



## Online Privacy Policy

### A. GENERAL INFORMATION

#### 1. Overview

At Archer Daniels Midland Company “ADM” (“we” “our” or “us”), we are committed to protecting the confidentiality, accuracy and integrity of any personal data you provide to us. We always strive to safeguard such data from misappropriation, loss, misuse, unauthorized access, disclosure and/or alteration. We only collect personal data that is relevant for our described purposes.

#### 2. Scope

This Online Privacy Notice has been created for all website users, suppliers and customers to provide relevant information and demonstrate that your personal data is processed in a legal and responsible manner.

However, information in grey is only applicable only where *Regulation EU 2016/679 (GDPR)* applies to you. The GDPR applies to you where the processing of your personal data is done in the context of the activities of a relevant establishment in the Union, or where the offering of goods or services, or the monitoring of your behaviour, has occurred and you are in the Union.

#### 3. Controller

Below are the contact details of the ‘Controller’ of your data - that is, the entity responsible - and also the contact details of our Data Protection Officer.

Controller	EU Data Protection Officer
ADM Group 4666 Faries Parkway, Decatur, IL, 62526 United States  Telephone: +1 217 451 6194 Email: <a href="mailto:dataprivacy@adm.com">dataprivacy@adm.com</a>  Our EU representative & Global Privacy Lead:  Global Privacy Lead c/o ADM Germany GmbH Ferdinandstraße 5 20095 Hamburg Germany	EU Data Protection Officer c/o ADM Germany GmbH Ferdinandstraße 5 20095 Hamburg Germany  Telephone: 0049 (0) 40 3013 774 Email: <a href="mailto:privacyeu@adm.com">privacyeu@adm.com</a>  <i>You can contact the Data Protection Officer in relation to any questions, comments or complaints you have regarding your personal data.</i>

### B. INFORMATION FOR WEBUSERS

#### 1. Purpose and Legal Basis

Below you will find information about how we process your personal data, the purpose for our processing of your personal data and the legal basis for our processing of your personal data according to the GDPR if applicable.

<b>Website visitor</b> <i>(this data is always collected and processed by us when you visit our site)</i>	
<b>Purpose of the processing</b>	<b>Legal basis for our processing (EU)</b>
(i) Personalised advertising; (ii) Technical provision & optimisation of our site; (iii) Understand your interests; (iv) Provide information, products and services.	Article 6(1)(f): Our legitimate interest is: (i) To provide you with personalised advertising for ADM when you leave our site; (ii) The successful technical provision of our website, the IT security and its continued optimisation by utilising user data; (iii) To understand what parts of our website you visit, and which of our products do you seek information; (iv) To provide you with information about our company and our products and services.

<b>Communications, Contact &amp; Downloads</b>	
<b>Purpose of the processing</b>	<b>Legal basis for our processing (EU)</b>
(i) To make contact with you where you have so requested (primarily for investor communications and annual reports); (ii) To send you a quote; (iii) Allow you to contact us; (iv) To allow you to download materials relevant to your interests; (v) To send you promotional material from time to time.	Article 6(1)(f): Our legitimate interest is: (i) To make contact with you where you so request; (ii) To send you a quote where you so request; (iii) To allow you to contact us where you so wish; (iv) To allow you to download relevant materials:  Article 6(1)(a): Consent. (v) <i>Your consent is entirely voluntary and can be withdrawn at any time.</i>

<b>'ADM Delivers' &amp; Logistics</b>	
<b>Purpose of the processing</b>	<b>Legal basis for our processing (EU)</b>
(i) To provide you with a quote from our logistics team; (ii) The provision of our ADM Delivers portal;	Article 6(1)(b) <i>The provision of the personal data for these purposes is not mandatory by law or contract however, achieving the planned purpose for the processing will be considerably restricted.</i>

<b>Careers</b>	
<b>Purpose of the processing</b>	<b>Legal basis for our processing (EU)</b>
(i) The provision of our ADM job board 'ADM Global Link'; (ii) Facilitating your job application; (iii) Assessing your job application; (iv) Contacting you further.	Article 6(1)(b) <i>The provision of the personal data for these purposes is not mandatory by law or contract however, achieving the planned purpose for the processing will be considerably restricted.</i>

