

Commodity Classic Privacy Policy

Effective November 9, 2022

Commodity Classic, a trade show jointly owned by the American Soybean Association and the National Corn Growers Association (collectively “Commodity Classic”, “we”, “our” or “us”) is committed to protecting your privacy. This privacy policy (and as amended from time to time as posted <https://commodityclassic.com/2022-marketing-materials/2022-commodity-classic-print-ads/privacy-policy> (“Privacy Policy”) describes how Commodity Classic collects, uses, and shares your information when you purchase, use and interact with our products and services, register for or attend our events, or download or read our content (collectively “Services”) and applies to all persons who use our Services (“Users”, “you” or “your”). Our Privacy Policy governs your access to and use of all Commodity Classic operated and controlled websites including www.commodityclassic.com (the “Websites”), and all other publicly available Services – online or otherwise – controlled or provided by Commodity Classic.

If you have questions about Commodity Classic’s Privacy Policy or practices, or if you need to contact us about the information we collect about you, our contact information is at the end of this Privacy Policy.

Acknowledgement and Consent

By visiting our Website or purchasing our Services in any manner, you acknowledge that you accept the terms, practices and policies described in this Privacy Policy (and as updated from time to time), and you hereby consent that we may collect, use, and share your information as described herein. If you do not agree with our policies and practices, your choice is not to use our Website or our Services.

What Information Does This Privacy Policy Cover?

This Privacy Policy covers our treatment of personally identifiable information. “Personal Information” means any unencrypted or non-deidentified information that identifies, relates to, describes, is reasonably capable of being associated with, or could reasonably be linked with a particular person such as, but not limited to, your name, mailing address, email address, telephone number, etc. Please see additional information below on the particular information we may collect.

Personal Information does not include your Personal Information that has been deidentified, pseudonymized, anonymized, aggregated, and/or otherwise processed so as to be unidentifiable in such a way that the data can no longer be attributed to a specific individual (by reasonable means) without the use of additional information, and where such additional information is kept separate and under adequate security to prevent unauthorized re-identification of a specific individual such that one could not, using reasonable efforts, link such information back to a specific individual (collectively, all of the foregoing in this sentence being referred to as “De-Identified Personal Information”).

We also may collect Personal Information from you through means other than our Website. This may include offline collection, such as if you submit a paper application, make a payment by check, or call or visit our office. It also may include emails, text messages, or other electronic communications that you send to us separate from our Website or by way of our Service Providers (as defined herein). However, if we combine the Personal Information we collect from you outside of our Website with Personal Information that is collected through our Website or by another means as described above, the Privacy Policy will apply to the combined information, unless specifically disclosed otherwise.

Applicability & Eligibility

Applicability. This Privacy Policy applies only to the Services, and Commodity Classic's collection, use, disclosure, and protection of your data. It does not apply to third party websites, applications, or services.

Before accessing, using, or interacting with the Services you should carefully review the terms and conditions of this Privacy Policy.

Eligibility To Use The Services. The Services are not directed to children under the age of 16. You may not use the Services if you are under the age of 16. We do not knowingly collect, solicit or maintain Personal Information from anyone under the age of 16 or knowingly allow such persons to register for or use our Services. In the event that we learn that we have collected Personal Information from a child under age 16 without verification of parental consent, we will use commercially reasonable efforts to delete that information from our database.

Changes to Our Privacy Policy

We are constantly working to improve our Website and Services, and we may need to change this Privacy Policy from time to time as well. Our current Privacy Policy will always be on our Website and any updates will be effective upon posting. You are responsible for periodically checking our Website for updates. Under certain circumstances, we also may elect to notify registered Users of changes or updates to this Privacy Policy by additional means, such as posting a notice on the Website or by sending you an email, but you should not rely on receiving such additional notice.

How We Collect Personal Information and from What Sources

Information You Provide Us. The Personal Information we collect through our Website, or from our business partners, service providers, exhibitors, and sponsors and may include the following:

- Information that you provide by filling in webforms on our Website. This includes information provided when creating an online account, purchasing our Services, subscribing to our e-newsletters or other communications, requesting information from us, submitting or posting material (where permitted) on our forums, or

interacting with customer support or service, report a problem with our Website, Services, or otherwise communicating with us

- Records and copies of your correspondence (including email addresses), if you contact us
- Registering for an event
- Your responses to surveys that we or our service providers might ask you to complete for research purposes
- Your search queries on the Website
- When communicating with customer service/support
- Third party websites and mobile applications (e.g., websites that share information with us or advertising partners regarding online activities)
- Data suppliers (e.g., companies that provide demographics and other information regarding consumers)
- On mobile applications (parent, subsidiary and affiliate brands)
- Fulfillment and delivery service providers
- Social media companies
- Other service providers
- Responding to employment opportunities

Information Collection & Use

Commodity Classic collects data about you and your use of the Services through various means, including when you provide information to us such as when you join, sign up for a membership, donate, register for events and webinars including The Commodity Classic Show®, and when we automatically collect information about you when you access, use, or interact with the Services. We use this information for a variety of different reasons, including to improve the Services and to tailor the Services to you.

