

Privacy Policy

Last updated: 10/1/2024

Tootsie Roll Industries, Inc. and its affiliated companies (“Tootsie Roll,” “we” or “us”) takes your privacy seriously. Please read the following to learn more about our privacy policy. If you do not agree with our policy or practices, your choice is not to use our website (the “Website”). We reserve the right to update or change this policy periodically, so please check back frequently for these updates. Your continued use of the Website after we make changes is deemed to be acceptance of those changes.

1. Who does this Privacy Policy Apply to?

This policy applies to and governs the manner in which Tootsie Roll collects, manages, and uses the personal information collected from Tootsie Roll’s customers and users of Tootsie Roll’s websites or other services.

All those subject to this notice are referred to as “you” or “users” in this privacy policy.

2. What does this privacy policy cover?

This privacy policy covers how Tootsie Roll treats personally identifiable information (“personal information”) such as (a) first and last name; (b) home or other physical address; (c) an email address; (d) a telephone number; (e) any other identifier that permits the physical or online contacting of a specific individual. We also collect information that does not identify you as such. (See “**Information collected by visiting our website.**” Tootsie Roll assumes no responsibility for information or statements you may encounter on the Internet not under the control of Tootsie Roll or information collected by any third party, including through any application or content (including advertising) that may link to or be assessable from or through the Website.

3. What does Tootsie Roll do with the information?

Tootsie Roll uses the information for the sole purpose of improving our products, services and marketing to our customers. We do not rent, sell, share, trade or in any way divulge our customer list to any outside firm or individual. If you believe you are being contacted by any firm or individual other than Tootsie Roll using information you have provided to us, please contact us immediately.

4. Does Tootsie Roll use “cookies”?

We use Google Analytics, a web analytics service provided by Google, Inc. (“Google”). Google Analytics uses “cookies”, which are text files placed on your computer, to help us analyze how users use our website. The information generated by the cookie about your use of the website (including your IP address) will be transmitted to and stored by Google on servers in the United States. The IP address will be truncated before transmission. On our behalf Google will use this information for the purpose of evaluating your use of the website, compiling reports on website activity and providing other services relating to website activity and internet activity in

connection with your use of our website. Google will not associate your IP address with any other data held by Google. You may refuse the use of cookies by selecting the appropriate settings on your browser; however please note that if you do this you may not be able to use the full functionality of this website. In addition to that you may prevent the collection of the information generated by the cookie about your use of the website (including you IP address) and the processing of this data by Google if you download and install the browser plug-in available at the following link: <http://tools.google.com/dlpage/gaoptout>. You can opt out of Google Analytics Advertising Features through [Ads Settings](#) and Ad Settings for mobile apps. Other opt out means include <http://optout.networkadvertising.org/> and <http://www.networkadvertising.org/mobile-choice>. For more information on the privacy practices of Google, please visit the [Google Privacy & Terms page](#).

Other than the cookies Google places on your computer, Tootsie Roll does not utilize cookies in connection with its website.

5. How does Tootsie Roll ensure that the data submitted will remain secure?

Tootsie Roll's web server is located in a physically and electronically secured data center. Any personal information you provide when submitting an online form to us is maintained and accessible only by employees of Tootsie Roll who we believe reasonably need to come into contact with that information to provide products or services to you or in order to respond to your specific questions or comments.

6. What information does Tootsie Roll Collect?

Tootsie Roll collects the following information:

Information collected by visiting our website

Tootsie Roll's web hosting servers routinely collect the following information for the sole purpose of providing a better web site to our customers and better overall customer service. This information is used solely by Tootsie Roll and not shared or disseminated in any form.

IP Address: We collect your IP address to measure our incoming traffic and better understand who is visiting our site, and what we can do to improve our site and make it a better experience for our customers.

Referral Web site: If you were referred from another site such as a search engine, we collect that information so we can better determine where our traffic is coming from.

Browser Type: We collect information about the browser you are using to help us bring consistent web viewing across all platforms and browsers.

Information collected by Tootsie Roll's online store

For customers at our online store (TootsieShop.com) we or our agent collect and process the following types of personal information:

Personal Information: such as each customer's name, address, email address, phone number, and social media identifiers.

Transaction Information: For example, your purchase history, and billing and shipping information, details of merchandise ordered, and other information about your use of our products or services.

