

OUR PRIVACY STATEMENT

What does this privacy statement apply to?

This privacy statement applies to your personal information collected or processed through the websites, mobile applications and other services and products that collect or process data and display this statement belonging to Mars, Incorporated and its family of companies. This statement does not apply to such entities' websites, mobile applications and other services and products that do not display or include a link to this privacy statement or that have their own privacy statement. This privacy statement applies to your personal information, which is any information or combination of information that could reasonably be used to identify you.

We adapt our privacy practices to country data protection laws and cooperate with country data protection authorities if they believe a privacy problem has occurred.

If you are in the European Union the Mars subsidiary or affiliate who owns and operates the website that you are visiting will be the data controller responsible for the collection and use of your personal information. If you have a query about how your personal information is being used, you can contact the data controller through the Global Privacy Officer whose contact details appear below.

What information do we collect and process?

We may collect or process various information that you provide to us, including personal contact details, and information related to your purchases, employment or demographic.

- Personal contact details include information such as names, addresses, telephone numbers, or e-mail addresses such as when you provide them to us during online registration or when doing business with us or providing services to us; some websites allow you to establish a user name and password to set up an account.
- Purchase-related information includes data regarding purchases you make on our websites, including payment card information and shipping details.
- Employment-related information includes your indicated job preferences, work history and information provided on applications submitted to us online.
- Personal information including, but not limited to: name, contact details, nationality, birth date, personal identification numbers, family information, emergency contact details, banking details, benefit enrolment and other additional relevant information as part of the recruitment and onboarding process for job applicants (who are not yet employed by Mars, Inc.).
- Demographic information includes data such as age, gender, hobby or activity information, taste or other preference information, and the like.

We may collect information from other sources, including contact lists, and demographic information from third parties and other sources. This data may be combined with other information that we collect and use for the purposes described in this privacy statement.

We also collect certain types of information automatically:

- Your Internet Protocol (IP) address or device identifier, your 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 your interaction with advertisements.
- Third-party service and advertising partners may also collect information automatically.
- Find out more about our collection practices below.

This information is collected directly from you, as well as through third parties that you have authorized to provide such personal information, and where permitted by local law, through publicly available sources such as social media.

Why do we collect and how do we use your information?

We may use your information for a variety of purposes including: to provide products or services that you request; to administer promotions (sweepstakes, contests and offers); to communicate with you; to deliver advertising; to improve our websites, products and services; and for other legitimate business purposes explained further as follows:

- Providing the features, products and services you request: We may use the information we collect about you to fulfil your requests for, and enable your use of, our features, products and services.
- Registration, contests and promotions: We may use your information to enter you in contests, to notify you of results and to register you for certain features, products and services in line with your chosen marketing preferences.
- To communicate with you and provide you with information: We may use your information to communicate with you, to respond to your questions or comments, to provide you with updates and news and to alert you when job vacancies that fit your profile arise (in the event that you submit your resume). We also may use your information 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. We ask visitors providing e-mail addresses to indicate if they would like further information or updates from us or our website and only those who request it will receive follow-up communications from us. We may also ask if you would like to receive information about other products available from members of our family of companies. We also offer visitors an "opt-out" option at any time they wish to cease receiving e-mails or other information from us.
- When we perform our obligations under a contract with you – We may use your information when you work for us either as an employee or a service provider or apply for a job with us as necessary in connection with your contract of employment or services agreement. If you are a consumer or a user of our services we will use your personal information to carry out our obligations under the contract that we have with you.
- To deliver to you relevant advertising: We may purchase and use opt-in e-mail lists to contact potential customers who we believe may be interested in products or services from the Mars family of companies. We will honor opt-out requests and ask those providing lists to give us assurances that e-mail contact information is provided only for those consumers who have expressed a desire to receive offers and information by e-mail. We also may use demographic and preference information to allow advertising related to Mars products and services to be targeted to the users for whom they are most pertinent. This is designed so that users will see advertising that is most likely to interest them, and advertisers can display their ads to people who are most likely to be receptive. For further information about our advertising practices, [please see What are our policies regarding online interest-based advertising?](#)
- To provide you with other offers: Sometimes our brands will make offers, coupons and information, including catalogues, available to you through the 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 we have received from third parties or public sources to send you this information, and, as is routinely done in the catalogue business, may exchange names and addresses (but not e-mail addresses absent consent) of our catalogue customers with other catalogue companies who may also contact you by mail. You may “opt-out” of receiving offline communications from our brands at any time.

