

OUR PRIVACY STATEMENT

Last Updated: November 1, 2021

Overview

Mars has been proudly family owned for over 100 years. It's this independence that gives us the gift of freedom to think in generations, not quarters, so we can invest in the long-term future of our business, our people, our consumers and the planet — all guided by our enduring Principles. We believe the world we want tomorrow starts with how we do business today.

Our Data Privacy Principles:

1. We value and respect the Personal Data entrusted to us.
2. We aim to be transparent and responsible about how we handle the Personal Data in our care, guided by our Five Principles and the law.
3. We adhere and respect the privacy rights afforded to our consumers, customers and job applicants.
4. We are committed to the continual improvement of our privacy and security practices.

This Privacy Statement provides you with information about how we collect, use, and share Personal Data at [Mars, Incorporated and its family of companies](#), which includes subsidiaries and affiliates (collectively, “Mars,” “we,” “us” or “our”), through our websites, products, mobile applications, or other sites that display this Privacy Statement (collectively, the “Sites”). This Privacy Statement will also apply to information gathered from you in person, through our products, and at any of our retail and / or veterinary hospitals (also, the “Sites”) and when you apply for a job at Mars.

Contact Us

We are committed to working with you to promptly responding to any questions or concerns you may have.

If you have a general question, want to contact the global privacy team and/or Mars Data Protection Officer, please [click here](#). If you have a request regarding your data and would like to exercise your rights under applicable law, please [click](#)

[here](#). If you are a resident of California and wish to exercise your right to ask that we do not sell your personal data please [click here](#). You may also make a request by calling 1-844-316-5985, or by contacting a specific Mars entity with whom you have a relationship, including:

- Banfield Pet Hospital: by clicking [here](#) or by calling 888-899-7071
- BluePearl Specialty + Emergency Pet Hospital: by clicking [here](#) or by calling 855-900-8444
- VCA Animal Hospitals: by clicking [here](#) or by calling 1-844-276-5786.

To print this Privacy Statement, please [click here](#).

What does this Privacy Statement apply to?

This Privacy Statement applies to Personal Data collected or processed by [Mars, Incorporated and its family of companies](#). The Privacy Statement applies if we collect Personal Data in-person, through our websites, mobile applications, email, veterinary hospitals, social media and other sites that display this Privacy Statement (the “Sites”). Your Personal Data includes information or a combination of information that could directly or indirectly be used to identify you (“Personal Data”). This includes identifiers like a name, ID number, location data, online identifier or to factors about physical, physiological, genetic, mental, economic, cultural or social identity. Please note, the definition of Personal Data can vary by region. If we collect information that is considered Personal Data in your region, we will treat it as such in accordance with this Privacy Statement and applicable local law.

Please read this Privacy Statement carefully to understand our policies and practices for your Personal Data. This Privacy Statement may change from time to time. We will tell you about material changes by posting a notice on our home page for a reasonable period of time and changing the “Last Updated” date. Please check back for updates.

We follow country and state data protection laws and we cooperate with data protection authorities.

If you are in a jurisdiction that recognizes the concept of a “data controller” or similar, the data controller is:

Mars, Incorporated

c/o: Chief Data Protection and Chief Privacy Officer

Dundee Road

Slough, Berkshire SL1 4LG

Contact:Chief.Privacy.Officer@effem.com or privacy@effem.com

What categories of Personal Data do we collect and process?

We may collect or process various categories of Personal Data. The following categories of Personal Data are followed by information about their source(s), purpose(s), and disclosure(s).

- **Identifiers.** We get identifiers directly from you or from third parties like data brokers or social media platforms. Identifiers are things like your name or contact information. We use these to provide and improve the features, products and services you request; for registration, contests and promotions; to communicate with you to provide information; to provide personalized content, information, and to send you brochures, coupons, samples, offers and other information on our products or our family of companies; when we perform our duties in a contract with you; for processing of Personal Data needed for the assessment and acceptance of customers or vendors; to deliver relevant advertising; and/or for research. They are shared for business purposes within the Mars family of companies and with service providers.
- **Personal Data categories contained in customer records.** We get this directly from you. We use this to provide and improve the features, products and services you request; to provide you with personalized content, information, and to send you brochures, coupons, samples, offers

and other information on our products or our family of companies; when we perform our duties in a contract with you; and/or for processing of Personal Data needed for the assessment and acceptance of customers or vendors. They are shared for business purposes within the Mars family of companies and with service providers.

