**THE J.M. SMUCKER CO. AND SUBSIDIARIES PRIVACY POLICY**

This Privacy Policy describes how Vitakraft Sunseed, Inc. treats personal information on the websites and platforms where this Privacy Policy is referenced or found, in our email messages to you, and in our offline activities where this Privacy Policy is referenced.  Our sites are intended for use only in the United States and are subject to U.S. laws.  If you live outside of the United States, you understand and agree that we may transfer your information to the United States.

**1.  Collection and Use of Personal Information.**

We collect, receive, and develop several different types of personal information about you depending on the nature of your interactions with us, including:

We may collect your Contact Information, including your name, email address, social media handles, mailing address, zip code, and phone number. If you create an account, we also collect your username and password.

We may collect Internet and Network Activity Information, including your IP address when you visit our websites. We also use tracking tools like cookies to automatically collect information about how you interact with our websites and online content.  This might include device identifiers, the type of browser and operating system you are using, your browsing and search history on our sites, what areas of our sites you visit and for how long, what products or content you view and click on, what site you came from to get to us and what site you go to when you leave us, and your interactions with our digital ads and content on other sites. We may collect and record page interaction information and other electronic communications and content from your use of the sites.  We may also embed technologies (which may include, for example, web beacons, tags, and pixels) in the emails and other communications we or our vendors send to you to help us understand how you interact with those messages.  We may engage or otherwise allow other parties to also collect information on our sites in these ways.

Location Information: We may automatically collect information about your precise geolocation when you access our website or the mobile version of our website, including by using GPS and WiFi technology. We also collect information about your general location using your IP address and your zip code, such as when you search online for product retailers near you.

If you apply for a job, we may collect Employment-Related Information about your work experience and previous employment, your education history, your resume, the URL to your personal or professional websites, whether you need a visa to work in the United States, and salary expectations. If you apply for a job, you can choose to also voluntarily provide any of the following information: ethnicity, gender, disability status, and/or veteran status.

We collect information you submit or post audio or visual information you post to our sites or other social media sites, like photos or videos. We collect feedback and any other information you provide when you contact us.

**2.****Use of Personal Information.**

We use information for marketing purposes, and use your information to tailor and send you information about new products and special offers.

We use information to develop and improve our products and services. We use your information to customize your experience.

We use your information to respond to your questions, complaints, and feedback. If your request relates to products or transactions, we may also use your information to identify the particular transaction.

We use information to communicate with you. We might also use your information to contact you about this Privacy Policy or our website.

We use information for security purposes, and to detect, investigate, and remediate fraud or other suspected illegal activity.

We use information for hiring purposes. If you choose to voluntarily submit your ethnicity, gender, disability status, and/or veteran status in connection with a job application, we will use that information for statistical tracking purposes, and not for hiring decisions, in accordance with applicable law.

We use information to verify and respond to requests made pursuant to this Privacy Policy.  We may use information to verify your identity if you make requests pursuant to this Privacy Policy.

We use information as otherwise permitted or required by law or as we may notify you.

**3.  Collection of Personal Information.**

We collect information directly from you, and we may collect information when you register an account, sign up for an e-newsletter, enter a contest, submit or post content, or otherwise contact us.

We collect information from your devices. We use technical tracking tools that work behind the scenes, like browser cookies, to automatically collect information from and about you and your devices. We collect this information when you interact with our websites, our ads, and our emails that we or our vendors send to you. We collect this information about users over time and across devices.

We get information from vendors we hire to work on our behalf. For example, vendors that host or maintain our websites and send promotional emails for us may give us information. Our employment and recruiting vendors also give us information.

We get information about you from other parties. We work with business and marketing partners and social media platforms that give us information about you that they have collected either directly or indirectly from you. We may also receive information from a job network or social network if you choose to import your information from those platforms when applying for a job with us.  We also use features that let your friends give us your information.

**4.  Sharing of Personal Information.**

We share information within Vitakraft Sunseed, Inc. and its subsidiaries.

We share information with vendors that perform services on our behalf for our own business and operational purposes. We may share information with vendors that send emails for us, run our websites and contests, provide advertising or marketing services, track advertising impressions, provide analytics services, investigate and prevent data incidents, audit our business and financial statements, vet job applicants, provide legal advice, and place our advertisements on other platforms.

We may share your information with business partners and marketing companies. For example, we may share information with other parties that co-sponsor a promotion or sell our products. These partners may send you marketing information including by mail or email. We may also share information with business partners in whose products or services you may be interested and they may use the information for their own marketing purposes or the marketing purposes of others. We may also share personal information with other parties, including those that run social media platforms that help us with marketing. This may include social media platforms and influencers, advertising networks, operating systems and platforms, data analytics providers, and ad tech companies.

