

#### **Privacy Policy**

Ingredion Incorporated and its Affiliates ("**Ingredion**," "we," "us" and "our") values your trust and respects your privacy. This Privacy Policy applies to the ways we collect, use and share the information you provide to us. It notifies you of the measures we take to protect the security of personal information, as well as:

- the scope of this policy in particular what personally identifiable information of yours is collected from you through the Ingredion Group of websites you can contact www.ingredion.com to access the full website list; for the purposes of this policy "Website" means any of these Ingredion websites, as the context requires,
- who we are the organization(s) collecting the information,
- how the information is collected and used,
- with whom the information may be shared / disclosed ,
- what choices are available to you regarding collection, use and distribution of the information,
- the kind of procedures we employ in security in an effort to hinder the unauthorized access, deletion, alteration, use or disclosure of information you provide to Ingredion,
- data retention and changes in policies
- how you can correct any inaccuracies in the information you provide to us; and
- your privacy rights.

Please read this policy carefully. By visiting our Website you acknowledge and agree to the practices described in this policy.

If you have questions or concerns regarding this notice, please contact us at web@ticgums.com.

#### Scope of This Policy

This policy applies to the treatment of personally identifiable information that Ingredion collects through our Website and our services. The policy does not apply to practices of companies whose websites may be linked to Ingredion. For access to the privacy policies of such linked websites, please refer to the information provided by such websites on their homepages. Also, see the paragraph below under the heading "Hypertext Links."

For the purpose of applicable data protection and privacy law, Ingredion is the controller of personally identifiable information collected from you on our Websites.



#### How and Why We Collect and Use Your Information

You may voluntarily provide personally identifiable information to us in the following ways:

- by filling forms on our Website (for example, our "Inquiry" or "Contact us" form);
- by corresponding with us by phone, e-mail or otherwise using the contact details provided on any of our Websites;
- by joining our mailing list;
- creating an account for one or more products; or
- providing your information when you purchase goods from us online or otherwise.

#### What types of personally identifiable information do we collect and why?

From time to time, Ingredion collects personally identifiable information, which may include, but is not limited to:

*Identity Data* including your name, user name or similar identifier, title/occupation;

*Contact Data* including your email address, postal address; telephone number; details required to respond to your inquiry or resolve your complaint;

*Financial Information* including creditworthiness data including scoring; data for assessing the economic risk of the customer/supplier/relevant third party;

*Transaction Data* including details about payments to and from you/customer/supplier/relevant third party you represent, and other details of products and services you/customer/supplier/relevant third party you represent, have purchased from or supplied to Ingredion, and other customer/supplier/relevant third party, history;

*Profile Data* including username and password, preferred language, personal information concerning your interests, feedback, responses to surveys and opinions;

Technical and Usage Data including data about your use of the telemedia offered by us (e. g. date, time and location of access to our Websites, 'mouse events', apps or newsletter, clicked pages/links of us or entries and comparable data), and the use of other technology on the devices (and the type of devices) you use to access any of our Websites;

Marketing and Communications Data including your preferences (including those of the customer/supplier/relevant third party you represent), in receiving marketing from us and/or our third parties and your communication preferences, and other demographic information.

We also collect, use and share Aggregated Data such as statistical or demographic data for any purpose. Aggregated Data may be derived from your personal data but is not considered personal



data in law as this data does not directly or indirectly reveal your identity. For example, we may aggregate your Usage Data to calculate the percentage of users accessing a specific website feature. However, if we combine or connect Aggregated Data with your personal data so that it can directly or indirectly identify you, we treat the combined data as personal data which will be used in accordance with this privacy notice.

We process the data because it is necessary for: the contractual relationship with you, or the organization which you represent (or in order to take steps, prior to entering into that contract); and the activities performed by you/your organization. We may also process personal data which we lawfully receive from other Ingredion companies offices or other third parties (e.g. quality assessment or complaints by customers/suppliers/consumers/relevant third party you represent). In addition, we process personal data that we have lawfully collected, received or acquired from publicly accessible sources (such as, for example, commercial registers and association registers, civil registers, the press, Internet and other media) if such is necessary and we are allowed to process this data in accordance with statutory provisions.

