

OUR PRIVACY STATEMENT

Last Updated: December 2, 2022

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.

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


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 data gathered from you in person, through our products, and at any of our retail or veterinary hospitals and clinics (also, the “Sites”) and when you apply for a job at Mars. One or more of our brands sell franchises. This Privacy Statement does not apply to information gathered from you at independently owned and operated franchise locations.

Contact Us

We are committed to working with you to promptly respond 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](#). For United States residents, to exercise your right to ask that we do not sale, share, or use your personal data for targeted advertising or to limit the use of your sensitive personal data, please click “[Your Privacy Choices](#) ”. We also recognize the Global Privacy Control for consumers who utilize that signal to exercise their privacy rights. 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 844-276-5786.

For Russian residents wishing to contact us regarding enquiries or requests regarding their personal information, please contact our Russian Privacy Team by clicking [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 and clinics, 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. In some areas certain types of Personal Data might be deemed Sensitive Personal Data (like precise geolocation data, biometric data, racial or ethnic origin, health information, or financial information). The definitions of Personal Data and Sensitive Personal Data can vary by region. If we collect data that is considered Personal Data or Sensitive 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 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 us [here](#).

Notice At Collection

We may collect or process various categories of Personal Data. The section directly below titled “What categories of Personal Data do we collect and process?” contains information on the categories of Personal Data collected and/or whether we sell or share the Personal Data. The section titled “Third Party Collection & Service Providers” contains information about third parties that control the collection of Personal Data on our behalf. Note that all such third parties are bound to data processing terms in compliance with applicable law.

If you have a general question or want to contact the global privacy team or Mars Chief Data Protection Officer, please see the Contact Us section above. If you have a request regarding your data and would like to exercise your rights under applicable law, please [click here](#). For United States residents, to exercise your right to ask that we do not sell, share, or use your Personal Data for targeted advertising or to limit the use of your Sensitive Personal Data, please click the “Your Privacy Choices” link in the footer. We also recognize the Global Privacy Control opt-out preference

signal in a frictionless manner. The Global Privacy Control is available [here](#). The Global Privacy Control applies to devices and individual browsers, so additional devices and browsers may need to have the Global Privacy Control activated.

What Personal Data do we collect and process and why?

We collect or process various categories of Personal Data as part of running our business. Below is a description of the types of Personal Data we collect and process, where we collect it from, and why. We also describe whether or not we “sell” or “share” certain categories of personal information. For reference, the term “sell” means to exchange personal information for monetary or non-monetary value. Mars does use vendors, such as analytics providers, that do use information in such a way to create a “sale” as that term is defined under the law. Further, we “share” information as that term is generally defined to refer to targeted advertising.

Category of Personal Data	Examples of Personal Data	Business or Commercial Purpose	Categories of Sources	Is this data sold, shared or disclosed? To whom it is sold, shared, or disclosed and for what purpose?
Identifiers	<ul style="list-style-type: none"> • Name • Contact information like email or physical address • Account username 	Business Purposes: <ul style="list-style-type: none"> • To provide products and services you request • For registration, contests and promotions • To communicate with you, to respond to your questions or comments or to provide you with updates and news 	<ul style="list-style-type: none"> • Directly from you; depending on where you live, you might be asked to opt-in to receiving certain communication from us. You can always opt out of receiving communications from us. • From third parties like data brokers or social media platforms. We may purchase and use opt-in email lists to 	<ul style="list-style-type: none"> • With your consent where applicable, we sell and share identifiers with third-parties like advertising networks, data analytics providers, operating systems and platforms, and social networks for the business and commercial purposes provided herein.

