

**Revised January 1, 2020**

### **California Resident Privacy Notice Addendum**

This privacy addendum applies to you if you reside in the State of California and supplements and is in addition to the privacy policy terms applicable to you contained in Imperial Sugar Company and its subsidiaries ("ISC" or "We") [Privacy Policy](#).

ISC adopts this privacy addendum to comply with the California Consumer Privacy Act of 2018, as amended and modified, including the regulations adopted thereunder (collectively, the "CCPA"). Certain information may be excluded from the CCPA's scope because it is subject to protection under federal law.

This privacy addendum applies to a California resident's interaction and communication with ISC, including in person, by phone, through mail or email or through the website [www.imperialsugar.com](http://www.imperialsugar.com), [www.dixiecrystals.com](http://www.dixiecrystals.com), [www.imperialsugarcompany.com](http://www.imperialsugarcompany.com) and any other ISC-owned and/or operated websites, mobile sites, mobile applications or social media accounts (collectively, our "Site") and our practices for collecting, using, maintaining, protecting and disclosing your personal information.

This privacy addendum does not apply to third party applications or websites that interact with or are integrated into our Site. These third-party websites are not under the control of ISC. In using such third-party websites please be aware that each third-party website is subject to its own privacy policies and is not covered by our Privacy Policy or this privacy addendum. We make no representation or warranty regarding the accuracy of the information contained on such third-party websites, and ISC disclaims all responsibility relating to or resulting from your use of such third-party websites.

### **Information We Collect About You and How We Collect It**

In addition to the categories of information ISC may collect that are stated in ISC's Privacy Policy, ISC may collect information that identifies, relates to, describes, references, is reasonably capable of being associated with, or could reasonably be linked, directly or indirectly, with a particular consumer, household, or device ("Personal Information"). Personal Information does not include information that is publicly available or information that ISC has deidentified or aggregated. In the prior 12 months, ISC may have collected the following categories of Personal Information from California residents:

- Various identifiers, including, name, address, online identifier, Internet Protocol address, email address, account name, or other similar identifiers.
- Personal information categories listed in the California Customer Records statute (Cal. Civ. Code § 1798.80(e)), including, telephone number or financial information.
- Commercial information, including, records of products or services purchased, obtained, or considered, or other purchasing or consuming histories or tendencies.
- Biometric information, including, behavioral characteristics, or activity patterns used to extract a template or other identifier or identifying information.
- Internet or other similar network activity, including, browsing history, search history, information on a consumer's interaction with a website, application, or advertisement, including internet protocol (IP) addresses, browser type, internet service provider (ISP), referring/exit pages, the files viewed on our Site

(e.g., HTML pages, graphics, etc.), operating system, date/time stamp, and/or clickstream data in order to analyze trends in the aggregate and administer our Site.

- Geolocation data, including, physical location or movements.
- Sensory data, including, audio, electronic, visual, or similar information.
- Professional or employment-related information, including, current or past job history or performance evaluations.
- Educational information, including, transcript, student records, grades and performance, activities, school name or school ID.
- Inferences drawn from other personal information, including, profile reflecting a person's preferences, characteristics, predispositions, behavior, attitudes, intelligence, abilities, and aptitudes.
- Protected classification characteristics, including, race, color, national origin, marital status, sex, veteran or military status.
- Personal records, such as, power of attorney, family history or power of attorney.
- Information received from a government entity or other third party.

ISC may collect the above categories of Personal Information directly from you, indirectly as you interact with our Site, from or through other third party sources, including ISC's customers, affiliates or service providers, or through email or other electronic messages between you and our Site.

### **Disclosure of Your Information**

In the prior 12 months, ISC may have disclosed the categories of Personal Information set forth above for one or more of the purposes set forth in the section entitled "Sharing of Information" in ISC's Privacy Policy, including disclosure to a service provider or other third party for a business purpose. ISC will not collect additional categories of Personal Information or use the Personal Information we collected for materially different, unrelated, or incompatible purposes without providing you notice.