Commodity Classic processes Personal Information collected through the Services on the lawful basis of legitimate interests to provide the Services to you. Such processing is necessary for the purposes of the legitimate interests pursued by Commodity Classic or by our Service Providers related to the Services.

We collect several categories of Personal Information from and about you as summarized in the following table:

Category	Specific Items of Personal Information
Identifiers	<ul style="list-style-type: none"> • first and last name • user name (which may include first and last name) • email address • postal address • unique personal identifier, e.g.: <ul style="list-style-type: none"> • customer/account name or number • phone number • mobile device identifier

Category	Specific Items of Personal Information
Demographic	<ul style="list-style-type: none"> • country of residence
Internet or other electronic network activity; device information	<ul style="list-style-type: none"> • type and manufacturer of device and its ID/UDID or similar device-specific code • operating system and platform • screen resolution • Internet service provider or mobile carrier's name, connection speed, and connection type • browsing, session, interaction, and search history related to our Website • Internet Protocol (or IP) address, protocol, and sequence information • cookies • pixel tags • browser type, language, and version • domain name system requests • Media Access Control (MAC) address of pages you have visited • mobile device advertising identifier • material and pages viewed • time and date of access to the Website • number of bytes transferred • number of clicks per visit • IP address • date stamp and URL of the last webpage visited before visiting our Website, and URL of the first page visited after leaving our Website • pages viewed, time spent on a page, click-through and clickstream data, queries made, search results selected, comments made • type of service requested • hypertext transfer protocol headers, application client and server banners, and operating system fingerprinting data
Professional or employment information	<ul style="list-style-type: none"> • email address that identifies you (e.g., jane.r.smith@website.com versus jrs@website.com) • employer, employment history, information from professional references, work experience

Commodity Classic Membership & Event Information. Commodity Classic collects certain Personal Information from you when you join Commodity Classic or register for Commodity Classic events. Commodity Classic uses this information to

provide your membership, register you for events, provide information about memberships and events, and administer your registrations with Commodity Classic.

Location Analytics. Our mobile application includes functionality which allows our attendees to identify their location at the event, in certain cases. Application users choose to use the application anonymously or to login as an identified user, in which case the Personal Information provided upon registration may be used. Information such as IP address, device ID and location is gathered.

Commodity Classic Account Information. Commodity Classic may require you to register for an account (a “**Commodity Classic Account**”) in order to use certain Services. We do not require you to register to use all of our Services. However if you do register for Services offering an Commodity Classic Account, you will gain access to those areas and features of the Services that require registration. Commodity Classic will collect certain information about you in connection with your registration for your Commodity Classic Account, which may include Personal Information and other information such as a username, password, personal profile, pictures, your location, and information about your contacts. Some of your Commodity Classic Account information may be displayed publicly. You are not required to provide your Personal Information; however, if you choose to withhold certain Personal Information, we may not be able to provide you with certain Services.

Payment Transaction Information. We may collect and store information related to purchases and donations made through the Services. You may provide to our service providers certain information to complete payments via the Services, including your credit or debit card number, card expiration date, CVV code, and billing address (collectively, “**Payment Information**”), along with your name and billing, delivery and shipping address, to complete payment transactions through certain Services. Please note Commodity Classic works with Service Providers (as defined below) to handle payment transactions. Commodity Classic does not itself collect or retain your credit card or other financial account information. You are subject to the privacy policies and terms and conditions of our Service Providers when purchasing a Commodity Classic membership, shopping for Commodity Classic products, or making donations, the terms of which may differ from those of Commodity Classic for the Commodity Classic Services. Please review the Service Providers’ privacy policies and terms and conditions before using their services.

Form Information. We may use online forms to request certain information from you in order to perform certain Services, such as your location to assist you in locating our products, or your contact information to assist with contacts or service requests. This information may include Personal Information.

Correspondence Information. If you sign up for a membership, attend a conference or event including The Commodity Classic Show®, email us, subscribe to our newsletters mailing lists, publications, or blogs, we may keep your message, email address, and contact information to respond to your requests, provide the requested products or Services, and to provide notifications or other correspondences to you. If

you do not want to receive email from us in the future, you may let us know by sending us an email or by writing to us at the address below. Please note requests to remove your email address from our lists may take some time to fulfill. We may still contact you including via email as needed to provide important announcements or notifications regarding the Services.

