Only the highest standards

Ensuring data privacy for your business. And your customers.



Privacy by design

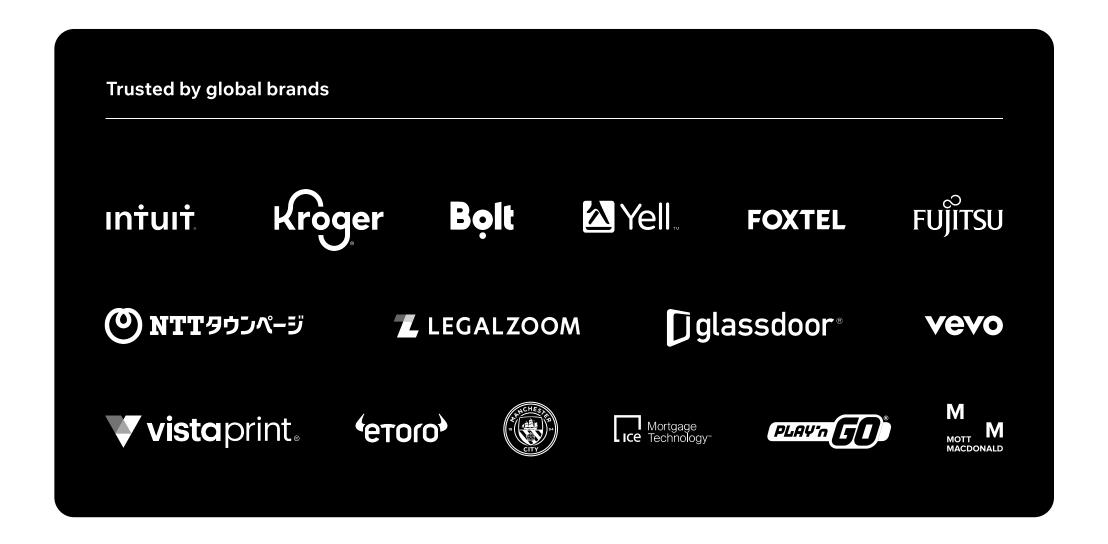
Data privacy goes beyond governing how organizations collect, use, and share sensitive data; it focuses on the rights of individuals. As of January 2023, more than 120 countries have established international data privacy laws and regulations aimed at giving citizens more control, choice, and consent. For businesses, the importance of having a comprehensive data privacy program has never been greater.

At Wix, we value our users' privacy and are 100% committed to protecting and processing their personal data responsibly. The purpose of this white paper is to illustrate how we safeguard data, and describe our various privacy and security practices, such as:

- Our different data protection roles for processing personal information
- How we help individuals exercise their privacy-related rights or obligations
- Where we store data and who can access it
- · Our security practices, and
- Information related to international transfer of data.

The legally-binding obligations and rights of Wix, our Users, our Users-of-Users (UoU), and other parties are described in our <u>Privacy Policy</u> and <u>Terms of Use.</u> If anything written in this white paper conflicts in any way with Wix's Privacy Policy or Terms of Use, the provisions of the Privacy Policy and Terms of Use shall prevail.

Since our founding in 2006, we have earned the trust of more than 230 million users in 190 countries plus hundreds of companies, including top global brands, who choose Wix for our high privacy standards.

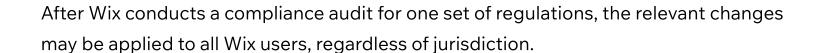


Wix and Worldwide Data Protection Laws

Wix respects and honors the rights of individuals as outlined in worldwide privacy regulations. To this end, we work with experts to ensure our products, services, and documentation meet standards and comply with key privacy regulations, including:



- The EU's General Data Protection Regulation (GDPR)
- The California Consumer Privacy Act (CCPA) in the United States
- Brazil's Lei Geral de Proteção de Dados (LGPD)
- Canada's Personal Information Protection and Electronic Documents Act (PIPEDA)
- Israel's Protection of Privacy Law







Privacy Principles

Wix as Data Controller

Wix is a controller of its users' (site owners') personal information. We do not collect special categories of personal data as defined in the GDPR.

Wix as a Processor

Wix is a processor on behalf of site owners with respect to the site owners' customers' or visitors' personal information. We refer to these data subjects as "users-of-users", or "UoU".