If you request specific information from us, or communicate with us by e-mail, we may retain additional personal information about you, including your identity.

Ingredion does not seek to collect such information from persons under the age of 18. If you are under the age of 18, please do not submit any such information to us. We do not collect or process Special Categories of personal data. Nor do we collect or process any information about criminal convictions or offences.

#### If you fail to provide personal data

In addition, no person (of any age) is required to provide us with the personally identifiable information we request (ie where we need your consent). If you do not wish to provide such information, you are free not to do so. However, this may prevent you from using certain features or taking full advantage of all of our offerings on our Websites or other communication channels, or it may prevent us from carrying out a contractual relationship with you or the organization which you represent. Where we need to collect personal data by law, or under the terms of a contract we have with you and you fail to provide that data when requested, we may not be able to perform the contract we have (with you or the organization which you represent) or are trying to enter into with you or the organization which you represent (for example, to provide you/the customer/ relevant third party you represent, with goods or services, or vice versa). In this case, we may have to cancel a product or service you/customer/supplier/relevant third party you represent, have with us but we will notify you if this is the case at the time. If, after submitting personally identifiable information to us, you wish to "opt-out," please contact us at web@ticgums.com, informing us of the products and/or services/information you do not



wish to receive and we will disable the services/products/information, according to your instructions and as set forth below in the section titled "Managing Your Information." You can also opt-out of marketing emails by using the 'unsubscribe' link provided in our emails.

#### How we use personal data

Website Activities: We keep records of your activity on our Websites, to help us understand how you use the system so that we can make it a more effective tool for you. Our Website also receives and records information from server logs from your browser or device; this is not limited to cookie information only relating to pages requested, your domain, IP address, date, time and duration of your visit, browser type, operating system and page visits. Some web browsers and devices permit you to broadcast a preference that you not be "tracked" online.

The processing of your personal data described in this section is necessary in order to comply with our legal obligations regarding integrity and security of our website. Some of the processing is also necessary for the purpose of the legitimate interests pursued by us: we have a legitimate interest in saving connection logs for the purposes of determining disruptions and for security reasons (e.g., to investigate attack attempts) and in order to learn more about how our website is used. Such legitimate interest of Ingredion is appropriately balanced with the interests of the users.

*Direct Marketing:* Ingredion uses the information you provide to us to customize advertising and content that we present to you, to contact you concerning specials, and new products, and to enhance our product offerings. We have a legitimate interest in direct marketing. Such legitimate interest of Ingredion is appropriately balanced with the interests of the users as long as we comply with requirements for direct marketing under applicable law (we will, for example, obtain your prior consent to us sending you marketing emails if required).

Disclosure of information to third parties: Ingredion will not sell, rent or disclose your personally identifiable information to any third party except when:

- Ingredion or the third party have a legitimate interest in sharing the information which has been appropriately balanced with your interests ;
- Ingredion must share the information in order to provide a product or service that you have requested, in which case, we will demand that any third party we use to fulfill your order agree that it does not have the right to use the personally identifiable information other than to fulfill your request;
- Ingredion is required to respond to subpoena, court orders, statutory or regulatory obligation or other legal processes requiring such disclosure



We do not share your personal information with third parties for their direct marketing purposes.

#### Scope of your obligations to provide us your data

You only need to provide personal data that is necessary for the commencement and performance of the relevant business relationship or for a pre-contractual relationship with Ingredion or for the collection by Ingredion, as required by law. Without this data, we are generally not able to conclude the agreement or continue to perform such. This may also relate to data that is required later within the framework of the contractual relationship. If we request data from you above and beyond this, you shall be informed about the voluntary nature of the information separately.

#### Presence of an automated decision made in individual cases (including profiling)

We do not use any purely automated decision-making procedure as set out in Article 22 of the GDPR. If we do institute such a procedure in individual cases in the future, we shall inform you pursuant hereto separately if this is required by law. Under certain circumstances, we may process your data in part with the aim of evaluating certain personal aspects (profiling).

In order to provide you with targeted information and advice on products, we may use evaluation tools. These enable a needs-oriented product design, communication and advertising including market and opinion research.

