

Introduction

Winland Foods, Inc., (“**Company**” or “**We**”) respects the privacy of your Personal Information and is committed to protecting it through our compliance with this Privacy Policy.

This Policy describes the types of Personal Information we collect from you or that you may provide when you visit our websites: www.winlandfoods.com; americanbeauty.com; anthonyaspasta.com; creamette.com; www.edsmith.com; edsmithfoodservice.com; goldengrainpasta.com; noxgelatine.com; lightnfluffy.com; luxurypasta.com; mrsweiss.com; muellerspasta.com; novolks.com; pastalensi.com; pastalensi.it; pennsylvaniadutchnoodles.com; princepasta.com; sangiorgio.com; skinnerpasta.com; and wackymac.com and our practices for collecting, using, maintaining, protecting, and disclosing Personal Information.

This Policy applies to Personal Information we collect:

- When you visit our Websites including through digital advertisements.
- In email, text, and other electronic messages between you and Winland.

It does not apply to Personal Information collected by:

- Us offline or through any other means; or
- Any third party including through any application or content that may link to or be accessible from or on our Websites including social media sites.

Please read this Policy carefully to understand our policies and practices regarding Personal Information and how we will treat it. If you do not agree with our policies and practices, your choice is not to use our Websites. This Policy may change from time to time (see **Changes to Our Privacy Policy**, below). Your continued use of our Websites after we make changes is deemed to be acceptance of those changes, so please check this Policy periodically for updates.

Children Under the Age of 16

Our Websites are not intended for children under 16 years of age. No one under age 16 may provide any Personal Information on our Websites. We do not knowingly collect Personal Information from children under age 16. If you are under 16 years old, do not use our Websites or provide any information about yourself to us, including your name, address, telephone number, email address. If we learn we have collected or received Personal Information from a child under 16 without verification of parental consent, we will delete that information. If you believe we might have any information from or about a child under 16, please contact us at **WFI Contact Us Page**.

California residents under 16 years of age may have additional rights regarding the collection, sale and sharing of Personal Information relating to them. Please see **U.S. Privacy Notices for State Residents** below for more information.

Personal Information We Collect and How We Collect It

We collect several types of Personal Information from and about visitors and users of our Website, including information:

- From which you may be personally identified, such as your name, postal address, e-mail address, telephone number, and any other identifier by which you may be contacted online or offline (“**Personal Information**”);
- The products or services purchased, obtained, or considered, or other purchasing or consuming histories or tendencies; and inferences drawn from other Personal Information. For example, information about your purchase preferences.
- About your visits to our Websites, specifically traffic data, location data, logs, and other communication data and the resources that you access and use on the Websites; and information about your computer/device and internet connection, specifically your IP address, operating system, and browser type.
- That is about you but does not identify you individually, such as total number of visitors to our Websites, the popularity of various areas of our Websites, and the length of the visits in an aggregate form (as one of a group, your individual Personal Information is not singled out).

We collect this information:

- Directly from you when you provide it to us.
- Automatically as you navigate through our Websites including social media sites. Information collected automatically includes your usage details, your IP address and or device ID, and information collected through cookies, web beacons, and other tracking technologies.
- From third parties, for example, our business partners and/or service providers.

Personal Information You Provide to Us

The Personal Information we collect on or through our Websites includes:

- Personal Information that you provide by filling in forms on our Websites. This includes information you provide when subscribe to our marketing communications, submit feedback, or request help or other customer services. We also ask you for Personal Information when you enter a contest or promotion sponsored by us or our business partners, and when you report a problem about our Websites.
- Records and copies of your communications with us such as your email address or phone number, when you contact us.
- Your responses to surveys that we or our business partners or service providers ask you to complete for our research purposes.
- Your search queries on our Websites.
- Information our business partners may request in order to provide you with special offers.

Personal Information We Collect Through Automatic Data Collection Technologies

As you navigate through and interact with our Websites, we use automatic data collection technologies to collect certain Personal Information about your equipment, browsing actions and patterns, including:

- **Usage Details** of your visits to, and use of, our Websites, including traffic data, location data, logs, and other communication data and the content that you access and use on the Websites.
- **Device Information** about your computer, mobile device, and internet connection, including your device’s unique device identifier (IP address/device ID), operating system, browser type, mobile network information and your mobile device’s telephone number.
- **Location Information** Our Websites collect real-time information about the location of your device during the time that you are accessing and/or using our Websites.

If you do not want us to collect this information do not use our Websites. For more information, see **Your Choices About How We Use and Disclose Personal Information** below. Note, however, that opting out of our Websites’ collection of location information will disable its location-based features.

We may also use these technologies to collect information about your online activities over time and across third-party websites, apps, or other online services (behavioral tracking). Some web browsers may transmit “do-not-track” signals to our Websites. At this time there is no industry standard about our Services should do when those signals are received. As a result, our Websites do not currently respond to “do-not-track” signals.

The information we collect automatically is statistical data and does not include Personal Information, but we may maintain it or associate it with Personal Information we collect in other ways or receive from third parties including our business partners and service providers. It helps us to improve our Websites and to deliver better and more personalized services, including by allowing us to:

- Estimate our audience size and usage patterns.
- Store information about your preferences, allowing us to customize our Websites to your individual interests and preferences.
- Speed up your searches.
- Recognize you when you return to our Websites.
- Use location information we collect to provide you with content specific to your location and to personalize your experience for you.

Data we collect automatically which may not be Personal Information, is treated as Personal Information when it is attached to other Personal Information.