Support Information. You may provide information to us via a support request submitted through the Services. We will use this information to assist you with your support request and may maintain this information to assist you or other Users with support requests. Please do not submit any information to us via a support submission, including confidential or sensitive information that you do not wish for Commodity Classic or our Service Providers to have access to or use in the future.

Information We Collect Through Automatic Data Collection Technologies

As you navigate through and interact with our Website, we may use automatic data collection technologies to collect certain information about your equipment, browsing actions and patterns, including the following:

- Details of your visits to our Website, including, but not limited to, traffic data, geolocation data, logs, and other communication data and the resources that you access and use on the Website.
- Information about your computer, mobile device, and internet connection, including your IP address, operating system, browser type, clickstream patterns, the URL of the most recent website you visited before coming to our Website, the amount of time you spent on our Website, and the pages you viewed while on our Website.

Behavioral Tracking. We also may use these technologies to collect information about your online activities over time and across third-party websites or other online services, or associate Personal Information with other information collected in this manner.

Keystrokes. We or our service providers may keep track of and/or collect the keystrokes and cursor movements of Website visitors before purchase of a Product or Service from our Website (and before we have any email address or other information about you (other than IP address) which would specifically identify you), but, this information is anonymous and, at the time of collection, we do not directly associate or attempt to associate this information with you as an identifiable individual. If you sign up to receive our emails (e.g., through the popup box that appears) we then do have the ability going forward to associate the keystroke and cursor information with the email address you provide. We use this information solely for the purpose of improving our Website to improve our customers' user experience (e.g., improving navigation, readability, etc.).

The information we collect automatically is statistical data and may include Personal Information, and we may maintain it or associate it with Personal Information we collect in other ways or receive from third parties. It helps us to improve our Website and to deliver better and more personalized Products and Services, including, but not limited to, by enabling us to: estimate our audience/visitor size and usage patterns, store information about your preferences, allowing us to customize and improve our Website, speed up your searches, and/or, recognize you when you return to our Website.

Cookies, Web Beacons, Links, And Other Tracking Technologies

Commodity Classic may keep track of how you use and interact with the Services through the use of cookies, web beacons, links, and other tracking technologies. We do this to help analyze the use of and improve the Services. Through these technologies we may automatically collect information about your use of the Services and other online activities, including our email correspondences, third-party services, and client applications, and certain online activities after you leave the Services. Link information is generally only analyzed on an aggregate basis. Some Services may not function properly if you disable cookies. Such data may include analytics information, sites visited before visiting the Services, browser type, operating system, and tracking of your interactions with our content and emails. **For full details, please refer to our Cookie Policy.**

Unique Identifiers. When you use or access the Services, we may access, collect, monitor, store on your device, and/or remotely store one or more “**Unique Identifiers**,” such as a universally unique identifier (“**UUID**”). A Unique Identifier may remain on your device persistently, to help you log in faster and enhance your navigation through the Services. Some features of the Services may not function properly if use or availability of Unique Identifiers is impaired or disabled.

Log File Information. When you use our Services, we may receive log file information such as your IP address, browser type, access times, domain names operating system, the referring web page(s), pages visited, location, your mobile carrier, device information (including device and application IDs), search terms, and cookie information. We receive log file data when you interact with our Services, for example, when you visit our websites, sign into our Services, or interact with our email notifications. Commodity Classic uses log file data to provide, understand, and improve our Services, and to customize the content we show you. Commodity Classic may link this log file to other information Commodity Classic collects about you via the Services.

Public Information. Commodity Classic also may collect information about you from publicly available sources. Information you make publicly available in any public or open forum, such as on a social network, may be considered public information for the purposes of this Privacy Policy, and may be accessed and collected by Commodity Classic. Please be aware that any content or information you share with or provide to third parties using or related to your use of the Services is neither private, nor confidential. Commodity Classic is not responsible for any content or information you

post or share with third parties. If you do not wish for certain information to be public, please do not share it.

