be secure. Therefore, you should take special care in deciding what information you send to us via e-mail. You are responsible for the selection and use of any privacy settings or security capabilities within the Sites or where applicable, third-party applications.

12. Children's Personal Information

Workato does not knowingly collect any personal information from children under the age of 16. If you are under the age of 16, please do not submit any personal information through our Site. We encourage parents and legal guardians to monitor their children's internet usage and to help enforce our Policy by instructing their children never to provide personal information on our Site without their permission. If you have reason to believe that a child under the age of 16 has provided personal information to Workato through our Site, please contact us, and we will use commercially reasonable efforts to delete that information from our databases.

13. Notice to California Residents

Under California Civil Code Sections 1798.83-1798.84, California residents are entitled to ask us for a notice identifying the categories of personal information which we share with our affiliates and/or third parties for marketing purposes, and providing contact information for such affiliates and/or third parties. If you are a California resident and would like a copy of this notice, please submit a written request to: support@workato.com or Workato Inc., 215 Castro St., Suite 300, Mountain View, CA 94041, Attn: Legal.



Moreover, we are required by the California Consumer Privacy Act of 2018 ("CCPA") to provide this CCPA Notice to California residents to explain how we collect, use and share their personal information, and the rights and choices we offer California residents regarding our handling of their personal information, which the CCPA currently defines as "information that identifies, relates to, describes, is reasonably capable of being associated with, or could reasonably be linked, directly or indirectly, with a particular consumer or household."

This CCPA Notice does not apply to individuals with whom Workato engages in the individuals' capacity as representatives of businesses that may provide services to Workato, or to which Workato may provide its Services.

- 1. Personal Information Collection, Use, and Disclosure: We describe the sources through which we collect personal information and the types of personal information collected in the "Personal Information We Collect" section in this Privacy Policy. We describe the purposes for which we use and share this information in the "Use of Personal Information" section in this Privacy Policy.
- **2.** California Privacy Rights: To the extent provided for by law and subject to applicable exceptions, California residents have the following privacy rights in relation to the personal information we collect:
 - a) Right to know what categories of personal information Workato has collected about you, categories of sources from which the personal information is collected, the business or commercial purpose for collecting, selling, or sharing personal information, the categories of third parties with whom Workato shares personal information, and the specific pieces of personal information Workato has collected about you.
 - b) Right to request deletion of any personal information collected by us about you.
 - c) Right to correct inaccurate personal information that we maintain about you.
 - d) Right to opt-out of the sale of personal information. Please note that we do not sell personal information we collect from you, in accordance with the definition of sell in the CCPA and its supplemental regulations.
 - e) Right against discrimination because you exercised the rights available to you.
 - f) Right to protection against waiver of rights.

You can exercise the rights described above, by sending an email to support@workato.com or calling +1-844-469-6752. You may exercise these rights by yourself or via an authorized agent who meets the agency requirements of CCPA. Once you exercise your rights, you agree to receive communication from us seeking information from you in order to verify your identity as the consumer from whom we have collected the personal information and such other information as reasonably required to enable us to fulfill your request. We will not fulfill your request unless you have provided sufficient information for us to reasonably verify that you are the consumer from whom we collected the personal information, as well as sufficient details necessary to help us handle the request.

Note: The Sites do not respond to browser "Do Not Track" (DNT) signals and operates as described in this Privacy Policy whether or not a DNT signal is received. If we do so in the future, we will describe how we do so in this Privacy Policy.

14. Notice for other US State Residents

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 support@workato.com or call +1-844-469-6752. To appeal a decision regarding a consumer rights request please email privacy@workato.com.

Nevada provides its residents with a limited right to opt-out of certain personal information sales. Residents who wish to exercise this sale opt-out rights may submit a request by phone by calling: +1-844-469-6752. However, please know we do not currently sell data triggering that statute's opt-out requirements.

15. Notice to European Users

If you are a User in the European Economic Area ("EEA") or the United Kingdom ("UK"), the following provisions apply to you, in addition to the other policies in this Privacy Policy. Workato, Inc. is the controller for your personal data. For the purposes of the GDPR, Workato, Inc. is established in the EEA through and Workato Europe, S.A., with office at Av Diagonal Num.497 Esc. P.2 Pta., Barcelona.