Payment information: This includes information from your credit or debit card, online payment account, or other payment options.

Other Information: Other information we have collected from you with your consent.

7. How do we use your information?

We use information that we collect about you or that you provide to us, including personal information, in the following ways:

- To present our Website and its contents to you.
- To fulfill orders and provide you with information, products, or services that you request from us.
- To process payments and inform customers via e-mail when new merchandise has been added to the shop.
- To carry out our obligations and enforce our rights arising from any contracts entered into between you and us, including for billing and collection.
- To notify you about changes to our Website or any products or services we offer or provide through it.
- If you choose to enter a contest, giveaway, sweepstakes or promotion, your personal information may be disclosed to third parties in connection with such promotion, including without limitation for purposes of posting your entry with attribution or otherwise as permitted in the official rules for the promotion in question, fulfilling your prize or including your name on a winners list. Also, by entering a promotion, we may require you to consent to the use of your personal information or other information, such as name, voice or likeness, in advertising, promotional and marketing materials. In addition, we may offer certain promotional content, such as a sweepstakes, sponsored by or co-branded with a third party, who may obtain the personal information that you submit.
- In any other way we may describe when you provide the information.
- For any other purpose with your consent.

We may use the information we have collected from you to enable us to display advertisements to our advertisers' target audiences. Even though we do not disclose your personal information

for these purposes without your consent, if you click on or otherwise interact with an advertisement, the advertiser may assume that you meet its target criteria. Any information you provide to third parties (including third party advertisers) are subject to the privacy policies of those third parties.

8. Disclosure of your information.

We may disclose information, other than personal information, without restriction.

We may disclose the personal information that we collect or you that you provide to us as described in this privacy policy:

- To our subsidiaries and affiliates;
- To contractors, service providers, vendors, and other third parties we use to support our business and who are bound by contractual obligations to keep personal information confidential and use it only for the purposes for which we disclose it to them;
- To a buyer or other successor in the event of a merger, divestiture, restructuring, reorganization, dissolution, or other sale or transfer of some or all of Tootsie Roll's assets, whether as a going concern or as part of bankruptcy, liquidation, or similar proceeding, in which personal information held by Tootsie Roll, about our Website users is among the assets transferred;
- To fulfill the purpose for which you provide it. For example, if you give us an e-mail address to use when using the delivery ordering feature of our Website, we will transmit the contents of that email and your email address to the recipients;
- For any other purpose disclosed by us when you provide the information; and/or
- With your consent.

We may also disclose your personal information:

- To comply with any court order, law, or legal process, including to respond to any government or regulatory request.
- To enforce or apply our agreements, including for billing and collection purposes.
- If we believe disclosure is necessary or appropriate to protect the rights, property, or safety of Tootsie Roll, our customers, or others. This includes, subject to applicable law, exchanging information with other companies and organizations for the purposes of fraud protection and credit risk reduction.

We do not use or share the personal information provided to us in ways unrelated to the ones described above. To prevent unauthorized access, maintain data accuracy, and ensure the correct

use of information, we have put in place appropriate physical, electronic, and managerial procedures to safeguard and secure the information we collect online.

9. How Long Do We Keep Your Information

We retain your information for business purposes and as long as reasonably necessary to provide you with our products and services. We will also retain your information as reasonably necessary to comply with our legal obligations, resolve disputes and enforce our agreements. We may also retain cached or archived copies of your information for a reasonable period of time.

10. Children’s Privacy

We do not knowingly collect any personal information from children under the age of 13. If we discover we have received or collected personal information from a child under 13 without verification of parental consent, we will delete such personal information from our systems.

11. Additional Information for California Residents

We collect information from users as set forth in this privacy policy. The scope of the information that we collect will vary depending on that relationship and your rights under the California Consumer Privacy Act (“CCPA”) vary based on your relationship with us. Please note that not all rights listed below are available to all users.

