

## **The Scoular Company: Global Privacy Notice**

Effective Date: May 1, 2020

The Scoular Company and our affiliates and subsidiaries listed in Schedule 1 (collectively, “Scoular”) respect your concerns about privacy. This Global Privacy Notice describes the types of personal information we collect, how we use the information, with whom we share it and the choices available to you regarding our use of the information. We also describe measures we take to protect the security of the information and how you can contact us about our privacy practices.

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### **Information We Obtain**

We collect personal information about you through various channels. This Global Privacy Notice applies to the personal information we obtain via your transactions and dealings with Scoular, including through your use of [www.scoular.com](http://www.scoular.com) (the “Site”) and your offline interactions with Scoular (such as when you use our risk management, transportation & logistics or product-related services).

This Global Privacy Notice does not apply to your use of the *Field Direct*, *GrainView* or *Roger* mobile applications. Click [here](#) to view the *Field Direct* app privacy policy.

Click [here](#) to view the *GrainView* app privacy policy.

Click [here](#) to view the *Roger* app privacy policy.

#### *Information You Provide to Us*

We may collect certain personal information about you when you provide it to us. The types of personal information you may provide to us through the channels described above include:

- Contact information (such as name, telephone number, postal address and email address);
- Billing and payment information, such as financial account number and billing address;
- Purchase and service history and transaction information;

- Information about your business or organization, such as your company name, location, market and Tax ID number;
- Information you submit in connection with a career opportunity;
- Account information (such as your username and password);
- Location data (such as data derived from your IP address, country and/or ZIP code); and
- Other information you choose to provide, such as through the “Contact Us” feature of the Site.

#### *Automated Collection of Information*

When you visit our Site, we may collect certain information by automated means, such as cookies, web beacons, web server logs and other technologies. The information we collect in this manner may include your device IP address, unique device identifier, web browser characteristics, device characteristics, operating system, language preferences, referring URLs, clickstream data, and dates and times of website visits. We may use these automated technologies on our Site to collect information about your equipment, browsing actions, and usage patterns. These technologies may help us (1) remember your information so you do not have to re-enter it; (2) track and understand how you use and interact with our Site; (3) tailor the Site around your preferences; (4) measure the usability of our Site and the effectiveness of our communications; and (5) otherwise manage and enhance our services, and help ensure they are working properly.

#### Cookies and Web Beacons

Cookies are files that websites send to your computer to uniquely identify your browser or to store information or settings in the browser. A web beacon (also known as an Internet tag, pixel tag or clear GIF) links web pages to web servers and their cookies and may be used to transmit information collected through cookies back to a web server. Your browser may tell you how to be notified when you receive certain types of cookies or how to restrict or disable certain types of cookies. Please note, however, that without cookies you may not be able to use all of the features of the Site.

#### **How We Use the Information We Obtain**

We may use the personal information we obtain about you to:

- Provide our products and services to you;
- Send you newsletters and other email communications if you sign up to receive them;
- Administer your participation in surveys, contests, promotions or other programs;
- Process orders and payment transactions;
- Manage transportation and shipping logistics;
- Provide customer support and respond to your inquiries;
- Protect against and prevent fraud, unauthorized transactions, claims and other liabilities;
- If you submit information in connection with a career opportunity, evaluate your interest in and suitability for employment and contact you regarding possible employment;
- Operate, evaluate and improve our business (including managing the Site, developing new products and services; enhancing and improving our products and services; managing our communications; analyzing our products, services and customer base; performing data analytics; and performing accounting, auditing and other internal functions); and
- Comply with and enforce applicable legal requirements, industry standards and Scoular policies and procedures.

We also may use the information in other ways for which we provide specific notice at the time of collection.

### *Third-Party Analytics Services*

We may use third-party analytics services on our Site, such as Google Analytics and Hotjar. The analytics providers that administer these services use technologies such as cookies, web beacons and web server logs to help us analyze your use of the Site. The information collected through these means (including IP address) may be disclosed to these analytics providers, and other relevant third parties who use the information to evaluate use of the Site. To learn more about Google Analytics and Hotjar and how to opt out, please visit <https://tools.google.com/dlpage/gaoptout?hl=en> or <https://www.hotjar.com/opt-out>.