Category of Personal Data	Examples of Personal Data	Business or Commercial Purpose	Categories of Sources	Is this data sold, shared or disclosed? To whom it is sold, shared, or disclosed and for what purpose?
		<ul style="list-style-type: none"> • To provide personalized content, information, and to send you brochures, coupons, samples, offers and other information on our products or our family of companies • To perform a contract with you • To deliver relevant advertising • For research. <p>Commercial Purposes:</p> <ul style="list-style-type: none"> • Auditing relating to counting ad impressions, • Helping ensure security and integrity of our systems • Debugging and repairing errors • Short-term transient use • Performing services on behalf of Mars • Providing advertising and marketing services • Internal research • Verifying or maintaining the quality or safety or a service within the Mars 	<p>contact potential customers. We ask those providing the lists to confirm that contact data is provided only for those who want to receive offers and information by email.</p>	<ul style="list-style-type: none"> • We disclose identifiers within the Mars family of companies. • We may exchange names and addresses with other companies who may contact you by mail to provide offers.

Category of Personal Data	Examples of Personal Data	Business or Commercial Purpose	Categories of Sources	Is this data sold, shared or disclosed? To whom it is sold, shared, or disclosed and for what purpose?
		family of companies and with service providers.		
Customer records	<ul style="list-style-type: none"> • Purchase history • Billing and shipping information • Payment information, like your credit card number • Other data about your transactions with us 	<ul style="list-style-type: none"> • 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 data on our products or our family of companies • To perform a contract with you • For processing of Personal Data needed for the assessment and acceptance of customers or vendors • To secure, audit, or repair our Sites • For research advertising, and marketing 	<ul style="list-style-type: none"> • Directly from you when you purchase goods and services at any of our retail locations, including our veterinary hospitals and clinics or online 	<ul style="list-style-type: none"> • With your consent where applicable, we do sell and share customer records. • We share customer records with third parties like advertising networks, data analytics providers, operating systems and platforms, and social networks for the business and commercial purposes provided herein, namely, for purposes of targeted advertising. • We disclose customer records within the Mars family of companies and with service providers for the business and commercial purposes provided herein.
Commercial Data	<ul style="list-style-type: none"> • Contact information for employees of our commercial partners and service providers 	<ul style="list-style-type: none"> • To assess or accept a customer or vendor • To perform a contract with you • For research, advertising, and marketing 	<ul style="list-style-type: none"> • Directly from you • From third-party service providers like credit agencies • From public sources 	<ul style="list-style-type: none"> • We do not sell commercial data. • We share commercial data with third parties like advertising networks, data analytics providers,

Category of Personal Data	Examples of Personal Data	Business or Commercial Purpose	Categories of Sources	Is this data sold, shared or disclosed? To whom it is sold, shared, or disclosed and for what purpose?
	<ul style="list-style-type: none"> • Credit status of our business customers • Data publicly available related to sanctions or watch lists 			<p>operating systems and platforms, and social networks for the business and commercial purposes provided herein.</p> <ul style="list-style-type: none"> • We disclose commercial data within the Mars family of companies and with service providers for the business and commercial purposes provided herein.
Internet or Other Network Activity	<ul style="list-style-type: none"> • Device identifier and operating system • Browser information • IP address • Internet activity, social media activity • Activity at our Sites 	<ul style="list-style-type: none"> • 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 • To deliver relevant advertising • To secure and repair our Sites • For research, advertising, and marketing 	<ul style="list-style-type: none"> • Indirectly from you (for example from observing your actions on our Sites or through first-party cookies) • From third parties like data analytics providers 	<ul style="list-style-type: none"> • With consent where applicable, we sell and share internet or other network activity information (cookie data) with third parties like advertising networks, data analytics providers, operating systems and platforms, and social networks for the business and commercial purposes provided herein. • We disclose this Personal Data within the Mars family of companies and with service providers.

