

PRIVACY POLICY

WWM Infrastructure Services LLC

International IT Infrastructure · Cybersecurity · Hosting · Consultation

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Supersedes the Privacy Policy dated December 2024

Data Controller

WWM Infrastructure Services LLC (a Wyoming limited liability company)
2232 Dell Range Blvd, Ste 245, Cheyenne, WY 82009, United States
Website: <https://ifs-wwm.com> · Privacy contact: info@ifs-wwm.com

This notice explains how we handle personal information in connection with our website and our business relationships. It is provided for transparency and does not itself form part of any customer contract.

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1. Introduction and scope

WWM Infrastructure Services LLC ("IFS", "WWM Infrastructure Services", "we", "us" or "our") respects your privacy and is committed to protecting personal information in accordance with applicable United States federal and state privacy laws and, where relevant, the European Union General Data Protection Regulation (GDPR), the United Kingdom GDPR and the Swiss Federal Act on Data Protection.

We are a business-to-business (B2B) provider of international IT infrastructure services, including cybersecurity, hosting, IT consultation and infrastructure management. This Privacy Policy describes the personal information we collect, how and why we use it, with whom we share it, and the rights and choices available to you.

1.1 What this policy covers

This policy applies to personal information we handle as a controller, namely:

- our website at <https://ifs-wwm.com> and any marketing or informational pages we operate;
- enquiries, correspondence and other communications you send to us; and
- the negotiation and administration of our relationships with customers, prospective customers, suppliers, partners and their personnel (together, our "business contacts").

1.2 What this policy does not cover

Customer-entrusted data (we act as a processor). Where our customers, or their users, submit personal data to — or such data is processed within — infrastructure, software or services that we operate on a customer's behalf, the customer is the controller (or "business") and IFS acts as a processor (or "service provider"). Our handling of that data is governed by the applicable Master Services Agreement, order form and Data Processing Addendum (DPA), not by this notice.

Separately licensed products and services. A number of our products and services are licensed under their own terms of service and are accompanied by their own privacy documentation. Where those documents apply, they govern the personal data processed through the relevant product or service.

Third-party services. This policy does not cover the practices of third parties whose websites or services may be linked from, or integrated with, our own (see Section 13).

In this policy, "personal information" and "personal data" are used interchangeably to mean information that identifies, relates to, or could reasonably be linked with an identified or identifiable individual.

2. Who we are and who is responsible

For personal information handled under this policy, the controller is WWM Infrastructure Services LLC, a limited liability company organized under the laws of the State of Wyoming, United States, with its registered address at 2232 Dell Range Blvd, Ste 245, Cheyenne, WY 82009, United States.

IFS is part of the WWM group of companies. Our parent is W.W.M. Holding Limited, and our affiliates include W.W.M. Ai Labs Europe Limited (Cyprus). Where a customer relationship is contracted with one of our affiliates — for example, where an affiliate established in the European Union contracts with EU-based customers — that affiliate's own privacy terms and any applicable DPA govern the relationship, and the contracting affiliate is the relevant controller for that engagement.

EU representative: for the purposes of Article 27 of the EU GDPR, our representative in the European Union is W.W.M. Holding Limited, 1 Alexandrou Panagouli, 6057 Larnaca, Cyprus. A separate representative under the UK GDPR will be appointed for individuals in the United Kingdom. Contact details are set out in Section 15.

3. The personal information we collect

3.1 Information you provide to us

We collect information you choose to provide, including when you complete our contact or enquiry form, email or call us, or engage with us as a customer, supplier or partner. This may include your name, business email address, company name, job title or role, telephone number (optional), country, the content of your message or correspondence, and information relevant to sales, onboarding, contracting, billing and support (such as business contact and account-administration details).

3.2 Information we collect automatically

When you visit our website we automatically collect certain technical and usage information through cookies and similar technologies (see Section 6), including your IP address, browser type and settings, operating system and device identifiers, the pages and links you view or click, referring and exit pages, timestamps, and an approximate (city/region-level) location derived from your IP address. Through our analytics and session-analysis tools we also collect information about how you interact with our pages, including, via Microsoft Clarity, aggregated session-replay and heatmap data.

3.3 Information from other sources

We may receive information about you from our group companies and affiliates; from referral partners and resellers; from publicly available sources and business-information providers (for example, in connection with due diligence, sanctions or know-your-customer screening, and account verification consistent with our legal obligations); from service providers that support our operations (such as hosting, communications, security and payment/banking providers); and from social-media or advertising platforms where you interact with our content.

3.4 Sensitive information

We do not intentionally collect sensitive or special-category personal information (such as health, biometric, or government-identifier data) through our website, and we ask that you do not submit such information via our forms. Where we issue you account log-in credentials, we treat them as confidential.