Our Site is not designed to respond to “do not track” signals received from browsers.

### **Information We Share**

We do not disclose personal information we obtain about you, except as described in this Global Privacy Notice.

We may share your personal information with our affiliates and subsidiaries for the purposes described in this Global Privacy Notice. We also may share personal information with service providers who perform services on our behalf based on our instructions. We do not authorize these service providers to use or disclose the information except as necessary to perform services on our behalf or to comply with legal requirements.

We also may disclose information about you (1) if we are required to do so by law or legal process (such as a court order or subpoena); (2) in response to requests by government agencies, such as law enforcement authorities; (3) to establish, exercise or defend our legal rights; (4) when we believe disclosure is necessary or appropriate to prevent physical or other harm or financial loss; (5) in connection with an investigation of suspected or actual illegal activity; or (6) otherwise with your consent. In addition, we reserve the right to transfer personal information we have about you in the event we sell or transfer all or a portion of our business or assets (including in the event of a merger, acquisition, joint venture, reorganization, divestiture, dissolution or liquidation).

### **Data Transfers**

We may transfer the personal information we collect about you to recipients in countries other than the country in which the information originally was collected. Those countries may not have the same data protection laws as the country in which you initially provided the information. When we transfer your information to recipients in other countries (such as the U.S.), we will protect that information as described in this Global Privacy Notice and will comply with applicable legal requirements providing adequate protection for the transfer of personal information to recipients in countries other than the one in which you provided the information (including, to the extent required by applicable law, entering into contractual arrangements with the relevant recipient).

### **Your Rights and Choices**

You may at any time ask us to stop sending you emails or other communications. To update your preferences, ask us to remove your information from our mailing lists or submit a request, please contact us as described in the [How to Contact Us](#) section below. You may also follow the opt-out instructions contained in our marketing communications.

Where provided by law, you may withdraw any consent you previously provided to us or object at any time on legitimate grounds to the processing of your personal information, and we will apply your preferences going forward.

Subject to applicable law, you may (1) have the right to access certain personal information we maintain about you; (2) request that we update or correct your personal information; (3) object to the processing of your personal information or withdraw your prior consent, if applicable; and (4) ask us to block or delete your personal information from our database. To exercise these rights, please contact us as indicated in the [How To Contact Us](#) section of this Global Privacy Notice. You also may write to the relevant Scoular entity for your jurisdiction via the contact details listed [here](#). We will process your request in accordance with applicable law and, to help protect your privacy and maintain security, we may take steps to verify your identity before granting you access to the information. To the extent permitted by applicable law, we may charge a reasonable fee to comply with your request.

If you are a California consumer, for more information about your privacy rights, please see the section of this Global Privacy Notice called "[California Consumer Privacy Statement](#)".

### **How We Protect Personal Information**

We maintain administrative, technical and physical safeguards designed to protect personal information against accidental, unlawful or unauthorized access, destruction, loss, alteration, disclosure or use.

### **Children's Personal Information**

Our Site is designed for a general audience and are not directed to children. We do not knowingly collect or solicit personal information from children under the age of thirteen (13) (or other relevant age, as applicable pursuant to relevant law) through our Site. If we become aware that we have collected personal information from a child under thirteen (13), we will promptly delete the information from our records. If you believe a child under thirteen (13) may have provided us with personal information, please contact us as specified in the [How to Contact Us](#) section of this Global Privacy Notice.

### **Links to Non-Scoular Sites and Services**

For your convenience and information, our Site may provide links to or plug-ins of non-Scoular websites, apps and services that may be operated by companies not affiliated with Scoular. The privacy practices of the relevant third parties, including details on the information they may collect about you, is subject to the privacy statements of these parties, which we strongly suggest you review. We are not responsible for the privacy practices of any non-Scoular websites, apps or services.

### **Updates to Our Global Privacy Notice**

This Global Privacy Notice may be updated periodically to reflect changes in our personal information practices. Changes to the Global Privacy Notice will be posted on this page. For significant changes, we will notify you by posting a prominent notice on our Site indicating at the top of the Notice when it was most recently updated.