- When we perform our due diligence in relation to considering job applicants as permitted by applicable law.
- When we carry out the recruitment and onboarding process, to enroll an applicant as an Associate (i.e. an employee), to comply with local regulations and submit local regulatory reporting, to assess tax and social security implications and register for payroll. To determine eligibility to company benefits, including dependent benefits. To ensure the work environment is set up to support the accessibility needs in advance, if needed. To contact the right person as quick as possible in case of any major work emergency.
- To improve our websites, features, products and services: We may use the information that we collect to improve the Mars family of product offerings, services, as well as our websites and features.
- For certain automated decision-making activities: We may use the information we collect for serving online advertising, and/or generating a personality profile for you. Details of the personal information we collect, how it is used, and how you may opt out of any automated decision-making is explained below.

How do we share and disclose your information?

We may share or disclose your information:

- With Mars and the Mars family of companies;
- With vendors or agents. For example, we may share your information with companies we have hired to provide services on our behalf. When we share information with these other companies to provide services for us, they are not allowed to use it for any other purpose and must keep it confidential unless you otherwise consent.
- Where your information may be transferred along with other business assets.

We also may share or disclose personal information, including the content of your communications:

- To comply with the law or respond to legal process or lawful requests, including from law enforcement and government agencies.
- To conduct investigations of 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 safety of our associates, customers or the public.

Please note that our websites may include links to third-party websites whose privacy practices may differ from our privacy practices. If you submit personal information to any of those websites, your information is governed by the privacy policies on those websites. We encourage you to review the privacy policy of any website you visit.

What about children’s privacy?

Our websites are primarily designed and intended for adults and teens (age 13 and older) and not directed to children under age 13. In accordance with the Children’s Online Privacy Protection Act (COPPA), we do not knowingly collect or store any personal information about children under age 13, and our company websites are not designed to collect personal information from children under age 13. In relation to teenagers under age 16, we will obtain parental consent prior to allowing them to submit their personal information to Mars through our websites, post material or upload photographs or information. We will implement measures to verify parental consent, taking into consideration available technology. We may ask visitors to enter a birth date to restrict those who are underage from accessing certain websites, areas or features. Where local law imposes higher age thresholds, we will comply with such requirements. For more information, please review our [Special Note to Parents](#) and the [Mars Marketing Code](#).

What are our policies regarding online interest-based advertising?

We support the Self-Regulatory Principles for Online Behavioral Advertising of the Digital Advertising Alliance in the US and for US consumers. More information about these Principles can be found [here](#). Advertisements that we place online using interest-based data are expected to be delivered with the Advertising Option Icon to help consumers understand how their data is being collected and used and to provide choices for consumers who want more control. The Icon looks like this:



By clicking on the Icon when it appears, you can review information (and follow information) regarding online interest-based advertisements, including who is collecting and using your online data, how you can opt-out from receiving such advertisements, and more.

How do we serve advertisements through online interest-based advertising?

At times we display ads both on our network of owned and operated websites and on the websites of third parties. When you visit one of our websites or view ads that we serve elsewhere online, you may see different kinds of ads, such as text ads next to search results or video ads on web pages. Sometimes, these ads are based on the content of the pages on which they appear. Other times, these ads are generated by matching the particular ad to your interests as inferred from your online activities that have been collected over time. With interest-based advertising, the goal is to show you ads that are most relevant to you.

To do this, we and some of our third-party advertising companies use technologies such as cookies and web beacons to collect information about your interaction with our websites and other third-party websites (“Online Data”). This Online Data generally does not identify you to us personally and, typically, it is aggregated with other data to create segments – groups of users and certain general interest categories that we have inferred based on a variety of factors (for example, “sports fan”). The Online Data can include:

- The webpages, products and services you view and links you click when using our websites and services as well as third-party websites;
- Our e-mails that you view and links you click on within that e-mail;

- Whether you view or click on ads that are shown to you;
- Demographic or interest data, including general geographic location derived from IP address;
- The search terms you enter when using certain search services.

We and our third-party advertising partners use this Online Data to paint a more accurate picture of the interests of the audiences with which we interact – including you – so that we can serve ads that are more relevant to those interests.

In addition, our third-party advertising partners use this Online Data for a variety of other purposes, including (a) in conjunction with advertising that appears on our website or other websites, (b) for reporting website traffic, statistics, advertisement data and other interaction with ads and the websites on which they are served, and (c) to measure the effectiveness of web-based and e-mail advertisements.

Why would you want to receive interest-based ads?

