

# Privacy Statement

This Privacy Statement applies only to the websites operated or owned by North American Export Grain Association, Inc. and/or its subsidiary and affiliated entities ("NAEGA," "we" or "us") where this Privacy Statement is posted (collectively, the "Sites"). BY USING THE SITES, YOU CONSENT TO THE TERMS AND CONDITIONS OF THIS PRIVACY STATEMENT AND TO OUR USE AND DISCLOSURE OF PERSONAL INFORMATION IN THE MANNER STATED BELOW. IF YOU DO NOT AGREE TO THE TERMS AND CONDITIONS OF THIS PRIVACY STATEMENT, PLEASE DO NOT USE THE SITES.

## **A. Information Collected**

We collect two types of information from visitors to the Sites: (1) Personally Identifiable Information; and (2) Non-Personally Identifiable Information, such as your IP address or cookies.

### **(1) Personally Identifiable Information**

"Personally Identifiable Information" is information that identifies you personally, such as your photograph, name, address, telephone number, fax number, email address, company name, or title. NAEGA collects and stores the personally identifiable information that you have provided to us. Here are some examples of manners in which we may collect your personally identifiable information on the Sites:

- We may collect your company name, email address, first and last name, address and zip code if you submit a membership inquiry form or a trade lead form;
- We may collect your name and email address if you contact us with a question;
- We may collect your first and last name, date of birth, address, and email address if you choose to participate in a promotion on our Sites, such as a contest, sweepstakes or other loyalty program; and
- We may collect your photograph, first and last name, company name and title, telephone number, email address, and fax number if you choose to provide this information in the secure membership area.

The above list provides an example of the personally identifiable information that may be collected on the Sites. If you do not want NAEGA to collect your personally identifiable information, please do not provide it to us.

### **(2) Non-Personally Identifiable Information**

"Non-Personally Identifiable Information" can be technical information or it can be demographic information, such as your age, gender or interests. Non-personally identifiable information does NOT identify you personally. Here are some examples of the non-personally identifiable information that is collected via the Sites and a description of how this information is used:

- Internet Protocol (IP) address -- Your IP address is a number that lets computers attached to the Internet know where to send you data -- such as the webpages you view. We use this information to deliver our webpages to you upon request, to tailor our Sites to the interests of our users and to measure traffic within our Sites.
- Cookie -- A "cookie" is a small text file that may be used to collect information about your activity on the Sites. For example, when someone visits a page within the Sites, a cookie is placed on the user's machine (if the user accepts cookies) or is read if the user has visited the Sites previously. You may set most browsers to notify you if you receive a cookie, or you may choose to block cookies with your browser, but if you do, you may not be able to take advantage of the personalized features enjoyed by other users to our Sites. Some of the cookies we use may be flash cookies or Adobe cookies. While they are harmless, they may contain Demographic Information (defined below) and depending on your browser these cookies may not normally be deleted when your cookies are deleted. Please check your browser to determine where these types of cookies are stored and how they may be deleted.
- Web Beacons (also known as "clear gifs," "web bugs" or "pixel tags") -- "Web Beacons" are tiny graphics with a unique identifier, similar in function to cookies, and are used to allow us to count users who have visited certain pages of the Sites and to help determine the effectiveness of promotional or advertising campaigns. When used in HTML-formatted email messages, web beacons can tell the sender whether and when the email has been opened. In contrast to cookies, which are stored on a user's computer hard drive, web beacons are embedded invisibly on web pages.
- Demographic Information -- "Demographic Information" includes your zip code and interests or areas of focus, which you voluntarily provide to us on the Sites. We use this information to provide you with personalized services and to analyze trends to ensure the information provided by the Sites meets your needs. For example, we offer a "trade lead" form where we attempt to connect individuals and companies with other individuals and companies in the same industry to help foster business relationships and information exchange. Please note that we also consider aggregated information, which is not personally identifiable, to be non-personally identifiable information. The above list provides an example of the non-personally identifiable information that is collected via the Sites.

We collect the above non-personally identifiable information from all visitors to our Sites. If you do not want NAEGA to have access to this information, please do not visit our Sites.