## How to Contact Us

You can update your preferences, ask us to remove your information from our mailing lists, submit a request or ask us questions about this Global Privacy Notice or the manner in which we or our service providers handle personal information by sending us an email using the “[Contact Us](#)” section of our website, or writing to:

The Scoular Company  
Corporate Office  
2027 Dodge Street  
Omaha, NE 68102  
<https://www.scoular.com/our-locations>

*For Residents of Canada:* You may contact Scoular regarding our information practices and this Global Privacy Notice at:

privacycan@scoular.com

*For Residents of Mexico:* For purposes of our data processing activities in Mexico, the relevant data controllers are:

Compañía Scoular de México, S. de R.L. de C.V.  
Procesos Biointegrales de México, S. de R.L. de C.V.  
Scoular Corporativo de México, S. de R.L. de C.V.  
Scoular de México, S. de R.L. de C.V.  
Scoular Servicios Internacionales S. De R.L. de C.V

*For Residents of Singapore.* You may contact Scoular regarding our information practices and this Global Privacy Notice at:

privacysg@scoular.com

3 Killiney Road #07-08  
Winsland House 1  
Singapore, Singapore 239519

## CALIFORNIA CONSUMER PRIVACY STATEMENT

This California Consumer Privacy Statement supplements the [Scoular Global Privacy Notice](#) and applies solely to California consumers. This Statement does not apply to Scoular personnel or job applicants.

This California Consumer Privacy Statement uses certain terms that have the meanings given to them in the California Consumer Privacy Act of 2018 and its implementing regulations (the “CCPA”).

### 1. Notice of Collection and Use of Personal Information

We may collect (and may have collected during the 12-month period prior to the effective date of this Statement) the following categories of personal information about you:

- **Identifiers:** identifiers such as a real name, alias, postal address, unique personal identifier (such as a device identifier; cookies, beacons, pixel tags, mobile ad identifiers and similar technology; customer number, unique pseudonym, or user alias; telephone number and other forms of persistent or probabilistic identifiers), online identifier, internet protocol address, email address, account name, Social Security number, driver’s license number, passport number, and other similar identifiers
- **Additional Data Subject to Cal. Civ. Code § 1798.80:** signature, physical characteristics or description, state identification card number, insurance policy number, education, bank account number, credit card number, debit card number, and other financial information, medical information, and health insurance information
- **Protected Classifications:** characteristics of protected classifications under California or federal law, such as race, color, national origin, religion, age, sex, gender, gender identity, gender expression, sexual orientation, marital status, medical condition, ancestry, genetic information, disability, citizenship status, and military and veteran status
- **Commercial Information:** commercial information, including records of personal property, products or services purchased, obtained, or considered, and other purchasing or consuming histories or tendencies
- **Biometric Information**
- **Online Activity:** Internet and other electronic network activity information, including, but not limited to, browsing history, search history, and information regarding your interaction with websites, applications or advertisements
- **Sensory Information:** audio, electronic, visual, and similar information
- **Employment Information:** professional or employment-related information
- **Inferences:** inferences drawn from any of the information identified above to create a profile about you reflecting your preferences, characteristics, psychological trends, predispositions, behavior, attitudes, intelligence, abilities, and aptitudes.

We may use (and may have used during the 12-month period prior to the effective date of this Statement) the categories of personal information listed above for the purposes described in our Global Privacy Notice. In addition, we may use these categories of personal information for the following business purposes specified in the CCPA:

- Performing services, including maintaining or servicing accounts, providing customer service, processing or fulfilling orders and transactions, verifying customer information, processing payments, providing advertising or marketing services, providing analytics services, or providing similar services
- Auditing related to a current interaction with you and concurrent transactions, including, but not limited to, counting ad impressions to unique visitors, verifying positioning and quality of ad impressions, and auditing compliance
- Short-term, transient use, including, but not limited to, the contextual customization of ads shown as part of the same interaction
- Detecting security incidents, protecting against malicious, deceptive, fraudulent, or illegal activity, and prosecuting those responsible for that activity
- Debugging to identify and repair errors that impair existing intended functionality
- Undertaking internal research for technological development and demonstration
- Undertaking activities to verify or maintain the quality or safety of a service or device that is owned, manufactured, manufactured for, or controlled by us, and to improve, upgrade, or enhance the service or device that is owned, manufactured, manufactured for, or controlled by us
- Managing career opportunities with Scoular

