

# ARCHER DANIELS MIDLAND COMPANY

## California Resident Privacy Notice

Last Updated: December 16, 2019

### A. SCOPE

This California Resident Privacy Notice (“Notice”) applies to California residents (“you” or “your”) and the collection, use retention, destruction or transfer (“processing”) of your Personal Information by Archer Daniels Midland Company (“ADM,” “we,” “our,” or “us”) where such processing may be governed by the California Consumer Privacy Act (“CCPA”). This Notice applies to you and your Personal Information when it is processed: (1) through ADM websites or mobile applications (“Internet/Network Information”), (2) in connection with your job application, your work for ADM, or ADM-sponsored benefits (“Employment Information”), or (3) through other interactions with us, such as in business-to-business contexts (“B2B Information”), futures trading, sales, marketing or other circumstances.

The Personal Information we process and your CCPA rights in connection with it are subject to certain CCPA exemptions. These exemptions include, but are not limited to, B2B Information, Employment Information, or financial information subject to Gramm-Leach-Bliley Act (“GLBA”, which is the federal privacy law applicable to financial institutions) (see Section C.2).

ADM.com Users: Please read this Notice in conjunction with ADM’s Online Privacy Policy available at <https://www.adm.com/privacy-statement>.

### B. PERSONAL INFORMATION PROCESSING

#### 1. Personal Information Processed in the Past 12 Months

Personal Information broadly refers to information about you or your household. It is routine for us to process Personal Information about you over the course of your relationship with us in order to manage our business and provide services to you.

We primarily collect and share information as required by law, with third parties who we contract with to provide products or services to you, or as otherwise needed to operate and monitor our core business activities. The following chart describes more specifically how we may have processed Personal Information in the last 12 months. **ADM does not sell your Personal Information and has not sold it in the last 12 months. Additionally, ADM does not share Personal Information with third parties for their own marketing purposes.**

<b>Personal Information Category</b>	<b>From Whom Collected</b>	<b>Purpose</b>	<b>With Whom Potentially Shared</b>
Personal Identifiers (e.g., name, contact information, Social Security Number, etc.)	<ul style="list-style-type: none"> <li>• Directly from you</li> <li>• Service Providers</li> <li>• Business Partners, including Joint Venture and Strategic Partners</li> <li>• Publicly Available Sources</li> </ul>	<ul style="list-style-type: none"> <li>• Provide/perform services for you</li> <li>• Carry out contractual obligations</li> <li>• Market to you</li> <li>• Manage human resources and benefits</li> <li>• Comply with laws and regulations</li> </ul>	<ul style="list-style-type: none"> <li>• Service Providers</li> <li>• Government Agencies/Law Enforcement</li> <li>• Business Partners, including Joint Venture and Strategic Partners</li> </ul>
California Customer Records Statute Information (to extent not a Personal Identifier, e.g., employment history, insurance information)	<ul style="list-style-type: none"> <li>• Directly from you</li> <li>• Service Providers</li> </ul>	<ul style="list-style-type: none"> <li>• Provide/perform services for you</li> <li>• Carry out contractual obligations</li> <li>• Manage human resources and benefits</li> <li>• Comply with laws and regulations</li> <li>• Conduct analytics</li> </ul>	<ul style="list-style-type: none"> <li>• Service Providers</li> <li>• Government Agencies/Law Enforcement</li> </ul>
Protected Classification Information (e.g., demographics)	<ul style="list-style-type: none"> <li>• Directly from you</li> </ul>	<ul style="list-style-type: none"> <li>• Comply with laws and regulations</li> <li>• Conduct analytics</li> </ul>	<ul style="list-style-type: none"> <li>• Government Agencies/Law Enforcement</li> </ul>
Commercial Information (e.g., information about you've bought from or sold to us or other business interactions)	<ul style="list-style-type: none"> <li>• Directly from you</li> <li>• Service Providers</li> <li>• Business Partners, including Joint Venture and Strategic Partners</li> </ul>	<ul style="list-style-type: none"> <li>• Provide/perform services for you</li> <li>• Carry out contractual obligations</li> <li>• Market to you</li> <li>• Comply with laws and regulations</li> <li>• Conduct analytics</li> </ul>	<ul style="list-style-type: none"> <li>• Service Providers</li> <li>• Business Partners, including Joint Venture and Strategic Partners</li> </ul>