Under the CCPA, we are required to provide specific information about our information collection, use, and disclosure practices to residents of California (“consumers” in this section). This section covers information that we collect both online and offline. Under the CCPA and as used in this California specific section, “Personal Information” is any information that identifies, relates to, describes, is capable of being associated with, or could reasonably be linked, directly or indirectly, with a particular consumer or household, including the categories identified in the table below to the extent they identify, relate to, describe, are capable of being associated with, or could be reasonably linked, directly or indirectly, with a particular consumer or household. CCPA further requires that we disclose certain information about the categories of personal information that we have collected, disclosed for a business purpose, or that we have “sold”. If you have questions or concerns about our privacy policies or practices, please contact us using the information set forth in the “How to Contact Us” section below.

Our Policy on Selling your Information

We do not sell your information. We only use your information as listed in this Privacy Policy. Some sharing of your information may be considered a “sale” of your information under the CCPA, even though no money is exchanged for that information. If you choose to opt out, Tootsie Roll will stop sharing your information with some of its business contacts.

<https://stg-tootsie-tootsiestg.kinsta.cloud/unsubscribe/>

Your rights as a California Resident

As a California resident, your rights relating to our collection, use, and sharing of your personal information are as follows:

You may request:

- That we disclose the sources, categories, and specific pieces of personal information we have collected about you within the past 12 months, how that information is used including the purpose, and with whom we share the information;
- That we delete your personal information in accordance with the requirements under the CCPA;
- That, for any transfer of information that is deemed a “sale” under the CCPA, that we disclose the categories of personal information collected and sold and to what categories of third parties it was sold;
- To opt out of sales of your personal information, if any; and
- That we provide you with a copy of your personal information in a readily usable format that allows the information to be transmitted to others.

California residents will not be discriminated against for exercising any of the rights described above.

California “Shine The Light” Law

California Civil Code Section 1798.83, also known as the "Shine The Light" law, permits our users who are California residents to request and obtain from us, once a year and free of charge, information about categories of personal information (if any) we disclosed to third parties for direct marketing purposes and the names and addresses of all third parties with which we shared personal information in the immediately preceding calendar year. If you are a California resident and would like to make such a request, please submit your request in writing to us by using the contact details provided in the section "[How to Exercise Your Rights](#)", below.

How to Exercise Your Rights

California residents, and their authorized agents, may exercise their rights by completing the “Contact Us” form on our web site, or via regular mail sent to:

Web Site Administrator
Tootsie Roll Industries, Inc.
7401 South Cicero Avenue
Chicago, Illinois 60629

Who we share California Residents’ Data With

We share your data with our service providers and business partners. In addition, we provides data to vendors, consultants, marketing partners, research firms, and other service providers or business partners. These include:

- Cloud storage providers;
- Consultants, lawyers, accountants, and other professional service providers;
- Data analytics providers;
- Insurance and financing partners;
- Law enforcement and government entities;
- Marketing partners and marketing platform providers;
- Payment processors and facilitators;
- Providers of mobility services; and
- Research partners.

12. Additional State Privacy Rights. In additional to the above rights applicable to California residents, if you are a resident of Colorado, Connecticut, Delaware, Florida, Indiana, Iowa, Kentucky, Montana, New Hampshire, New Jersey, Oregon, Tennessee, Texas, Utah, or Virginia, you may have the right to request access to and receive details about the personal information we maintain about you and how we have processed it, correct inaccuracies, get a copy of, or delete your personal information. You may also have the right to withdraw your consent to our processing of your personal information. These rights may be limited in some circumstances by applicable law and the rights may vary by state. To exercise your rights, you can contact us as discussed in “How to Exercise Your Rights”, above or by referring to the contact details at the bottom of this document.

13. Additional Information for Residents of Europe and the United Kingdom

If you are located in the European Economic Area (“EEA”) or the United Kingdom (“UK”) and your personal information is subject to Regulation (EU) 2016/679 General Data Protection Regulation (“EU GDPR”) or the EU GDPR as it forms part of the laws of the United Kingdom by virtue of section 3 of the European Union (Withdrawal) Act 2018 and as amended by the Data Protection, Privacy and Electronic Communications (Amendments etc.) (EU Exit) Regulations 2019 (the “UK GDPR”, and, together with the EU GDPR, the “GDPR”), this section provides additional disclosures and a description of your rights under the GDPR. This section will provide additional information regarding the collection, use, storage, disclosure, or transfer (“processing”) of your personal information, and is intended to be reviewed in conjunction with the other sections of our privacy policy. For purposes of the GPDR, Tootsie Roll is a “Controller.”