Category of Personal Data	Examples of Personal Data	Business or Commercial Purpose	Categories of Sources	Is this data sold, shared or disclosed? To whom it is sold, shared, or disclosed and for what purpose?
Professional or Employment-Related Data	<ul style="list-style-type: none"> • Work history • Personal Data provided on a job application 	<ul style="list-style-type: none"> • To process employment applications • To perform a contract with you • For security, auditing, hiring and research 	<ul style="list-style-type: none"> • Directly from you • From third parties (like a background check provider). 	<ul style="list-style-type: none"> • We do not sell or share professional or employment-related data. • We disclose this Personal Data within the Mars family of companies and with service providers for the business and commercial purposes provided herein.
Inferences from Other Personal Data	<ul style="list-style-type: none"> • Demographic data such as age, gender, hobbies or interests 	<ul style="list-style-type: none"> • To provide and improve the features, products and services you request • For advertising to target users for whom ads are most relevant. This way, users will see advertising that is most likely to interest them. We honor opt-out requests. For more information about our advertising practices, see our policy on online interest-based advertising. • For automated profiling (please see below for more information) 	<ul style="list-style-type: none"> • From third parties, such as a data analytics provider or social media site. • Indirectly from you (from observing your actions on our Sites, including which links you click on and data that you type into our online forms and chat boxes • With your consent, we may use session replay technology to monitor and record mouse clicks and movements, keystrokes, and pages and content viewed by you. Please discontinue use of the Sites if you do not consent to our collection of such data. 	<ul style="list-style-type: none"> • We do not sell inferences from other Personal Data. • We share and disclose inferences within the Mars family of companies, with service providers, and with third parties like advertising networks, data analytics providers, operating systems and platforms, and social networks for the business and commercial purposes provided herein.
Sensitive Personal Data	<ul style="list-style-type: none"> • Precise geolocation 	<ul style="list-style-type: none"> • To process employment applications 	<ul style="list-style-type: none"> • Directly from you 	<ul style="list-style-type: none"> • We do not sell or share Sensitive Personal Data.

Category of Personal Data	Examples of Personal Data	Business or Commercial Purpose	Categories of Sources	Is this data sold, shared or disclosed? To whom it is sold, shared, or disclosed and for what purpose?
	<ul style="list-style-type: none"> Protected classification characteristics such as race, ethnicity, sexual orientation, or criminal history 	<ul style="list-style-type: none"> To perform a contract with you For security, auditing, hiring and research To deliver relevant advertising, if you allow precise geolocation through your device settings. 	<ul style="list-style-type: none"> Indirectly from you (like if you allow location services when using one of our apps) From third parties such as background check providers if you apply for a job with us, or others who partner with us to process your Personal Data 	<ul style="list-style-type: none"> We disclose sensitive Personal Data within the Mars family of companies and with service providers, such as when you apply for a job, and we rely upon a service provider to assist with background checks. We may also disclose this information to service providers or other third parties for additional, specified purposes provided at the time of collection. You have the right to limit the use or disclosure of your Sensitive Personal Data via the “Your Privacy Choices” option though it may still be used for the purpose for which you consented.

Retention: We retain all categories of Personal Data for as long as needed to meet the purpose of processing and in accordance with this Privacy Statement.

Your Choices: Please note that you have choices about the information we collect. When you are asked to provide Personal Data, you may decline. However, if you choose not to provide information that is necessary to provide a product or service, you may not be able to use some of our features, products or services.

Sharing with the Mars family: We may 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.

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

Third Party Collection & Service Providers

Our advertising partners and third-parties may also collect data automatically when you visit our websites through the use of cookies. For information on the service providers with whom we work or third parties that assist with collection, please see our Cookies Notice [here](#).

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?

In addition to the sharing described above, we may share or disclose your Personal Data for purposes consistent with this Privacy Statement in the following situations.

- **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 cases, 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 fulfil a service to you.**
- **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 data is governed by their privacy policies. We encourage you to review the privacy policy of any website you visit. We are not responsible for the practices employed by third party websites linked to/from our Sites nor the information contained therein.

We may sell anonymized data to third parties, and we may share anonymized or non-personally identifying data as described above. We may combine anonymized or de-identified data with other anonymized or de-identified data from other sources; however, we maintain and use all deidentified data in de-identified form. We do not attempt to reidentify it except to ensure our deidentification processes are in compliance with applicable data protection laws. We also may share aggregated and anonymized data 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 Sites and the most popular features or services. All above sharing exclude text messaging originator opt-in data and consent; this information will not be shared with any third parties.

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 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, data about hobbies and social preferences or Sensitive Personal Data like your race, ethnicity or disability status). All data 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.