Such procedures can also be used to assess your solvency and creditworthiness as well as to combat money laundering and fraud. "Score values" can be used to assess your credit worthiness and creditworthiness. In the case of scoring, the probability is calculated using mathematical methods with which a customer will meet his payment obligations in accordance with the contract. We may also assess the credit worthiness of suppliers or other third parties. Such score values thus support us, for example, in assessing our creditworthiness, decision-making in the context of product deals and are incorporated into our risk management. The calculation is based on mathematically and statistically recognized and proven methods and is based on your data, in particular income, expenditure, existing liabilities, profession, employer, length of service, experience from the previous business relationship, repayment of previous loans in accordance with the contract and information from credit agencies.

#### Information Disclosure / Sharing / Intellectual Property

At Ingredion, your data (or that of the customer/supplier/relevant third party you represent), is received by those internal offices or organizational units that need this personal information, to fulfill our contractual and statutory obligations or that require such this data within the



framework of processing and implementing our legitimate interests. We may disclose information we collect (including Website usage information and personal information) in the following ways, to the extent permitted by law:

- in connection with the fulfillment of our contract with you/customer/supplier/relevant third party you represent;
- to our service providers and suppliers, who collect or use or process such information for us or on our behalf (such as website or database hosting companies, companies that provide analysis and feedback tools that reveal the online behavior and feedback of a website's visitors, address list hosting companies, support and maintenance of IT applications, archiving, call center services, compliance services, controlling, data screening for anti-money laundering purposes, courier services, credit institutions, email service providers, to respond to your requests, including your request to participate in electronic delivery or electronic voting, analytics companies, distribution companies, fulfillment/warehouse/logistics companies, and other similar entities that help us to operate the Website and/or provide functionality, content and services and/or products);
- as necessary, if we believe that there has been a violation of any Website Terms and Conditions or any other Website policy, or if we have reason to believe that our rights or property, or the rights or property of any third party, may be or have been harmed;
- to respond to subpoenas; court order or other judicial processes, or to provide information as requested by law enforcement agencies, a regulator, other government authorities, or otherwise as required by law or where the forwarding of data is in the public interest;
- in the event that Ingredion or substantially all of its assets are acquired by one or more third parties as a result of an acquisition, merger, sale, consolidation, bankruptcy, liquidation or other similar corporate reorganization, where your information may be one of the transferred assets;
- otherwise, with your permission; and
- as otherwise, with your permission or as permitted by law.

If we commission service providers within the framework of processing an order, your data will be subject to the security standards stipulated by us in order to adequately protect your personal data. In all other cases, recipients may only use the data for purposes for which the data has been sent to them. Additional information on the purposes for which we use your information purposes as applicable to EU Citizens, are detailed below.



#### Using publicly available features of our Website

Please note that when you contribute to a social, community or other publicly available area or feature of the Website (e.g., if you submit a product rating or review), the information and content that you post may be made available to the general public, depending on your settings (which is why we recommend that you do not submit or post any sensitive personal information, such as your full name, home address, phone number or other information that would enable others to contact or locate you). Content and information that you submit on or through Facebook, Twitter, Instagram, Tumblr and other third-party platforms may appear on the Website through feeds from and other interfaces with those platforms. We are not responsible for the information, content and/or privacy practices of any such third-party platforms.

#### Use of Cookies

A cookie is a text file that is placed on your computer or other mobile device when you access the Website. Ingredion uses cookies to enhance the interactive nature of your Internet experience and to provide a convenient feature to save you time. Cookies enable us to quickly retrieve specific information from previous visits and to recall features that you may have customized on your browser. We may also use other tracking mechanisms such as web beacons to collect marketing statistics.

This information may include your domain name, the pages you view, the amount of time you spend on our site, the type of browser you use, and the country in which you are located. Our web pages also may contain "cookies," which are sent to your web browser and allows our server to recognize you when you visit our web site in the future. Generally, you may set your browser to notify you when you receive a cookie.

You may at any time "opt out" of Ingredion's use of cookies, web beacons or other tracking mechanisms through your browser settings. However, disabling such features may prevent you from using certain features or taking full advantage of all of our offerings on our Website.