How We Use Your Information

We use information that we collect about you or that you provide to us, including any Personal Information, for one or more of the following purposes:

- To present our Website and its contents to you.
- To provide you with information and respond to your questions on Products or Services that you request from us and information on new products and services, discounts, special promotions or upcoming events, and features or offers that we believe will be of interest to you.
- To provide you with the Products, Services, or information that you have requested.
- To process transaction payments, including, but not limited to, Product and/or Service fees, subscription fees, professional fees, membership dues, registration fees, voluntary contributions, examination fees, credential and designation fees, and payments, refunds and reimbursements for any products or services that you choose to purchase from us (though we do not receive your credit or debit card number).
- To process discounts, offers, loyalty rewards, and/or rebate requests, forms, and applications and coordinate with the manufacturer, retailer and/or wholesaler.
- To provide you with notices about your account, including expiration and renewal notices.
- To notify you about information regarding or changes to our Website, our policies, terms, or any Products or Services we offer or provide, or regarding your account.
- To process your account application and any changes to your account information.
- To process Personal Information or other information that you submit through to us.
- To allow you to participate in interactive features on our Website.
- To contact you about our own and third-parties' products and services that may be of interest to you.
- To provide access to restricted parts of our Website, e.g., areas accessible if you have a user account.
- To enhance and improve our Products and Services, for example, by performing internal research, analyzing user trends, and measuring demographics and interests.
- For internal purposes, such as Website or Service and system operation, administration, maintenance, internal audits and reviews, diagnosing technical problems, and maintaining security.
- To provide statistics about the usage levels of the Website and other related information to our service providers.

- To notify you of data privacy incidents or provide you with legally required information.
- To contact you regarding a promotion, contest, or sweepstakes in which you have participated.
- To request your participation in ratings, reviews, surveys, focus groups, or other initiatives which help us to gather information used to develop and enhance our Products and Services.
- To determine eligibility for membership, credentials, designations, or volunteer opportunities.
- To evaluate your performance on continued learning courses and assist you in the tracking of your progress.
- For examination or event registration, scheduling, event attendance, administration and related purposes.
- To fulfill any other purpose for which you provide Personal Information.
- In any other way we may describe and for which we obtain your consent when you provide the information and you give your consent.

Information Sharing

We may disclose your Personal Information, in whole or in part, to the following types of third parties, and for one or more of the following purposes:

- Data storage or hosting providers for the secure storage and transmission of your data
- Database and software service providers for the management and tracking of your data
- Technology providers who assist in the development and management of our Website
- Identity management providers for authentication purposes
- Legal and compliance consultants, such as external counsel, external auditors, or tax consultants
- Payment solution providers for the secure processing of payments you provide to us
- Manufacturers, retailers, and wholesalers for submission, processing, and management of rebates, discounts, offers, loyalty rewards, and the like
- Outbound call center providers, who may perform outreach on our behalf regarding our products and Services
- Fulfillment and shipping vendors for the fulfillment of our Products and Services
- Survey and research providers who perform studies on our behalf
- Publishers and learning providers who develop products on our behalf
- Learning technology and online event providers for the delivery and improvement of web events and learning programs and the tracking of your progress
- Examination providers for the scheduling and delivery of credential and designation examinations

- Digital credential providers for the delivery of digital badges earned through your participation in learning programs
- Advertising partners, including social media providers, for the delivery of targeted advertisements
- Our volunteers or committee members who perform various functions on our behalf
- Unrelated third-party list renters for one-time mail or email approved by us
- Marketing providers who may sell mailing lists

Service Providers. Commodity Classic works with various organizations and individuals to help provide the Services to you (“**Service Providers**”), such as website and data hosting companies and companies providing analytics information, like Google Analytics (see below for additional information). We may share your Personal Information with our Service Providers for the purpose of providing the Services. The information we share to our Service Providers may include both information you provide to us and information we collect about you, including Personal Information and information from data collection tools like cookies, web beacons, log files, Unique Identifiers, and location data. Commodity Classic takes reasonable steps to ensure that our Service Providers are obligated to reasonably protect your information on Commodity Classic’s behalf. If Commodity Classic becomes aware that a Service Provider is using or disclosing information improperly, we will take commercially reasonable steps to end or correct such improper use or disclosure.

Third-Party Use of Cookies and Other Tracking Technologies

Some content or applications, including advertisements, on the Website are served by third parties, including advertisers, ad networks and servers, content providers and application providers. First-party or third-party cookies may be used alone or in conjunction with web beacons or other tracking technologies to collect information about you when you use our Website. A first-party cookie is a cookie set by the domain name that appears in the browser address bar. A third-party cookie is a cookie set by (and on) a domain name that is not the domain name that appears in the browser address bar. It might be set as part of a side resource load (image, JS, iframe, etc., from a different hostname) or an AJAX HTTP request to a third-party server. The information that first-party and third-party cookies collect may be associated with your Personal Information or they may collect information, including Personal Information, about your online activities over time and across different websites and other online services (i.e., tracking such activities). They may use this information to provide you with interest-based (behavioral) advertising or other targeted content.

We do not control these third parties’ tracking technologies or how they may be used. If you have any questions about an advertisement or other targeted content, you should contact the responsible provider directly. More information on how to opt-out of third-party advertiser tracking mechanisms [here](#).