Data from third parties

We may also get data about you from public sources or third parties. For example, to verify data 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 data 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 do 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, in compliance with applicable law, 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 transactional 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, in compliance with applicable law, 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

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 Privacy Statement. 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 Notice](#) and [Cookies Notice](#) 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 data 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 to 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 unless a longer retention period is required or permitted by law.

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. Please understand, however, that no data transmissions over the Internet can be guaranteed to be 100% secure due to the inherent risks of data transmission. Consequently, we cannot ensure or warrant the security of any data you transmit to us, and you understand that any data that you transfer to us is done at your own risk. 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.

If we learn of a security system breach, we may attempt to notify you electronically so that you can take appropriate protective steps. By using the Sites or providing Personal Data to us, you agree that we can communicate with you electronically regarding security, privacy and administrative issues relating to your use of the Sites. We may post a notice via 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. 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.

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, and Switzerland where required by law. Where necessary, Mars uses the UK International Data Transfer Agreement for data transfers from the UK. For transfers between other jurisdictions, Mars may rely on other legal mechanisms for international transfer, as appropriate under the relevant law.

Law 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, or an authorized agent acting on your behalf, wish to: (1) make a request related to any of the rights set forth below; (2) appeal a decision we made regarding a request; or (3) appeal our refusal to act within a reasonable time, please reach out to us using the contact information provided above. 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. Note that we may deny a request from an authorized agent that does not submit sufficient proof that they have been authorized to act on behalf of another individual.

Right to know or 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 organizations, 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 data shall be provided in electronic form.

Right to correction, rectification, and completion

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

Right to delete or erasure ('right to be forgotten')

You may have the right to the deletion or 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 defense 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 defense 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 appropriate consent or 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 defense of legal claims. If Personal Data is processed for direct marketing purposes, including profiling, you may object at any time.

Right to Opt-out of Profiling and Automated individual decision-making

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 sale, sharing, and targeted advertising of your Personal Data

You may have the right to “opt-out” of the sale or sharing of your Personal Data to third parties (or, for consumers who are under 16 years old, the right not to have Personal Data sold absent your, or your parent’s, opt-in), or the right to opt out of the use of your Personal Data for purposes of targeted advertising. To exercise these rights, you may submit a

request using the Your Privacy Choices link provided in the footer. We also recognize the Global Privacy Control opt-out preference signal. The Global Privacy Control is available [here](#). The Global Privacy Control applies to devices and individual browsers, so additional devices and browsers may need to have the Global Privacy Control activated.

Right to Consent and/or Limit the Use and Disclosure of Your Sensitive Personal Data

If you are a United States resident, you may have the right to consent and/or limit our use of your Sensitive Personal Data to that which is necessary to perform services, provide the goods reasonably expected, or as authorized under applicable regulations. To exercise this right, you may select the Your Privacy Choices link in the footer. To stop sharing precise geolocation:

- Through a mobile app, please update your mobile device settings;
- On an iPhone, go to Settings > Privacy > Location Services > and choose an app. Select the app > tap on "location." Scroll down and slide the "Precise Location" toggle to Off.
- On an Android, go to Location Services > Google Location Accuracy. Toggle Improve Location Accuracy to off.

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.

Metrics

See [here](#) for metrics regarding Access, Delete, and Do Not Sell My Personal Information requests submitted pursuant to California law that Mars received, fulfilled (in whole or in part), and denied in the last full calendar year.

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.

Financial Incentives

We may offer various financial incentives from time to time, primarily requesting Identifiers and contact information as part of an offer, though we may also request information from your Customer Records. The terms of the financial incentive, including the Personal Data requested in connection with the offer will be provided at the time you sign up

for the financial incentive. In calculating these offers, we consider the expenses related to the offer and the value of your data. You may withdraw from any of the financial incentives at any time by following the instructions provided. For offers involving your e-mail, you may unsubscribe via the “unsubscribe” link in any marketing email you have received. For offers involving text messaging, you may text STOP. For all other offers, you may follow the instructions provided with the offer.

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.**