For more information about cookies including how to set your internet browser to reject cookies please go to cookiecentral.com, a site dedicated to providing full information upon Internet cookies. For more information about the cookies we use, please contact <u>web@ticgums.com</u>.

Different types of cookies are used for different purposes on our Website, these are known as: strictly necessary cookies, performance cookies, and functionality cookies. Some cookies may be provided by an external third party to provide additional functionality to our Website and these are included below.



#### Strictly necessary cookies

These are cookies that are essential to fulfill an action requested by you, such as identifying you as being logged in. If you prevent these cookies by adjusting your browser settings we cannot guarantee how our Websites will perform during your visit.

#### Performance cookies

These are cookies used to improve our Websites, for example for analytics that let us see how a Website is being used and where to make improvements. These cookies are used to collect information about how visitors use a Website. The information is collected in an anonymous form and includes the number of visitors, where visitors have come from to the Websites and the pages they visited.

#### **Functionality cookies**

These cookies enhance the performance and functionality of our Websites, often as a result of something you're doing as a user. For instance, we may personalize our content for you or remember your preferences.

#### Targeting and advertising cookies

These cookies track browsing habits and are used to deliver targeted (interest-based) advertising. They are also used to limit the number of times you see an ad and to measure the effectiveness of advertising campaigns. They are usually placed by advertising networks with the website operator's permission. They remember that you have visited a website and this information is shared with other organizations, such as advertisers.

#### **Intellectual Property**

Ingredion, our suppliers, licensors, or the original creators of all materials on our Websites own all copyrightable subject matter on the Websites and all trademarks, patents, proprietary information, technologies, products, processes or other proprietary rights of Ingredion and/or such other parties. No license to or right in any such copyrights, trademarks, patents, proprietary information, technologies, products, processes and other proprietary rights of Ingredion and/or other parties is granted to or conferred upon you. In addition, direct linking, deep linking, framing, page-jacking, metatagging, and using a robot, spider or automated device of any kind to monitor or copy any of our Websites, is strictly prohibited.



Notwithstanding the foregoing, Ingredion hereby authorizes you only to copy the content herein solely for your personal and non-commercial use in learning about, evaluating, or acquiring Ingredion products and services. Except where expressly noted, no other permission is granted to print, copy, reproduce, distribute, transmit, upload, download, store, display in public, alter, or modify the content contained on any of our Websites. Any unauthorized use of any material contained on any of our Websites, may violate copyright laws, trademark laws, the laws of privacy and publicity, and communications regulations and statutes. Any other use of materials on any of our Websites, including reproduction for purposes other than those expressly permitted herein, modification, distribution, or republication, without prior written permission from Ingredion is strictly prohibited. Any copy made by you as permitted herein must retain all copyright and trademark notices, including any other proprietary notices, contained in the materials. The use of such materials on any other website or in any environment of networked computers, is prohibited.

Unless otherwise noted, all trademarks, slogans, service marks, or logos referenced on the web site are the property of Ingredion Incorporated, or its affiliated or related companies or naed third parties, as authorized by Ingredion. No trademark, patent, or other intellectual property right in any product, process, or technology mentioned in our Websites transfers to you by license or otherwise in connection with your use or viewing of any Website material.

#### **Hypertext Links**

In the event that any of our Websites contains hypertext links to websites that are not created or maintained by Ingredion, this Privacy Policy applies only to our Websites and not to any of these third party websites. Ingredion is not responsible for the accuracy, relevance, timeliness, or completeness of those third party websites. The inclusion of any link to such websites does not imply endorsement, sponsorship or recommendation by Ingredion of the third party websites. Ingredion disclaims any liability for links (1) from another website to any of our Websites, and (2) to another website from any of our Websites. Ingredion cannot guarantee the standards of any website to which links are provided on our Websites, nor shall Ingredion be held responsible for the contents of those websites, or any subsequent links. For this reason, Ingredion does not represent or warrant that the contents of any third-party website is accurate, compliant with state or federal law, or compliant with copyright or other intellectual property laws. Ingredion does not endorse the contents of these third party websites in any way. Also, Ingredion is not responsible for web casting or any other form of transmission received from any linked website. Any reliance on the contents of a third party website is done at your own risk, and you assume all responsibilities and consequences resulting from such reliance.