Personal Information Collection and Tracking Technologies

The technologies we use for automatic data collection may include:

- **Cookies (or browser cookies/mobile cookies).** A cookie is a small data file placed on the hard drive of your computer or your mobile device for example to recognize you when you return to our Websites. Cookies may contain information used to track users' progress through our Websites. You may refuse to accept cookies by activating the appropriate setting on your browser or mobile device. However, if you select this setting you may be unable to access certain parts of our Websites. Unless you have adjusted your device settings so that it will refuse cookies, our systems will issue cookies when you visit, access or use our Websites. For more information see our [Cookie Use Policy \[LINK\]](#).
- **Flash Cookies.** Certain features of our Websites may use local stored objects (or Flash cookies) to collect and store information about your preferences and navigation to, from, and on our Websites. Flash cookies are not managed by the same browser settings as are used for browser cookies. For information about managing your privacy and security settings for Flash cookies, see [Your Choices About How We Use and Disclose Personal Information](#) below and our [Cookie Use Policy \[LINK\]](#).
- **Web Beacons.** Parts of our Websites, and our e-mails contain small electronic files known as web beacons (also referred to as clear gifs, pixel tags, and single-pixel gifs) that permit us, for example, to count users who have visited those pages or opened an email and for other related statistics (for example, recording the popularity of certain of our Websites content and verifying the integrity of our systems and servers).

Third-Party Collection of Personal Information and Use of Cookies and Other Tracking Technologies

Some content or functions on our Websites, including advertisements are provided by third-parties including content providers, application providers, our service providers and/or our business partners. These third parties may use cookies alone or in conjunction with web beacons or other tracking technologies to collect information about you when you use our Websites. The information they collect may be associated with Personal Information about you or they may collect information, including Personal Information, about your online activities over time and across different websites, apps and other online services. They also use this information to provide you with interest-based (behavioral) advertising or other targeted content.

These third parties include:

- Our business partners
- Our service Providers
- Advertisers, ad networks, and ad servers including social media sites
- Analytics companies (including Google Analytics)
- Your mobile device manufacturer
- Your mobile service provider

We do not control these third parties' tracking technologies or how they may be used. If you have any questions about an advertisement or targeted content, you should contact the responsible party directly. For information about how you can opt out of receiving targeted advertising/content from many providers, see [Your Choices About How We Use and Disclose Personal Information](#) below and our [Cookie Use Policy \[LINK\]](#).

How We Use Personal Information

We use Personal Information that we collect about you or that you provide to us to:

- Present to you, improve, and maintain our Websites and their content, and any other information, products, or services that you request from us.
- Maintain the security of our Websites.
- Fulfill any other purpose for which you provide it.
- To personalize your experience such as sending you offers from our business partners or service providers.
- Respond to your inquiries and requests for information.
- Provide you with notices about your subscriptions, including expiration and renewal notices.
- Carry out our obligations and enforce our rights arising from any contracts entered into between you and us.
- Notify you about changes to our Websites including when updates to our Websites are available.
- In any other way we describe when you provide the information.
- For other purposes with your consent.

We may also use Personal Information to contact you about our own and our business partners' goods and services that may be of interest to you. If you do not want us to use Personal Information relating to you in this way, please check the relevant box located on the form where we collect information from you. For more information, see [Your Choices About How We Use and Disclose Personal Information](#).

Our business partners may also use Personal Information we collect to display advertisements to our business partner's target audiences. Even though we do not disclose Personal Information about you for these purposes without your consent, if you click on or otherwise interact with an advertisement, the advertiser may assume that you meet its target criteria.

Disclosure of Personal Information

We may disclose aggregated information about our users, and information that does not identify any individual, without restriction. In addition, we may disclose Personal Information that we collect, or that you provide us as described in this Privacy Policy:

- To our subsidiaries and affiliates.
- To enhance your experience when using our Websites.
- To contractors, service providers, vendors, consultants, and other third parties we use to support our business and who are bound by contractual obligations to keep Personal Information confidential and use it only for the purposes for which we disclose it to them.
- To a buyer or other successor in the event of a merger, divestiture, restructuring, reorganization, dissolution, or other sale or transfer of some or all of Winland's assets, whether as a going concern or as part of bankruptcy, liquidation, or similar proceeding, in which Personal Information held by Winland about users of our Websites is part of the assets transferred.
- To our business partners to market their products or services to you if you have consented to these disclosures. We contractually require our business partners to keep Personal Information confidential and to use it only for the purposes for which we disclose it to them. For more information, see [Your Choices About How We Use and Disclose Personal Information](#) below.

- To fulfill the purpose for which you provide it. For example, if you give us an email address to use the “Share This” feature of our Websites, we will transmit the contents of that email and your email address to the recipient. **Note**, we may block your use of our “Share This” feature if we determine that your attempted use of that feature may violate any applicable laws including anti-SPAM laws. For more information, see our [Terms of Use](#).
- For any other purpose disclosed by us when you provide the information to us.
- With your consent.
- To comply with any subpoena, court order, law, or legal process, including to respond to any government or regulatory request.
- To enforce or apply our [Terms of Use](#) and other agreements.
- If we believe disclosure is necessary or appropriate to protect the rights, property, or safety of Winland, our business partners, or others. This includes exchanging information with other companies and organizations for the purposes of fraud prevention.

Your Choices About How We Use and Disclose Personal Information

We strive to provide you with choices regarding Personal Information you provide to us. We have created mechanisms for you to control certain uses and sharing of Personal Information:

- **Tracking Technologies** You can set your browser to refuse all or some browser cookies, or to alert you when cookies are being sent. You can choose whether or not to allow our Websites to collect information through other tracking technologies. If you disable or refuse cookies, please note that some parts of our Websites may not be accessible or not function properly.
- **Location Information.** You can choose whether or not to allow our Websites to collect and use real-time information about your device’s location through your device’s privacy settings. If you block the use of location information, some parts of our Websites may become inaccessible or not function properly.

Disclosure of Personal Information for Promotional Offers from Us and Our Business Partners. If you do not wish to have your email address or other contact information used by us to promote our own or our business partners’ products or services, you can opt-out by checking the relevant box located on the form where we collect Personal Information, or by contacting us at [WFI Contact Us Page](#). You may also Opt-out by replying STOP to an SMS message, or selecting “unsubscribe” from the footer of any email. This opt out does not apply to Personal Information you provided us related to a customer service request or other transaction.

