

## Privacy Policy

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### Introduction

CHS Hedging LLC (the “Firm” or “us”) respects the privacy of our customers, visitors, and others who share their Personal Information with The Firm. This Privacy Policy (Policy) sets forth the privacy principles the Firm follows with respect to the collection, protection, and transfer of Personal Information of non-employee individuals that provide information to the Firm.

### Acceptance

By providing Personal Information to us, either directly or indirectly, you signify your acceptance of this Policy and agree that we may collect, store, process and transfer your Personal Information as described in this Policy.

**Please do not provide information to us, either directly or indirectly, if you do not accept this Policy or are in a country or location where this Policy violates local laws or regulations, or the use of Firm services is not permitted.**

## Scope

This policy applies to the Firm, its subsidiaries, business units. Partnerships, and joint ventures where the Firm exercises management control must also comply unless they have in place a substantially similar program that meets at a minimum the requirements of this Policy. In addition, the Firm expects its suppliers, vendors, consultants and contractors to act legally, ethically and in a manner consistent with this Policy.

## Effective Date

The effective date of this Policy is August 31, 2017

## Definitions

For purposes of this Policy, the following definitions apply:

- **Agent** means any third party that collects or uses Personal Information on behalf of the Firm or to which the Firm discloses Personal Information for use on the Firm's behalf.
- **Personal Information** means any information or set of information in any format, including electronic, paper or verbal that is about or pertains to a specific individual and can be linked to that individual. Examples include but are not limited to: first and last name, age/birthday, credit card numbers, or national identification number. Personal information does not include information on entities or other public information.
- **Sensitive Personal Information (SPI)** means personal Information that reveals race, ethnic origin, sexual orientation, political opinions, religious or philosophical beliefs, trade union membership or that concerns an individual's health.

## Privacy Principles

**INFORMATION COLLECTED:** The Firm collects Personal Information in a variety of ways, including face-to-face meetings, websites, internet, telephone, correspondence and industry events. The Firm uses this information to meet the needs of our customers, for normal business operations, to learn about our markets and improve our products and services.

The Firm does not routinely collect SPI but in the event that we do collect SPI, we will endeavor to obtain your explicit consent.

### Information Sent by Your Web Browser

The Firm collects information that is sent to us automatically by your Web browser. This information typically includes your IP address (identifies your computer's "location" and may be linked to account information that identifies you personally), the identity of your Internet service provider, the name and version of your operating system, the name and version of your browser, the date and time of your visit, and the pages you visit. Please check your browser if you want to learn what information your browser sends or how to change your settings.

## Cookies and Similar Technologies

The Firm uses “cookies” and other Web technologies to collect information and support certain features of this Site. For example, we may use these technologies to:

- collect information about the ways visitors use this Site—which pages they visit, which links they use, and how long they stay on each page;
- to support the features and functionality of this Site—for example, to save you the trouble of re-entering information already in our database or to prompt the settings you established on previous visits; and
- to personalize your experience when you use this Site.

Generally, the information we collect using these Web technologies does not identify you personally. If, however, you have created a user identity, for example, by registering on this Site, we may link the information we collect using these Web technologies to other information that identifies you personally. The Firm does not provide identifiable cookie information to 3<sup>rd</sup> parties.

If you do not wish to receive cookies, you may set your browser to reject cookies or to alert you when a cookie is placed on your computer. Although you are not required to accept cookies when you visit this Site, you may be unable to use all of the functionality of this Site if your browser rejects our cookies.

## User-Generated Content

The Firm site uses feedback forms, information request forms and e-mail options for visitors to request information or express their interest. By contacting us through our site or any of our related web sites or links, you agree that any information or comments you provide may be shared between the Firm and any of its associated businesses, including, but not limited to, its subsidiaries, joint ventures, agents and contractors (collectively referred to as "Associated Businesses"), and we will use reasonable efforts to maintain the confidentiality of the information you provide. Information will be used for internal business purposes and to support your relationship with the Firm and its associated businesses.

**NOTICE:** When you first provide Personal Information to us, or as soon as practical thereafter, we will notify you of the purposes for which we collect and use your Personal Information and the types of Agents to which we disclose such Information, if applicable. Further, before we use your Personal Information for any purpose other than that for which it was originally provided, we will inform you of the new purpose for which we intend to use your Personal Information.

**CHOICE:** For Personal Information, where required we offer you the opportunity to **opt-out** of any use, processing or storage of such Personal Information that: (a) is to be used for purposes other than the purpose for which it was originally collected or subsequently authorized or (b) requires disclosure to an Agent unless such disclosure is required. A decision to opt-out may limit the type of services the Firm is able to provide to you.