A. Legal Bases For Processing

We are required to identify the legal bases for processing personal data about you. We process personal data as follows:

- **Legitimate Interest:** We process the following categories of personal data when we believe it furthers our legitimate interests or those of third parties, or your legitimate interest. We will rely on our legitimate interests for processing personal data only after balancing our interests and rights against the impact of the processing on individuals.
 - Profile Data
 - o Online Form, Email and Chat Data
 - Usage Data

These legitimate interests include:

- Providing the Sites to Users
- Responding to your inquiries, comments, feedback or questions
- Managing our relationship with Users, which includes sending administrative information to Users relating to our Sites and changes to our policies, and asking Users to leave a review or take a survey
- Providing personalized and customized content and information to Users
- o Gaining insights about and making improvements to our business, products and services
- Administering and protecting our business, preventing fraud, criminal activity, or misuse of our Sites, and ensuring the security of our IT systems, infrastructure and networks (including troubleshooting, testing, system maintenance, support and hosting of data)
- Providing information to current and prospective users of our products and services
- Compliance with legal obligations and legal process and protecting our rights, privacy, safety or property, and/or that of our affiliates, you or other third parties
- Consent: In some cases, we process personal data based on the consent you expressly grant to us at the time we collect such data, such as in relation to the collection of information through the use of cookies and similar technologies other than strictly necessary technologies. When we process personal data based on your consent, it will be expressly indicated to you at the point and time of collection.



• Other Processing Grounds: From time to time, we may also need to process personal data to comply with a legal obligation.

B. Your Rights Regarding Your Personal Data

You have certain rights with respect to your personal data, including those set forth below, subject to certain conditions and exceptions. For more information about these rights, or to submit a request, please email privacy@workato.com. In some cases, we may also need you to provide us with additional information, which may include personal data, if necessary to verify your identity and the nature of your request.

- Access: You can request more information about the processing of personal data we hold about you and request a copy of such personal data by contacting us at privacy@workato.com.
- Rectification: If you believe that any personal data we are holding about you is incorrect or incomplete, you can request that we correct or supplement such data by contacting us at privacy@workato.com.
- **Erasure:** You can request that we erase some or all of your personal data from our systems by sending a request to privacy@workato.com.
- Withdrawal of Consent: If we are processing your personal data based on your consent (as
 indicated at the time of collection of such data), you have the right to withdraw your consent at any
 time. However, that if you exercise this right, you may have to then provide express consent on a
 case-by-case basis for the use or disclosure of certain of your personal data, if such use or
 disclosure is necessary to enable you to utilize some or all of our Sites.
- Portability: You can ask for a copy of your personal data in a machine-readable format. You can
 also request that we transmit the data to another controller where technically feasible, if the
 processing of your data is based on your consent or on contractual necessity, and if the processing
 is carried out by automated means.
- **Objection:** You can contact us to let us know that you object to the further use or disclosure of your personal data for certain purposes by sending a request to privacy@workato.com.
- **Restriction of Processing:** You can ask us to restrict further processing of your personal data by sending a request to privacy@workato.com.
- Right to File Complaint: You have the right to raise a complaint about Workato's practices with
 respect to your personal data to your local regulator. If you are a resident of the United Kingdom
 and believe that we maintain your personal data within the scope of the applicable laws relating to
 personal data in the UK, you may direct questions or complaints to the UK supervisory authority,
 the Information Commissioner's Office.

C. Transfer of Personal Data

Workato's Sites are accessible in various geographic regions, including the United States, the EEA and the UK. However, as described in section 3, some personal data may nonetheless be collected, transferred to and stored by us in the United States and by our service providers that are based in the United States as necessary for the purpose of providing the Site and for the business purposes described in this Privacy Policy. Laws in the U.S. may be less stringent or otherwise different from the laws where you reside. Where applicable or required by law, we will ensure that the recipient of your personal data offers an adequate level of protection and security, for instance by entering into appropriate standard contractual clauses or an alternative mechanism for the transfer of data as approved by the European Commission (Art. 46 GDPR) or other applicable regulators.

16. Changes to the Privacy Policy

We may, in our sole discretion, modify or update this Policy from time to time. When we post changes to this Privacy Policy, we will also revise the "Last Updated" date appearing at the top of the Policy. Any changes to this Privacy Policy are effective immediately after we post them. If we make any material changes to this Policy, we will endeavor to notify you by email or by posting a prominent notice on the Sites. We encourage you to review this page periodically for the latest information on our privacy practices. Your



continued use of the Site after the publication of any updated Privacy Policy shall constitute your agreement to be bound by such changes to this Policy. Your only remedy, if you do not accept the terms of this Policy, is to discontinue use of the Site.

17. Contact Us

If you have questions regarding this Policy or about Workato's privacy practices, or to file any complaints, please send your inquiries to:

Workato, Inc.

Attention: Privacy Team

215 Castro Street, Suite 300, Mountain View, CA 94041, United States

Email address: privacy@workato.com