4. How we use personal information

We use personal information to: operate, secure and improve our website; respond to your enquiries and provide the information or services you request; manage sales, contracts, onboarding, billing and support with our business customers, prospects, suppliers and partners; send service, security and administrative messages; send business communications and marketing where permitted (subject to your choices — see Section 5); perform analytics and improve our website and offerings; ensure network and information security and prevent, detect and handle fraud, abuse and other unlawful activity; comply with our legal, tax, accounting and regulatory obligations (including filings applicable to a Wyoming-formed company); establish, exercise or defend legal claims; and manage corporate transactions such as financings or reorganizations.

4.1 Legal bases (EEA, UK and Switzerland)

Where EU/UK/Swiss data protection law applies, we rely on the following legal bases:

Purpose	Legal basis
Responding to enquiries and taking steps before entering a contract	Performance of a contract or pre-contractual steps (Art. 6(1)(b)); legitimate interests (Art. 6(1)(f))
Managing customer, supplier and partner relationships and contract administration	Performance of a contract (Art. 6(1)(b)); legitimate interests (Art. 6(1)(f))
Business and marketing communications	Consent where required (Art. 6(1)(a)); otherwise legitimate

Purpose	Legal basis
	interests in B2B marketing (Art. 6(1)(f)), subject to your right to object
Analytics and other non-essential cookies	Consent (Art. 6(1)(a))
Security, fraud/abuse prevention and network security	Legitimate interests (Art. 6(1)(f))
Legal, tax, accounting and regulatory compliance	Legal obligation (Art. 6(1)(c))
Establishing/defending legal claims; corporate transactions	Legitimate interests (Art. 6(1)(f))

Where we rely on legitimate interests, we balance those interests against your rights and freedoms; you may request further information about that assessment using the contact details in Section 15.

5. Marketing communications and your choices

We may send business-to-business marketing about our services to business contacts where permitted by law. You can opt out at any time by using the unsubscribe link in our emails or by contacting info@ifs-www.com. Where the law requires your prior consent, we will obtain it before sending marketing, and you may withdraw that consent at any time. Opting out of marketing does not affect service, security or administrative messages necessary for our relationship.

6. Cookies and similar technologies

Cookies are small text files placed on your device; we also use similar technologies such as pixels, local storage and software development kits. We use them to make our website work, to remember your preferences, and to understand and improve how our website is used.

For visitors in the EEA, the UK and Switzerland, we set non-essential cookies (such as analytics and session-analysis cookies) only after you consent through our cookie banner, and you can change your choices at any time. For visitors in the United States, we honour recognized opt-out preference signals, including the Global Privacy Control (GPC), where required by applicable law. You can also control cookies through your browser settings and, for Google Analytics, via Google's opt-out browser add-on.

The principal cookies and similar technologies used on our website are:

Cookie(s) / technology	Provider	Purpose	Retention
wwm-cookie-consent	IFS (first party)	Stores your cookie-consent choices (strictly necessary)	Up to 12 months
__cf_bm, cf_clearance and similar	Cloudflare	Security, bot management and content delivery (strictly necessary)	Session to ~1 year
_ga, _ga_*, _gid	Google (Google Analytics)	Analytics: distinguish users and measure website usage	_ga/_ga_* up to 24 months; _gid ~24 hours
_clck, _clsk, CLID, ANONCHK, MUID, SM	Microsoft (Microsoft Clarity)	Product analytics, heatmaps and aggregated session replay to understand website usage	Session to ~12-13 months

Retention periods are indicative and are set by the relevant provider; please also consult the Google Privacy Policy and the Microsoft Privacy Statement. Because Google Analytics and Microsoft Clarity involve disclosing online-activity data to those providers, some US state privacy laws may treat certain analytics or advertising cookies as a "sale" or as "sharing"/"targeted advertising." We do not exchange personal information for money, and you may exercise the choices described in this Section and in Section 8.

7. How we disclose personal information

We disclose personal information to the following categories of recipients:

- **Service providers and processors** that act on our instructions, including cloud, hosting and infrastructure providers; content-delivery and security providers (for example, Cloudflare); website form-processing providers (for example, Formspree); analytics providers (Google and Microsoft); communications and email providers; payment and banking providers (for example, Mercury, Wise and Ebury); customer-relationship and business-productivity tools; and professional advisers such as legal, accounting and audit firms;
- **Affiliates** within the WWM group (including our parent W.W.M. Holding Limited and our affiliate W.W.M. Ai Labs Europe Limited) for group administration, service delivery and the purposes described in this policy;
- **Authorities and other parties** such as regulators, law-enforcement agencies and courts, where required by law or legal process, to handle abuse reports, or to protect our rights, property, safety or security and those of others; and
- **Acquirers and successors** in connection with a merger, financing, reorganization, acquisition or sale of assets, subject to appropriate confidentiality protections.