Google Tools. We use tools provided by Google as described below.

Google Analytics. We use, and some of our third-party service providers may use, [Google Analytics](#) (click for link to Google's website) or other analytics service to help us understand the use of our Website and Services. Google Analytics is a web analysis service provided by Google. Google utilizes data it collects to track and examine the use of our Website to prepare reports on its activities and share them with other Google services. Google may use the Data collected to contextualize and personalize the ads of its own advertising network. The Personal Information collected and processed may include cookies, usage data, and other internet information. Such service providers may place their own cookies in your browser. This Privacy Policy covers use of cookies by us only and not the use of cookies by third parties.

Google AdSense Advertising. We use Google AdSense Advertising (or other search engine or display network advertising) on our website. Google's advertising requirements and principles are available [here](#). They are put in place to provide a positive experience for users. We have implemented the following: (a) Remarketing with Google AdSense and (b) Google Display Network Impression Reporting.

Google DART Cookie. Google, as a third-party vendor, uses cookies to serve ads on our Website. Google's use of the DART cookie enables it to serve ads to our users based on previous visits to our Website and other sites on the Internet. Users may opt out of the use of the DART cookie by visiting the Google Ad and Content Network privacy policy.

We, along with third-party vendors such as Google, use first-party cookies (such as the Google Analytics cookies) and third-party cookies (such as the DoubleClick cookie) or other third-party identifiers together to compile data regarding user interactions with ad impressions and other ad service functions as they relate to our Website.

Google DoubleClick Cookie. We work with DoubleClick Cookie Google, a third-party vendor, which uses cookies to serve ads on our Website. Google's use of the DoubleClick cookie enables it and its partners to serve ads to our users based on their visit to our Website or other websites on the Internet. You may opt out of the use of the DoubleClick Cookie for interest-based advertising by visiting the Google Ads Settings web page [here](#).

Google Maps/Google Earth. We also use Google Maps (including the Google Maps API(s)) and/or Google Earth, which may, among other things, request access to your geolocation, and both of which are subject to their own terms of use and privacy policy.

Google reCAPTCHA. We use Google reCAPTCHA, which identifies bots by collecting hardware and software information and sending that data to Google for analysis. More about Google reCAPTCHA is available [here](#).

Users can set preferences for how Google advertises to you using the Google Ad Settings page. Alternatively, you can opt out by visiting the Network Advertising Initiative Opt Out page or by using the Google Analytics Opt Out Browser add-on.

Event-Related Disclosure. From time to time, we may conduct events, run contests, make special offers, or other activities (“**Events**”), possibly together with an exhibitor, sponsor or other Service Provider. If you provide information to such third parties, you give them permission to use it for the purpose of that Event and any other use to which you consent. We cannot control such third parties’ use of your information. If you do not want your information to be collected by or shared with such third parties, you can choose not to participate in these Events.

We may share your Personal Information with exhibitors for their marketing and commercial purposes (including, but not limited to, their sending you marketing and related communications), but only if you have both registered for a conference and either had your attendee credentials scanned by the exhibitor at its booth or enter an exhibitor’s booth virtually online (this does not apply to casual website visitors or conference attendees who are not registered to enter the exhibit hall).

Disclosure of De-Identified Personal Information. We may share De-Identified Personal Information with third parties for any purpose. De-Identified Personal Information or non-Personal Information may be aggregated for system administration and to monitor usage of the Website. It may be utilized to measure the number of visits to our Website, average time spent, number of pages viewed and to monitor various other Website statistics. This monitoring helps us evaluate how visitors use and navigate our Website so we can improve the content. We may share De-Identified Personal Information or anonymous information (including, but not limited to, anonymous usage data, referring/exit pages and URLs, IP address, platform types, number of clicks, etc.) with interested third parties in any way we choose and for any purpose.

Your Consent to Disclosure/Transfer/Sale of Your Personal Information. You consent to our disclosure of your Personal Information, De-Identified Personal Information, and other information you provide to us (collectively, “**Transferred Information**”) to a potential or actual buyer or acquirer of our company or other successor for the purpose of considering or undergoing a merger, divestiture, restructuring, reorganization, dissolution, change in control, or sale or transfer of some or all of our assets (each of the foregoing referred to as a “**Transfer**”), whether as a going concern or as part of bankruptcy, liquidation or other court proceeding, in which Personal Information held by us is among the assets transferred. You agree to and do hereby consent to (and shall not object to) our assignment, conveyance, transfer, and/or license (whether by contract, merger or operation of law) as part of a Transfer, of any or all of our rights, in whole or in part, in or to Transferred Information and your consents, with or without notice to you and without your further consent. We cannot make any representations regarding the use or transfer of Transferred Information that we may have in the event of our bankruptcy, reorganization, insolvency, receivership, or an assignment for the benefit of creditors. By providing any Personal Information, you expressly agree and consent to the use and/or transfer of Transferred Information or other information in connection with a Transfer. Furthermore, except as required by law, we are not and will not be responsible for any breach of security by any third parties or

for any actions of any third parties that receive any of the Transferred Information that is disclosed to us.