Biometric Information (e.g. fingerprints, retina scans, etc.)	Not applicable	Not applicable	Not applicable
Internet/Network Information (interactions with our network or digital sites)	<ul style="list-style-type: none"> <li>• Directly from you</li> <li>• Digital Devices you use</li> <li>• Service Providers</li> <li>• Security Monitoring Devices</li> </ul>	<ul style="list-style-type: none"> <li>• Provide/perform services for you</li> <li>• Comply with laws and regulations</li> <li>• Monitor our systems and assets</li> <li>• Conduct analytics</li> </ul>	<ul style="list-style-type: none"> <li>• Service Providers</li> <li>• Government Agencies/Law Enforcement</li> <li>• Threat Intelligence Partners</li> </ul>
Geolocation Information	<ul style="list-style-type: none"> <li>• Digital Devices you use</li> </ul>	<ul style="list-style-type: none"> <li>• Comply with laws and regulations</li> <li>• Monitor our systems and assets</li> <li>• Conduct analytics</li> </ul>	<ul style="list-style-type: none"> <li>• Service Providers</li> <li>• Threat Intelligence Partners</li> </ul>
Audio, Visual or Other Sensory Information (e.g., closed-circuit TV cameras, web recordings, voicemails, etc.)	<ul style="list-style-type: none"> <li>• Directly from you</li> <li>• Security Monitoring Devices</li> </ul>	<ul style="list-style-type: none"> <li>• Provide/perform services for you</li> <li>• Comply with laws and regulations</li> <li>• Monitor our systems and assets</li> </ul>	<ul style="list-style-type: none"> <li>• Service Providers</li> <li>• Government Agencies/Law Enforcement</li> </ul>
Professional Information (e.g., employment-related information)	<ul style="list-style-type: none"> <li>• Directly from you</li> <li>• Service Providers</li> </ul>	<ul style="list-style-type: none"> <li>• Manage human resources and benefits</li> <li>• Comply with laws and regulations</li> <li>• Conduct analytics</li> </ul>	<ul style="list-style-type: none"> <li>• Service Providers</li> <li>• Government Agencies/Law Enforcement</li> </ul>
Education Information (e.g., as maintained by an education institution)	Not applicable	Not applicable	Not applicable
Inferences (e.g. preferences, characteristics, abilities, aptitude, etc.)	<ul style="list-style-type: none"> <li>• Directly from you</li> <li>• Digital Devices you use</li> </ul>	<ul style="list-style-type: none"> <li>• Provide/perform services for you</li> <li>• Market to you</li> <li>• Manage human resources and benefits</li> <li>• Conduct analytics</li> </ul>	<ul style="list-style-type: none"> <li>• Service Providers</li> <li>• Business Partners, including Joint Venture and Strategic Partners</li> </ul>

## 2. How We Respond to Do Not Track Signals

We do not currently take actions to respond to Do Not Track signals and similar signals because a uniform technological standard has not yet been developed.

## 3. Children's Data

Our products and services are not directed to minors under the age of 16 and we do not knowingly collect or sell the Personal Information of minors.

## C. YOUR RIGHTS

### 1. Access, Deletion and Opt-Out of Sale

- a. **Access.** If you believe that ADM has collected or shared Personal Information that is not exempt (see Section C.2. below), you have the right to request that we disclose the following information to you about our processing of your personal information over the past 12 months:
  - a. The categories of Personal Information we've collected about you.
  - b. The categories of sources from which we collected the Personal Information.
  - c. The business or commercial purposes for which we collected the Personal Information.
  - d. The third parties with whom we shared the information.
  - e. The specific pieces of information we collected.
- b. **Deletion.** Unless otherwise exempt (see Section C.2. below), if you submit a verified request, we will delete the Personal Information we have collected about you except where it is necessary to maintain or is otherwise permitted by law, and is compatible with the context in which you provided the information to us or is reasonably aligned with your expectations based on your relationship with us.
- c. **Opt-Out of Sale.** In the past 12 months, we have not sold your Personal Information to any other entity; nor do we presently sell Personal Information to third parties. Therefore, we do not offer a sale opt-out right.

To exercise your rights, email [dataprivacy@adm.com](mailto:dataprivacy@adm.com) or contact us at 1-800-637-5843 and ask to be connected to the Chief Privacy Officer. All requesters will be required to authenticate themselves before we respond to their request. You may designate an agent to submit requests on your behalf. If you do so, we will require your written authorization to release your Personal Information to your agent.

## 2. Exemptions

- a. **Employment Information.** If we collected Employment Information, the access and deletion rights described in this Notice do not apply. However, under other laws, you may be entitled to other rights concerning your Personal Information. Please contact your manager, Human Resources representative, or Chief Privacy Officer at [dataprivacy@adm.com](mailto:dataprivacy@adm.com) with questions.
- b. **B2B Information.** The access and deletion rights described in this Notice do not apply to B2B Information.
- c. **Financial Account Exemption.** The access and deletion rights described in this Notice do not apply to Personal Information in connection with a financial account regulated by GLBA, such as your ADM Investor Services account.

## 3. Non-Discrimination

If you exercise any of the rights explained in this Privacy Policy, we will continue to treat you fairly. Individuals who exercise their rights under this Notice will not be denied or charged different prices or rates for goods or services, or provided a different level or quality of goods or services, than those who do not.

## D. INFORMATION SECURITY

We implement and maintain reasonable security appropriate to the nature of the Personal Information that we process.

## E. CHANGES TO THIS NOTICE

ADM reserves the right to change this Privacy Notice at any time. If we make a material change in the way we use or share your Personal Information, you will be notified.

## F. CONTACT US

If you have questions on the processing of your Personal Information, please contact us in writing or via email at:

Chief Privacy Officer  
Archer Daniels Midland Company  
77 West Wacker, Suite 4600  
Chicago, Illinois 60601  
[dataprivacy@adm.com](mailto:dataprivacy@adm.com)