

Effective Date September 30, 2013

**Ventura Foods, LLC**  
**Privacy Policy**

This Privacy Policy ("Privacy Policy") applies to those web sites owned or controlled by Ventura Foods, LLC ("Ventura Foods," "we," or "us") that post a link to this Privacy Policy (individually, "Site" and collectively, the "Sites"), (however the Sites are accessed or used, whether via personal computers, mobile devices or otherwise). The Privacy Policy describes Ventura Food's information and privacy practices with regard to our Sites, including the types of information we may collect from you and how we may use and share that information. Except as specifically stated otherwise, this Privacy Policy does not apply to information collected offline by Ventura Foods.

This Privacy Policy as posted on the Site is the sole statement of our privacy policy with respect to the Site, and no summary, modification, restatement or other version thereof, or other privacy statement or policy, in any form, is valid unless we post a new or revised policy to the Site.

**YOUR CALIFORNIA PRIVACY RIGHTS**

Residents of the State of California have the right to request from companies conducting business in California a list of all third parties to which the company has disclosed personally identifiable information (defined below) during the preceding year for direct marketing purposes. Alternatively, the law provides that if the company has a Privacy Policy that gives either an opt-out or opt-in choice, the company may instead provide you with information on how to exercise your disclosure choice options. Ventura Foods has opted for the alternative option and has a comprehensive Privacy Policy that provides you with details on how you may opt-out or opt-in to the use of your personally identifiable information by third parties for direct marketing purposes. Therefore, we are not required to maintain or disclose a list of third parties that received your information.

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**Personal Information Ventura Foods Collects**

"Personal Information" is any information that can be used to identify and/or locate a specific person. The types of Personal Information we collect through our Sites will vary depending on the activity involved, but may include: first and last name, address, e-mail address, phone number and mobile phone number. We do not require that you provide Personal Information to obtain access to public parts of the Sites, however, some areas of the Sites may ask you to submit Personal Information in order for you to benefit from specific features or to participate in a particular activity. For example, we may collect Personal Information when you:

- register on the Site;
- subscribe to a newsletter or other communications, whether by e-mail, mobile device or other method;
- send questions or comments to us;
- "sign" one of our guest books and participate on message boards; or
- participate in sweepstakes, events, or other promotional events (collectively, "Promotions") offered through the Site.

You can always choose not to provide us with your Personal Information but you may not be able to participate those Sites' features that are conditioned upon collecting Personal Information.

From time to time, we may obtain Personal Information that has been collected by third parties. For example, our sponsors may provide us Personal Information about users that choose to participate in a promotional opportunity (collectively, "Third Party Information"). We may use such Third Party Information in combination with Personal Information that we have collected from you on the Site, in which case we will apply this Privacy Policy to the Third Party Information. However, because the Third Party Information is not collected on this Site, we are not responsible for the accuracy of this data or how such third parties collect and use such data.

We may passively collect certain non personal information about you on our Sites, such as how you use the Sites or which pages you view (collectively, "Usage Information"). We may utilize such Usage Information for many purposes, including to customize the Site based on your preferences, compile and analyze statistics and trends including the number of Site visitors, and otherwise administer and improve the Site. When we associate Usage Information with your Personal Information, we will treat that information as Personal Information. We may utilize various technologies that may collect Usage, including those described as follows:

**Cookies** - Cookies are small files that a web site transfers to your computer for many purposes such as facilitating your web page display preferences and web site login features. While most browsers are set up to accept cookies, you can configure your browser to refuse cookies. However, if you decline to accept the Site's cookies, you may not be able to take advantage of or participate in certain features of this Site. We do not save Personal Information in cookies but we may link cookies to any Personal Information or other information we collect.

**IP Addresses** - An IP address is a number automatically assigned to your computer or mobile device when you are using the Internet. When you view pages on this Site, our servers may record your IP address. We may use IP address records for a number of purposes, such as system administration, to report aggregate information to our business partners or to audit the use of the Site. We may associate your IP address with the Personal Information you provide in which case we will treat it as Personal Information.

**Web Beacons** - The Sites' pages and any communications sent by the Site, including newsletters, may contain a small graphic image or other web programming code called a web beacon. Web beacons can be very small or invisible to the user, although any image or other component viewed as part of a web page or e-mail can act as a web beacon. We may use web beacons to count visitors to our Site or to monitor how visitors navigate our Site, and we may include web beacons in communications sent from the Site in order to count how many messages we sent were actually opened or acted upon, among other purposes.

**Embedded Scripts** - An embedded script is programming code that is designed to collect information about your interactions with the Site. It is temporarily downloaded onto your computer from our web server or a third party we with whom we work, is active only while you are connected to the Site, and is deleted thereafter.

#### How Ventura Foods Uses Personal Information.

Ventura Foods may retain and use your Personal Information for many purposes, including:

- to send newsletters and other communications for which you have subscribed or otherwise agreed to receive;
- provide you with services or fulfill transactions that you have requested;
- send you offers or promotional materials on behalf of Ventura Foods or third parties;
- communicate with you regarding information, features or offers that we believe will be of interest to you;
- contact you regarding promotions in which you have participated;
- respond to your questions or other requests;
  
- contact you with regard to your use of the Site, including, without limitation, changes to the Site's Privacy Policy, Terms of Use or other Site policies;
- to improve or customize the Site and its content, features and services;
- allow you to access specific sections of Site for which you have registered;
- for other business purposes or for other purposes disclosed at the time you provide your Personal Information;
- send you e-mail communications or otherwise contact you regarding your job search; and
- facilitate your job search and prepare governmental and internal statistics reports.

