



## DISCLOSURE MATERIALS

Certified B Corporations must complete a Disclosure Questionnaire to identify potentially sensitive issues related to the company (e.g. historical fines, sanctions, material litigation, or sensitive industry practices).

This component does not affect the company's score on the B Impact Assessment. If the company answers affirmatively to any items in the Disclosure Questionnaire and B Lab deems them to be material, the company must:

- 1) Be transparent about the disclosure issues identified on the company's public B Impact Report
- 2) Describe how the company has addressed this issue.
- 3) Demonstrate that management systems are in place to avoid similar issues from arising in the future.

In all cases, the Standards Advisory council reserves the right to refuse certification if the company is ultimately deemed not to uphold the spirit of the community.

In addition to the voluntary indication of sensitive issues in the Disclosure Questionnaire, companies pursuing Certification also are subject to background checks by B Lab staff. Background checks include a review of public records, news sources, and search engines for company names, brands, executives/founders, and other relevant topics.

Sensitive issues identified through background checks may or may not be within the scope of questions in the Disclosure Questionnaire, but undergo the same review process and are subject to the same possible review by the Standards Advisory Council, including ineligibility for B Corp Certification, required remediation, or disclosure.

**This document contains a copy of the company's completed Disclosure Questionnaire and related disclosure documentation provided by the company.**



## DISCLOSURE QUESTIONNAIRE

Company Name: WeTransfer

Date Submitted: 03/23/2020

Industries & Products	Yes	No
Please indicate if the company is involved in production of or trade in any the following. Select Yes for all options that apply.		
Animal Products or Services		√
Biodiversity Impacts		√
Chemicals		√
Company Explanation Of Disclosure Item Flags		√
Disclosure Alcohol		√
Disclosure Firearms Weapons		√
Disclosure Mining		√
Disclosure Pornography		√
Disclosure Tobacco		√
Energy and Emissions Intensive Industries		√
Fossil fuels		√
Gambling		√
Genetically Modified Organisms		√
Illegal Products or Subject to Phase Out		√
Industries at Risk of Human Rights Violations		√
Monoculture Agriculture		√
Nuclear Power or Hazardous Materials		√
Payday, Short Term, or High Interest Lending		√
Water Intensive Industries		√
Other		√

Supply Chain Disclosures	Yes	No
Please indicate if any of the following statements are true regarding your company's significant suppliers.		
Business in Conflict Zones		√
Child or Forced Labor		√
Negative Environmental Impact		√
Negative Social Impact		√
Other		√

Other Disclosures	Yes	No
		√

Outcomes & Penalties	True	False
Please indicate if the company has had any formal complaint to a regulatory agency or been assessed any fine or sanction in the past five years for any of the following practices or policies. Check all that apply.		
Anti-Competitive Behavior		√
Breaches of Confidential Information		√
Bribery, Fraud, or Corruption		√
Company Explanation Of Disclosure Item Flags		√
Company has filed for bankruptcy		√
Consumer Protection		√
Financial Reporting, Taxes, Investments, or Loans		√
Hazardous Discharges Into Air/Land/Water (Past 5 Yrs)		√
Labor Issues		√
Large Scale Land Conversion, Acquisition, or Relocation		√
Litigation or Arbitration		√
On-Site Fatality		√
Penalties Assessed For Environmental Issues		√
Political Contributions or International Affairs		√
Recalls		√
Significant Layoffs		√
Violation of Indigenous Peoples Rights		√
Other		√

Practices	True	False
Please indicate if the following statements are true regarding whether or not the company engages in the following practices. Check all that apply. If the statement is true, select "Yes." If false, select "No."		
Animal Testing		√
Company/Suppliers Employ Under Age 15 (Or Other ILO Minimum Age)		√
Company Explanation Of Disclosure Item Flags		√
Company prohibits freedom of association/collective bargaining		√
Company workers are prisoners		√
Conduct Business in Conflict Zones		√
Confirmation of Right to Work		√
Does not transparently report corporate financials to government		√
Employs Individuals on Zero-Hour Contracts		√
Facilities located in sensitive ecosystems		√
ID Cards Withheld or Penalties for Resignation		√
No formal Registration Under Domestic Regulations		√
No signed employment contracts for all workers		√
Overtime For Hourly Workers Is Compulsory		√
Payslips not provided to show wage calculation and deductions		√
Sale of Data	√	
Tax Reduction Through Corporate Shells		√
Workers cannot leave site during non-working hours		√
Workers not Provided Clean Drinking Water or Toilets		√
Workers paid below minimum wage		√
Workers Under Bond		√
Other		√



## B Corp Certification - Disclosure Questionnaire Documentation

PROVIDED BY: WeTransfer

UPDATED AS OF: 03/23/2020

<b>DISCLOSURE QUESTIONNAIRE CATEGORY</b>	Selling or Providing Access to Consumer or User Data
<b>TOPIC</b>	Sharing User Data to Advertising Partners and Third Parties
<b>SUMMARY OF ISSUE</b>	<p>Company shares user data - collected through cookies and similar technology - with their advertising partners so they can measure the performance of their campaigns. A cookie is a small file that can be placed on a user's device that allows WeTransfer to recognise and remember that user. It is sent to the user browser and stored on their computer's hard drive or tablet or mobile device. WeTransfer collects personal information from users such as name, email address, gender, age, city as well as preferences, content and metadata and personal messages (the ones users send to people along with sharing of files). WeTransfer shares some personal user information with other third parties such as Service Providers, Law Enforcement agencies or regulators, Business Partners and other WeTransfer Entities. A list of third party entities are available at this link: <a href="https://wetransfer.com/docs/legal/cookieelist-190527.pdf">https://wetransfer.com/docs/legal/cookieelist-190527.pdf</a></p> <p>Full information on data sharing is available on their online Privacy and Cookie Statement available at the following link: <a href="https://wetransfer.com/legal/privacy">https://wetransfer.com/legal/privacy</a></p>
<b>SIZE/SCOPE OF ISSUE</b> (e.g. \$ financial implication, # of individuals affected)	In 2018, WeTransfer received 43% of its annual revenue from advertising which involved sharing user data with third parties.
<b>IMPACT ON STAKEHOLDER(S)</b>	<p>Users may object to the sharing of data with advertising partners of WeTransfer, in that case the user may choose to clear all their cookies, thereby removing all their stored data.</p> <p>WeTransfer provide an in depth Privacy and Security policy available online at <a href="https://wetransfer.com/legal/privacy">https://wetransfer.com/legal/privacy</a>. They explain that they store user data to be able to provide a variety of different activities such as improved service, support, account and billing, safety, integrity and security, improvement and development, marketing, advertising and communication and legal.</p>
<b>IMPLEMENTED MGT PRACTICES</b>	<p>WeTransfer is implementing changes to ensure that they are fully GDPR compliant with all of their tools, and will continue to update their policies as the GDPR and other data legislation evolves further. They have a dedicated data privacy officer who reports to the CEO as well as an assurance / privacy team. WeTransfer also offers its users the option of requesting a Data Processing Agreement by sending an email to the following address: <a href="mailto:legal@wetransfer.com">legal@wetransfer.com</a>.</p> <p>As WeTransfer is a global business, they may also share or store personal information in countries outside of the European Economic Area (EEA). They make sure that appropriate safeguards are in place in order to ensure user personal information enjoys a similar level of protection as it would within the EEA.</p>
<b>REPORT</b>	WeTransfer policies on cookies and privacy are available at the following link. <a href="https://wetransfer.com/legal/privacy">https://wetransfer.com/legal/privacy</a>