Required Disclosures. Except as otherwise described in this Privacy Policy, we will not disclose your Personal Information to any third party unless required to do so by law, court order, legal process, or subpoena, including, but not limited to, in order to respond to any government, regulatory, or licensing request, or if we believe that such action is necessary to: (a) comply with the law, comply with legal process served on us or our affiliates, subsidiaries, contracted vendors, or affinity partners, or investigate, prevent, or take action regarding suspected or actual illegal activities; (b) enforce our Terms or customer agreement (including for billing and collection purposes); (c) take precautions against liability; (d) investigate and defend ourselves against any third-party claims or allegations; (e) assist government enforcement agencies or to meet national security requirements; (f) to protect the security or integrity of our Website, our Products, or Services; or, (g) exercise or protect the rights, property, or personal safety of us, our users or others.

We will attempt to notify you about these requests unless: (i) providing notice is prohibited by the legal process itself, by court order we receive, or by applicable law, or (ii) we believe that providing notice would be futile, ineffective, create a risk of injury or bodily harm to an individual or group, or create or increase a risk of fraud upon us, our users, our Website, or our Services. In instances where we comply with legal requests without notice for these reasons, we will attempt to notify that user about the request after the fact if we determine in good faith that we are no longer legally prohibited from doing so and that no risk scenarios described in this paragraph apply.

It is likely that the identity and categories of such third parties will change during the life of your account. We require that our third-party service providers only use your Personal Information as necessary to provide the requested services to us and each service provider is subject to a set of terms consistent with the applicable portions of this Privacy Policy.

Access To The Information Commodity Classic Has Collected About You

Commodity Classic provides certain tools and settings within the Services to help you access, correct, delete, or modify your Personal Information associated with the Services. Commodity Classic welcomes you to contact us regarding the information we have collected about you, including regarding the nature and accuracy of the data that has been collected about you, to request an update, modification, or deletion of your information, to opt-out of certain Services uses of your information, or to withdraw any consent you may have granted to Commodity Classic.

Please note requests to delete or remove your information do not necessarily ensure complete or comprehensive removal of the content or information posted, and removed information may persist in backup copies indefinitely. Please note that if you choose to

delete your information or opt-out of the collection and use of your information, you understand that certain features, including but not limited to access to the Services, may no longer be available to you.

We may store the information we collect about you indefinitely, or as otherwise required by law. Following termination or deactivation of a Commodity Classic Account, Commodity Classic may retain your information and content for a commercially reasonable time for backup, archival, and audit purposes.

Do Not Track. Commodity Classic does not currently employ a process for automatically responding to “Do Not Track” (DNT) signals sent by web browsers, mobile devices, or other mechanisms. Per industry standards, third parties may be able to collect information, including Personal Information, about your online activities over time and across different websites or online services when you use Services. You may opt out of online behavioral ads at <http://www.aboutads.info/choices/>. You also may limit certain tracking by disabling cookies in your web browser.

Information Security

Security Of Your Information. Commodity Classic takes reasonable efforts to secure and protect the privacy, accuracy, and reliability of your information and to protect it from loss, misuse, unauthorized access, disclosure, alteration and destruction. Commodity Classic implements security measures as we deem appropriate and consistent with industry standards. As no data security protocol is impenetrable, Commodity Classic cannot guarantee the security of our systems or databases, nor can we guarantee that Personal Information we collect about you will not be breached, intercepted, destroyed, accessed, or otherwise disclosed without authorization. Accordingly, any information you transfer to or from Services is provided at your own risk.

Please do your part to help us keep your information secure. You are responsible for maintaining the confidentiality of your password and Commodity Classic Account, and are fully responsible for all activities that occur under your password or Commodity Classic Account. Commodity Classic specifically reserves the right to terminate your access to the Services and any contract you have with Commodity Classic related to the Services in the event it learns or suspects you have disclosed your Commodity Classic Account or password information to an unauthorized third party. You hereby release and forever discharge us and our affiliates, subsidiaries, officers, directors, employees, and agents, and their respective successors and assigns, and you will indemnify, defend and hold us harmless, from and against any liability, claim, or cost (including attorneys’ fees), arising directly or indirectly from any failure by you to maintain the security of your email or other accounts that directly or indirectly results in an unauthorized third party having access to such email or accounts or causes us to transfer funds based on instructions purporting to have originated from you (i.e., “wire transfer fraud” or “business email compromise” events).