As part of our routine record keeping practices, we may delete certain records that contain Personal Information you have submitted through the Site. We have no obligation to store such Personal Information and disclaim any liability arising out of, or related to, the destruction of such Personal Information. You should also be aware that it is not always possible to completely remove or delete all of your information from our databases without some residual data because of backups and other reasons.

Ventura Foods may share non-personally identifiable information, including aggregated statistics and Usage Information that is not associated with Personal Information, with third parties. Ventura Foods may share Personal Information and Usage Information (collectively, "*Information*") with third parties or nonaffiliated companies as follows:

**Service Providers** - We may share Information with outside parties who work on our behalf to support our business needs or to provide a product or service for you on our behalf.

**Marketing Purposes** - We may share Information with a third party for marketing purposes. If you later decide that you do not want that third party to use your Personal Information, you will need to contact that third party directly.

**Sale/Reorganization** - We reserve the right to disclose and transfer Information about you and you consent to such disclosure and transfer of Information: (i) to a subsequent owner, co-owner or operator of any of the Sites, including any applicable databases; and/or (ii) in connection with a corporate merger, consolidation, restructuring, reorganization, issuance of securities, the sale of substantially all

of Ventura Foods' stock and/or assets or other corporate change, including, without limitation, during the course of any due diligence process.

**Legal and Safety Obligations** - We may disclose your Information: (i) at the request of governmental authorities; (ii) if we are required to respond to subpoenas, court orders, legal process or other valid law enforcement measures; (iii) when we believe in good faith that the law requires disclosure; (iv) to verify or enforce compliance with the Site's Terms of Use or other policies governing the Site; (v) whenever we believe disclosure is necessary to limit our legal liability or to protect or enforce the rights, interests, or safety of the Site, visitors to the Site or other third parties; or (vi) to respond to an emergency.

**Promotions** - We may disclose your Personal Information to third parties in connection with the administration of such Promotions, including, without limitation, in connection with winner selection, prize fulfillment, allowing the sponsor(s) of the Promotions to use your name, voice and/or likeness in advertising or marketing associated with the Promotion.

**Submissions** - Ventura Foods may publish your name, voice, likeness and other Personal Information in connection with any submissions you may make to our Sites as set forth in the [Terms of Use](#).

**EEOC/Affirmative Action Reporting** - We may ask you to provide us with self-identifying information (such as veteran status, gender and ethnicity) in conjunction with laws and regulations enforced by the Equal Employment Opportunity Commission the Office of Federal Contract Compliance Programs and similar state and local regulatory agencies.

**Links to Third Party Websites** - Our Sites may contain links to third party web sites that we do not control or maintain and we are not responsible for the privacy practices employed by any Third Party Site. We encourage you to note when you leave our Site and read the privacy statements.

**Posting in Public Forums** - The Site may provide message boards, blogs and other "public" forums (collectively, the "Public Forums"). Your use of Public Forums is subject to our Terms of Use .Please keep in mind that whenever you post Personal Information in a Public Forum, that information can be collected and used by anyone. We cannot ensure the security of any information you choose to make public. Please exercise caution when deciding to disclose Personal Information in these areas

**Advertisements** - The Sites may display advertisements from third party advertisers, which may use cookies, web beacons and other methods of passively collecting Information.

**Updating Your Personal Information and Subscriptions** - You are responsible for maintaining the accuracy of the information you submit to us, such as your contact information provided as part of registration. The Site may allow you to correct or update Personal Information you have provided to us through a Site registration form or otherwise. We will make good faith efforts to make requested changes in our then active databases as soon as reasonably practicable. You may cancel or modify your subscriptions to e-mails from the Site by following the instructions contained within an e-mail you receive from the Site. However, even if you opt-out from receiving our newsletters or other marketing/promotional communications, we reserve the right to send you certain communications relating to our Site, such as service announcements or notices of changes to this Privacy Policy or our Terms of Use without offering you the opportunity to opt-out of receiving such information.

**Data Security** - While we have taken steps to protect the Personal Information we collect from you on the Site, you should keep in mind that no Internet, wireless or mobile phone transmission is ever completely secure. In particular, unencrypted e-mail and web traffic are subject to potential interception by unauthorized third parties. Likewise, we cannot guarantee the security of any information that you disclose to us, or that which we process or store. Accordingly, you disclose your Personal Information at your own risk. Please consider this when you choose the information, if any, you wish to transmit to the Sites.

**Note to Parents** - This is a general audience site and does not knowingly collect Personal Information from children ("Child"). If you are a Child younger than 13 years of age, please do not send any information about yourself to us. If we are become aware that a Child has submitted Personal Information to the Site, we will delete that Child's Personal Information.

**Consent to Transfer Outside United States** - The Site is operated in the United States and intended for residents of the United States. If you are located outside of the United States, be aware that Information we collect will be transferred to the United States. By using the Site, accessing the Site or providing your Information to the Site or Ventura Foods, you consent to this transfer.

**Changes to this Privacy Policy** - We reserve the right to update or otherwise change this Privacy Policy at any time and will post any changes here. We encourage you to check the Privacy Policy periodically for updates. Such changes will become effective immediately upon being posted unless we inform you otherwise. We will use your Information in a manner consistent with the Privacy Policy in effect at the time you submitted the information unless we receive your consent to the revised Privacy Policy.

**Contact Us** - If you have any questions, comments, requests, or concerns about this Privacy Policy, please contact us as at 877-VENTURA. Please note that your e-mails may not receive a response.