- **Sensitive Personal Data, including protected classification characteristics, geolocation and precise geolocation information.** We get protected classification characteristics and precise geolocation information directly from you or from third parties, such as data brokers or social media platforms. We also get geolocation data directly from you, indirectly from you (e.g., if you allow location services), and/or from third parties like social media platforms. We may use these to provide and improve the features, products and services you request; for registration, contests and promotions; to provide you with personalized content, information, and to send you brochures, coupons, samples, offers and other information on our products or our family of companies; when we perform our duties in a contract with you; for processing of Personal Data needed for the assessment and acceptance of customers or vendors; and/or to deliver relevant advertising. They are shared for business purposes within the Mars family of companies and with service providers.
- **Commercial information.** We get this directly from you when you purchase goods and services at any of our retail locations, including our veterinary hospitals or online. We use commercial information to provide and improve the features, products and services you request; to provide you with personalized content, information, and to send you brochures, coupons, samples, offers and other information on our products or our family of companies; and/or to deliver relevant advertising. They are shared for business purposes within the Mars family of companies and with service providers.
- **Internet or other similar network activity.** We get this indirectly from you (e.g., from observing your actions on our Sites) or from third parties like data analytics providers. We use these to provide you with personalized content, information, and to send you brochures, coupons, samples, offers and other information on our products or our family of

companies; and/or to deliver relevant advertising. They are shared for business purposes within the Mars family of companies and with service providers.

- **Professional or employment-related information.** We get professional or employment-related information directly from you or from third parties (i.e., background check provider). We use these to process employment applications and when we perform our duty in a contract with you. They are shared for business purposes within the Mars family of companies and with service providers.
- **Inferences drawn from other Personal Data.** We receive these inferences indirectly from you (e.g., from observing your actions on our Sites) or from third parties, such as a data analytics provider. We use these to provide and improve the features, products and services you request; to provide you with personalized content, information, and to send you brochures, coupons, samples, offers and other information on our products or our family of companies; and/or to deliver relevant advertising. They are shared for business purposes within the Mars family of companies and with service providers.

We may collect information from various sources, including contact lists, demographic information originally collected from other companies of the Mars family, and personal data legally obtained from other third parties, which may be combined with other information that we collect for the purposes described below.

We collect the following specific pieces of Personal Data:

- **Personal contact details.** This includes information like names, addresses, telephone numbers, or email addresses. For example, when you provide contact details during online registration, when doing business with us, or when providing services to us. Some Sites allow you to establish a user-name and password to set up an account.

- **Information about your transactions with us.** For example, your purchase history, and billing and shipping information, and other information about your use of our products or services.
- **Payment information.** This includes information from your credit or debit card, online payment account, or other payment options.
- **Unique customer and commercial information.** For example, user-names and other login credentials.
- **Information to indicate your interest in a position.** For example, your preferences, work history and information provided on job applications.
- **Demographic information.** For example, data such as age, gender, hobby or activities, taste or preferences.
- **Sensitive information.** For example, when you apply for a job with us we may collect certain information where allowed and/or needed by law and/or that you voluntarily choose to provide.
- **Data for agreements with customers or vendors.** This includes the assessment and acceptance of a customer or vendor. For example, we collect credit status or information publically available on sanctions or watch lists.
- **Information collected from our Sites and social media pages.** This includes information collected when you interact with us. For example, comments, photos, or other information that you post through blogs, message boards, or social networking.
- **Device information.** For example, Internet Protocol (IP) address, device identifier, device's operating system, browser type, websites visited before or after you visit our website, pages viewed and activities at our website, as well as interaction with advertisements.
- **Third-party service and advertising partners may also collect information automatically.**
- **Other information we have collected from you with your consent.**

Information we collect about your pet – like your pet's species, breed, birthday, or treatment history – is not considered Personal Data.

Why do we collect and how do we use your Personal Data?