Disclosure of Personal Information for Third-Party Advertising and Promotions. If you do not want us to share Personal Information about you with unaffiliated or non-agent third parties for advertising or promotional purposes, you can opt out by contacting us at [WFI Contact Us Page](#)

We do not control third parties’ collection or use of Personal Information to serve interest-based advertising. However, these third parties may provide you ways to choose not to have Personal Information about you collected or used in this way. 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](#).

Residents of certain states such as California, Nevada, Colorado, Connecticut, Virginia, and Utah and persons in the EU/EEA/UK may have additional Personal Information/Data rights and choices. Please see our [U.S. Privacy Notices for State Residents](#), [Privacy Notice for California Residents](#), and [Privacy Notice for Personas in the EU/EEA/UK](#) below

Accessing and Correcting Personal Information in General

Residents of certain states, such as California, Nevada, Colorado, Virginia and Utah, may have additional Personal Information rights and choices. Please see [U.S. Privacy Notices for State Residents](#) below for more information.

Security of Personal Information

We have implemented measures designed to secure Personal Information from accidental loss and from unauthorized access, use, alteration, and disclosure. All Personal Information you provide to us is stored on our secure servers behind firewalls.

Unfortunately, the transmission of information via the internet and mobile platforms is not completely secure. Although we do our best to protect Personal Information, we cannot guarantee the security of Personal Information transmitted through our Websites. Any transmission of Personal Information is at your own risk. We are not responsible for circumvention of any privacy settings or security measures we provide.

Changes to Our Privacy Policy

It is our policy to post any changes we make to this Privacy Policy on this page with a notice that the Privacy Policy has been updated via email. The date the Privacy Policy was last revised is at the top of the page. You are responsible for making sure we have an up-to-date active and deliverable email address and phone number for you, and for periodically reviewing this Privacy Policy to check for any changes.

Our Contact Information

To ask questions or comment about this Privacy Policy or our privacy practices, contact us at: [WFI Contact Us Page](#).

U.S. Privacy Notices for State Residents

U.S. State consumer privacy laws may provide their residents with additional rights regarding our use of Personal Information. To learn more about the privacy rights of California residents, please see [Privacy Notice for California Residents](#) below.

Colorado, Connecticut, Virginia, and Utah each provide their state residents with rights to:

- Confirm whether we process Personal Information about them.
- Access and delete certain Personal Information.
- Data portability.
- Opt-out of Personal Information processing for targeted advertising and sales.

Colorado, Connecticut, and Virginia also provide their state residents with rights to:

- Correct inaccuracies in Personal Information about them, taking into account the information’s nature, processing, and purpose.
- Opt-out of profiling in furtherance of decisions that produce legal or similarly significant effects.

To exercise any of these rights or to appeal a decision regarding a consumer rights request please contact us at [WFI Contact Us Page](#).

Nevada provides its residents with a limited right to opt-out of certain Personal Information sales. Residents who wish to exercise this sale opt-out rights may submit a request to this designated address contact us at [WFI Contact Us Page](#).

Privacy Notice for California Residents

Effective Date: February 1, 2023

Last Reviewed: February 1, 2023

This **Privacy Notice for California Residents** supplements the information contained in Winland' General Privacy Policy/Notice above and applies solely to all visitors, users, and others who reside in the State of California ("consumers" or "you"). We adopt this notice to comply with the California Consumer Privacy Act of 2018 (CCPA) and any terms defined in the CCPA have the same meaning when used in this Notice.

CCPA Personal Information We Collect

We collect Personal Information that identifies, relates to, describes, references, is reasonably capable of being associated with, or could reasonably be linked, directly or indirectly, with a particular consumer, household, or device ("**Personal Information**"). Personal Information does not include:

- Publicly available information from government records.
- Deidentified or aggregated consumer information.
- Information excluded from the CCPA's scope, like:
 - health or medical information covered by the Health Insurance Portability and Accountability Act of 1996 (HIPAA) and the California Confidentiality of Medical Information Act (CMIA), clinical trial data or other qualifying research data;
 - Personal Information covered by certain sector-specific privacy laws, including the Fair Credit Reporting Act (FCRA), the Gramm-Leach-Bliley Act (GLBA) or California Financial Information Privacy Act (FIPA), and the Driver's Privacy Protection Act of 1994.

In particular, we have collected the following categories of Personal Information from consumers within the last twelve (12) months:

Category	Examples	Collects
A. Identifiers.	A real name, alias, postal address, unique personal identifier, online identifier, Internet Protocol address, email address, account name, or other similar identifiers.	YES
B. Personal Information categories listed in the California Customer Records statute (Cal. Civ. Code § 1798.80(e)).	A name, signature, physical characteristics or description, address, telephone number, credit card number, debit card number. Some personal information included in this category may overlap with other categories.	YES
C. Protected classification characteristics under California or federal law.	Age (40 years or older), sex (including gender, gender identity, gender expression, veteran or military status.	YES
D. Commercial information.	Records of products or services purchased, obtained, or considered, or other purchasing or consuming histories or tendencies.	YES
E. Biometric information.	Genetic, physiological, behavioral, and biological characteristics, or activity patterns used to extract a template or other identifier or identifying information, such as, fingerprints, faceprints, and voiceprints, iris or retina scans, keystroke, gait, or other physical patterns, and sleep, health, or exercise data.	NO
F. Internet or other similar network activity.	Browsing history, search history, information on a consumer's interaction with a website, application, or advertisement.	YES
G. Geolocation data.	Physical location.	YES
H. Sensory data.	Audio, electronic, visual, thermal, olfactory, or similar information.	NO
I. Professional or employment-related information.	Current or past job history.	YES
J. Non-public education information (per the Family Educational Rights and Privacy Act (20 U.S.C. Section 1232g, 34 C.F.R. Part 99)).	Education records directly related to a student maintained by an educational institution or party acting on its behalf, such as grades, transcripts, class lists, student schedules, student identification codes, student financial information, or student disciplinary records.	NO
K. Inferences drawn from other Personal Information.	Profile reflecting a person's preferences, characteristics, psychological trends, predispositions, behavior, attitudes, intelligence, abilities, and aptitudes.	YES

We obtain the categories of Personal Information listed above from the following categories of sources:

- Directly from you. For example, from forms you complete.
- Indirectly from you. For example, from observing your actions on our Websites.

