

InnerWorkings and International Data Privacy

Certain data protection laws prohibit the transfer of personal information to countries outside of the European Economic Area that are viewed as not ensuring an “adequate” level of data protection. Many of the countries in which InnerWorkings operates - including the United States - are not regarded by the EEA as providing such “adequate” protection. As such, InnerWorkings has put in place an agreement between it and its various affiliates on standard terms approved by the EEA in order to ensure such “adequate” protection and is working toward adopting a set of binding corporate rules and supporting procedures and principles (“Rules”) that seek to ensure that personal information of covered individuals in the EEA is treated in an appropriate manner in accordance with applicable law.

These Rules will apply globally to all InnerWorkings entities and in all cases where InnerWorkings processes personal data of covered individuals in the EEA whether by automatic means or manually, and whether the personal data relates to InnerWorkings’ employees, contractors, business contacts, customers, or third parties. Each InnerWorkings entity must comply with these Rules.

Among other things, InnerWorkings’ Rules will provide for the following with respect to the processing of personal data of covered individuals in the EEA:

I. Fairness

InnerWorkings will process personal data fairly and lawfully and will respect the rights and freedoms of individuals in relation to privacy.

II. Purpose

InnerWorkings will limit its processing of personal data to the fulfilment of its specific and legitimate purposes and will only carry out processing of personal data that is compatible with such purposes or with appropriate consent.

III. Proportionality

InnerWorkings will limit its processing of personal data to that which is adequate, relevant and not excessive in relation to the purposes for which it processes such data.

IV. Transparency

InnerWorkings will adopt and publish policies which govern its processing of personal data and will make available to relevant individuals details of its identity and the purposes of its processing of personal data together with any other information required to ensure fairness.

V. Data Quality

InnerWorkings will keep personal data collected in the EEA accurate and up to date and only for as long as necessary for its specific and legitimate purposes. InnerWorkings encourages consumers to inform InnerWorkings when their personal data changes by posting ways in which to update information in the InnerWorkings Privacy Policy.

VI. Security

InnerWorkings will take commercially reasonable technical and organizational measures to protect personal data against accidental or unlawful destruction or loss and against unauthorized disclosure or access, in particular where the processing involves the transmission of data over a network, and against other unlawful forms of processing.

InnerWorkings will require that service providers also adopt commercially reasonable security measures and enter into contractual arrangements with InnerWorkings that provide that the service provider has in place such technical and organizational security measures to safeguard personal information.

VII. Individuals' Rights

Individuals whose personal information is collected and/or used in the EEA and transferred between InnerWorkings entities under the Rules have the right to obtain the information which relates to them and which is being processed by InnerWorkings. Provided that an individual whose personal information is collected and/or used in the EEA makes a request to InnerWorkings in writing, he or she is entitled to:

- (a) be informed of whether InnerWorkings holds and processes personal data about themselves;
- (b) be provided with a description of any personal data that InnerWorkings holds about an individual, the purposes for which any such personal data are being held, and the recipients or classes or recipients to whom the information is, or may be, disclosed; and
- (c) a copy of the personal data held by InnerWorkings.

Relevant individuals also have the right to:

- (a) ask InnerWorkings to correct or delete personal data about them that may be incomplete, inaccurate or excessive;
- (b) object to the processing of personal data about them that for specific reasons causes them substantial damage or distress which is unwarranted in the circumstances;
- (c) opt out, without charge and on request, to the use of their personal data for direct marketing purposes by InnerWorkings.

Any such requests and objections may be sent to: (a) the registered address of their local InnerWorkings entity, which can be found on InnerWorkings' website at www.inwk.com; or (b) InnerWorkings Europe Limited, One Cranmore, Cranmore Drive, Solihull, B90 4RZ, Birmingham, U.K. or (c) compliance@inwk.com.

Finally, the Rules will provide that, depending on the circumstances, individuals whose personal information is collected and/or used in the EEA may be able to enforce privacy rights using the Rules through a regulator or a court.