#### Your Choices/Your Privacy Rights

You may choose not to receive unsolicited marketing material from Ingredion, this can be done by using the 'unsubscribe' link included in our marketing email or by contacting us at web@ticgums.com; and you have the right to request your Ingredion account information be disabled, subject to our need to keep appropriate archives of our business operations. Please be aware that if you opt out of receiving promotional correspondence from us, we may still contact you in connection with your account, relationship, activities, transactions and communications with us. Ensure that you specify which services you would like to opt out of.

Please see also the information at the end of this Policy.

#### Managing Your Information

You are entitled to request access to and correction of all your personal information collected by us through our any of our Websites, as well as to require us to disable the account that contains your data if you no longer want us to process it. You can make such a request or a related inquiry at web@ticgums.com. We will keep your personal information as long as it is reasonably necessary to fulfill the purposes for which it was collected. However, in some circumstances we may retain your personal information for longer, for instance where required to do so in accordance with legal, tax and accounting requirements. In specific circumstances we may retain your personal information for longer periods of time so that we have an accurate record of your dealings with us in the event of any complaints or challenges. Please see below also.

#### Security

Ingredion employs reasonable measures to maintain all personally identifiable information provided by you on computer servers in a controlled and secured environment in an effort to hinder unauthorized access, loss, alteration, use or disclosure of such information. Ingredion utilizes secure socket layer encryption technology and firewall network protection to protect personally identifiable information that is transmitted to our Websites. Unfortunately, the nature of the Internet is such that information may be transmitted over networks without appropriate security measures and may be accessed, deleted, altered, used or disclosed by unauthorized persons at that time.

Because of the international nature of the services and products we provide on our Websites and the nature of our business, personal information may, subject to applicable law, be transferred internationally throughout Ingredion worldwide for the purposes described above. This may mean that personal information may be transferred to countries which do not have laws or



regulations that protect personal information to the same extent as in the European Union. We use reasonable measures to limit the disclosure of the data you provide to us only to certain staff within Ingredion and our affiliates (i.e. staff whose job it is to process your inquiries and survey answers or otherwise to administer our Website; those staff involved in the provision of our services and products which may be of interest to you) and to authorized third party providers who manage our Websites and customer/supplier/third party, relationship management processes. We will require that they each process the data only for the purposes identified in this Privacy Policy.

If you have selected a personal identification number or password in connection with your use of our Websites, we recommend that you not divulge your password to anyone. We will never ask you for your password in an unsolicited phone call or e-mail. Also remember to sign out of the registered Website and close your browser window when you are finished to ensure that others who might gain access to your computer cannot access your personal information and correspondence.

Any information that you provide to us through the Website (other than the personal information discussed above), including remarks, suggestions, concepts, techniques, ideas, graphics, or other information becomes our property. We will not treat any such information as confidential, nor should confidential or proprietary information be provided to us through the Website. We shall have the right to use the information for any purpose, including commercial development, without compensation to you. You represent that you are free to disclose any information submitted to us, and are not under obligation to any third party with respect to the information.

#### How long will you use my Personal Data for?

We will only retain your personal data for as long as necessary to fulfill the purposes we collected it for, including for the purposes of satisfying any legal, accounting, or reporting requirements.

To determine the appropriate retention period for personal data, we consider the amount, nature, and sensitivity of the personal data, the potential risk of harm from unauthorised use or disclosure of your personal data, the purposes for which we process your personal data and whether we can achieve those purposes through other means, and the applicable legal requirements.

We process and store your data for the duration of the relevant commercial business relationship. This also includes the initiation of a supply contract (pre-contractual legal relationship) and the execution of a contract.



By law we have to keep basic information about our customers/suppliers/relevant third party you represent, (including contact, identity, financial and transaction data) for six years after they cease being commercial partners, for tax purposes.

We are subject to various retention and documentation obligations that come from the relevant local data protection laws, for example the German Commercial Code (HGB) and the German Tax Code (AO). The periods and deadlines for retention and/or documentation set out in the applicable laws/regulations can be up to ten years beyond the end of the contractual relationship or the pre-contractual legal relationship.

