



ARCHER DANIELS MIDLAND

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: dataprivacy@adm.com 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: privacyeu@adm.com <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.

Website visitor <i>(this data is always collected and processed by us when you visit our site)</i>	
Purpose of the processing	Legal basis for our processing (EU)
(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.
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Communications, Contact & Downloads

Purpose of the processing	Legal basis for our processing (EU)
(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>

'ADM Delivers' & Logistics

Purpose of the processing	Legal basis for our processing (EU)
(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>

Careers

Purpose of the processing	Legal basis for our processing (EU)
(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>

ADMFarmview (e-ADM)

Purpose of the processing	Legal basis for our processing (EU)
(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>

Credit (e-ADM)

Purpose of the processing	Legal basis for our processing (EU)
(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>

Help Desk (e-ADM)

Purpose of the processing	Legal basis for our processing
(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>



Futures & Options (e-ADM)	
<i>Purpose of the processing</i>	<i>Legal basis for our processing</i>
(i) Provide our futures, commodities and options service/portal (ii) Allow you to run reports based on your interest in this area	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>

e-ARTCO Barge Management System (e-ADM)	
<i>Purpose of the processing</i>	<i>Legal basis for our processing</i>
(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.

Recipient	Function
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"> 1. ADM may share your personal data with unaffiliated third parties who perform administrative, marketing, professional or technological support functions; 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; 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; 4. ADM may share your personal data with third parties who assist us with our job boards, or with whom we have agreements.
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. Website Cookies

Our website uses cookies. Cookies are small text files that are stored on your device when you visit our website. Each time you visit, this cookie information is returned to us. This allows us to recognize you, for example, or to help you navigate by using the information in the cookies. Cookies cannot be used to launch programs or to transfer viruses to a computer. The reading of cookies is only possible through the web server from which they originated.

You can also view our website without cookies. To prevent the use of cookies, you may disable the use of cookies through the settings of your internet browser. The help functions of your Internet browser will generally tell you how to deactivate and/or delete cookies. Please note that disabling and/or deleting cookies may cause certain features on our site to stop functioning as expected.

Cookies that we use for certain functions include:

- (1) Cookies that store certain user preferences (e.g. search or language settings);
- (2) Cookies that store data to ensure trouble-free playback of video or audio content;
- (3) Cookies that temporarily store certain user entries;
- (4) Cookies used to identify or authenticate our users.

We store this cookie data until the end of the term of a particular cookie or until the cookies are deleted by you.

These processing operations are based on Article 6(1)(f) of the GDPR. Our interest is the ongoing optimization and usability of our website.

6. Third Party Cookies

This website uses Third Party Cookies & Analytics. You can find specific information about these below:

Google Inc.

This website uses cookies managed by Google Inc. ("Google") for the purpose of analysing internet and website usage, and often also for advertising. Personal data processed in this context is your IP address (which will entail your location data) and further information produced by your movements on the internet in connection with that IP address.

This data is fully pseudonymised. The IP address sent by your browser as part of Google Analytics is not combined with other data held by Google. In some cases, the truncating of your IP address occurs so swiftly that no personal data is stored by Google for these purposes. This means in those circumstances, the information collected by Google is entirely anonymised. Some processing by Google will only occur in the European Union. For some cookies, the processing will occur on servers located in the United States. Safeguards for your personal data where this occurs are that Google Inc. is Privacy Shield certified, meaning your personal data is processed to a standard acceptable under EU expectations.

Below you will find information about the sort of Google cookies used by this website. You are able to manage the way Google uses your information and/or the way Google cookies track you on this site. All Google cookies preferences can be managed at the following link: <https://policies.google.com/technologies/managing?hl=en>

Cookies used in this context on this site are:

- a) *Google Analytics*: Google Analytics is a web analysis service provided by Google. 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.
- b) *Google Tag Manager*: Google Tag Manager is a tag management service. It is a service provided by Google that facilitates the updating of tags for conversion tracking, site analytics and other Google cookie management.
- c) *DoubleClick*: Doubleclick is an advertisement management and bidding service that streamlines advertisements. As a user, this means that cookies allow Google to serve ads based on previous visits to our or other websites on the Internet based on your movements.



d) *DoubleClick Floodlight*: Doubleclick Floodlight is a system used in conjunction with Doubleclick to track and report conversions.

By using our webpages, you agree to the processing of the data collected about you by Google in the manner described above. You can prevent the storage of such cookies by ensuring your settings are set accordingly in your internet browser, including by using the link provided above. Please note, your use of our website may be affected where you block or ban tracking cookies. If you would like further information about Google’s Privacy Policy, that information can be found here: <https://policies.google.com/privacy?hl=en>.

These processing operations are based on Article 6(1)(f) of the GDPR. Our interest is the ongoing optimization and usability of our website.

Other

For users based in the US, we may engage third parties to process or otherwise analyze other web-tracking technologies used by ADM. This may include cookies, pixels, beacons, or other technologies that track the amount of time spent on our sites or social media and whether or not certain content, such as video was viewed. Third parties who will access this information are generally our direct marketing partners. ADM may also engage in interest-based advertising, meaning that you may see advertising on our website tailored to how you browse or shop, or you may see advertising for ADM on other websites based on your general web-browsing behavior.

7. Location Targeted Advertising & Tracking

For individuals located in the United States of America, we may use targeted advertising technologies that are able to identify your mobile device based on your location. Where your device is intercepted in a relevant location, your IP address and location will be processed in order to provide specific advertising relating to ADM. This occurs at specific events where ADM is present, including fairs. When such processing occurs, you will be presented with ADM advertising when you open an internet browser on your device.

You can opt-out of receiving interest-based ads from third parties who are members of the Network Advertising Initiative (NAI) or who follow the Digital Advertising Alliance’s Self-Regulatory Principles for Online Behavioral Advertising by visiting the opt-out pages on the NAI website and DAA website. (<http://www.networkadvertising.org/choices/>) and (<http://www.aboutads.info/choices/>).

8. 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, SUPPLIERS, LOGISTICS PARTNERS & PUBLIC

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, supplier, a member of the general public or logistics partner.

Managing contractual relationship	
Purpose of the processing	Legal basis for our processing (EU)
(i) Management of contact persons; (ii) Facilitate the performance of the contractual relationship and fulfilment of contractual rights and obligations	Article 6(1)(f): Our legitimate interest is: (i) <i>Managing contact persons for communication and customer care;</i> (ii) <i>Carrying out of the contractual relationship and related rights and obligations;</i>



and related services, including the optimization of processes; (iii) Facilitate communications; (iv) Manage and facilitate the information flow.	(iii) <i>Facilitate communications relevant to the contractual relationship;</i> (iv) <i>Process information relevant to the contractual relationship.</i> <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>
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Marketing	
<i>Purpose of the processing</i>	<i>Legal basis for our processing (EU)</i>
(i) Send you marketing material such as emails and/or newsletters, allow you to participate in prize competitions or other promotional offers, or send you technical information and/or legal updates.	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> <u>Where you enter into a contractual relationship with us:</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> 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>

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:

Recipient	Function
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	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; 2. Where we engage external service providers to support us in promotional and/or advertising activities, your personal data will be shared accordingly. 3. Where it is necessary for the carrying out of a contractual relationship, we will share your data with partners, customers and suppliers (including logistics partners).

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.

- 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.