Use of CCPA Personal Information

We may use, sell/share or disclose the Personal Information we collect for one or more of the following purposes:

- To fulfill or meet the reason you provided the Personal Information. For example, if you share your name and contact information to ask a question about our products or services, we will use that Personal Information to respond to your inquiry.
- To provide, support, personalize, and develop our Websites.
- To create, maintain, customize, and secure your account with us.
- To process your requests, transactions, and to prevent transactional fraud.
- To provide you with support and to respond to your inquiries, including to investigate and address your concerns and monitor and improve our responses.
- To personalize your experience on our Websites and to deliver content and product and service offerings relevant to your interests, including targeted offers and ads through our Websites, our business partners, third-party sites, and via email or text message (with your consent, where required by law).
- To help maintain the safety, security, and integrity of our Websites, databases and other technology assets, and business.
- For testing, research, analysis, and product development, including to develop and improve our Websites.
- To respond to law enforcement requests and as required by applicable law, court order, or governmental regulations.
- As described to you when collecting Personal Information about you or as otherwise set forth in the CCPA.
- To evaluate or conduct a merger, divestiture, restructuring, reorganization, dissolution, or other sale or transfer of some or all of our assets, whether as a going concern or as part of bankruptcy, liquidation, or similar proceeding, in which personal information held by us about our Websites' users/consumers is among the assets transferred.

We will not collect additional categories of Personal Information or use the Personal Information we collected for materially different, unrelated, or incompatible purposes without providing you notice.

Sharing CCPA Personal Information

We may share Personal Information about you by disclosing it to a third party for a business purpose. We only make these business purpose disclosures under written contracts that describe the purposes, require the recipient to keep that Personal Information confidential and prohibit using the disclosed information for any purpose except performing the contract. In the preceding 12 months, Winland has disclosed Personal Information for a business purpose to the categories of third parties listed below.

We may also share Personal Information about you by selling/sharing it to third parties, subject to your right to opt-out of those sales/shares. Our sales/sharing of Personal Information do not include information about individuals we know are under the age of 16. In the preceding 12 months, Winland has sold/shared the following categories of Personal Information to the categories of third parties listed below. For more information on CCPA sale/share rights see **CCPA Personal Information Sales/Shares Opt-Out and Opt-in Rights** below.

Disclosures of CCPA Personal Information for a Business Purpose

In the preceding twelve (12) months, Winland has disclosed the following categories of personal information for a business purpose:

Category A: Identifiers.

Category B: California Customer Records personal information categories.

Category C: Protected classification characteristics under California or federal law.

Category D: Commercial information.

Category F: Internet or other similar network activity.

Category G: Geolocation data.

Category I: Professional or employment-related information.

Category K: Inferences drawn from other Personal Information.

We disclose Personal Information for a business purpose to the following categories of third parties:

- Our business partners.
- Our Service Providers (including fraud prevention agencies, and professional advisers such as lawyers, bankers, auditors and insurers who provide us consultancy, banking, legal, insurance and accounting services.)
- Advertisers, social and ad networks, ad servers, and Internet cookie data recipients.
- Analytics companies (including Google Analytics) and data aggregators.
- Your mobile device manufacturer.
- Your mobile service provider.
- Tax regulators and other governmental regulatory authorities.

Sales/Sharing of CCPA Personal Information

In the preceding twelve (12) months, Winland has sold/shared the following categories of Personal Information:

Category A: Identifiers.

Category B: California Customer Records personal information categories.

Category C: Protected classification characteristics under California or federal law.

Category D: Commercial information.

Category F: Internet or other similar network activity.

Category G: Geolocation data.

Category I: Professional or employment-related information

Category K: Inferences drawn from other Personal Information.

We sell/share Personal Information to the following categories of third parties:

- Our business partners
- Social media advertisers, ad networks, and ad servers.
- Data aggregators

CCPA Personal Information Retention

By law Winland must keep basic information about our customers (including Contact, Identity, Financial and Transaction Data) for six years after they cease being customers.

In some circumstances you can ask us to delete Personal Information about you. Please see **CCPA Right to Delete** below.

In some circumstances we will anonymize Personal Information (so that it can no longer be associated with you) for research or statistical purposes, in which case we may use this information indefinitely without further notice to you.

CCPA Rights and Choices

The CCPA provides California residents with specific rights regarding Personal Information. This section describes CCPA rights and explains how to exercise those rights.

CCPA Right to Know and Data Portability

California residents have the right to request that we disclose certain information to them about our collection and use of Personal Information about them over the past 12 months (the "right to know"). Once we receive your request and confirm your identity (see Exercising Your Rights to Know or Delete below), we will disclose to you:

- The categories of Personal Information we collected about you.
- The categories of sources for the Personal Information we collected about you.
- Our business or commercial purpose for collecting or selling/sharing that Personal Information.
- The categories of third parties with whom we share that Personal Information.
- The specific pieces of Personal Information we collected about you (also called a data portability request).

- If we sold or disclosed Personal Information about you for a business purpose, two separate lists disclosing:
 - Sales/shares, identifying the Personal Information categories that each category of recipient purchased; and
 - disclosures for a business purpose, identifying the Personal Information categories that each category of recipient obtained.