Consumers like to receive interest-based ads for many different reasons. Interest-based ads are helpful because they are more tailored to your particular interests. For example, cat owners may see more ads for cat food and fewer ads for dog grooming services. Interest-based ads also are more likely to help you discover new products and services that are actually relevant to you and your interests. For example, dog owners may see an ad about the latest dog-grooming products, whereas cat owners might be more likely to see an ad for the latest feline hairball solution. In short, receiving interest-based ads can help to improve your access to new products, services and features that are most relevant to you, which in turn could help to improve your life and social experiences. You also will not see the same ads over and over from us because the number of times you see a particular interest-based ad is limited. By opting-out of interest-based ads, you lose all of these benefits.

A Note on Google Analytics - To help facilitate the delivery of relevant content, we use Google Analytics Advertising Features, which you can learn more about and opt-out from here.

How can you opt-out of receiving interest-based ads from us?

If you are no longer interested in receiving interest-based ads from any of our US sites, you can opt-out by contacting us using the information below. Please note, however, that opting-out does not mean you will no longer see ads from us online. It simply means that the online ads from us you do see will not be based on your particular interests.

Depending on where you live, you may be able to access one convenient place to indicate your preferences, including the option to make one “universal” opt-out of interest-based advertising with participating entities:

In the United States, visit this site: [Ad Choices](#).

In Canada, visit this site: [Your Ad Choices](#).

In the EU, visit this site: [Your Online Choices](#).

When you opt-out using these methods, a cookie will be placed on your device indicating that you have opted-out of interest-based advertising. If you delete your cookies, you will need to opt-out again. These websites also provide detailed information about interest-based advertising and tips for managing your online privacy.

Cookies Notice

What are cookies and how do we use them?

“Cookies” are data files that a website sends to your computer while you are viewing the site. These data files include information that allows our site to remember important information that will make your use of the site more efficient and useful to you. Our sites use cookies for a variety of purposes. We use cookie technology and IP addresses to obtain information from online visitors, and also to provide registered visitors with the best possible personalized online experience.

Visitors to our sites use different web browsers and different computers. To make your visits as easy as possible with the technology you use, we automatically keep track of the type of browser (e.g., Internet Explorer) and operating system (e.g., Windows, Mac) used by a visitor, and the domain name of the visitor's Internet service provider. We also track the total number of visitors to our site in an aggregate form to allow us to update and improve our sites. This data tells us if more visitors prefer certain features or areas to others, which helps us keep our site fresh and interesting to the majority of our visitors. We also use cookies to help prevent children from entering certain areas or features intended only for adults or teens.

How do we use cookies to personalize your experience at our sites?

Cookie technology helps us deliver content tailored to a visitor's interests, and allows us to make ordering products, entering and participating in sweepstakes and contests, and offering other functions at our sites easier for our visitors. Sites that offer online shopping use cookies to remember and process the items in your shopping cart. Where appropriate under our disclosed practices and policies, we may associate personal information with a cookie file in such instances.

Do third parties use cookies on our site?

We may allow third parties to use cookies and to advertise on our websites. We do not control the cookies of third parties. There are free programs you can download which would allow you to set your preferences and block the vast majority of third-party cookies across the Internet.

Different types of cookies used by us

The cookies used by us are based on the International Chamber of Commerce guide for cookie categories: Strictly Necessary, Performance, Functionality, and Targeting.

'Strictly Necessary' cookies let you move around the website and use essential features like secure areas, shopping baskets and online billing. These cookies don't gather any information about you that could be used for marketing or remembering where you've been on the internet. We use these Strictly Necessary cookies to

- Remember things like information you've entered on order forms when you navigate to different pages in a single web browser session
- Remember the goods and services you ordered when you get to the checkout page
- Identify you as being logged in to a Mars website
- Make sure you connect to the right service on our website when we make any changes to the way the website works

Cookies we have defined as 'Strictly Necessary' cookies will **NOT** be used to

- Gather information that could be used to advertise products or services to you
- Remember your preferences or username beyond your current visit

'Performance' cookies collect information about how you use our website e.g. which pages you visit, and if you experience any errors. These cookies don't collect any information that could identify you – all the information collected is anonymous and is only used to help us improve how our website works, understand what interests our users, and measure how effective our advertising is. We use performance cookies to

- Provide statistics on how our website is used
- See how effective our adverts are (we don't use this information to target adverts to you when you visit other websites)
- Help us improve the website by measuring any errors that occur
- Test different designs of our website

Cookies we have defined as 'Performance' cookies will **NOT** be used to

- Gather information that could be used to advertise products or services to you on other websites
- Remember your preferences or username beyond your current visit
- Target adverts to you on any other website

'Functionality' cookies are used to provide services or to remember settings to improve your visit. We use 'Functionality' cookies to