Data Retention Policy

Wix may retain our users' personal information (and our UoUs' personal information) for as long as the user account is active, or as otherwise needed to provide our services. If necessary, we may retain personal data after a user account is deactivated in order to:

- Comply with our legal obligations
- Resolve disputes regarding our users or their UoUs
- Prevent fraud and abuse
- Enforce our agreements, and/or
- · Protect our other legitimate interests.

To determine how long to retain personal information, we consider the amount, nature, and sensitivity of the data, the potential risk of harm from unauthorized use or disclosure of the data, the purposes for which we process it, and the applicable legal requirements.

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Data Subject Rights

Wix believes all users should have control over their personal information. If a user wishes to receive a copy, access and/or request that corrections be made to their personal information, they can follow the instructions provided in Wix's Help Center: Retrieving Your Wix Account Data or Permanently Deleting Your Wix Account.

To ensure compliance with its UoUs' data subject rights, we provide tools that let users notify Wix (as a processor) that a particular UoU wants their personal data deleted from Wix's systems, or that the UoU has asked to receive a copy of their personal data held by Wix. To fully comply with UoUs' data requests for deletion or access, users need to follow the instructions found here: Privacy: About Your Customer's Data. We also provide additional tools to help users inform site visitors and manage personal personal data, such as cookie banners, Wix Forms, and Consent Logs.

Additional data privacy measures for businesses and their customer

In addition to out-of-the-box tools, Wix (as a processor) provides the controls, information, and support businesses need to gain and maintain their customers' trust, including:

- Dedicated hub with access to relevant information on privacy practices
- A List of sub-processors for your convenience
- On-call support from our team of privacy compliance experts at privacy@wix.com

Data Processing Addendum

To provide our services, Wix may process the customers' or visitors' data of the users' websites, following the terms set forth in the Wix Data Processing Addendum for Users, found here: <u>Data Processing Addendum - Users</u>

Data Storage

Users' personal information is controlled by Wix.com Ltd. in Israel. According to the European Commission, Israel offers an adequate level of protection for the personal information of EU member state residents, as explained <u>here</u>.

To provide services to our users, Wix may transfer personal information to Wix subsidiaries and third-party vendors. Regardless of where data is stored or processed, our users' security, privacy and confidentiality is of critical importance.

Wix Data Centers are located in the US and Ireland where we use third-party service providers for cloud services, hosting, CDNs, and colocation services. Currently, Wix works with the following third parties:



Google Cloud



Cross-border transfer of personal data

When Wix transfers personal information to a location outside of Europe, we ensure that:

- 1. There is a level of protection deemed adequate by the European Commission; or
- 2. The relevant Standard Contractual Clauses are in place (i.e., the applicable module of the Standard Contractual Clauses for the transfer of personal data to third countries pursuant to Regulation (E.U.) 2016/679 of the European Parliament and of the Council from June 4, 2021, and the ICO's International Data Transfer Addendum to the E.U. Commission Standard Contractual Clauses version B1.0, in force from 21 March 2022, as it is revised under Section 18 of its Mandatory Clauses).

When Wix transfers EU personal information to a third country that the European Commission finds will not adequately protect that information, we take additional measures to comply with the European data protection laws, as described in the next section.

For selected services, users may opt to store some of their data^a within a defined geographic boundary within their own private clouds. With Velo code, users can connect an external database to their Wix site to make sure that custom data is stored in the customer's local servers.

It is important to note that Wix offers a wide array of features within its services. The user may process data which is not covered under the definition of custom data^b, typically where the nature of the service cannot be delivered by implementing integration with the user's private server. In these circumstances, data will be processed in accordance with the Data Processing Agreement—Users.

Additional measures on cross border transfer

Schrems II and the Invalidation of the EU-US Privacy Shield

Wix follows the recommendations of the European Data Protection Board (EDPB) on measures that supplement transfer tools to ensure compliance with the EU level of protection of personal data. Our legal team's assessment and understanding is that cross-border transfers performed by Wix are compliant with current GDPR and other applicable data protection requirements. We apply all the technical, organizational and contractual measures as described below:

Technical: Compliance and encryption

Our platform complies with the highest industry standards for physical, environmental and hosting controls. Wix is a PCI Level 1 Merchant & Service Provider and is certified as ISO 27001, ISO 27018, ISO 27701, and ISO 27017 compliant. Copies of our certifications can be found here.