Furthermore, special statutory provisions may require longer retention such as for example the preservation of evidence in connection with statutory time-barring provisions - time-barred periods of up to 30 years may also be applicable.

In some circumstances you can ask us to delete your personal data. If the data is no longer required to meet contractual or statutory obligations and rights, it is regularly deleted unless it's further processing - for a limited period - is necessary to fulfill the purposes listed in this Policy, for example due to an overriding legitimate interest. Such an overriding legitimate interest is deemed to be the case, for example, if it is not possible to delete the data as a result of a special type of storage, or because it is only possible at an unreasonably great expense and processing for other purposes is excluded by appropriate technical and organizational measures.

In some circumstances we may anonymise your personal data (so that it can no longer be associated with you) for research or statistical purposes in which case we may use this information indefinitely without further notice to you.

#### Modifications to This Policy

Ingredion may make modifications or amendments to this Policy from time to time. In the event that such changes alter how we gather, process, use, or disclose your personally identifiable information, we will publish such changes on our Websites or you can contact <u>web@ticgums.com</u> for an up to date version of the Policy.

Older policy versions can be viewed in an archive.



### Additional Information for European Union ("EU") Residents – how we use your personal data

#### Legal Basis for Processing

All processing (i.e. use) of your personal information is based on one of a number of legal conditions. Generally these will be:

- your consent (for example, to place some of cookies which process personal information);
- the performance of our contract with you or the organization which you represent (for example, to process the payment or shipping information in order to fulfill an order);
- compliance with a legal obligation (for example, where we are required to disclose information to a court or a tax authority); and
- our legitimate interests, provided these do not override your fundamental rights and freedoms (for example, where we carry out our own direct marketing to existing customers or suppliers or other third parties, subject to your right to opt-out of this at any time).

We process personal data in accordance with the relevant data protection laws and regulations. The details of which data are processed and how they are used depends largely on the services requested, or agreed in each case. Further details or additions for the purposes of data processing can be found in the respective contract documents, forms, a declaration of consent and/or other information provided to you (e. g. in the context of the use of our Websites or our terms and conditions or customer/supplier/relevant third party registration procedures). In addition, this data protection information may be updated from time to time. Please contact the following for further information: web@ticgums.com

### Purposes pursuant to fulfilment of an agreement or pre-contractual measures (Art. 6, section 1 b of the GDPR)

The processing of personal data is carried out in order to perform our contracts with you (or the organisation which you represent) and the execution of orders as well as to carry out measures and activities within the framework of pre-contractual relations, e. g. with interested/relevant third parties. In particular, the processing therefore serves to register you (or the organisation which you represent) as a new customer/supplier/third party partner and/or for new products or services; process your order and fulfil/deliver your purchase, and provide the necessary services and other activities, connected with the purchase or sale or commercial



venture, including managing payments, fees and charges; collecting and recovering money owed to us.

This processing also includes: contract-related communications with you, information to verify transactions, orders and other agreements as well as quality control by means of appropriate documentation, goodwill procedures, measures to control and optimize business processes; the fulfilment of general duties of care; control and supervision by affiliated companies (of Ingredion Incorporated); statistical evaluations for corporate management; cost recording and controlling, reporting; internal and external communication; emergency management; accounting and tax assessment of operational services; risk management, assertion of legal claims and defence in the event of legal disputes; ensuring IT security (including system and plausibility tests) and general security, including building and plant security, (e. g. by means of access controls); guaranteeing the integrity, authenticity and availability of data; for fraud detection purposes; preventing and investigating criminal offences; control by supervisory bodies or supervisory authorities (e. g. auditing).