<b>ADMFarmview (e-ADM)</b>	
<b>Purpose of the processing</b>	<b>Legal basis for our processing (EU)</b>
(i) The provision of our ADMFarmview portal and software.	Article 6(1)(b) <i>The provision of the personal data for these purposes is not mandatory by law or contract however, achieving the planned purpose for the processing will be considerably restricted.</i>

<b>Credit (e-ADM)</b>	
<b>Purpose of the processing</b>	<b>Legal basis for our processing (EU)</b>
(i) Provision of our ADM credit service; (ii) Process your credit application; (iii) Process invoices and trading information; (iv) Manage ADM account information; (v) Security and/or fraud prevention.	Article 6(1)(b) <i>The provision of the personal data for these purposes is not mandatory by law or contract however, achieving the planned purpose for the processing will be considerably restricted.</i>

<b>Help Desk (e-ADM)</b>	
<b>Purpose of the processing</b>	<b>Legal basis for our processing</b>
(i) Provision of our helpdesk service; (ii) Provide you with assistance where you request it.	Article 6(1)(b) <i>The provision of the personal data for these purposes is not mandatory by law or contract however, achieving the planned purpose for the processing will be considerably restricted.</i>

<b>Futures &amp; Options (e-ADM)</b>	
<b>Purpose of the processing</b>	<b>Legal basis for our processing</b>



(i) Provide our futures, commodities and options service/portal	Article 6(1)(b) <i>The provision of the personal data for these purposes is not mandatory by law or contract however, achieving the planned purpose for the processing will be considerably restricted.</i>
(ii) Allow you to run reports based on your interest in this area	

<b>e-ARTCO Barge Management System (e-ADM)</b>	
<b>Purpose of the processing</b>	<b>Legal basis for our processing</b>
(i) Provision of our e-ARTCO Barge Management system/portal	Article 6(1)(b) <i>The provision of the personal data for these purposes is not mandatory by law or contract however, achieving the planned purpose for the processing will be considerably restricted.</i>

**2. Recipients of your Personal Data**

Here you will find information about recipients to whom we may need to share your personal data. We only share your personal data where it is necessary. We will never share your personal data without a valid reason or interest connected to the above stated purpose.

<b>Recipient</b>	<b>Function</b>
ADM Group	ADM may share your personal information with subsidiaries and affiliated companies to provide the services you have requested. These subsidiaries and affiliated companies will handle your personal data in accordance with this Notice.
Unaffiliated third parties	<ol style="list-style-type: none"> <li>1. ADM may share your personal data with unaffiliated third parties who perform administrative, marketing, professional or technological support functions;</li> <li>2. ADM may share your personal data with unaffiliated third parties with whom we enter into joint venture agreements, branding agreements or other strategic alliances, or in the event of a sale, merger, reorganization, liquidation or other similar event;</li> <li>3. ADM may share your personal data with unaffiliated third parties who help us to process your requests to do business with ADM, such as processing a credit application, performing a background check based on reference information, managing ADM account information, facilitating trading and processing payments;</li> <li>4. ADM may share your personal data with third parties who assist us with our job boards, or with whom we have agreements.</li> </ol>
Authoritative bodies	ADM may be required to disclose personal data by law or legal process, for the administration of justice, for investigation of breaches, for interacting with governmental anti-fraud databases, to protect the security or integrity of our databases or this website, to protect and defend the rights or property of ADM, to protect the personal safety of ADM website users, to take precautions against legal liability, to protect your or our legal claims and interests, defend against litigation and to comply with a government organization. We reserve the right to contact appropriate authorities when activities that are illegal or violate our policies occur on an ADM website.

**3. Transfer to third countries and/or international organisations**

If you are located in the European Union, personal data collected will be processed in a country where the adequacy of that countries data protection laws have not been approved by an adequacy decision of the European Commission. ADM is a US based company and therefore personal data processing occurs in the USA, but also some of the service providers are based outside the EU. Where we transfer personal data in this manner, ADM will ensure that any such agreements involving the processing of your personal data will be concluded so that your personal information is protected to an acceptable EU standard under standard EU contractual clauses for the transfer of data, which provide you and your personal data with adequate safeguards. If you would like more information as to how we protect your personal data in these circumstances, please contact your Data Protection Officer with the contact details that we provided above.