CCPA Right to Delete

California residents have the right to request that we delete any Personal Information that we collected from you and retained, subject to certain exceptions (the "Right to Delete"). Once we receive your request and confirm your identity (see **Exercising CCPA Rights to Know or Delete** below), we will review your request to see if an exception allowing us to retain the information applies.

We may deny your deletion request if retaining the information is necessary for us or our service provider(s) to:

1. Complete the transaction for which we collected the Personal Information, provide a good or service that you requested, take actions reasonably anticipated within the context of our ongoing business relationship with you, fulfill the terms of a written warranty or product recall conducted in accordance with federal law, or otherwise perform our contract with you.
2. Detect security incidents, protect against malicious, deceptive, fraudulent, or illegal activity, or prosecute those responsible for such activities.
3. Debug products to identify and repair errors that impair existing intended functionality.
4. Exercise free speech, ensure the right of another consumer to exercise their free speech rights, or exercise another right provided for by law.
5. Comply with the California Electronic Communications Privacy Act (Cal. Penal Code § 1546 *seq.*).
6. Engage in public or peer-reviewed scientific, historical, or statistical research in the public interest that adheres to all other applicable ethics and privacy laws, when the information's deletion may likely render impossible or seriously impair the research's achievement, if you previously provided informed consent.
7. Enable solely internal uses that are reasonably aligned with consumer expectations based on your relationship with us.
8. Comply with a legal obligation.
9. Make other internal and lawful uses of that Personal Information that are compatible with the context in which you provided it.

We will delete or deidentify Personal Information not subject to one of these exceptions from our records and will direct our service providers to take similar action.

Exercising CCPA Rights to Know or Delete

To exercise the CCPA rights to know or delete described above, please submit a request to us by contacting us at [WFI Contact Us Page](#).

Only California residents, or someone legally authorized to act on their behalf, may make a CCPA request to know or delete Personal Information. You may also make a CCPA request to know or delete on behalf of your minor child. Please note that Winland's Websites are not intended for children under the age of 16.

California residents may only make a request to know twice within a 12-month period. Your CCPA request to know or delete must:

- Provide sufficient information that allows us to reasonably verify the person about whom we collected Personal Information or an authorized representative; and
- Describe your request with enough detail to allow us to properly understand, evaluate, and respond to it.

We cannot respond to your request or provide you with Personal Information if we cannot verify your identity or authority to make the request and confirm the Personal Information relates to you.

We will only use Personal Information provided in the request to verify the requestor's identity or authority to make the request.

For instructions on exercising sale/share opt-out or opt-in rights, see **Personal Information Sales/Sharing Opt-Out and Opt-in Rights** below.

CCPA Response Timing and Format

We will confirm receipt of your request within ten (10) business days. If you do not receive confirmation within the 10-day timeframe, please contact us at [WFI Contact Us Page](#).

We endeavor to substantively respond to a verifiable CCPA consumer request within forty-five (45) days of receiving it. If we require more time (up to another 45 days), we will inform you of the reason and extension period in writing.

We will deliver our written response to you by e-mail.

Any disclosures we provide will only cover the 12-month period preceding our receipt of your request. The response we provide will also explain the reasons we cannot comply with a request, if applicable. For data portability requests, we will select a format to provide the requested Personal Information that is readily useable and should allow you to transmit the information from one entity to another entity without hindrance, specifically text formatted file(s) which may contain plain text or delimited data.

We do not charge a fee to process or respond to your verifiable CCPA consumer request unless it is excessive, repetitive, or manifestly unfounded. If we determine that the request warrants a fee, we will tell you why we made that decision and provide you with a cost estimate before completing your request.

CCPA Personal Information Sales/Shares Opt-Out and Opt-In Rights

California residents age 16 or older, have the right to direct us to not sell/share Personal Information about them at any time (the "right to opt-out"). We do not sell/share Personal Information about consumers we actually know are less than 16 years old. Consumers who opt-in to Personal Information sales/sharing may opt-out of future sales/sharing at any time.

To exercise the right to opt-out, you (or your authorized representative) may submit a request to us by visiting the following Internet Web page link:

Do Not Sell/Share My Personal Information

Once you make an opt-out request, we will wait at least twelve (12) months before asking you to reauthorize Personal Information sales/sharing. However, you may change your mind and opt back in to Personal Information sales/sharing at any time by:

clicking here

We will only use Personal Information provided in an opt-out request to review and comply with the request.

CCPA Non-Discrimination

We will not discriminate against you for exercising any of your CCPA rights. Unless permitted by the CCPA, we will not:

- Deny you goods or services.

- Charge you different prices or rates for goods or services, including through granting discounts or other benefits, or imposing penalties.
- Provide you a different level or quality of goods or services.
- Suggest that you may receive a different price or rate for goods or services or a different level or quality of goods or services.

However, we may offer you certain financial incentives permitted by the CCPA that **can result** in different prices, rates, or quality levels. Any CCPA-permitted financial incentive we offer will reasonably relate to the value of the Personal Information and contain written terms that describe the program's material aspects. Participation in a financial incentive program requires your prior opt in consent, which you may revoke at any time. Winland does not currently provide any financial incentives.

Other California Privacy Rights

California's "Shine the Light" law (Civil Code Section § 1798.83) permits users of our Website that are California residents to request certain information regarding our disclosure of Personal Information to third parties for their direct marketing purposes. To make such a request, please contact us at [WFI Contact Us Page](#).

CCPA Contact Information

If you have any questions or comments about this notice, the ways in which Winland collects and uses CCPA Personal Information described here and in our general Privacy Policy, your choices and rights regarding such use, or wish to exercise your rights under California law, please do not hesitate to contact us at:

Website: contact us at [WFI Contact Us Page](#).

Postal Address:

Winland Foods, Inc.