We may use your Personal Data for various legitimate purposes including:

- **Providing the features, products and services you request.** We may use the Personal Data we collect to fulfil your requests for, and enable your use of, our features, products and services. This includes payment processing for purchases, subscriptions or sales, and to protect against or identify possible fraudulent transactions.
- **Registration, contests and promotions.** We may use your Personal Data to enter you in contests if you choose to enter, to notify you of results and to register you for certain features, products and services in line with your marketing preferences.
- **To communicate with you and provide you with information.** We may use your Personal Data to communicate with you, to respond to your questions or comments or to provide you with updates and news. And, if you have stated your interest in positions at Mars, to alert you when matching jobs open.
- **To provide you with personalized content, information, and to send you brochures, coupons, samples, offers and other information on our products or our family of companies.** Where required by law, we ask visitors providing email addresses to tell us if they would like more information or updates from us, such as information about products and services available from our family of companies. We also offer visitors an “opt-out” option if they wish to stop receiving information from us. Sometimes you may be asked to “opt-in” before we contact you in certain ways or before certain services become available.
- **When we perform our duty in a contract with you.** We may use your Personal Data when you work as a service provider or apply for a job with us, as needed. If you are a consumer or a user of our services, we will use your Personal Data to fulfil our duty in our agreement with you.
- **To assess and accept customers or vendors.** This includes verifying the identity and credit status of some customers or vendors, conducting due diligence, and screening against publicly available government and/or sanctions lists and other third-party data sources, the use of and participation in Mars’ incident registers and sector warning systems and/or

third party verification services. Collecting this Personal Data may involve a credit reference agency or other third party.

- **To deliver relevant advertising.** We may purchase and use opt-in email lists to contact potential customers. We ask those providing the lists to confirm that contact information is provided only for those who want to receive offers and information by email. We also may use demographic and preference information for advertising to target users for whom they are most relevant. This way, users will see advertising that is most likely to interest them. We honor opt-out requests. For further information about our advertising practices, please [click here](#) to see our policy on online interest-based advertising.
- **To provide you with other offers.** Sometimes we will make offers, coupons and information, including catalogues, available through mail. For example, when customers place an online order in our catalogue stores or sign up for one of our catalogues online we may add them to the list to receive that catalogue. We may also use lists from third parties or public sources. With your consent, we may exchange names and addresses with other companies who may contact you by mail to provide offers. You may unsubscribe at any time.
- **To improve the features, products and services that we offer through the Sites.** We may use Personal Data to improve the Mars family of product offerings, services, as well as our Sites and features.
- **To combine your data within the Mars family.** We may also combine Personal Data legally collected by other companies within the Mars family to create a single view of our customers, for internal market research and/or measuring the effectiveness of our campaigns and based on our legitimate interest. This enables us to understand where customers exist across our different brands and business divisions within the Mars family and will support us in improving our products and services.
- **For certain automated decision-making activities.** We may use the Personal Data we collect for online advertising, and / or making a personality profile for you. Details of the Personal Data we collect, how it is used, and how you may opt out of any automated decision-making is

explained below.

What are the lawful bases on which we may process your Personal Data?

- **To protect your vital interests.** We may, for example, process Personal Data for health and safety reasons if you are at a Mars facility or, for job applicants, to further agreements with employee representations in some jurisdictions, and to protect the public interest.
- **At your direction and with your consent.**
- **For scientific research purposes.**
- **For other legitimate business purposes.** We may also rely on our legitimate interest to improve business and marketing practices. This includes but is not limited to legal compliance, research and analysis, combining data, clinical studies, evaluating diagnosis, treatment of pets and other purposes described above. When we rely on our legitimate interest, we'll carry out a legitimate interest assessment to ensure we consider and balance any potential impact to your rights under applicable data protection laws before we carry out any data processing. We won't use your Personal Data for activities where our interests are overridden by the impact on you, unless we have your consent or are otherwise required or permitted to by law.

How do we share and disclose your Personal Data?

We may share or disclose your Personal Data for purposes consistent with this Privacy Notice in the instances below.

- **Within Mars and the Mars family of companies.** For instance to combine the Personal Data collected about you.
- **With vendors or agents.** We may share your Personal Data with companies we have hired to provide services for us. When we share Personal Data with companies to provide services for us, they are not allowed to use it for any other purpose. They must keep your Personal Data confidential unless you otherwise consent.

- **Where your Personal Data may be transferred along with other business assets.** In such case, Personal Data may also be shared during any assessment process, subject to confidentiality and non-disclosure requirements.
- **Where we have received your direction or consent to the disclosure of your Personal Data.**
- **To comply with the law or respond to legal process or lawful requests,** including from law enforcement and government agencies.
- **To investigate consumer complaints or possible breaches of law, to protect the integrity of the website, to fulfill your requests, or to cooperate in any legal investigation.**
- **To protect the rights or property of the Mars family of companies or our customers,** including enforcing the terms governing your use of the services.
- **To act on a good faith belief that access or disclosure is necessary to protect the health and / or safety of our associates, customers, the public, and pets.**
- **To support other legitimate business purposes.** This includes but is not limited to legal compliance, furthering clinical studies, evaluating diagnosis and treatment of pets.