^a Site Database, which includes any custom data of the site using dynamic pages or data binding.

^b The actual website itself - including layout, texts on the site, metadata, domain name and Vertical Data, which includes members area, stores, booking and all the other "Wix Apps".

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Wix also provides end-to-end encryption for data at rest, in transit and in backups. For users' data, the following provisions are in place:

- PII data is encrypted at rest within the production database using AES 256-bit encryption.
- Data is also encrypted at rest within all backups, including the DR backup.
- Customer data in transit between the application and the client interface is encrypted using Transport Layer Security (TLS) 1.2 or later.

For more information about our technical/security measures, please refer to Wix Security Measures Overview.

Organizational: Wix Privacy Team, supplier vetting, and transparency reporting

The Wix Privacy team is responsible for monitoring privacy aspects in all stages of Wix product and service development, from inception to launch. This includes conducting product reviews to ensure compliance with privacy and security standards. As a result, Wix can provide users with strong privacy standards, including the transparent collection of their data and providing users with meaningful privacy configuration options. The privacy team is also responsible for creating a culture of "privacy by design" within Wix, which means sharing their knowledge and establishing relevant flows to ensure compliance with existing and emerging global data privacy regulations.

Supply chain security

Prior to onboarding, Wix vets each third-party supplier to assess their security postures and ensure they meet our security standards. The measure is co-orchestrated with legal, procurement, IT, and security. As part of the ongoing process and in accordance with Wix's data protection policy, we also continuously conduct security and privacy assessments to vendors that hold or process personal and sensitive data. This includes performing a transfer impact assessment as required by relevant regulations.

Transparency report

Wix believes that transparency is an essential element for building trust. For this reason, we publish an annual <u>Transparency Report</u> with relevant information about government requirements and other legitimate requests for our users' data.

Contractual: Data processing agreements with third-party suppliers

When engaging with third-party suppliers that process Wix users' or UoUs' data, Wix enters into a separate contractual arrangement—a data processing agreement—with each processor or subprocessor to ensure compliance with Wix obligations under applicable data privacy laws. These data processing agreements require each of the recipients to execute a written agreement with all of their sub-processors containing terms providing at least equivalent protection of personal data, as provided under the agreement between Wix and the third-party suppliers. To obtain the current list of sub-processors engaged by Wix and Wix subsidiaries that may process UoUs' information, please visit: List of Wix's Sub-Processors.

Security Measures, Certifications, Controls, and Plans

Wix deploys and maintains technical and organizational security measures to protect the company's and our customers' data and assets. The Wix security team leads the facilitation and development of procedures, in addition to the processes and controls that govern the integrity, confidentiality, and availability of Wix services.

Security WP →

Wix and US Surveillance Laws

Wix, like most cloud-based SaaS companies that host data in the US, could technically be subject to FISA 702 if it is deemed by a US Court to be an electronic communication service provider within the meaning of 50 U.S.C. § 1881(b)(4), which can include remote computing service providers, as defined under 18 U.S.C. § 2510 and 18 U.S.C. § 2711. However, Wix does not process personal data that is likely to be of interest to US intelligence agencies.

To date, Wix has never received a US National Security Request (including requests for access under FISA 702 or direct access under EO 12333) in connection with users' or UoUs' personal data. Therefore, while Wix may technically be subject to the surveillance laws identified in Schrems II, the company has not been subject to the types of requests mentioned therein in our day-to-day business operations

Data access by government organizations

Wix receives requests for different categories of data on its users from law enforcement agencies around the world. We strongly believe we should balance our responsibility to respect our users' right to privacy with our legal obligations to disclose personal data, based on a proper legal basis.

When responding to any government or other legitimate request, Wix will check and make sure of its legal validity. If required to comply by disclosing user data, we will respond in accordance with applicable law, including the US Federal Stored Communications Act, and will respond as precisely as possible to the specific request. For more information, please see the <u>Wix Transparency Report.</u>

WiX Enterprise

Keep your data where it belongs

Schedule a call with the Enterprise team to learn more about Wix's data privacy practices.

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