Attn: General Counsel

Postal Address: 2015 Spring Rd. Suite 400, Oak Brook, IL 60523

Privacy Notice for Persons in the EU/EEA/UK

Introduction

This EU/EEA/UK privacy notice supplements the information contained in Winland's general Privacy Notice above for persons located in the EU/EEA/UK and is not intended to override Winland's general privacy notices. It is important that you read this privacy notice together with any other privacy notices or fair processing notices Winland may provide on specific occasions when we are collecting or processing Personal Data about you so that you are fully aware of how and why we are using the Personal Data.

For your convenience this notice is provided in a layered format so you can click through to the specific areas you are interested in. You can also download a pdf version of Winland's entire privacy notice [HERE](#). Please also use the Glossary to understand the meaning of some of the terms used in this EU/EEA/UK privacy notice.

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Controller

Winland is the data controller and is responsible for our Websites.

Winland has appointed a data privacy manager who is responsible for overseeing questions in relation to this EU/EEA/UK privacy notice. If you have any questions about this privacy notice, including any requests to exercise your legal rights, please contact Winland's data privacy manager using the details below:

Website: contact us at [WFI Contact Us Page](#).

Winland Foods, Inc

Attn: General Counsel

Postal Address: 2015 Spring Rd. Suite 400 Oak Brook, IL 60523

You have the right to make a complaint at any time to the EU/EEA/ UK Data Protection Supervisory Authority in your area at any time. We would, however, appreciate the chance to deal with your concerns before you approach the Supervisory Authority so please contact us in the first instance.

Changes to this EU/EEA/UK privacy notice and your duty to inform us of changes

We keep this EU/EEA/UK privacy notice under regular review. This version was last updated on the date at the top.

It is important that the Personal Data we hold about you is accurate and current. Please keep us informed if Personal Data about you changes during your relationship with us.

Third-party links

Our websites may include links to third-party websites, plug-ins and applications including links to our third-party service provider that operates and manages the Careers portion of our websites. Clicking on those links or enabling those connections may allow third parties to collect or share Personal Data about you. Winland does not control these third-party websites and is not responsible for their privacy statements or practices. If you provide any information to such third parties, different rules regarding the collection and use of Personal Data may apply. We strongly suggest you review such third parties' privacy policies before providing any Personal Data to them. We cannot control this collection of information. You should contact these entities directly if you have any questions about their use of the information that they collect.

When you leave our websites, we also encourage you to read the privacy policies and notices of every website you visit.

2. Personal Data We Collect About You

Personal data, or Personal Information, means any information about an individual from which that person can be identified. It does not include data where the identity has been removed (anonymous data).

We may collect, use, store and transfer different kinds of Personal Data about you as described in our general privacy notice above.

We also collect, use and share Aggregated Data such as statistical or demographic data for any purpose. Aggregated Data could be derived from Personal Data but is not considered Personal Data under the law because this data will **not** directly or indirectly reveal your identity. For example, we may aggregate your Usage Data to calculate the percentage of users accessing specific features of our websites. However, if we combine or connect Aggregated Data with Personal Data about you so that it can directly or indirectly identify you, we treat the combined data as Personal Data which will be used in accordance with this EU/EEA/EK privacy notice.

If you fail to provide Personal Data to us

Where we need to collect Personal Data by law, or under the terms of a contract we have with you, and you fail to provide that Personal Data when requested, we may not be able to perform the contract we have or are trying to enter into with you (for example, to provide you with goods or services or when our business partners are trying to provide you with goods or services). In this case, we may need to cancel a product or service you have with us, but we will notify you if this is the case at the time.

3. How we collect Personal Data

See **Personal Information We Collect and How We Collect It** above.

4. How we use Personal Data

We will only use Personal Data about you when the law allows us to. Most commonly, we will use Personal Data in the following circumstances:

- Where we need to perform the contract we are about to enter into or have entered into with you.
- Where it is necessary for our legitimate interests (or those of a third party) and your interests and fundamental rights do not override those interests.
- Where we need to comply with a legal obligation.

Click **Lawful Basis** [\[LINK\]](#) to find out more about the types of lawful basis that we will rely on to process Personal Data.

Generally, we do not rely on consent as a legal basis for processing Personal Data about your although we will get your consent before sending third party direct marketing communications to you via email or text message. You have the right to withdraw consent to marketing at any time by contacting us at [WFI Contact Us Page](#)

Purposes for which we will use Personal Data

We have set out below, in a table format, a description of all the ways we plan to use Personal Data, and which of the legal bases we rely on to do so. We have also identified what our legitimate interests are where appropriate.

Note that we may process Personal Data for more than one lawful ground depending on the specific purpose for which we are using the Personal Data. Please contact us if you need details about the specific legal ground we are relying on to process Personal Data about your where more than one ground has been set out in the table below.

Purpose/Activity	Type of data	Lawful basis for processing including basis of legitimate interest
To manage our relationship with you which will include: (a) Notifying you about changes to our terms or privacy policy (b) Asking you to leave a review or take a survey	(a) Identity	(a) Performance of a contract with you
	(b) Contact	(b) Necessary to comply with a legal obligation
	(c) Profile	(c) Necessary for our legitimate interests (to keep our records updated and to study how customers use our products/services)
	(d) Marketing and Communications	(a) Performance of a contract with you
To enable you to partake in a prize draw, competition or complete a survey	(b) Contact	(b) Necessary for our legitimate interests (to study how customers use our products/
	(c) Profile	services, to develop them and
	(d) Usage	grow our business)
To administer and protect our business and our websites (including troubleshooting, data analysis, testing, system maintenance, support, reporting and hosting of data)	(e) Marketing and Communications	(a) Necessary for our legitimate interests (for running our business, provision of administration and IT services, network security, to prevent fraud and in the context of a business reorganization or group restructuring exercise)
	(a) Identity	(b) Necessary to comply with a legal obligation
	(b) Contact	Necessary for our legitimate interests
To deliver relevant website content and advertisements to you and	(c) Technical	
	(a) Identity	