Please note that the Sites may include links or refer to third-party websites whose privacy practices may differ from ours. If you submit Personal Data to any of those websites, your information is governed by their privacy policies. We encourage you to review the privacy policy of any website you visit.

We may sell anonymized data to third parties, and we may share anonymized or non-personally identifying information as described above. We may combine anonymized or de-identified information with other anonymized or de-identified information from other sources. We also may share aggregated and anonymized information with third parties, including for example advisors, advertisers, and investors, for general business analysis. For example, we may tell our advertisers the number of visitors to our website and the most popular features or services.

Applying for a job at Mars

When you apply for a position with the Mars family of companies, we will process your Personal Data as described here, in compliance with applicable data protection laws. Mars respects your privacy and will treat your Personal Data as a job applicant as confidential. We will use and share your Personal Data as described in this Privacy Statement, and also as described below as it relates to you as a job applicant.

Personal Data we collect about you as a job applicant

When you apply for a job at Mars, we ask you to provide Personal Data to evaluate your application. You may also choose to provide additional Personal Data (for example, information about hobbies and social preferences). All information is provided on a voluntarily basis and you choose what Personal Data you want to provide. Please note, if you choose not to provide requested Personal Data, our ability to consider you for a position may be limited.

Information from third parties

We may also get information about you from public sources or third parties. For example, to verify information in your application or conduct background screenings through a third party, as allowed by applicable law. If you choose, you may provide us with Personal Data on third party sites like LinkedIn, if applicable in your market. If you choose to authorize Mars to access this Personal Data, you agree that Mars may collect, store and use this information in accordance with this Privacy Statement.

How Mars uses your Personal Data as a job applicant

Mars will use your Personal Data to process your application, including for the below purposes.

- Recruitment, evaluation and selection of job candidates
- General, human resources administration and management
- Conducting satisfaction surveys (for example, to manage and improve the recruitment process)

- Verifying your employment reference(s), conducting background checks and related assessments
- Compliance with legal and company requirements (for example, to monitor diversity)
- Communicating with you regarding your application and interest in Mars
- Future job opportunities if you allow this use

Profiling and automated decision-making

Mars may also process your Personal Data for data and statistical analysis. To comply with legal requirements or for Mars' legitimate interests, we may deploy global-level recruiting analysis and diversity monitoring, with your consent and where permitted by applicable law. You have the right not to have a decision made about you that is based solely on automated processing, including profiling if that decision produces legal effects about you or significantly affects you. **Mars does not, as part of its recruitment process, make solely automated decisions about candidates.**

With whom will Mars share your Personal Data as a job applicant?

Your Personal Data will be shared among Mars entities in the Mars family and only with those Mars associates who really need it to perform their tasks and duties, and to third parties with a legitimate business need. Third parties specific to job applicants include recruitment agencies, consultants, background service providers and attorneys. These service providers may change depending on the Mars entity that employs you and may change over time. We always seek to ensure that third parties handling Personal Data do so in a manner consistent with this Privacy Statement and in accordance with applicable law.

How We Communicate with You

If you no longer want us to use your contact information to promote Mars' or third parties' products or services, please reach out to us using the contact information provided above.

If we send you a promotional email, you may also unsubscribe at the bottom of the email to opt out of future promotional emails. In some instances, we may request your consent before sending you promotional emails. By declining to provide consent, you will not receive certain emails from us.

Even if you choose not to receive promotional emails, you may still receive emails that facilitate, complete or confirm a commercial transaction that you have already agreed to enter with us. These include communications about your pet's health, appointment reminders, completion of your registration, correction of user data, password reset requests, transaction confirmations, shipping notices, and other communications essential to your transactions with us.

We may also offer text/SMS messaging to you. In some circumstances, we might require you to opt-in to receive text messages from us. At any time, you may opt-out of receiving particular text messages from us (other than text appointment reminders) by texting **STOP** in response to any text message.

Unless expressly noted, all text messaging services are offered without charge to you. Message, data rates and other charges may apply. You are liable for any mobile phone charges incurred (usage, subscription, etc.) as a result of using any of our products or services. Please consult your mobile service carrier's pricing plan to determine the charges for sending and receiving text messages.

