

Aspen USA, Inc. Privacy and Cookies Policy

Introduction

Aspen USA, Inc. (the “**Company**” or “**we**”) collects, uses, stores and discloses (or “**process(es)**”) personal information about persons who visit and use our websites, mobile apps and social media platforms (“**Digital Channels**”) and about persons who participate in evaluations, campaigns or competitions organised by us or who contact us in connection with customer issues.

This Privacy and Cookies Policy describes how we process your personal information, what rights you may have in connection with it, and what cookies we use in connection with our Digital Channels.

Your privacy is important to us and we strive for a high level of protection in all our personal information processing. We strive for all personal information processing to be carried out within the Company in accordance with applicable information protection legislation.

What is personal information?

Personal information generally includes your name in association with a certain identifier, such as your account or credit card number. Depending on your location, however, personal information can include information that identifies, relates to, describes, is associated with or is reasonably capable of being associated with you. This means that different types of information such as name and contact details, IP addresses, competition entries, purchase history, case information and photographs may constitute personal information under applicable law.

What personal information do we collect about you?

When you visit our Digital Channels

When you visit or use our Digital Channels, we may collect information that you choose to submit to us, for example your name, postal address, e-mail address and phone number. We may also collect personal information through cookies on our Digital Channels as described under “Information about cookies - and how to avoid them” below.

When you participate in competitions, other marketing activities, evaluations or tasting panels

If you participate in competitions or other marketing activities organised by the Company, competition entries and other necessary information about you for such activities (for example to administer prizes) will be processed. If you participate in an evaluation activity for any of our products, your ratings and suggestions, as well as your gender and age, may also be processed. If you participate in tasting panels, we will also process information regarding any food allergies you might have.

When you are in contact with customer services or communicate with us in other ways

When you communicate with us, for example, when you ask customer services something or if you have queries in connection with a complaint regarding a product, we may process case information, which may include, in addition to your contact details, your customer number, complaints, requests and other information you provide about yourself while in contact with us.

Purposes for which we process your personal information

We process your personal information for various purposes, depending on whether you visit our Digital Channels, participate in competitions, marketing activities, evaluations or tasting panels, or communicate with us for other reasons:

- To deliver services or products that you order and to administer our agreements with you;
- To communicate with you and deal with your requests (e.g. handle returns/damages, complaints or comments etc.);
- To handle and respond to legal claims, e.g. during a dispute or litigation, and to document our agreements regarding ethanol and grain trading;
- To administer events, competitions and prizes. Note that competition entries may be published during related marketing;
- To follow-up and evaluate the Company's products, for example through tasting panels;
- To maintain, develop, test and improve our Digital Channels and the technical platforms on which they are delivered;
- To generate statistics regarding the use of our Digital Channels; and
- To market products and services from companies within the Company (including by e-mail and text/picture messages) that may be of interest to you. You can choose to opt out of electronic marketing by following the link in the e-mail/message we send to you.

Erasure

The Company will only process your personal information for as long as necessary in order to fulfil the purposes of the processing or otherwise in view of applicable

law. We have procedures in place to ensure that your information is erased thereafter.

Security for the protection of personal information

The Company safeguards your personal information with appropriate technical and organisational security measures to protect your personal information from unauthorised access, amendments, dissemination or destruction.

Disclosure of personal information

The Company may appoint external partners to perform tasks on its behalf, such as providing IT services, marketing, data analytics or statistics. The performance of these services may mean that our partners gain access to your personal information. Companies that manage personal information on our behalf must always sign an agreement with us so that we are able to ensure a high level of protection of your personal information also with our partners.

We may share your personal information with members of the Lantmännen Group companies for performance of Lantmännen business functions, such as to administer central customer relationship management systems. We may also disclose your personal information to third parties, for example the police or other public authorities, if it concerns criminal investigations or if we are otherwise required to disclose such information by law or public authority decisions. In addition, we may disclose your personal information with other legal entities, on a temporary or permanent basis, in connection with a merger, acquisition, sale of assets, joint venture, securities offering, bankruptcy, reorganization, liquidation, dissolution, or other transaction, or if the ownership of all or substantially all of our business otherwise changes.

The Company will not disclose your personal information to any extent other than described in this section.

External links

The Company's Digital Channels may sometimes contain links to external websites or services that are administered and controlled by unaffiliated third parties. If you follow a link to an external website, we recommend that you familiarize yourself with the principles for personal information processing and cookie policy(ies) that apply to the site in question. This Privacy and Cookies Policy only applies to our Digital Channels.

Your rights

Where required by applicable law, you may have certain rights to your personal information, including the right to access, correct or amend, or delete your personal

information. You may exercise your rights by contacting us as detailed below. Please note that in certain cases we may need to retain your personal information as required or permitted by applicable law.

Information about cookies - and how to avoid them

The Company's use of cookies

We use cookies on our websites. A cookie is a small text file placed on your computer in order, for example, to facilitate certain features such as navigation on the website. We also use cookies to aggregate statistics about the number of visitors to the website and obtain information about how the website is used. This information allows us to develop and optimise the website. Finally, we use cookies to see which adverts are relevant to you and to evaluate our advertising campaigns. For example, these cookies track whether you have seen an advertising campaign for other group companies on another website and been referred to our website.

The Company is only using the information collected through cookies on our websites for its purposes and not for third parties' purposes. Sometimes cookies collect personal information, for example, IP addresses and information linked to the IP address, but not personal information directly attributable to you as an individual.

Cookies may either be deleted automatically when the user closes their web browser (so-called "session cookies") or stored on the user's computer to facilitate future visits to the website (so-called "persistent cookies"). Likewise, Persistent cookies will be removed automatically after a specified period.

How to avoid cookies

You can block the usage of cookies by changing the settings of your web browser to reject storing of cookies automatically, or to inform you each time a Digital Channel requests to store a cookie. You can also erase previously stored cookies through your web browser. If you block cookies, the functionality of our website may be affected.

Social networks

Our websites sometimes contain embedded content and sharing tools from social networks. These suppliers may therefore place cookies on our websites. We have no access to or control over these cookies or the information they collect. You therefore need to check the websites of the relevant third party for further information about these cookies, and about how to opt out of receiving them.

Do Not Track signals

We do not currently recognize automated browser signals regarding tracking mechanisms, which may include "Do Not Track" instructions.

Contact details for queries regarding personal information and cookies

If you have any questions about how the Company processes your personal information or uses cookies please contact us at dataprotectionofficer@lantmannen.com.