- Remember settings you've applied such as layout, text size, preferences and colours
- Remember if we've already asked you if you want to fill out a survey
- Show you when you're logged in to our site
- Share information with partners to provide a service on our site. The information shared is only to be used to provide the service, product or function and not for any other purpose

Cookies defined as 'Functionality' will **NOT** be used to

- Target you with adverts on other websites
'Targeting' cookies are linked to services provided by third parties, such as 'Like' buttons and 'Share' buttons. The third party provides these services in return for recognising that you have visited our website. We use 'Targeting' cookies to
- Link to social networks like Facebook, who may subsequently use information about your visit to target advertising to you on other websites
- Provide advertising agencies with information on your visit so that they can present you with adverts that you may be interested in

What are web beacons and how do we use them?

Some of our Web pages and e-mail updates may contain electronic images called Web beacons, sometimes known as one pixel GIFs, clear GIFs or pixel tags. On sites, these allow us to count visitors who have viewed our pages. In promotional e-mail messages/newsletters, they allow us to count how many subscribers have read them. Web beacons allow us to develop statistical information about the activities and features that most interest our consumers for the purpose of providing more personalized content. They are not used to access your personal information without your consent.

How can you opt-out of cookies?

Setting your browser to reject cookies

If you don't want cookies, you can set your computer to warn you each time a cookie is being sent or turn off all cookies through your browser (e.g., Internet Explorer or Firefox). Check your browser HELP menu to learn the correct way to change or update your cookies.

Alternatively, you may wish to visit [which](#) contains comprehensive information on how to do this on a wide variety of browsers. You will also find details on how to delete cookies from your computer as well as more general information about cookies. For information on how to do this on the browser of your mobile phone you will need to refer to your handset manual.

Please be aware that restricting cookies may impact on the functionality of Mars websites.

What else do you need to know?

Where is your information stored and processed?

Personal information collected on our websites and services, or received by Mars from you or third parties, may be stored and processed in the United States or any other country where we or our service providers maintain facilities.

The servers and databases in which information may be stored may be located outside the country from which you accessed this website and in a country that does not have the same privacy laws as your country of residence. The personal information you provide us may be transmitted abroad, but we will collect, process and use personal information only in accordance with this privacy statement.

Employment-related queries may also be transferred to any member of the Mars family of companies. By visiting this website and submitting information, you consent to such collection, processing, transfer and/or storage of your personal information. Please note: our policies may differ by region, so if you visit one of our websites in a different region, please check to see if there is a statement specific to that location.

How long do we store your information?

We retain and store your personal information only for as long as we have a legitimate business purpose to do so and in accordance with our data retention policies.

What about personal information 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 post comments or information for our visitors' enjoyment. If there is a chat room, bulletin or message board, social networking opportunities or other interactive areas where personal information may be posted at this website, be sure to check posted rules before entering, as you will be bound by them as well as our General Terms and Conditions. Rules for participation in interactive features may establish age and other restrictions on participation. Anything you post online is public information, and we are not responsible for

anything you voluntarily post online. Users should exercise caution when disclosing personal information online.

Assignment

In the event that all or part of our assets are sold or acquired by another party, or in the event of a merger, you grant us the right to assign the personal information we have collected from you.

How do we safeguard your information?

We have implemented administrative, physical and technical safeguards designed to protect your information. No security measures can be 100% secure, however, and so we recommend that you take additional measures to protect yourself and your information, including by installing up to date anti-virus software, closing browsers after use, keeping confidential your log-in credentials and passwords, and making sure that you regularly update software and apps you have downloaded to ensure you have enabled the latest security features on your devices.

International Transfer of Information

If you choose to provide us with personal information, we may transfer that information to our affiliates and subsidiaries or to other third parties, across borders, and from your country or jurisdiction to other countries or jurisdictions around the world in accordance with legal requirements. Mars primarily uses European Union Commission Standard Contractual Clauses for data transfers from the European Union to countries outside the European Economic Area. Mars also uses the EU-US Privacy Shield framework for data transfers between the EU and US.