Children

What about children's privacy?

Most of our websites are designed and intended for adults. Where one of our websites is intended for a younger audience, we get consent from a parent or guardian in accordance with local law.

For more information, please read the [Mars Marketing Code](#). If you learn that a child has, in violation of this policy, registered for email newsletters, or otherwise provided their Personal Data, please report it to us [using the contact information provided at the top of this policy](#). If we become aware that an underage user has provided Personal Data without parental permission, we will terminate that account and delete all Personal Data provided by that user to the extent feasible.

Advertising and Cookies

What are our policies regarding online interest-based advertising?

Please see our [Ad Choices](#) and [Cookies](#) notices for detailed information on our practices around online interest-based advertising and the use of cookies.

Additional Helpful Information

What else do you need to know?

Where is your information stored and processed?

Personal Data we collect or receive may be stored and processed in the United States or any other country where we or our service providers have facilities.

The servers and databases storing Personal Data may be located outside the country from which you accessed the Site and in a country that does not have the same privacy laws as your country of residence. The Personal Data you provide us may be sent abroad in accordance with legal requirements. We will collect, process and use Personal Data only in accordance with this Privacy Statement.

How long do we store your Personal Data?

We retain and store your Personal Data only for as long as we have a legitimate business purpose and in accordance with our data retention policies.

What about Personal Data that is publicly available (such as in chat rooms, message boards, or other interactive forums)?

We may offer chat rooms, message or bulletin boards, or interactive areas where visitors may publish comments or information. If there is a chat room, bulletin or message board, social networking opportunities or other interactive areas, be sure to check posted rules. You will be bound by posted rules, as well as our Site Terms of Use. Rules for participation may establish age and other restrictions, such as posting abusive, offensive or inflammatory content. Anything you post online is public information. We are not responsible for anything you voluntarily post online. Users should use caution when disclosing Personal Data online.

Assignment

We may share or transfer your Personal Data in the course of any direct or indirect reorganization process including, but not limited to, mergers, acquisitions, divestitures, bankruptcies, and sales of all or part of our assets. Your Personal Data may be shared following the completion of such transaction and/or during the assessment processing pending transfer (subject to confidentiality requirements). If transferred, your Personal Data will remain subject to this Privacy Statement or a policy that, at a minimum, protects your privacy to an equal degree as this Privacy Statement unless you otherwise consent.

How do we safeguard your Personal Data?

We maintain (and require our service providers to maintain) appropriate organizational and technical measures to protect the security of your Personal Data. If you have any questions on the security measures we use, you may

contact us using the contact information provided at the top of this Privacy Statement.

We recommend that you also take additional measures to protect your Personal Data. For example, install up-to-date anti-virus software, close browsers after use, keep confidential your login credentials and passwords, and regularly update software and apps to ensure you have the latest security features.

International Transfer of Personal Data

If you choose to provide us with Personal Data, we may transfer that Personal Data to our affiliates and subsidiaries or to other third parties, in accordance with local law. We may also transfer your Personal Data across borders, from your country or jurisdiction to other countries or jurisdictions in accordance with legal requirements. Mars primarily uses European Union Commission Standard Contractual Clauses for data transfers from the European Union, the EEA, the UK and Switzerland to countries outside the EEA (including the UK). For transfers between other jurisdictions, Mars may rely on other legal mechanisms for international transfer, as appropriate under the relevant law.

Laws and Rights that May Apply to You

Depending on your residence, the rights available to you may differ in some respects. Mars will respond to any rights request in accordance with local legal regulations.

If you wish to make a request related to any of the rights set forth below, please reach out to us using the contact information provided above.

Right of access

You may have the right to get confirmation about whether or not your Personal Data is being processed. If so, you may have the right to access the Personal

Data and other information, such as the purposes, the categories of Personal Data, the recipients (or categories of recipients) to whom the Personal Data have been or will be disclosed, for particular recipients in third countries or international organisations, where possible, the predicted period that the Personal Data will be stored, or, if not possible, the criteria used to determine that period, your rights, etc.

Where feasible and permitted by law, we will provide a copy of the Personal Data we are processing. For any further copies, we may charge a reasonable fee based on administrative costs. If you make the request by electronic means, and unless otherwise requested, the information shall be provided in electronic form.

Right to rectification

You may have the right to rectify or complete your Personal Data if inaccurate or incomplete.