Additional Provisions Regarding The Services & Your Information

Commodity Classic shares your data, including Personal Information, with our website hosting Service Provider for the purposes of processing your data pursuant to your use of the Services.

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Safely Using Commodity Classic's Services

Despite Commodity Classic's safety and privacy controls, we cannot guarantee the Services are entirely free of illegal, offensive, pornographic, or otherwise inappropriate material, or that you will not encounter inappropriate or illegal conduct from other Users when using the Services. You can help Commodity Classic by notifying us of any unwelcome contact by contacting us using the information below.

Data Retention

The time period for which we retain your Personal Information depend on the purposes for which we use it. We will retain your Personal Information for as long as your account is active, or as long as you are a registered member or user of our Services or for as long as we have another business purpose to do so (such as, but not limited to, for business, tax, or legal purposes) and, thereafter, for no longer than is required or permitted by law, or our records retention policy, reasonably necessary for internal reporting and reconciliation purposes, or to provide you with feedback or information you might request. This period of retention is subject to our review and alteration.

Following termination or deactivation of your user account, we may retain your profile information and all information posted to public areas of the Website. Following termination or deactivation of your user account, we may retain your Personal Information and other data, but will maintain it as confidential according to the Terms, this Privacy Policy, and as required by applicable law. We have the right to delete all of your Personal Information and other data after termination of your user account without notice to you.

We may retain De-Identified Personal Information for as long as we deem appropriate.

Your California Privacy Rights

Under California Civil Code Section 1798.83 (known as the "Shine the Light" law), Commodity Classic members and customers who are residents of California may request certain information about our disclosure of Personal Information during the prior calendar year to third parties for their direct marketing purposes. To make such a request, please write to us at the address below or at nafemdpo@nafem.org with

“Request for California Privacy Information” on the subject line and in the body of your message. We will comply with your request within thirty (30) days or as otherwise required by the statute. Please be aware that not all information sharing is covered by the “Shine the Light” requirements and only information on covered sharing will be included in our response.

Notices; Opting Out

By providing us with your email address (including by “following”, “liking”, linking your account to our Website or Service or other services, etc., on a third party website or network), you consent to our using the email address to send you Service-related notices by email, including any notices required by law (e.g., notice of data privacy or security incidents), in lieu of communication by postal mail. You also agree that we may send you notifications of activity regarding our Products, Services, the Website, your Personal Information, or any aspect of our relationship, to the email address you give us, in accordance with any applicable privacy settings. We may use your email address to send you other messages or content, such as, but not limited to, newsletters, additions or changes to features of the Service, or special offers. If you do not want to receive such email messages, you may opt out by emailing us your opt-out request or, where available, by clicking “unsubscribe” at the bottom of our e-newsletter. Opting out may prevent you from receiving email messages regarding updates, improvements, special features, announcements, or offers. You may not opt out of Service-related emails. Please note that if you have opted not to receive legal notice emails from us (or you haven’t provided us with your email address), those legal notices will still govern your use of the Services, and you are still responsible for reading and understanding them.

Where We Process and Store Personal Information

We have our headquarters in the United States. The Personal Information we or our service providers collect may be stored and processed in servers within or outside of the United States and wherever we and our service providers have facilities around the globe, and certain information may be accessible by persons or companies outside of the United States who provide services for us. You consent to our and our service providers’ transmission and/or transfer of your Personal Information to, or access it in, jurisdictions that may not provide equivalent levels of data protection as your home jurisdiction. We will take reasonable steps to ensure that your Personal Information receives an adequate level of protection in the jurisdictions in which we process it.

If you are a resident or citizen of the UK, European Economic Area (“**EEA**”), or Switzerland, please see the section below on GDPR compliance.

If you are a citizen or resident of the UK, EEA, Switzerland, or other regions with laws governing data collection and use that may differ from the laws in the United States, please note that we may transfer your information to a country or jurisdiction that does

not have the same data protection laws as your jurisdiction. We may do so to process your information by staff operating outside these countries who work for us or for one of our service providers.

If you are a resident of a country other than the United States, you acknowledge and consent to our collecting, transmitting, processing, transferring, and storing your Personal Information out of the country in which you reside.