We do not sell your personal information for monetary consideration. Other than the analytics and cookie context described in Section 6, we do not “share” personal information for cross-context behavioural advertising. A current list of the key sub-processors used to deliver contracted services is maintained under the applicable DPA and is available to customers on request.

8. Your privacy rights and choices

8.1 United States — rights available to residents

Depending on your state of residence and applicable law, you may have some or all of the following rights: to know and access the categories and specific pieces of personal information we collect, use and disclose; to correct inaccurate personal information; to delete personal information; to obtain a portable copy of personal information; to opt out of the “sale” or “sharing” of personal information and of “targeted advertising”; to opt out of certain “profiling” that produces legal or similarly significant effects; to limit the use of sensitive personal information; and not to receive discriminatory treatment for exercising your rights. Many states also give you the right to appeal a refusal of your request.

How to exercise your rights. Email info@ifs-wwm.com or use our website contact form, and tell us your state of residence and the right you wish to exercise. We will take reasonable steps to verify your identity and, where an authorized agent submits a request on your behalf, to verify their authority. We honour Global Privacy Control (GPC) signals as an opt-out of sale/share/targeted advertising where required. We respond within the time required by applicable law (generally 45 days, extendable where permitted).

Appeals. If we decline your request, you may appeal by replying to our decision. If you remain unsatisfied, you may contact the Attorney General of your state.

8.2 California (CCPA/CPRA)

For the purposes of the California Consumer Privacy Act, as amended by the California Privacy Rights Act, IFS is a “business.” Appendix A lists the statutory categories of personal information we may collect and indicates which we collect. The sources and purposes are described in Sections 3 and 4, and the categories of recipients in Section 7.

California residents have the rights to know/access, delete, correct, opt out of the sale or sharing of personal information, limit the use of sensitive personal information, and to non-discrimination. In the preceding twelve months we have not sold personal information for monetary consideration; we may “share” online-identifier and

internet-activity information through analytics/advertising cookies as described in Section 6, and you may opt out via our cookie controls and GPC. We do not use or disclose sensitive personal information for purposes that would require us to offer a “Right to Limit.” Under California’s “Shine the Light” law you may request information about disclosures of personal information to third parties for their own direct marketing; we do not make such disclosures. You may use an authorized agent to submit requests. Our retention approach is described in Section 9.

8.3 Virginia, Colorado, Connecticut, Utah, Texas and other state laws

If you are a resident of a state with a comprehensive consumer-privacy law — including Virginia (VCDPA), Colorado (CPA), Connecticut (CTDPA), Utah (UCPA), Texas (TDPSA), Oregon (OCPA) and Montana (MCDPA), and other states as their laws take effect (for example Delaware, Iowa, Nebraska, New Hampshire, New Jersey, Maryland, Minnesota, Tennessee, Indiana, Kentucky and Rhode Island) — you may have rights to access, correct, delete and obtain a portable copy of your personal information, and to opt out of targeted advertising, the sale of personal data, and certain profiling. Where applicable, we obtain consent before processing sensitive data. We recognize universal opt-out mechanisms such as GPC where required by law, and appeal rights apply as described in Section 8.1.

8.4 Nevada

Nevada residents may direct us not to sell certain “covered information.” We do not sell covered information as defined by Nevada law, but you may submit a request to info@ifs-www.com.

8.5 Other US residents

Even where no specific state law applies, we extend a reasonable baseline of access and deletion choices to US residents. Please contact us to make a request.

8.6 EEA, UK and Switzerland — GDPR rights

Where EU, UK or Swiss data protection law applies, you have the rights to: access your personal data; request rectification of inaccurate data; request erasure (the “right to be forgotten”); restrict processing; data portability; object to processing (including direct marketing and processing based on our legitimate interests); and withdraw consent at any time, without affecting processing carried out before withdrawal. You also have the right to lodge a complaint with a supervisory authority in your country of residence or work, or where an alleged infringement occurred. You are not subject to decisions based solely on automated processing that produce legal or similarly significant effects (see Section 12).

To exercise these rights, contact info@ifs-www.com or our Article 27 representative (Section 15). UK residents may contact the Information Commissioner’s Office (ico.org.uk); EEA residents may contact their local supervisory authority.