In the prior 12 months, ISC has not sold and will not sell a California resident's Personal Information.

### **California Resident Rights**

Subject to certain exceptions, California residents have the following rights regarding their Personal Information:

- Access to Personal Information and Data Portability Rights.** The right to request that ISC disclose certain Personal Information to you about ISC's collection, use, disclosure and sale of your Personal Information over the prior 12 month period. Once ISC receives and confirms your verifiable request, we may disclose to you pursuant to the terms of your request: the categories of Personal Information collected, the sources collected from, the purpose for collection, the categories of third parties shared with, and the specific pieces of Personal Information collected about you.

- Deletion Request Rights.** The right to request ISC delete any of your Personal Information we've collected from you and retained (subject to exceptions granted under law). Once we receive and confirm your verifiable request, we will delete your Personal Information records, unless an exception applies.

- Right to Not be Discriminated Against.** The right to not receive discriminatory treatment by ISC for the exercise of the privacy rights conferred under California law. ISC will not discriminate against a California resident for exercising any of his or her rights under applicable California law.

In addition to the rights under the CCPA, California's "Shine the Light" law (Civil Code Section § 1798.83) permits users of our Site that are California residents to request certain information regarding our disclosure of Personal Information to third parties for their direct marketing purposes. To make such a request, please send an email to [imperialsugar@ldc.com](mailto:imperialsugar@ldc.com).

### **Exercising Your California Resident Rights**

To exercise a request described above, a California resident may submit a verifiable consumer request to: 1-877-212-2144, or [imperialsugar@ldc.com](mailto:imperialsugar@ldc.com).

Only a California resident, or someone legally authorized to act on such California resident's behalf, may make a verifiable consumer request related to his or her Personal Information. In connection with submitting a request, ISC may require you to provide the following information: name, email, phone number and address. In general, ISC has the right to require you to provide written permission granting authority to your representative and for your agent to verify its identity directly with us, and we may deny a request from your representative who does not submit proof of authorization as we request.

A California resident may only make a verifiable consumer request for access or data portability twice within a 12-month period. The verifiable consumer request must provide sufficient information that allows ISC to reasonably verify the requestor is the person about whom we collected Personal Information or an authorized representative and describe the request with sufficient detail that allows us to properly understand, evaluate, and respond to it. ISC cannot respond to a request or provide Personal Information if we cannot verify the identity or authority to make the request.

ISC will endeavor to confirm receipt of a request within 10 days following submission and provide information about how we will process the request. ISC will endeavor to respond to a verifiable consumer request within 45 days of its receipt. If we require more time (up to an additional 45 days), we will provide notice in writing explaining the reason for the extended time period.

Making a verifiable consumer request does not require a California resident to create an account with us. We may deliver our written response through an account with ISC (if you have one) or through mail or electronically, at your option.

Any disclosures we provide will only cover the 12-month period preceding the request receipt date. If we deny a request, we will provide a response explaining the reasons we cannot comply with a request, if applicable.

### **Do-Not Track Signals**

Do-Not-Track signals are certain consumer browser settings that request that a web application disable its tracking of an individual user. While our Site does not currently recognize Do-Not-Track signals, ISC

does not track activities that occur on websites other than our own and declining to accept cookies will ensure that online activities on our Site is not tracked.

### **Changes to This Privacy Addendum**

This privacy addendum may change from time to time. It is our policy to post any changes we make to this privacy addendum on this page. If we make material changes to how we treat a California residents' Personal Information, we will notify you through a notice on our Site's home page. Your continued use of our Site after we make changes is deemed to be acceptance of those changes. The date this privacy addendum was last revised is identified at the top of the page. You are responsible for periodically visiting our Site and this privacy addendum to check for any changes.

### **Contact Information**

To ask questions or comment about this privacy addendum and our privacy practices, contact us at: [imperialsugar@ldc.com](mailto:imperialsugar@ldc.com).