

# PRIVACY POLICY

## ARDENT MILLS' COMMITMENT TO PRIVACY

Your privacy is important to us. This Online Privacy Policy (“Privacy Policy”) explains how we protect your privacy when you visit this Web site and the other Ardent Mills Web sites that display this Privacy Policy (our “Site(s)”). This Privacy Policy describes what types of information we gather and track when you use our Sites, how this information is used and with whom it is shared. If you have any questions about this Privacy Policy, please contact us. This site is operated by the Ardent Mills company established in the country to which the content of the site is directed. This Ardent Mills company is referred to in this Privacy Policy as “Ardent Mills,” “we,” “us,” and “our”.

### SCOPE OF THIS PRIVACY POLICY

This Privacy Policy covers the “personal information” we collect through our Sites.

“Personal information” is information that identifies you personally, either alone or in combination with other information available to us. Examples of personal information include your name, contact details, credit card information, job applications, information you provide when you create an account or a personal profile on one of our Sites and information about the pages you have viewed and the path you have taken through our Sites.

### YOUR CONSENT

Please take a few minutes to review this Privacy Policy. By accessing or using this Site, you are consenting to the collection, use and disclosure of your personal information as set forth in this Privacy Policy.

IF YOU DO NOT CONSENT TO THE COLLECTION, USE AND DISCLOSURE OF YOUR PERSONAL INFORMATION AS SET FORTH IN THIS PRIVACY POLICY, PLEASE EXIT AND DO NOT USE THIS SITE.

### CHANGES TO THIS PRIVACY POLICY

As we add new features and functionality to our Sites, we may need to update or revise this Privacy Policy. We reserve the right to do so, at any time and without prior notice, by posting

the revised version on our Sites. These changes will be effective as of the date we post the revised version on our Sites. They will apply only to the personal information we collect after we have posted the revised version. Your use of one of our Sites following any such change constitutes your consent to the terms of the revised Privacy Policy. For this reason, it is important to review this Privacy Policy regularly.

If we modify this Privacy Policy, we will provide a notice at the top of this Privacy Policy for at least 30 days after the new effective date, so that you can see at a glance whether our Privacy Policy has changed since your last visit. You may access the current version of this Privacy Policy at any time by clicking on the link marked “Privacy Policy” at the bottom of each page of our Sites.

## PRIVACY NOTICES

This Privacy Policy may be supplemented or amended from time to time by “Privacy Notices” posted on our Sites. Generally, Privacy Notices provide details about the personal information we collect on particular pages or particular areas of a Site, why we need that information, and choices you may have about the ways we use that information.

## AGREEMENTS GOVERNING YOUR USE OF SPECIAL FEATURES AND PASSWORD-PROTECTED AREAS OF THIS SITE

Some of our Sites include special features, such as licensed content or an online store, or password protected areas, such as a discussion forum, a chat room, a careers area, or a customers-only area.

When you sign up to use a special feature or password-protected area, you may be asked to agree to special terms governing your use of the special feature or password-protected area. In such cases, you will be asked to expressly consent to the special terms, for example, by checking a box or clicking on a button marked “I agree.” This type of agreement is known as a “click-through” agreement. If any of the terms of the click-through agreement are different than the terms of this Privacy Policy, the terms of the click-through agreement will supplement or amend this Privacy Policy, but only with respect to the matters governed by the “click-through agreement.”

## WHAT PERSONAL INFORMATION DO WE COLLECT THROUGH OUR SITES?

*Information You Provide.* We collect the personal information you knowingly provide (using your mouse and keyboard) when you use our Sites. The information we collect depends on how you use our Sites. For example, if you sign up to receive email communications from us, we collect your email address and any related information you provide. If you communicate with

us using the “Contact Us” feature, we collect the information you provide when you complete the “Contact Us” form.