**4. Storage of your Personal Data**



We only store your personal data for a period reasonable for our purposes of processing and/or for a period of time that is required of us by the laws applicable in your local area. We do not process your data any longer than we need to.

If you would like more information about our retention periods, please contact our Data Protection Officer with the contact details that we provided above.

**5. Use of Google Analytics & Cookies**

Whilst we do not interfere with any cookies preferences you have submitted with your browser, this website does use Google Analytics, a web analysis service provided by Google Inc. ('Google'). If you have consented to the processing of third party cookies in your browser settings, your personal data will be processed in this way by our site.

Google Analytics uses "cookies"; these are text files which are stored on your computer to analyse the way you use the website. The information about the way you use this website created by the cookie is sent to and stored on a Google server in the USA.

If the IP anonymization is activated on this website, Google will first truncate your IP address in Member States of the European Union or in other state parties to the Agreement on the European Economic Area. Only in exceptional cases is the full IP address sent to and truncated on a Google server in the USA. Google uses this information on behalf of the website operator to evaluate the way you use the website, to collate reports on website activities and to provide the website operator other services related to website and Internet use.

In addition, we use Google Conversion Tracking in conjunction with Google Analytics. This will allow us to measure the behaviour of our website users. For example, we can see how many PDFs have been downloaded or how many times our contact form has been used. Likewise, we can ascertain how many clicks on advertisements from external sources (AdWords, LinkedIn, Xing, Bing) have led to our website.

The IP address sent by your browser as part of Google Analytics is not combined with other data held by Google. You can change your browser settings to prevent cookies from being stored; however, we draw your attention to the fact that, in these circumstances, you may find that you are unable to make full use of functions on the website. You can also prevent the data (including your IP address) relating to your use of the website which is captured by the cookie being sent to or processed by Google by downloading and installing the browser plug-in from the following link <https://tools.google.com/dlpage/gaoptout?hl=en>.

The legal basis is Art. 6 (1) f, our interest is the website optimization.

For further information please visit <https://www.google.com/analytics/terms/us.html> or <https://www.google.de/intl/en/policies/>

**6. External Links**

This website may provide links to external websites. When you click on one of these links, you will be transferred from this website and connected to the website of the organization or company that you have selected. Even if an affiliation exists between ADM and such a website, ADM may not exercise any control over linked sites and we do not imply any endorsement of the activities of these websites. Unless specifically stated, this Policy does not govern the data collection and use practices of those websites and we cannot ensure they are compliant with the data protection standards contained in this Policy.

If you visit a website that is linked from this website, you should familiarize yourself with that site's privacy practices before providing any personal information.

**C. INFORMATION FOR CUSTOMERS AND SUPPLIERS**

**1. Purposes and Legal Basis**

Below you will find information relevant in the instance that ADM processes personal data about you where you are a customer or supplier.

Managing contractual relationship	
Purpose of the processing	Legal basis for our processing (EU)



<ul style="list-style-type: none"> <li>(i) Management of contact persons;</li> <li>(ii) Facilitate communications;</li> <li>(iii) Manage and facilitate the information flow.</li> </ul>	<p>Article 6(1)(f): Our legitimate interest is:</p> <ul style="list-style-type: none"> <li>(i) <i>Managing contact persons for communication and customer care;</i></li> <li>(ii) <i>Facilitate communications relevant to the contractual relationship;</i></li> <li>(iii) <i>Process information relevant to the contractual relationship.</i></li> </ul> <p><u>Where this is a direct contractual relationship:</u>  Article 6(1)(b)  <i>The provision of the personal data for these purposes is not mandatory by law or contract however, achieving the planned purpose for the processing will be considerably restricted.</i></p>
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<b>Marketing</b>	
<b>Purpose of the processing</b>	<b>Legal basis for our processing (EU)</b>
<ul style="list-style-type: none"> <li>(i) Send you marketing material, such as emails, newsletters, technical information or legal updates</li> </ul>	<p>Article 6(1)(a): Consent  <i>Where we explicitly ask for your consent; your consent is entirely voluntary and can be withdrawn at any time.</i></p> <p>Article. 6 (1) (f): Our legitimate interest is:  <i>Where your electronic contact details have been collected in the context of the sale of a product or service, such contact details may be used for our interest of direct marketing of similar products and/or services; you can object to the processing at any time.</i></p>

**2. Storage of your personal data**

The personal data noted above shall be deleted after the expiry of the purpose for which they were collected, insofar as no legal archiving rights, obligations or warranty periods justify a storage or retention of the personal data for other legal reasons.