## **2. Sources of Personal Information**

During the 12-month period prior to the effective date of this Statement, we may have obtained personal information about you from the following categories of sources:

- Directly from you, such as when you contact us with a comment or question, or purchase a product or service
- From your devices, such as when you visit our Site
- Our affiliates and subsidiaries
- Vendors who provide services on our behalf
- Our joint marketing partners
- Online advertising services and advertising networks
- Data analytics providers
- Government entities
- Operating systems and platforms
- Social networks
- Data brokers

### **3. Sale of Personal Information**

We do not sell your personal information for monetary or other valuable consideration.

### **4. Sharing of Personal Information**

During the 12-month period prior to the effective date of this Statement, we may have shared your personal information with certain categories of third parties, as described below.

We may have disclosed the following categories of personal information about you for a business purpose to the following categories of third parties:

<b>Category of Personal Information</b>	<b>Category of Third Party</b>
Identifiers	Joint venture partners, affiliates and subsidiaries, data analytics providers, social networks
Additional Data Subject to Cal. Civ. Code § 1798.80 Law	Joint venture partners, affiliates and subsidiaries
Protected Classifications	Joint venture partners, affiliates and subsidiaries
Commercial Information	Joint venture partners, affiliates and subsidiaries, advertising networks
Online Activity	Data analytics providers
Sensory Information	Security partners
Employment Information	Joint venture partners, affiliates and subsidiaries, social networks
Inferences	Joint venture partners, affiliates and subsidiaries, data analytics providers

In addition to the categories of third parties identified above, during the 12-month period prior to the effective date of this Statement, we may have shared personal information about you with the following additional categories of third parties:

Government Agencies/Law Enforcement and Service Providers

### **5. California Consumer Privacy Rights**

You have certain choices regarding your personal information, as described below.

Access: You have the right to request, twice in a 12-month period, that we disclose to you the personal information we have collected, used, disclosed and sold about you during the past 12 months.

Deletion: You have the right to request that we delete certain personal information we have collected from you.



**How to Submit a Request.** To submit an access or deletion request call us at 1-866-757-9040 or email at [privacyus@scoular.com](mailto:privacyus@scoular.com). To submit a request as an authorized agent on behalf of a consumer, email us at [privacyus@scoular.com](mailto:privacyus@scoular.com). For questions or concerns about our privacy policies and practices, please contact us as described in the How to Contact Us section of our Privacy Notice.

**Verifying Requests.** To help protect your privacy and maintain security, we will take steps to verify your identity before granting you access to your personal information or complying with your request. If you request access to or deletion of your personal information, we may require you to provide any of the following information: your name, your email address on file, the name of your contact person at Scoular, and the date of your last interaction with a Scoular representative. In addition, if you ask us to provide you with specific pieces of personal information, we will require you to sign a declaration under penalty of perjury that you are the consumer whose personal information is the subject of the request.

**Additional Information.** If you choose to exercise any of your rights under the CCPA, you have the right to not receive discriminatory treatment by us. To the extent permitted by applicable law, we may charge a reasonable fee to comply with your request.

**Schedule 1**

The Scoular Company Entities

Choice Drayage Company
Compañía Scoular de México, S. de R.L. de C.V.
Green Leaf Global, LLC
High Plains Ag, LLC
Pinnacle Health Promotions, Inc.
Procesos Biointegrales de México, S. de R.L. de C.V.
PT Scoular Trading Indonesia
Rogers Grain, Inc.
Sangamo Agriculture, LLC
SBT Far East Pte. Ltd.
SCO AG, LLC
Scoular Canada, LTD
Scoular Commodities, LLC
Scoular Corporativo de México, S. de R.L. de C.V.
Scoular de México, S. de R.L. de C.V.
Scoular Finance S.à R.L.
Scoular International Sales Corporation
Scoular Myanmar Company Limited
Scoular Partners S.C.S.
Scoular Properties, Inc.
Scoular Servicios Internacionales S. De R.L. de C.V
Scoular Singapore Pte. Ltd
Solomon Valley Enterprises LLC
The Scoular Company
The Scoular Cooperative, Inc.
The Scoular Foundation
Tri-State Grain, LLC