Generally, our sites distinguish between information we need in order to provide you with a particular product, service or to fulfil your request (“mandatory fields”), and information that although useful is optional with respect to that particular product, service or your request. Please be aware that if you do not provide us with mandatory fields we will not be able to provide you with the product or service or to fulfil your request.

*Supplemental Information.* From time to time, we may supplement the information you give us with information from other sources, such as information validating your address, information based on your zip code, or information about your business. We may also supplement the information you give us with information we collect from you through other Ardent Mills Web sites or other channels. For example, if you are an Ardent Mills customer, we may supplement the information you provide online with information you provide in your other business dealings with Ardent Mills.

*Information Sent to Us by Your Web Browser.* We collect information that is sent to us automatically by your Web browser. This information typically includes your IP address, the identity of your Internet Service Provider, the name and version of your operating system, the name and version of your browser, the date and time of your visit, and the pages you visit. An “IP address” is a unique number that is automatically assigned to your computer when you connect to the Internet. It is used to identify your computer’s “location” in cyberspace, so that the information you request can be delivered to you. If you use a dial-up connection or a connection that assigns dynamic IP addresses, your computer will be assigned a new IP Address each time you connect to the Internet. If, however, your computer is permanently connected to the Internet using a static IP address, the IP address assigned to your computer will generally be the same each time you use your computer. Although it does not identify you by name, we treat your IP address as your personal information.

You should be aware that when you respond to an electronic communication you receive from us, for example, by opening an email, downloading images or clicking on a link in an electronic newsletter, your browser tells us that you (or someone using your email address) has done so. We use this information to improve our marketing efforts. In addition, we review our server logs – which contain visitors’ IP addresses – for security and fraud prevention purposes. If criminal activity is suspected, we may share our server logs and the personal information we have collected through this Site with the appropriate investigative authorities who could use that information to trace and identify individuals.

*Cookies and Similar Technologies.* A cookie is a small file sent by a Web site and stored on a user’s computer which enables the Web site to remember information about you and your preferences. We use “cookies” and other Web technologies in a number of ways. For example, we may use these technologies to

- collect information about the ways visitors use our Sites – which pages they visit, which links they use, and how long they stay on each page;
- to support the features and functionality of our Sites – for example, to save you the trouble of reentering information already in our database or to prompt the settings you established on previous visits to our Sites;
- and personalize your experience when you use our Sites; and
- to measure the success of our web or email advertising.

Some of these uses may involve the use of “third party cookies”; that is, cookies that are set by software used by one of our service providers, such as to carry out statistical analysis of page use, page interactions and paths through the site, or for the purposes of serving internet advertisements using an online advertising supplier.

Generally, the information we collect using these Web technologies does not identify you by name. If, however, you have created a user identity, for example, by signing up to use a password-protected area on one of our Sites, we may link the information we collect using Web technologies to other information that identifies you personally.

If you do not wish to receive cookies, you may set your browser to reject cookies or to alert you when a cookie is placed on your computer. You may also delete our cookies as soon as you leave a Site. Although you are not required to accept our cookies when you visit our Sites, if you set your browser to reject cookies, you will not be able to use all of the features and functionality of our Sites.

## HOW DOES ARDENT MILLS USE YOUR PERSONAL INFORMATION?

Generally we use the personal information we collect through our Sites

- to provide the products, information and services you request;
- for security, credit or fraud prevention purposes;
- to provide you with effective customer service;
- to provide you with a personalized experience when you use our Sites;
- to display personalized advertising when you visit our Sites;
- to contact you with special offers and other information we believe will be of interest to you;
- to contact you with information and notices related to your use of our Sites;
- to invite you to participate in surveys and provide feedback to us;
- to better understand your needs and interests;
- to improve the content, functionality and usability of our Sites;
- to improve our products and services;
- to improve our marketing and promotional efforts; and

- for any other purpose identified in an applicable Privacy Notice or other agreement between Ardent Mills and you.