We will share information in order to comply with the law or to protect ourselves or others. For example, we will share information as required to respond to a court order or subpoena. We may share information if a government agency or investigatory body requests it. We might share information when we are investigating potential fraud, including fraud we think has happened during a contest or promotion. Or we may share your information if you are the winner of a contest or promotion with anyone who requests a winner’s list.

We may share information with any successor to all or part of our business. For example, if part of our business is sold, we may give our customer database to the buyer of the business as part of that transaction.

We may share information for other reasons we may describe to you or as permitted or required by law.

**5.  Your choices and rights.**

You can opt-out of receiving our marketing emails. To stop receiving our promotional emails, follow the instructions in any promotional message you get from us. Even if you opt-out of getting marketing messages, we may still send you messages in response to any questions or requests directed to us.

You can control certain cookies and tracking tools.

You can control certain tools on your mobile devices, such as turning off the GPS locator on your phone.

If you are a Nevada resident, you can request that we not “sell” your “covered information” (as defined in applicable Nevada law). To make such a request, email us at customerservice@vitakraft.us.  Please use “Nevada Do Not Sell” in the subject line.

**6.****California Residents**.

California Civil Code Section 1798.83, known as the “Shine The Light” law, permits California residents to request and obtain from businesses a list of what personal information (if any) was disclosed to third parties for direct marketing purposes in the preceding calendar year and the names and addresses of those third parties. Under Section 1798.83, we currently do not share your personal information with third parties for their direct marketing purposes.

We also want California residents to know the following about their personal information:

* We collect and use the following categories of personal information as set forth in the California Consumer Privacy Act of 2018 for the business and commercial purposes described in this Privacy Policy: Identifiers; Payment and customer records information; Characteristics of protected classifications under California or federal law (such as gender and age); Commercial information; Internet or other electronic network activity information; and Geolocation data.
* We collect these categories of personal information from the sources described above.
* We disclose each of the foregoing categories of personal information to our service providers and with business and advertising partners, advertising networks, data analytics providers, and social networks for our business purposes to the extent permitted by applicable law.
* We do not “sell” your personal information. “Sell” means the sale, rental, release, disclosure, dissemination, availability, transfer, or other oral, written, or electronic communication of your personal information to a third party for monetary or other valuable consideration. Based on our understanding of state laws, we do not sell your personal information, so we do not offer the opt-out right.

We will not discriminate against you because you exercised any of these rights.

A California resident can exercise their rights online by emailing us at customerservice@vitakraft.us.  We may deny certain requests, based on our legal rights and obligations. For example, we may retain personal information as permitted by law, such as for tax or other record keeping purposes, to maintain an active account, and to process transactions and facilitate customer requests. Except as otherwise provided by applicable California law, note that for purposes of these rights under this Section 6, personal information does not include information about job applicants, employees and other of our personnel or information about employees and other representatives of third-party entities we may interact with.

We will take reasonable steps to verify your identity prior to responding to certain of your requests.

From time to time, we may collect personal information, such as email addresses, in connection with a promotion, offer or discount.  Our offers and incentives generally reflect the value of the relationships that we have with the individuals who participate in these programs. Participation in these programs is voluntary and you may withdraw at any time by emailing us at customerservice@vitakraft.us.

If you reside in California, you also have the right to ask us one time each year if we have shared personal information with third parties for their direct marketing purposes. To make a request, please send us an email at customerservice@vitakraft.us. Indicate in your email that you are a California resident making a “Shine the Light” inquiry.

**7.  Vitakraft Sunseed, Inc’s sites are not meant for children.**

We do not knowingly collect personal information from children under 16.  If you are a parent or legal guardian and think your child under 16 has given us personal information, you can email us at [customerservice@vitafraft.us](mailto:customerservice@vitafraft.us) For more information on how to protect children's privacy online at https://www.consumer.ftc.gov/topics/protecting-kids-online.

**8.  Our security measures.**

We cannot guarantee that your use of our sites and apps will be completely safe. We encourage you to take all reasonable precautions when using the Internet.

We may link to other sites or outside party services on platforms we do not control.

If you click on a link to an outside party site, you will be taken to websites or platforms we do not control. This Privacy Policy does not apply to the privacy practices of websites or platforms that we do not control.

**9.  Our contact information.**

If you have any questions about this Privacy Policy or want to correct or update your information, please email us at customerservice@vitakraft.us You can also write to us at: PO Box 33 Bowling Green, OH 43402, or call toll free at: 419-832-1641.

**10.  We may update this Privacy Policy.**

From time to time we may change our privacy policies. We will notify you of any material changes to our Privacy Policy to the extent required by law. We will also post an updated copy on our sites.  Please check our sites periodically for updates.