**DISCLOSURE/ONWARD TRANSFER (TO AGENTS and NON-AGENTS):** The Firm uses a third-party service provider to complete or process certain transactions, such provider is subject to contractual requirements to maintain the confidentiality of any personal information they may obtain in connection with the performance of their services for us. We only transfer Personal Information to Agents that have provided assurances to provide at least the same

level of privacy protection as is required by this Policy. Where we know that an Agent is using or sharing Personal Information in a way that is contrary to this Policy, we will take reasonable steps to prevent or stop such use. We will transfer Personal Information to an Agent unless you have expressly opted-out of such disclosure and when such disclosure is in a manner consistent with the notice we have provided to you concerning such transfer.

We may disclose your Personal Information when we, in good faith, believe disclosure is appropriate to comply with the law, a court order, or a subpoena. We may also disclose your Personal Information to prevent or investigate a possible crime, such as fraud or identity theft; to protect the security of this Site; to enforce or apply our Terms of Use or other agreements; or to protect our own rights or property or the rights, property or safety of our users or others.

**Business Transactions and Alliances:** The Firm may decide, for strategic or other reasons, to sell, buy, merge or otherwise reorganize one or more of its businesses or enter into a joint venture agreement, branding agreement or other strategic alliance in relation to products you have purchased or for which you have sought information. A transaction of this type may involve the disclosure of personal information to prospective purchasers.

**ACCESS:** You have the right to access your Personal Information stored with us to ensure that it is accurate, complete and current. Upon request we will grant you reasonable access, either electronically or via a manual process, to Personal Information we hold about you, except where the burden or expense of providing access would be disproportionate to the risks to your privacy or where the rights of other persons would be violated. In addition, we will take reasonable steps to correct, amend or delete information that you can independently demonstrate is inaccurate or incomplete. Request for access can be sent via your regular contact methods or to the contact information located at the end of this document.

**SECURITY:** We are committed to protecting the Information you provide us. As part of the services offered to you, the information you provide may be transferred to countries outside of your own for the Firm's operational purposes. We take commercially reasonable administrative, physical and technical precautions to protect Personal Information and Sensitive Personal Information in our possession from loss, misuse and unauthorized access, disclosure, alteration and destruction. We have put in place reasonable security procedures to safeguard and secure Information from loss, misuse and unauthorized access, disclosure, alteration and destruction.

**DATA INTEGRITY:** We will use Personal Information only in ways that are compatible with and relevant to the purposes for which it was collected or subsequently notified. We will take reasonable steps to ensure the information provided by you is updated as requested and appropriate for its intended use.

**ENFORCEMENT:** To ensure compliance with this Policy, we commit to: (a) cooperate with appropriate government agencies that govern privacy (b) periodically review and verify that this Policy is current and accessible, and (c) take appropriate action, if necessary, for any confirmed violations of this Policy.

We encourage interested persons to raise any concerns using the contact information provided below and we will investigate and attempt to resolve any complaints and disputes regarding the use of Personal Information. If a complaint or dispute cannot be resolved through our internal process, we agree to cooperate with applicable

governing agencies to recommend specific action to be taken for the benefit of an individual affected by any noncompliance.

Notwithstanding anything in this Policy to the contrary, this Policy will be applied and enforced in a reasonable manner with cost and effort proportionate to the importance of the data processing and the sensitivity of the data.

**CHILDREN:** The Firm does not knowingly collect information online from children under the age of 13 or who are not recognized as an adult in their country of residence. Our websites are not targeted to children and, if we discover that a child under the age of 13 has provided us with Personal Information online, we will take reasonable steps to delete such Personal Information.

## Limitation on Scope of Policy

Adherence to this Policy may be limited to the extent required to meet legal, governmental, national security or public interest obligations, or as otherwise set forth herein.

## Contact Information

**The Firm is the data controller for your Personal Information.** You may contact us regarding this Policy or our data collection and privacy practices using the following information:

CHS Hedging  
Compliance Department  
5500 Cenex Drive  
MS 595  
Inver Grove Heights, MN 55077  
1-800-814-0505  
[Compliance@chshedging.com](mailto:Compliance@chshedging.com)  
[www.chshedging.com](http://www.chshedging.com)

## Amendments

This Policy may be amended from time to time. A notice will be posted on the Firm's website for sixty (60) days whenever this policy is changed in a material way.

## Document History

Revision	Date	Editor(s)	Additions / Modifications
1.0	8/27/2017	L Bryden	Draft

## Approval

Date	Approved by
8/31/2017	SMT
10/29/2019	Annual Approval by Board of Managers