## TO WHOM DO WE DISCLOSE PERSONAL INFORMATION?

We may share the personal information we collect through our Sites as described below:

*Our Service Providers.* We share personal information with companies and organizations, including subsidiaries and other business entities controlled by Ardent Mills, that perform services on our behalf, for example, companies that provide Web site support services to us.

*Within Ardent Mills.* We may share your personal information within Ardent Mills (that is, among the business units within Ardent Mills) and with any of our affiliates where there is a “need to know” for the purposes set forth in this Privacy Policy.

*Business Transactions.* Ardent Mills may decide, for strategic or other reasons, to sell, buy, merge or otherwise reorganize one or more of its businesses. A transaction of this type may involve the disclosure of personal information to prospective purchasers.

*Business Transfers.* Your personal information may be transferred to a company that has acquired the stock or assets of Ardent Mills or one of our business units, for example, as the result of a sale, merger, reorganization or liquidation.

*Compliance With Laws and Protection of Our Rights and the Rights of Others.* We may disclose personal information when we, in good faith, believe disclosure is appropriate to comply with the law, a court order or a subpoena. We may also disclose personal information to prevent or investigate a possible crime, such as fraud or identity theft; to enforce or apply our online terms of use or other agreements; or to protect our own rights or property or the rights, property or safety of our users or others.

*As Described in a Privacy Notice.* We reserve the right to disclose your personal information as described in any Privacy Notice posted on the Web page where you provide that information. By providing your personal information on that Web page you will be consenting to the disclosure of your personal information as described in that Privacy Notice.

*As Described in a Click-Through Agreement.* We reserve the right to disclose your personal information as described in any click-through agreement to which you have agreed.

## YOUR CHOICES

In some circumstances we give you choices about the ways we collect, use and disclose your personal information. If so, we may ask you to indicate your choices at the time we collect your personal information. If you have created an account or a personal profile on one of our Sites,

you may be able to update some or all of your privacy choices by changing the settings on your account settings or profile page.

## HOW CAN YOU ACCESS, UPDATE OR CORRECT YOUR PERSONAL INFORMATION?

If you have created an account or a personal profile on one of our Sites, you may be able to access and update some or all of your personal information on your account settings or profile page. In most cases, however, you will need our help. If you wish to access, update or correct your personal information, please contact us. We will respond to you within a reasonable time and within the time limits established by applicable law. We may ask you for additional information to verify your identity. In most cases, we will provide access and correct or delete any inaccurate information you discover. In some cases, however, we may limit or deny your request if the law permits or requires us to do so or if we are unable to verify your identity.

## CONTACT US

**Address:**

1875 LAWRENCE STREET, SUITE 1400, DENVER, CO 80202

**Contact Number:**

720-726-8884

## SECURITY

Although we take commercially reasonable measures to protect the confidentiality, integrity and security of your personal information, we cannot guarantee the security of your personal information. For this reason we urge users to take every precaution to protect their personal information while using the Internet.

*SSL Protection.* When you login to use password-protected areas of our Sites, we require that a secure connection between your computer and our server be established. We use an encryption technology called Secure Socket Layers (SSL). A secure connection is maintained until you leave the secure area of the Site. Although we use SSL encryption to safeguard the confidentiality of personal information as it travels over the Internet, "perfect security" does not exist on the Internet and we cannot guarantee the safety of transmitting personal information over the Internet.

*Password Protection.* Certain areas of our Sites are password protected. You are responsible for maintaining the confidentiality of your passwords. We have the right to assume that anyone

accessing one of our Sites using a password assigned to you has the right to do so. You will be solely responsible for the activities of anyone accessing our Sites using a password assigned to you, even if the individual is not, in fact authorized by you. If you have reason to believe that your password has been compromised or used without authorization, you must promptly change it using the functionality provided on the Site.