Right to erasure ('right to be forgotten')

You may have the right to the erasure of your Personal Data in certain circumstances. For examples, see below.

- Your Personal Data are no longer necessary for the purposes for which they were processed
- You withdraw your consent on which the processing is based, and we have no other legal ground for the processing
- You object to the processing and there are no overriding legitimate grounds for the processing
- Your Personal Data have been unlawfully processed
- Your Personal Data have to be erased for compliance with a legal obligation to which we are subject

This right shall not apply to the extent that processing is necessary for the below purposes.

- For exercising the right of freedom of expression and information
- For compliance with a legal obligation which requires processing by a law to which we are subject
- For the performance of a task carried out in the public interest
- For reasons of public interest in the area of public health
- For archiving purposes in the public interest, scientific or historical research purposes or statistical purposes
- For the establishment, exercise or defence of our legal claims

Right to restriction of processing

You may have the right to restrict the processing for the below reasons.

- You contest the accuracy of your Personal Data, for a period enabling us to verify the accuracy of the Personal Data
- The processing is unlawful and you oppose the erasure of the Personal Data and request the restriction of their use
- We no longer need the Personal Data for the purposes of the processing, but they are required by you for the establishment, exercise or defence of legal claims
- You exercised your right to object to processing pending the verification whether our legitimate grounds override yours

Right to data portability

You may have the right to receive the Personal Data that you have given us, in a structured, commonly used and machine-readable format. You have the right to send that Personal Data to another controller, if the processing is based on consent pursuant or on a contract and is carried out by automated means.

Right to object

You may have the right to object, on grounds relating to your particular situation, to processing of your Personal Data which is based on our legitimate purposes. In particular, you may have the right to object to your

Personal Data being combined across the Mars family on the basis of our legitimate interest. We will stop processing the Personal Data unless we have compelling legitimate grounds for the processing which override the interests, rights and freedoms of the data subject or for the establishment, exercise or defence of legal claims. If Personal Data is processed for direct marketing purposes, including profiling, you may object at any time.

Automated individual decision-making, including profiling

You may have the right not to be subject to a decision based solely on automated processing, including profiling, except under certain exceptions under local law.

Right to withdraw consent

Where the processing of Personal Data is based on your consent, you may have the right to withdraw consent at any time, without affecting the lawfulness of processing based on consent before withdrawal.

Right to anonymity

You may also have a right to request anonymity. This means that your Personal Data would not be collected or processed. If you choose to exercise this right, we may not be able to provide you with your requested goods or services.

Right to lodge a complaint with a supervisory authority

You may have the right to lodge a complaint with a supervisory authority.

Right to opt-out of the sale of your Personal Data

You may have the right to “opt out” of the sale of your Personal Data to third parties (or, for consumers who are under 16 years old, the right not to have their Personal Data sold absent their, or their parent’s, opt-in). To exercise this right, you may submit a request using the form provided above and/or the “Do Not Sell My Personal Information” link above.

Right to Non-Discrimination

You may have the right to non-discrimination, to receive equal service and pricing from a business, even after exercising your rights.

Shine the Light Disclosure

California law allows California residents to request certain information regarding our disclosure of Personal Data to third parties for their direct marketing purposes. To make such a request, please put “Shine the Light” in the “Request Details” portion of your request on the form above or in the subject line, if submitted by e-mail.

Note that there are restrictions on the number of times you can exercise some of these rights. You may designate an authorized agent to make a request on your behalf. The agent must provide proof of your authorization. We may deny a request from an agent that does not submit proof that they have been authorized by you to act on your behalf.

We may need to verify your request before completing it. For example, we may ask you to confirm data points we already have about you. We will only use Personal Data provided in a request to verify the requestor’s identity or authority.

Financial Incentives

We may offer various financial incentives from time to time. The terms of the financial incentive will be provided at the time you sign up for the financial incentive. You may withdraw from any of the financial incentives. In calculating these offers, we consider the expenses related to the offer and the value of your data.

How We Respond to Do-Not-Track Disclosures

We make best efforts to action browser settings requesting that we do not track your personal data, subject to technical limitations; we may not be able to respond to all user settings or signals.

Changes

Changes to this Privacy Statement

We will only use your Personal Data in the manner described in this Privacy Statement. If we decide to use your Personal Data in a manner that is different from that stated at the time it was collected, you will be given notice. **If there is any conflict between the English version of our Privacy Statement and a translated version, the English version controls.**