## **B. Use of Information Collected Via the Sites**

(1) Personally Identifiable Information. We use your personally identifiable information that is collected on these Sites primarily for the following purposes:

- To deliver services, such as networking, event information, trade lead information, and newsletters;
- To alert you to special events, breaking news, and other new services from NAEGA, or other third parties, or to forward promotional materials;
- To complete a service requested by you;

- To include your information in the Membership Directory, Contact List, or on the Sites as a member organization;
- To fulfill the terms of a promotion;
- To ensure the Sites are relevant to your needs;
- To help us create and publish content most relevant to you;
- To notify you about a material change to this Privacy Statement or the Terms of Use, if necessary;
- To allow you access to limited-entry areas of the Sites; and
- To contact you in response to sign up forms such as “Contact NAEGA,” “How to Import and Export Grain,” “Membership Inquiry,” and “Trade Lead.”

## **(2) Non-Personally Identifiable Information**

Non-personally identifiable information is used as described above and in other ways as permitted by applicable laws, including combining non-personally identifiable information with personally identifiable information.

## **C. Sharing and Disclosure of Information**

### **(1) Personally Identifiable Information**

We may share or disclose your personally identifiable information in the following instances:

- (i) To fulfill a service to you. For example, if you sign up for a membership via the Sites, we may use your personally identifiable information to secure your membership and complete your request. Further, if you choose to access or request educational information or news on the Sites, we may share your personally identifiable information in order to provide the information to you. In addition, if you email us a question, we may use your email address to process your request and respond to your question. Also, if you are entering a sweepstakes or contest, we may use your personally identifiable information in order to fulfill the terms of that promotion. This means that we may share the information for prize fulfillment purposes or mail carriers. We also may share your information with the co-sponsor of that promotion.
- (ii) To members and visitors to the Sites. If you become a member of NAEGA, we may share your name, title, company name, email address, phone number, fax number, and address with other members. For example, this information may be included in the Contact List or Membership Directory. We may also share your photograph on the Sites if you choose to upload a photograph or to be photographed at a NAEGA event. Additionally, non-members may have access to the membership list as well as member websites. We may share non-member information with members to help foster business relationships and trade where non-members provide their information for that purpose.
- (iii) To affiliates, strategic partners, agents, third party marketers or other unaffiliated parties who are offering products or services that we believe may be of interest to you or who require your personally identifiable information for research, administrative and/or internal business purposes. These parties may use your personally identifiable information to contact you with an

offer or advertisement related to a product or service, or they may use such information for their own research, administration or business purposes. If you do not want us to share your personally identifiable information in this manner, please do not provide us with this information.

(iv) To unaffiliated third-party service providers, agents or independent contractors who help us maintain our Sites and provide other administrative services to us (including, but not limited to maintaining and analyzing data, sending customer communications on NAEGA's behalf, and entry collection, winner selection and prize fulfillment for contests, sweepstakes and other promotions). We seek to ensure that these unaffiliated third parties will not use the personally identifiable information for any other purpose than to provide the administrative services for which they are responsible. Because such unaffiliated third-party service providers that help us administer our Sites will have access to users' personally identifiable information, if you do not wish for our unaffiliated third-party service providers to have access to your information, please do not register or submit any personally identifiable information to us.

(v) To comply with the law or in the good faith belief that such action is necessary in order to conform to the requirements of law or comply with legal process served on us, protect and defend our rights or property, including the rights and property of NAEGA and its family of Sites or act in urgent circumstances to protect the personal safety of our end users.

(vi) To third parties as part of any reorganization process including, but not limited to, mergers, acquisitions, and sales of all or substantially all of our assets.

(vii) To track and analyze non-identifying and aggregate usage and volume statistical information from our visitors and customers and provide such information to third parties.

(viii) To protect against potential fraud, we may verify with third parties the information collected from these Sites. In the course of such verification, we may receive personally identifiable information about you from such services.

Except as described in this Privacy Statement or at the time we request the information, we do not otherwise use, share or otherwise disclose your personally identifiable information to any third parties.

## **(2) Non-Personally Identifiable Information**

We use non-personally identifiable information collected on the Sites in the manner disclosed above, in the Section C (1). We may share this non-personal information with third parties.

## **D. Collection and Use of Information from Children Under the Age of 13**

The Sites do not knowingly target children under the age of 13 and we do not collect personal information from any child under the age of 13. In the event we learn that such information has been provided to the Sites, we will delete or destroy it.

## **E. International Transfer of Information**

If you choose to provide us with personally identifiable information, NAEGA may transfer that information to its affiliates and subsidiaries or to other third parties, across borders, and from your country or jurisdiction to other countries or jurisdictions around the world. If you are visiting from the European Union or other regions with laws governing data collection and use that may differ from U.S. law, please note that you are transferring your personally identifiable information to the United States which does not have the same data protection laws as the EU and by providing your personally identifiable information you consent to:

- the use of your personally identifiable information for the uses identified above in accordance with this Privacy Statement; and
- the transfer of your personally identifiable information to the United States as indicated above.