## **LINKS TO OTHER ARDENT MILLS WEB SITES**

Ardent Mills operates many different Web sites, each with its own content, features, and functionality. Each Ardent Mills Web site serves a different purpose. For this reason, not all of our Web sites are governed by this Privacy Policy. When you use a link on one of our Sites to access another Ardent Mills Web site, take a minute to review the privacy policy posted on that Web site.

## **LINKS TO THIRD-PARTY WEB SITES**

This Site may also contain links to Web sites operated by other companies, including websites operated by our third-party service providers, and unrelated third parties. This Privacy Policy does not apply to personal information collected on any of these other Web sites. When you access third-party Web sites through a link on one of our Sites, please take a few minutes to review the privacy policy posted on that site.

## **CHILDREN'S PRIVACY**

Our Sites are not directed at children under the age of 13, and we do not use our Sites to knowingly solicit personal information from or market to children under the age of 13. If we learn that someone under 13 has provided personally identifiable information through one of our Sites, we will use reasonable efforts to remove that information from our databases.

## **SPECIAL NOTICE FOR VISITORS**

Ardent Mills does business in many countries and we may transfer your personal information across national borders for the purposes described in this Privacy Policy. Our headquarters are in Denver, Colorado in the United States of America. Our Web servers and databases are located in the United States or in other countries and the information on these servers and databases may be accessed by our staff (or staff of our service providers) located in other countries where they have a “need to know”. Different countries have different privacy laws and requirements, and some, including the United States, provide less legal protection for your personal information than others. Please know, however, that no matter where your personal information is collected, used, transferred or stored, if it was collected through our Sites, it will be processed in accordance with this Privacy Policy and any privacy notices or click-through agreements that apply to you.

BY USING THIS SITE, YOU ARE CONSENTING TO THE COLLECTION, USE, AND TRANSFER OF YOUR PERSONAL INFORMATION IN OR TO THE UNITED STATES OR ANY OTHER COUNTRY IN THE WORLD.

## QUESTIONS ABOUT OUR PRIVACY PRACTICES

If you have questions about this Privacy Policy or our privacy practices:

- Send an e-mail to: [info@ardentmills.com](mailto:info@ardentmills.com)
- Write to us at:  
Web Privacy Inquiries Ardent Mills  
1875 Lawrence Street  
Denver, CO 80202

## BUSINESS INFORMATION NOTICE

This Notice explains how Ardent Mills uses Personal Information about you in a business context if you are:

- a Supplier or if you represent an organization that is a Supplier;
- a Customer or if you represent an organization that is a Customer; or
- Web Users.

We refer to this as “Business Information.”

“Ardent Mills” means Ardent Mills Solutions, LLC, a commodity trading advisor, and their subsidiaries and affiliates worldwide. “Supplier” means a current or prospective vendor, supplier, subcontractor or partner of Ardent Mills. “Customer” means a customer, prospective customer or target customer of Ardent Mills. “Web User” means a user of an Ardent Mills internet website. “Third Party Service Provider” means a third party vendor or supplier outside Ardent Mills who may have access to Business Information in providing services to Ardent Mills. “Personal Information” means information relating to an identified or identifiable natural person that is processed by or on behalf of Ardent Mills by automatic means.

### 1. WHAT BUSINESS INFORMATION DOES ARDENT MILLS COLLECT?

The type of Business Information that Ardent Mills collects and uses depends on the particular business context and the purpose for which it was collected. It may include:



- contact details (such as your name, job title, gender, work address, telephone numbers, email address, fax numbers and so on);
- details of your relevant experience and/or academic and professional qualifications (for example, if you are employed by a vendor);
- details of your business and other interests and opinions (for example, where information is held in a Customer Relationship Management database);
- for Web Users, information relating to your use of the Ardent Mills website, including the content of web forms, contributions made to any discussion
- forums and browsing history, IP addresses and your path through the Ardent Mills website;
- credit card details, credit worthiness, and other financial-related information, such as your bank account number and other relevant payment-related information collected in support of a business transaction;
- CCTV images and visit information for visitors to Ardent Mills sites.