GDPR: The Follow Provisions Apply Only to Citizens and Residents of the United Kingdom, EEA, and Switzerland

The following provisions apply only if you are a citizen or resident of the UK, EEA, or Switzerland. For such citizens or residents, all processing of your Personal Information is performed in accordance with privacy rights and regulations, in particular, (EU) 2016/679 of the European Parliament and of the Council of 27 April 2016, known as the General Data Protection Regulation (“**GDPR**”), and our processing will take place in accordance with the GDPR. For purposes of the GDPR, we will be the “data controller” of Personal Information (referred to and defined in the GDPR (available [here](#)) as “Personal Information”) we collect through the Website, unless we collect such information on behalf of a “data controller” in which case we will be a “data processor.” This Privacy Policy does not apply to websites, applications or services that do not display or link to this Privacy Policy or that display or link to a different privacy policy. For UK, EEA, and Switzerland residents and citizens only, to the extent any definition in this Privacy Policy conflicts with a definition under the GDPR, the GDPR definition shall control.

We provide adequate protection for the transfer of Personal Information to countries outside of the UK, EEA, or Switzerland through a series of intercompany agreements based on or incorporating the Standard Contractual Clauses, or we rely on the European Commission’s adequacy decisions about certain countries, as applicable, and/or obtain your consent for these data transfers from Europe to the United States to other countries. We also may need to transfer your information to other group companies or service providers in countries outside the EEA. This may happen if our servers or suppliers and service providers are based outside the UK, EEA, or Switzerland, or if you use our services and products while visiting countries outside this area.

Our Legal Basis for Processing Personal Information (UK, EEA, and Swiss Visitors Only)

If you are a visitor using our Website from the UK, EEA, or Switzerland, our legal basis for collecting and using the Personal Information described above will depend on the Personal Information concerned and the specific context in which we collect it. However, we will normally collect Personal Information from you only where we need the Personal Information to perform Services for you for which you have contracted with us, or where the processing is in our legitimate interests or rely upon your consent

where we are legally required to do so and not overridden by your data protection interests or fundamental rights and freedoms. In some cases, we also may have a legal obligation to collect Personal Information from you or may otherwise need the Personal Information to protect your vital interests or those of another person.

The collection and processing of your Personal Information may be necessary for the purposes of our legitimate interests. Such legitimate interest purposes may include:

- fraud prevention
- ensuring network and information security
- indicating possible criminal acts or threats to public security, including enhancing protection of our community against spam, harassment, intellectual property infringement, crime, and security risks of all kind, and enforcing legal claims, including investigation of potential violations of our Terms of Use
- when we are complying with legal obligations
- processing employee or visitor, member, attendee, or registrant data
- performing the function or service you requested of us
- providing our Services and their functionality to you where such processing is necessary for the purposes of the legitimate interests pursued by us or by our service providers related to the Services
- direct marketing
- the relevant and appropriate relationship we have with you
- analytics, e.g., assess the number of visitors, page views, use of the Website, etc., in order to understand how our Website and Services are being used, to optimize the Website and/or future communications, and to develop new services and Website features
- updating your information and preferences
- offering and improving our Services
- enforcing legal claims, including investigation of potential violations of our Terms

Your Data Rights Under GDPR

If you are subject to GDPR, your rights include the following:

- **The right to access** - Upon request, we will confirm any processing of your Personal Information and, and provide you with a copy of that Personal Information in an acceptable machine-readable format.
- **The right to rectification** - You have the right to have us correct any inaccurate Personal Information or to have us complete any incomplete Personal Information.
- **The right to erasure** - You may ask us to delete or remove your Personal Information and we will do so in some circumstances, such as where we no longer need it (we may not delete your data when other interests outweigh your right to deletion).
- **The right to restrict processing** - You have the right to ask us to suppress the processing of your Personal Information but we may still store your Personal Information. See below for more information.

- **The right to object to processing** - You have the right to object to your Personal Information used in the following manners: (a) processing based on legitimate interests or the performance of a task in the public interest/exercise of official authority (including profiling); (b) direct marketing (including profiling); and, (c) processing for purposes of scientific/historical research and statistics. See below for more information.
- **The right to data portability** - You have the right to obtain your Personal Information from us that you consented to give us or that is necessary to perform fulfillment of member benefits with you. We will give you your Personal Information in a structured, commonly used and machine-readable format.
- **Rights regarding automated decision making**. You have the right not to be subject to a decision based solely on automated processing, including profiling, which produces legal effects concerning you or similarly significantly affects you, except for the exceptions applicable under relevant data protection laws.
- **The right to complain to a supervisory authority** - You have the right to file a complaint with a supervisory authority, in particular in the European member state of your habitual residence, place of work or place of the alleged infringement if you consider that the processing of Personal Information relating to you infringes upon your rights.
- **The right to withdraw consent** - If we are processing your Personal Information based on your consent to do so, you may withdraw that consent at any time.

Contact Commodity Classic

Maureen Feck

Data Protection Officer

COMMODITY CLASSIC

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