**3. Recipients of your Personal Data**

Generally, your personal data will not be transmitted to third parties, unless there is a relevant need in conjunction with the above stated purposes, as outlined below:

<b>Recipient</b>	<b>Function</b>
ADM Group	ADM may share your personal information with subsidiaries and affiliated companies to provide the services you have requested. These subsidiaries and affiliated companies will handle your personal data in accordance with this Notice.
Unaffiliated third parties	<ol style="list-style-type: none"> <li>1. Insofar as your personal data is maintained in a CRM system, your personal data will be shared with the companies who provide such services and will be physically processed by them accordingly;</li> <li>2. Where we engage external service providers to support us in promotional and/or advertising activities, your personal data will be shared accordingly.</li> </ol>

**4. Transfer to third countries and/or international organisations**

If you are located in the European Union, personal data collected will be processed in a country where the adequacy of that countries data protection laws have not been approved by an adequacy decision of the European Commission, especially as ADM is a US based company and therefore personal data processing occurs in the USA. Where we transfer personal data in this manner, ADM will ensure that any such agreements involving the processing of your personal data will be concluded so that your personal information is protected to an acceptable EU standard under standard EU contractual clauses for the transfer of data, which provide you and your personal data with adequate safeguards. If you would like more information as to how we protect your personal data in these circumstances, please contact your Data Protection Officer with the contact details that we provided above.

**D. Personal Data Rights**

**1. Your rights**

You have many actions available to you in relation to our processing of your data. You may use the contact information below to request:



- a. *Access to your data*, pursuant to Article 15 GDPR: You have the right to request information as to whether we are processing personal data concerning you, and subsequent access to this personal data.
- b. *Rectification of your data*, pursuant to Article 16 GDPR: You have the right to the rectification of your personal data that is inaccurate or incomplete, this includes by means of a supplementary statement.
- c. *Erasure of your data*, pursuant to Article 17 GDPR: You have the right to ask us for the erasure of your personal data, where no exemption for retaining the personal data applies.
- d. *Restriction of our processing of your data*, pursuant to Article 18 GDPR: You have the right to request a restriction on the processing of your personal data in particular circumstances.
- e. *Data Portability*, pursuant Article 20 GDPR: In some circumstances, you may be entitled to request that your personal data be provided to you in machine readable format. This is applicable where the processing of your personal data is based on consent (Article 6(1)(a)), where special categories of personal data are being processed based on consent (Article 9(2)(a)), or where your personal data is processed on the basis of Article 6(1)(b). This right to data portability includes the right to have your personal data transferred directly to another controller.

*If you wish to exercise these rights, please contact our DPO at [privacyeu@adm.com](mailto:privacyeu@adm.com).*

- f. ***Objection to our processing of your data***, pursuant to Article 21 GDPR: Where your personal data is processed for the purpose of performing tasks carried out in the public interest (Article 6(1)(e)), for the purpose of legitimate interests of the controller (Article 6(1)(f)), or for the purpose of direct marketing and profiling related to this (Article 21(2)), you are able, based on the grounds relating to your particular situation, to object to the processing of your personal data.

**(Where the processing of your personal data is based on your consent, you are not able to object to this processing pursuant to Article 21 of the GDPR. However, you do have the right to withdraw your consent based on Article 7(3) of the GDPR. This shall have the same practical effect as objecting to the processing, should you wish to do so).**

## **2. Complaints**

You may submit a general complaint regarding your personal information to a supervisory authority regarding our processing of your personal data.

## **Comments**

All comments relating to this Notice and/or regarding your personal data should be directed to our Data Privacy Team at [dataprivacy@adm.com](mailto:dataprivacy@adm.com).