measure or understand the effectiveness of the advertising we serve to you	(b) Contact	(to study how customers use our products/
	(c) Profile	services, to develop them, to grow our
	(d) Usage	business and to inform our marketing strategy)
	(e) Marketing and Communications	
To use data analytics to improve our websites, products, marketing, customer relationships and experiences	(f) Technical	Necessary for our legitimate interests
	(a) Technical	(to define types of customers for our products
	(b) Usage	and services, to keep our website updated and
		relevant, to develop our business and to
To make suggestions and recommendations to you about goods or services that may be of interest to you		inform our marketing strategy)
	(a) Identity	
	(b) Contact	
	(c) Technical	Necessary for our legitimate interests
	(d) Usage	(to develop our products/services and
	(e) Profile	grow our business)
	(f) Marketing and Communications	

Marketing and Interest Based Advertising

We work with trusted third parties to collect and process Personal Data including through cookies, pixels, beacons, or other web tracking technologies to track the amount of time spent on our Websites including social media, based on our instructions and in compliance with our Privacy Policy. We also participate in interest-based advertising using similar technology. This means that you may see advertising on our Websites tailored to how you browse, or you may see advertising for Winland on other websites based on your browsing behavior across websites. Some websites where we advertise belong to ad networks that use your web browsing history to choose which ads to display on their network websites; these ads include advertising for Winland.

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/>).

Other websites where you see our ads, such as Facebook, may use interest preferences that you have chosen on those sites, as well as registration and other information about you, to choose which ads to display to you. Some internet browsers, websites (such as Facebook), and mobile devices offer opt-outs for interest-based advertising. Please refer to the website that you are visiting, your browser and/or your device settings for additional information.

Promotional offers from us

We may use your Identity, Contact, Technical, Usage and Profile Data to form a view on what we think you may want or need, or what may be of interest to you. This is how we decide which products, services and offers may be relevant for you (we call this marketing).

You will receive marketing communications from us if you have requested information from us or purchased goods or services from us and you have not opted out of receiving that marketing.

Third-party marketing

We will get your express opt-in consent before we share Personal Data about you with any third party for marketing purposes.

Opting out

You can ask us or third parties to stop sending you marketing messages at any time by following the opt-out links on any marketing message sent to you **OR** contacting us at **WFI Contact Us Page**.

If you opt out of receiving marketing messages, you will still continue to receive messages from us and our business partners related to your product/service purchases, product/service experience and/or other transactions.

Cookies

You can set your browser to refuse all or some browser cookies, or to alert you when websites set or access cookies. If you disable or refuse cookies, please note that some parts of our websites may become inaccessible or not function properly. For more information about the cookies we use, please see our **Cookie Use Policy (LINK)**

Change of data processing purpose

We will only use Personal Data about you for the purposes for which we collected it, unless we reasonably consider that we need to use it for another reason and that reason is compatible with the original purpose for which we collected it. If you wish to get an explanation about how our Personal Data processing for the new purpose is compatible with our original purpose, please contact us.

If we need to use Personal Data for an unrelated purpose, we will notify you and we will explain the legal basis which allows us to do so.

Please note that we may process Personal Data about you without your knowledge or consent, in compliance with the above rules, where this is required or permitted by law.

5. Disclosures of Personal Data

We may share Personal Data about you with the parties set out below for the purposes set out in the table **Purposes for which we will use personal data** above.

- Third Parties as described out in the **GDPR Glossary** below including service providers and business partners located in the U.S.
- Third parties to whom we may choose to sell, transfer or merge parts of our business or our assets. Alternatively, we may seek to acquire other businesses or merge with them. If a change happens to our business, then the new owners may use your personal data in the same way as set out in this privacy policy.

We require all third parties to respect the security of Personal Data and to treat it in accordance with the law. We do not allow our third-party service providers to use Personal Data for their own purposes and only permit them to process Personal Data for specified purposes and in accordance with our instructions.

6. International transfers of Personal Data

We share Personal Data within Winland including our subsidiaries and affiliates to provide our services to you. This will involve transferring your data outside the EU/EEA/UK including to the United States. Accordingly, Personal Data about you may be transferred outside the country where you reside or are located, including to countries that may not or do not provide the same level of protection for Personal Data.

Many of our third parties including service providers and business partners are also based outside the EU/EEA/UK so their processing of Personal Data will involve a transfer of data outside the EU/EEA/UK.

Whenever we transfer Personal Data out of the EU/EEA/UK, we seek to ensure a similar degree of protection is afforded by using specific contracts ("Standard Contract Clauses") approved for use in the EU/EEA/UK which give Personal Data the same protection it has in the EU/EEA/UK.

We also implement and seek to require our third parties to implement supplemental data protection measures including: end to end encryption; data minimization; data pseudonymization; data anonymization; and need to know access. Please also know that it is our good faith belief that the types of EU/EEA/UK Personal Data we receive, collect, process, use and/or share in the U.S. are not of the types of Personal Data that would generally be subject to requests from U.S. government authorities pursuant to FISA Section 702 and/or E.O. 12333. Please contact us if you want further information on the specific mechanism used by us when transferring Personal Data out of the EU/EEA/UK.

7. Personal Data security

See Security of Personal Information above. Our security measures are designed to prevent Personal Data from being accidentally lost, used or accessed in an unauthorized way, altered or disclosed. In addition, we limit access to Personal Data to those employees, agents, contractors and other third parties who have a business need to know. They will only process Personal Data on our instructions, and they are subject to a duty of confidentiality.

We have put in place procedures to deal with any suspected Personal Data breach and will notify you and any applicable regulator of a breach where we are legally required to do so.

8. Personal Data retention

How long will we use Personal Data?