### Purposes within the framework of a legitimate interest on our part or of third parties (Art. 6, section 1 f of the GDPR)

Above and beyond the actual fulfilment of the (pre-) agreement, we process your data whenever this is necessary to protect legitimate interests of our own or of third parties, in particular for the following purposes:

- advertising or market and opinion research, as far as you have not objected to the use of your data – including to deliver relevant Website content and advertisements to you and measure or understand the effectiveness of the advertising we serve to you; to make suggestions and recommendations to you about goods or services that may be of interest to you;
- obtaining information and exchanging data with credit agencies where this goes beyond our economic risk;
- the examination and optimization of processes for needs analysis;
- to use data analytics to improve our Websites, products/services, marketing, customer relationships and experiences; to the further development of services and products as well as existing systems and processes;
- when you interact with our customer or supplier or commercial partner, support representatives via email, telephone, online or in person, we collect personal data, such as your name, mailing address, phone number, email address and contact preferences; and information about the products and/or services relevant to your enquiry; we also may create event logs that are useful in diagnosing product or app performance-related issues, and capture information relating to the support or service issue;



- the disclosure of personal data within the framework of due diligence in the course of company sale negotiations;
- for comparison with European and international anti-terrorist lists, insofar as this goes beyond the legal obligations;
- the enrichment of our data, e. g. by using or re-searching publicly accessible data;
- statistical evaluations or market analysis;
- for benchmarking;
- the assertion of legal claims and defense in legal disputes which are not directly attributable to the contractual relationship;
- the restricted processing of data, if a deletion is not possible or only possible with disproportionately high effort due to the special type of storage;
- the development of scoring systems or automated decision-making processes;
- the prevention and investigation of criminal offences, if not exclusively for the fulfilment of legal requirements;
- building and plant security (e. g. by means of access control and video surveillance), insofar as this goes beyond the general duties of care;
- internal and external investigations, safety reviews;
- any monitoring of, or recording of, or analyzing of, telephone conversations for quality control and training purposes, and types of customer, supplier and product support we provide to our customers and/or suppliers; analyze any feedback provided to us through voluntary customer or supplier surveys;
- preservation and maintenance of certifications of a private-law or official government nature;
- the seizure and exercise of domestic authority by means of appropriate measures as well as video/CCTV surveillance for the protection of our customers, suppliers, visitors to our sites, contractors and employees as well as for securing evidence in the event of criminal offences and their prevention.

#### Purposes within the framework of your consent (Art. 6, section 1 a of the GDPR)

Your personal data can also be processed for certain purposes (e.g. use of company communication systems for private purposes; photographs/videos of you for publication in the Intranet/Internet) including as a result of your consent. As a rule, you can revoke this consent at any time. This also applies to the revoking of declarations of consent that were issued to us before the GDPR went into effect, i.e. prior to 25 May 2018. The consequences of revocation or refusal to provide consent are as referred to above or in the documentation we provide to you when obtaining the consent.

Generally speaking, revocation of consent only applies to the future. Processing that takes place prior to consent being revoked, is not affected and remains lawful.



### Purposes relating to adherence to statutory requirements (Art. 6, section 1 c of the GDPR) or in the public interest (Art. 6, section 1 e of the GDPR)

Similar to other commercial organizations, Ingredion is subject to a number of legal obligations. These are primarily statutory requirements (e.g. commercial and tax laws, health and safety laws), but also include applicable regulatory laws or other requirements set out by government authorities or local regulators. The purposes of processing may also include identity and age checks, prevention of fraud and money laundering (e.g. comparisons with European and international anti-terror lists), compliance with control and notification obligations under tax law as well as the archiving of data for the purposes of data protection and data security; for purposes of audits by tax advisors/auditors, fiscal and other government authorities. In addition, it may be necessary to disclose personal data within the framework of official government/court measures for the purposes of collecting evidence, law enforcement and criminal prosecution or the satisfaction of civil law claims.

#### **Rights of EU Residents**

Subject to applicable law, and if certain conditions are met, if you are a resident of the EU, you may have some or all of the following rights in respect of your personal information:

- to obtain a copy of your personal information together with information about how and on what basis that personal information is processed;
- to rectify inaccurate personal information (including the right to have incomplete personal information completed) ;
- to erase your personal information (in limited circumstances, where it is no longer necessary in relation to the purposes for which it was collected or processed);
- to restrict processing of your personal information where:
  - the accuracy of the personal information is contested;
  - the processing is unlawful but you object to the erasure of the personal information;
  - we no longer require the personal information but it is still required for the establishment, exercise or defense of a legal claim;
- to challenge, object to, or restrict the processing which we have justified on the basis of a legitimate interest (as opposed to your consent, or to perform a contract with you);
- to prevent us from sending you direct marketing;
- to withdraw your consent to our processing of your personal information (where that processing is based on your consent);
- to object to decisions which are based solely on automated processing or profiling; and



• to obtain, or see a copy of the appropriate safeguards under which your personal information is transferred to a third country or international organization, and/or to receive your data in accordance with applicable law.