## 2. WHAT WILL ARDENT MILLS DO WITH YOUR BUSINESS INFORMATION?

Generally, Ardent Mills only uses Business Information for one or more of business-related purposes below:

- Negotiating, concluding and performing contracts with Customers (including the provision of financial services and advice);
- Managing Ardent Mills accounts and records;
- Advertising, marketing and public relations (including direct marketing);
- Market Research and competitor analysis;
- Negotiating, concluding and performing contracts with Suppliers;
- Communicating with Individuals that are, or who represent, Customers, Suppliers or Web Users;
- Operating the Ardent Mills website, including the use of analytics software;
- Supporting Ardent Mills' corporate social responsibility activities;
- Facilitating the security of Ardent Mills sites, websites and other assets;
- Legal and regulatory compliance and internal control evaluations and audits (including where conducted by Ardent Mills' internal and external audit service providers);
- Debt administration; and/or
- Obtaining legal advice, including for legal proceedings and litigation and also in connection with the sale, purchase or merger of a business.

## 3. ARDENT MILLS DATA PRIVACY PRINCIPLES

Ardent Mills observes the following principles in relation to Business Information:

- We process it fairly and lawfully;

- We process it for a specific legitimate business purpose and do not process in a manner incompatible with that purpose without your knowledge and/or consent;
- We use Business Information that is adequate, relevant and not excessive for the purpose for which it is processed;
- We keep it accurate and, as necessary, up to date;
- We keep it in a form which permits identification for no longer than necessary for the purpose for which it was collected;
- We protect it against accidental or unlawful destruction or accidental loss, alteration, unauthorised disclosure or access, using appropriate technical and organisational measures;
- We process it in accordance with an Individual's rights.

## 4. WHO IS YOUR BUSINESS INFORMATION DISCLOSED TO?

### (a) Within Ardent Mills

Ardent Mills restricts access to Business Information to people within the company who have a “need to know” that information. As a company doing business across national borders and with certain shared services and resources, there are many situations where this “need to know” requires your information to be transferred to Ardent Mills in another country, including countries that may provide no legal protection for Personal Information. However, the purpose of the Ardent Mills Data Privacy Policy is to ensure protection for your Business Information in every country where Ardent Mills does business.

### (b) Outside Ardent Mills

Generally, Ardent Mills will only disclose your Business Information outside Ardent Mills and its Third Party Service Providers:

- when required to do so by law;
- where necessary to engage a new Third Party Service Provider;
- in response to a legitimate request for assistance by the police or other law enforcement agency;
- to protect an individual's vital interests;
- to seek legal advice from Ardent Mills' external lawyers or in connection with litigation with a third party;
- in connection with the sale, purchase or merger of a business; or
- to engage external auditors to validate Ardent Mills' financial accounts;
- and will only do so in accordance with any applicable local laws.

## 5. EXERCISING YOUR RIGHTS

### (i) Web Users, Customers and those representing Customers

If you would like a copy of any of your Business Information or if you would like to update or

correct it or you would like to request Ardent Mills to stop sending you marketing materials either generally or via a particular media, please contact Ardent Mills.

If you have a concern about how Ardent Mills has used your Business Information, as a first step, you should raise the concern in writing to the Ardent Mills business with which you do business.

**(ii) Suppliers and those representing Suppliers**

If you would like a copy of any of your Business Information or if you would like to update or correct it, please contact Ardent Mills' Privacy Office at [info@ardentmills.com](mailto:info@ardentmills.com).

If you have a concern about how Ardent Mills has used your Business Information, as a first step, you should raise the concern in writing to Ardent Mills' Privacy Office using the details set out above.

The Privacy Office will respond to you in writing within a reasonable time setting out its conclusions together with details of any remedial action that it proposes to take.