By law we have to keep basic information about our customers (including Contact, Identity, Financial and Transaction Data) for six years after they cease being customers.

Winland may also retain Personal Data:

- for as long as necessary to comply with any legal requirement;
- on our backup and disaster recovery systems in accordance with our backup and disaster recovery policies and procedures;
- for as long as necessary to protect our legal interests or otherwise pursue our legal rights and remedies;
- in order to use Personal Data, internally, in a lawful manner that is compatible with the context in which you provided the information; and
- for data that has been aggregated or otherwise rendered anonymous in such a manner that you are no longer identifiable, indefinitely.

Winland may also retain Personal Data related to any requests to exercise privacy rights for as long as needed or is permitted in light of the purpose(s) for which it was obtained.

In some circumstances you can ask us to delete Personal Data about you: See **9. GDPR legal rights** [\[LINK\]](#) below for more information.

In some circumstances we will anonymize Personal Data (so that it can no longer be associated with you) for research or statistical purposes, in which case we may use this information indefinitely without further notice to you.

9. GDPR legal rights

Under certain circumstances, you have rights under data protection laws in relation to Personal Data. Please click on **Your GDPR Rights** [\[LINK\]](#) below to find out more about these rights:

- Request access to Personal Data.
- Request correction of Personal Data.
- Request erasure of Personal Data.
- Object to processing of Personal Data.
- Request restriction of processing Personal Data.
- Request transfer of Personal Data.
- Right to withdraw consent.

If you wish to exercise any of the rights listed above, please contact us at:

Website: [WFI Contact Us Page](#).

Winland Foods, Inc

Attn: General Counsel

Postal Address: 2015 Spring Rd. Suite 400 Oak Brook, IL 60523

No fee usually required

You will not have to pay a fee to access Personal Data about you (or to exercise any of the other rights). However, we may charge a reasonable fee if your request is clearly unfounded, repetitive or excessive. Alternatively, we could refuse to comply with your request in these circumstances.

What we may need from you

We may need to request specific information from you to help us confirm your identity and ensure your right to access Personal Data (or to exercise any of your other rights). This is a security measure to ensure that Personal Data is not disclosed to any person who has no right to receive it. We may also contact you to ask you for further information in relation to your request to speed up our response.

Time limit to respond

We try to respond to all legitimate Personal Data requests within one month. Occasionally it could take us longer than a month if your request is particularly complex or you have made a number of requests. In this case, we will notify you and keep you updated.

10. GDPR Glossary

LAWFUL BASIS

Legitimate Interest means the interest of our business in conducting and managing our business to enable us to give you the best service/product and the best and most secure experience. We make sure we consider and balance any potential impact on you (both positive and negative) and your rights before we process Personal Data for our legitimate interests. We do not use Personal Data for activities where our interests are overridden by the impact on you (unless we have your consent or are otherwise required or permitted to by law). You can obtain further information about how we assess our legitimate interests against any potential impact on you in respect of specific activities by contacting us.

Performance of Contract means processing Personal Data about you where it is necessary for the performance of a contract to which you are a party or to take steps at your request before entering into such a contract.

Comply with a legal obligation means processing Personal Data where it is necessary for compliance with a legal obligation that we are subject to.

THIRD PARTIES

Third Parties include:

- Our business partners.
- Our Service Providers (including fraud prevention agencies, and professional advisers such as lawyers, bankers, auditors and insurers who provide us consultancy, banking, legal, insurance and accounting services.)
- Social Media advertisers, ad networks, and ad servers.
- Analytics companies (including Google Analytics) and data aggregators.
- Your mobile device manufacturer.
- Your mobile service provider.
- Tax regulators and other governmental regulatory authorities.

YOUR GDPR RIGHTS

You have the right to:

Request access to Personal Data about you (commonly known as a “data subject access request” or “data portability request”). This enables you to receive a copy of the Personal Data we hold about you and to check that we are lawfully processing it.

Request correction of the Personal Data that we hold about you. This enables you to have any incomplete or inaccurate Personal Data we hold about you corrected, though we may need to verify the accuracy of the new Personal Data you provide to us.

Request erasure of Personal Data about you. This enables you to ask us to delete or remove Personal Data where there is no good reason for us continuing to process it. You also have the right to ask us to delete or remove Personal Data where you have successfully exercised your right to object to processing (see below), where we may have processed your information unlawfully or where we are required to erase Personal Data about you to comply with local law. Note, however, that we may not always be able to comply with your request of erasure for specific legal reasons which will be notified to you, if applicable, at the time of your request.

Object to processing of Personal Data about you where we are relying on a legitimate interest (or those of a third party) and there is something about your particular situation which makes you want to object to processing on this ground as you feel it impacts on your fundamental rights and freedoms. You also have the right to object to our processing of Personal Data for direct marketing purposes. In some cases, we may demonstrate that we have compelling legitimate grounds to process Personal Data which override your rights and freedoms.

Request restriction of processing of Personal Data. This enables you to ask us to suspend the processing of Personal Data about you in the following scenarios:

- If you want us to establish the Personal Data’s accuracy.
- Where our use of the Personal Data is unlawful but you do not want us to erase it.
- Where you need us to hold the Personal Data even if we no longer require it as you need it to establish, exercise or defend legal claims.
- You have objected to our use of your Personal Data but we need to verify whether we have overriding legitimate grounds to use it.

Request the transfer of Personal Data about you to you or to a third party (commonly known as a “data portability request”). We will provide to you, or a third party you have chosen, Personal Data about you in a structured, commonly used, machine-readable format. Note that this right only applies to automated information which you initially provided consent for us to use or where we used the information to perform a contract with you.

Withdraw consent at any time where we are relying on consent to process Personal Data about you. However, this will not affect the lawfulness of any processing carried out before you withdraw your consent. If you withdraw your consent, we may not be able to provide certain products and/or services to you. We will advise you if this is the case at the time you withdraw your consent.