In addition to the above, you have the right to lodge a complaint with your local supervisory authority (for example, the ICO in the United Kingdom). We recommend, however, to first always send a complaint to our Data Protection Officer or to Ingredion at the contact details listed below.

In relation to all of these rights, we recommend that you please contact us using the details given below, in writing. Please note that we may request proof of identity, and we reserve the right to charge a fee where permitted by law, for instance if your request is manifestly unfounded or excessive. We will endeavor to respond to your requests within all applicable timeframes.

#### International Transfers for EU Residents

You should be aware that we are a US headquartered company, and your personal information will routinely be transferred to and stored outside of the European Economic Area (eg in the United States) for processing. It may be accessible through Ingredion Incorporated by other Ingredion companies. Data is transmitted to offices in countries outside the European Economic Area EU/EEA (so-called third states) whenever such is necessary to meet a contractual obligation towards you (e.g. if you located in another country), or as required by law (e.g. notification obligations under tax law), or because of a the legitimate interest of us or a third party, or you have issued us with your consent to this.

In relation to both internal transfers and the use of affiliates, service providers or suppliers, if personal information is transferred outside the European Economic Area ("**EEA**"), we will take steps to ensure that the information receives the same level of protection as if it remained within the EEA, including entering into data transfer agreements, using the EU Commission approved Standard Contractual Clauses, or by relying on certification schemes such as the EU - US Privacy Shield. You may have a right to request details of the mechanisms under which your data is transferred outside the EEA. Please see contact details below.

#### Contact Us

If you have any questions at all about our proposed use of your personal information or this Privacy Policy then please contact us using web@ticgums.com, or using the contact details as follows).



If you reside in a country in the European Economic Area or in Switzerland, then your personal data collected by Ingredion is controlled by either Ingredion UK Limited (which is located at Ingredion House, Manchester Green, 339 Styal Road, Manchester M22 5LW, UK) or Ingredion Germany GmbH (which is located at Grüner Deich 110, 20097 Hamburg, Germany). You can contact either company through emea.marketing@ingredion.com.

Ingredion Germany GmbH's Data Protection Officer is HEC Harald Eul Consulting GmbH, located at Auf der Höhe 34, 50321 Brühl, Germany and can also be reached by email at datenschutz@ingredion.com.

If you reside outside of the European Economic Area and Switzerland, then the personal data collected by Ingredion Incorporated is controlled by Ingredion Incorporated or its relevant Affiliated Company. For these purposes, Ingredion can be contacted at Ingredion Incorporated, 5 Westbrook Corporate Center, Westchester, IL 60154 USA, and which you can also contact by email at infosec@ingredion.com.

#### Information on your right of objection under Art. 21 of the GDPR

1. You have the right to file an objection at any time against processing of your data which is performed on the basis of Art. 6, section 1 f of the GDPR (data-processing on the basis of a weighing out of interests) or Art. 6, section 1 e of the GDPR (data-processing in the public interest). The precondition for this, however, is that there are grounds for your objection emanating from your special personal situation. This also applies to profiling that is based on this purpose in the meaning of Art. 4, section 4 of the GDPR.

If you file an objection, we shall no longer process your personal data unless we can demonstrate compelling reasons warranting protection for the processing that outweigh your interests, rights and freedoms, or the processing serves the purpose of asserting, exercising or defending legal claims.

2. We will also use your personal data in order to perform direct advertising. If you do not want to receive any advertising, you have the right to file an objection to this at any time. This also applies to the profiling to the extent that it is connected with such direct advertising. We shall respect this objection with effect for future marketing campaigns.

We shall no longer process your data for the purpose of direct advertising if you object to processing for this purpose.



The objection can be filed without following to any formal requirements, and should be sent to the contact details referred to above.

Version dated: 24 May 2018