Our Privacy Shield Commitment

Mars US and its controlled US subsidiaries (see list of covered Mars US entities and subsidiaries here) participate in the EU-US Privacy Shield Framework and Swiss-U.S. Privacy Shield Framework and have certified to the Department of Commerce that we are committed to the Privacy Shield Principles in the processing of all personal information transferred from the European Union and Switzerland to the United States. Mars remains responsible and liable under the Privacy Shield Principles if third-party agents that it engages to process the personal data on its behalf do so in a manner inconsistent with the Principles, unless Mars proves that it is not responsible for the event giving rise to the damage. In certain situations, Mars may be required to disclose personal data in response to lawful requests by public authorities, including to meet national security or law enforcement requirements. We encourage EU and Swiss individuals to contact us at privacy@effem.com should you have a Privacy Shield-related complaint or inquiry, but for any complaints that are not resolved with us directly, we have chosen to cooperate with the panel established by the European Data Protection Authorities (DPAs) and the Swiss Federal Data Protection and Information Commissioner (FDPIC). In certain circumstances, the Privacy Shield provides affected individuals the right to invoke binding arbitration to resolve complaints not resolved by other means. Mars US is subject to the investigatory and enforcement powers of the US Federal Trade Commission (FTC). If there is any conflict between the terms in this Privacy Statement and the Privacy Shield Principles, the Privacy Shield Principles shall govern. To learn more about the Privacy Shield program and to view our certification, please visit www.privacyshield.gov.

Changes to this Privacy Statement

We may update this privacy statement from time to time, so please visit this page periodically and review this statement for changes. We will notify you of material changes to this privacy statement by posting a notice on our home page for a reasonable period of time and changing the "Last Updated" date [(below)]. Your continued use of our websites following the posting of changes will mean that you accept the changed terms.

What should you do if you have questions, wish to access, update or delete information, or wish to opt-out of receiving future communications?

We take steps to keep your personal information accurate. You can view, correct or update the personal contact information you provide to Mars. Some Mars programs provide access to view or update personal information online. Check where you registered to learn if you can view or update your information there.

If you would like to access, update, change, delete, transfer, restrict or object to the processing of the information we have about you in our marketing database (subject to any applicable legal exceptions), opt-out of receiving further communications from us, or have questions about our privacy statement, please click [here](#).

Where our processing of your information is based on your consent, you may have the right to withdraw your consent by contacting us by e-mail at privacy@effem.com. Note that your withdrawal of consent will not affect the lawfulness of our processing of your information based on your consent prior to your withdrawal. Where appropriate, you may also have the right to lodge a complaint with your local data protection authority. We are intent on resolving any issues relating to our handling of your information, and you may contact us at any time regarding any questions or concerns.

How can you contact us?

You may contact us using the following information:

Mars, Incorporated
Attn: Evie Kyriakides, Global Privacy Officer
Global Privacy Team
Dundee Road
Slough, Berkshire SL1 4LG
E-mail: privacy@effem.com

We are committed to working with you to resolve any complaints you may have regarding this Privacy Statement or the treatment of your personal information. If you have a concern, please contact privacy@effem.com and your communication will be promptly addressed.

Processing information in the European Union

We only collect and use personal information processed in the European Union when we have a lawful basis to do so as follows:

- Where the processing of your personal information is in our legitimate interests: for example, we may use your personal information to improve our products and services and the content of our websites, and for administrative purposes as described in this privacy statement.
- When we perform our obligations under a contract with you: for example, when you work for us either as an employee or a service provider or apply for a job with us, we will need to process your personal information in connection with your contract of employment or services agreement. If you are a consumer we will use your personal information to carry out our obligations under the contract that we have with you.
- When we have a legal obligation to do so: for example to comply with the law or respond to legal process or lawful requests, including from law enforcement and government agencies.

Consent: We will rely on your consent to use your personal information for marketing purposes in accordance with applicable law.

What are your California Privacy Rights?

California law permits residents of California to opt-out of Mars' disclosure of personal information to third parties for their direct marketing purposes. You may choose to opt-out of the sharing of your personal information with third parties for marketing purposes at any time by submitting a request in writing to our contact address above or by e-mailing us at privacy@effem.com. Please note that this opt-out does not prohibit disclosure made for non-marketing purposes. California law also permits residents of California to request and obtain from us once per year, free of charge, a list of the third parties (if any) to whom we have disclosed personal information for their direct marketing purposes in the prior calendar year, as well as the type of personal information disclosed to those parties. If you are a California resident and would like to request this information, please submit your request in an e-mail to: privacy@effem.com or by writing to our contact address above. Requests via telephone or facsimile will not be accepted. The e-mail subject line or mailing envelope and the content of your request must include the phrase "Your California Privacy Rights," and include your name, e-mail address (if you wish to receive a response via e-mail) or street address, city, state, zip code (if you wish to receive a response via postal mail).

How We Respond to Do-Not-Track Disclosures

We do not support "Do Not Track" browser settings and do not currently participate in any Do Not Track frameworks that would allow us to respond to signals or other mechanisms from you regarding the collection of your personal information.

Updated: July 2017

If there is any conflict between the English version of our Privacy Statement and a version translated in another language, the English version controls.