9. Data retention

We keep personal information only for as long as necessary for the purposes described in this policy, after which we delete or anonymize it. To determine retention periods we consider the duration of our relationship or your enquiry; our legal, tax, accounting and regulatory obligations; and the need to establish or defend legal claims. Our indicative retention periods are:

Type of data	Indicative retention
Website enquiry / contact-form data	Up to 24 months from last contact, unless it becomes part of a customer relationship
Customer, supplier and partner	Duration of the relationship plus up to 7 years (longer where law requires)

Type of data	Indicative retention
relationship and contract records	
Accounting, tax and corporate records	As required by law (typically up to 7 years or longer; certain US filings retained per IRS requirements)
Marketing preferences and suppression lists	For as long as needed to honour your choices
Cookies and analytics identifiers	As set out in the Section 6 table
Security and abuse logs	Typically up to 12–24 months

10. How we protect personal information

We implement technical and organizational measures designed to protect personal information appropriate to the risk, including encryption in transit (TLS) and, where appropriate, at rest; access controls on a least-privilege basis; network and endpoint security; logging and security monitoring; and due diligence over the vendors we use. We maintain processes to detect, investigate and respond to security incidents, and will notify affected individuals and authorities where required by law. No method of transmission over the internet or of electronic storage is completely secure, however, and we cannot guarantee absolute security. Where we hold a relevant third-party security certification or audit report, we can make appropriate information available to customers under confidentiality.

11. International data transfers

IFS is based in the United States, and our affiliates and service providers may be located in the United States, the European Union/EEA, the United Kingdom, the United Arab Emirates and other countries. Where we transfer personal data out of the EEA, the UK or Switzerland to a country not recognized as providing adequate protection, we rely on appropriate safeguards, such as the European Commission's Standard Contractual Clauses (together with the UK International Data Transfer Agreement or Addendum), adequacy decisions where available, or other lawful transfer mechanisms, and we apply supplementary measures where needed. You may request more information about these safeguards using the contact details in Section 15.

12. Automated decision-making and profiling

We do not make decisions producing legal or similarly significant effects about you based solely on automated processing. We use analytics to understand aggregate website usage; this does not constitute automated decision-making about you as an individual.

13. Children's privacy and third-party links

Our website and services are directed to businesses and are not intended for children. We do not knowingly collect personal information from children under 16 (or under the age defined by applicable law, such as 13 under the US Children's Online Privacy Protection Act). If you believe a child has provided us with personal information, please contact us and we will delete it. Our website may contain links to, or integrations with, third-party websites and services that we do not control; their privacy practices are governed by their own policies, and we encourage you to review them.

14. Changes to this policy

We may update this policy from time to time. The "Last updated" date at the top shows when it was last revised. We will indicate material changes by appropriate means, such as a notice on our website. To the extent permitted

by law, your continued use of our website after an update takes effect indicates your awareness of the revised policy.

15. How to contact us

Controller: WWM Infrastructure Services LLC

Address: 2232 Dell Range Blvd, Ste 245, Cheyenne, WY 82009, United States

Privacy and general enquiries: info@ifs-wwm.com · abuse reports: abuse@ifs-wwm.com

EU representative (Article 27, EU GDPR): W.W.M. Holding Limited, 1 Alexandrou Panagouli, 6057 Larnaca, Cyprus

UK representative (Article 27, UK GDPR): *to be appointed for individuals in the United Kingdom*

Complaints: EEA residents may complain to their local data-protection supervisory authority (in Cyprus, the Office of the Commissioner for Personal Data Protection, dataprotection.gov.cy); UK residents to the Information Commissioner's Office (ico.org.uk); US residents may contact their state Attorney General.

Appendix A — California statutory categories of personal information

The following table lists the categories of personal information defined under the CCPA/CPRA and indicates whether we collect each category in connection with our website and business relationships. We collect this information for the business and commercial purposes described in Sections 3 and 4 and disclose it to the categories of recipients in Section 7.

Statutory category	Examples in our context	Collected
A. Identifiers	Name, business email, phone, IP address, online identifiers, account ID	Yes
B. Customer records (Cal. Civ. Code §1798.80(e))	Name, contact details, employer, billing/account-administration details	Yes (business)
C. Protected classifications	Age, gender and similar characteristics	No
D. Commercial information	Services enquired about or purchased; transaction and contract history	Yes (business)
E. Biometric information	Fingerprints, faceprints and similar	No
F. Internet/network activity	Browsing and usage data, interactions, analytics and session data	Yes
G. Geolocation data	Approximate (city/region) location derived from IP address; not precise geolocation	Yes (approximate)
H. Sensory data	Audio or visual information (e.g., a recording you send us)	Only if you provide it
I. Professional/employment information	Job title, role, employer, business relationship	Yes (business)
J. Education information	Education records	No
K. Inferences	Limited preferences drawn from your interactions with us	Limited
Sensitive personal information	Account log-in credentials (if we issue an account); we do not seek other sensitive PI via the website	Limited