Lawful Basis for Processing Your Personal Information

As set forth in Section 5 “What Information does Tootsie Roll Collect?”, we process the personal information that we collect about you. Our lawful bases for processing this personal information are:

- **Consent.** We may process your personal information based upon your consent, which may be revoked at any time by contacting us using the information below in “How to Contact Us”.
- **Contract Performance.** We may collect and use certain personal information to provide you with the products and services that you request. This includes personal information used to provide you with products and related services and related transaction information.
- **Legitimate Interests.** We may collect and use your personal information to the extent necessary for our legitimate interests. For example, this may include collecting and using data to prevent and detect fraud, provide customer support, and conduct market research.
- **Fulfill Legal Obligations.** We are subject to various legal requirements in the jurisdictions that we operate that require us to collect, process, disclose and retain your personal information in order to comply with those laws. We may be required to retain your data for extended periods of time, and to provide copies of such data to law enforcement, governmental or other regulatory authorities, or third parties.

International Transfer of Your Personal Information

We may need to transfer your personal information outside of Europe or the United Kingdom to be used or processed, which may not offer the same level of protection as required in Europe or the United Kingdom and where there is no adequacy decision by the European Commission. If such transfer is required, we will seek to ensure an adequate level of data protection by appropriate safeguards, e.g. EU Model Clauses or Binding Corporate Rules. We may also rely on only one of the conditions allowed under the GDPR in the absence of (i) a decision by the European Commission or the equivalent entity in the UK that has deemed a country to provide an adequate level of protection for personal data (i.e. an adequacy decision) or (ii) appropriate safeguards such as a contract that is compliant with the model contracts for the transfer of personal data to third countries approved by the European Commission or the equivalent entity in the UK. If you would like further information on specific mechanisms we utilize for transferring personal data outside of Europe or the UK and the countries to which such transfer may be made, please contact us as directed in Section “How to Contact Us” below.

Your Rights with Regard to Your Personal Information

The GDPR provides you with certain rights related to the collection, processing, and transfer of your personal information, including:

- **Access.** You have the right to know the personal information that we collect about you and to ask us for copies of your personal information.

- **Rectification.** You have the right to request that we correct information you think is inaccurate or incomplete.
- **Object to Processing.** You have the right to object to our processing of your personal information in some circumstances, including where we are using your personal information for our legitimate interests and for direct marketing purposes.
- **Erasure.** In certain circumstances, you may have the right to request that we erase your personal information.
- **Restrict Processing.** In certain circumstances, you may have the right to ask us to restrict the processing of your personal information.
- **Data Portability.** You have the right to receive the personal information we have collected about you in a structured, commonly used and machine-readable form and transmit those data to another data controller.
- **Withdraw Consent.** You may withdraw your consent for us to process your personal information at any time as a basis for us to process your personal information. This will not affect the lawfulness of any processing carried out before you withdraw your consent or affect any other lawful basis for which we process your personal information.
- **Lodge a Complaint with a Data Protection Authority (“EU DPA”).** If you are concerned that we have not complied with your legal rights or applicable privacy laws, you have the right to lodge a complaint with the appropriate Data Protection Authority.

How to Exercise Your Rights under the GDPR

You can exercise these rights by contacting us using the information below in the below section, “How to Contact Us.” You may be asked to provide some proof of identification so that we can verify that it is you making the request.

14. Links to Other Web Sites

Links to third-party web sites may be provided for your information and convenience or to provide additional information for the various goods we offer. If you use these links, you will leave our site. Our privacy policy does not cover the information practices of those web sites linked to our site, nor do we control their content or privacy policies. We suggest that you review the privacy policy of each site your visit.

15. Do Not Track Disclosures

We do not support “Do Not Track” browser settings and do not currently participate in frameworks that would allow us to respond to signals or other mechanisms from you.

16. Changes to Policy

We reserve the right to amend our privacy policy at any time. We will alert you to any changes by posting any updates or changes to the terms of our privacy policy on this page.

17. How to Contact Us

If you have any questions about our internet privacy policy you can contact us by completing the “Contact Us” form on our web site, or via regular mail sent to:

Web Site Administrator
Tootsie Roll Industries, Inc.
7401 South Cicero Avenue
Chicago, Illinois 60629