## **F. Opt-Out**

We may send you communications or data regarding the Sites, including but not limited to notices about our services or your use of the Sites, including any notices concerning your membership or other content that may be of interest to you. By using and/or registering with the Site, you agree to receive this type of communication from us. These notices will be sent to the email address we have on file for you.

Note however, that some email messages may be more commercial in nature, as they may advertise a feature of our Sites or services, a product or service we believe that you may be interested in, or otherwise discuss a marketing campaign or promotion offered by us or one of our partners or members. We give you the opportunity to opt-out of receiving these emails, which are more commercial in nature, by following the opt-out instructions provided in the message.

## **G. Public Posting Areas**

Please note that any information you include in a message or testimonial that you post to any forum or other public posting area is available to anyone with Internet access. Further, any documents or information posted in a member forum is available for all members to view. If you don't want people to know your e-mail address, for example, don't include it in any message you post publicly. PLEASE BE EXTREMELY CAREFUL WHEN DISCLOSING ANY INFORMATION IN FORUMS AND OTHER PUBLIC POSTING AREAS. WE ARE NOT RESPONSIBLE FOR THE USE BY OTHERS OF THE INFORMATION THAT YOU DISCLOSE IN SUCH PUBLIC POSTING AREAS.

## **H. Third Party Web Sites**

This statement applies solely to information collected on the Sites. The Sites may contain links to other web sites, including government web sites, news and informational web sites, and member web sites. We are not responsible for the privacy practices or the content of these other web sites.

## **I. Username and Password**

Your account information and access to our members-only services are accessible only through the use of an individual username and password. To protect the confidentiality of personal information, you must keep your password confidential and not disclose it to any other person. Please advise us immediately if you believe your password has been misused. In addition, always logout and close your browser when you finish your session. Please note that we will never ask you to disclose your password in an unsolicited phone call or email.

## **J. Updating and Accessing Your Personally Identifiable Information and Privacy Preferences**

We provide members with an opportunity to access personally identifiable information to ensure it is correct, accurate and current. To edit your personally identifiable information, please log in to your secure member page and edit your information. If you are a non-member and want to access information stored by NAEGA, please contact us at [info@naega.org](mailto:info@naega.org). To be removed from our mailing list or if you would prefer that we do not share your information with third parties, please make sure to indicate that in any message that you provide or by contacting us at the e-mail address above. We will make reasonable efforts to accommodate your request.

## **K. Assignment**

In the event that all or part of our assets or sold or acquired by another party, or in the event of a merger, you grant us the right to assign the personally identifiable and non-personally identifiable information collected via the Sites.

## **L. Changes to this Privacy Statement**

We reserve the right to change this Privacy Statement from time to time. When we do, we will also revise the "last updated on" date at the bottom of this Privacy Statement. For changes to this Privacy Statement that may be materially less restrictive on our use or disclosure of personal information you have provided to us, we will attempt to obtain your consent before implementing the change by sending a notice to the primary email address specified in your account or by placing a prominent notice on the Sites.

## **M. Security**

No data transmissions over the Internet can be guaranteed to be 100% secure. Consequently, we cannot ensure or warrant the security of any information you transmit to us and you understand that any information that you transfer to NAEGA is done at your own risk.

Once we receive your transmission, we make reasonable efforts to ensure security on our systems. We use firewalls to protect your information from unauthorized access, disclosure, alteration, or destruction. However, please note that this is not a guarantee that such information may not be accessed, disclosed, altered or destroyed by breach of such firewalls and secure server software.

If we learn of a security systems breach we may attempt to notify you electronically so that you can take appropriate protective steps. By using these Sites or providing personally identifiable information to us you agree that we can communicate with you electronically regarding security, privacy and administrative issues relating to your use of these Sites. We may post a notice on our Sites if a security breach occurs. We may also send an email to you at the email address you have provided to us in these circumstances. Depending on where you live, you may have a legal right to receive notice of a security breach in writing.

#### **N. Contacting NAEGA**

If you have any questions about this Privacy Statement or our privacy practices, please contact us at [info@naega.org](mailto:info@naega.org). All information you provide in any written communication will also be covered by this policy.

Last Updated On: June 18, 2012