

## **CHILDREN'S PRIVACY POLICY**

Effective Date: **1/1/2020**.

Kellogg Company, its affiliates and subsidiaries (collectively “**Company**” or “**we**,” “**our**” or “**us**”) operates online services that are general audience services and do not knowingly collect personal information as defined by the Children’s Online Privacy Protection Act (“**COPPA**”) from children under the age of 13 (“**child**” or “**children**”), except as may be permitted by COPPA and explained in this Children’s Privacy Policy. If you are a parent or guardian and believe that we have collected such personal information other than as permitted by COPPA, please contact us as noted below. Occasionally, we may have special sections of our services that are intended for children, in whole or in part. In such cases, this Children’s Privacy Policy shall apply.

This Children’s Privacy Policy explains our information collection, disclosure, and parental consent practices with respect to personal information provided by children. This Children’s Privacy Policy is in accordance with COPPA. For more information about COPPA and general tips about protecting children’s online privacy, please visit the Federal Trade Commission’s website at <https://www.ftc.gov/tips-advice/business-center/guidance/complying-coppa-frequently-asked-questions#General%20Questions>.

### **1. Children’s and Mixed Use Sections of Our Services**

Although we are a general audience service, we may from time-to-time have special sections intended, in whole or in part, for children. Where such section is directed to children, but not predominantly so, (a “Mixed-use” service) we may, consistent with COPPA, age screen users and treat users based on their self-reported age. Sections directed predominantly to children will assume all users are children, absent verification otherwise using COPPA’s verified parental consent methods. However, we need not use that process if our uses of the information we collect does not require verified parental consent under COPPA. In such cases, we still intend to comply with the other provisions of COPPA.

In the event that we become aware that we have collected personal information from any child, we will dispose of that information, or otherwise treat it in accordance with COPPA and other applicable laws and regulations. If you are a parent or guardian and you believe that your child under the age of thirteen (13) has provided us with personal information, please contact us at [https://www.kelloggsfamilyrewards.com/en\\_US/contactUs.html](https://www.kelloggsfamilyrewards.com/en_US/contactUs.html).

### **2. What About Contests and Sweepstakes?**

From time to time, we may host promotions (such as contests or sweepstakes) that allow entry by children. In order to enter these contests, users may be asked to submit information such as their first name, e-mail address, gender, date of birth, and content submissions. On our Mixed-use services, we may use an age screening mechanism to determine whether users are under the age of 13 at the time of entry. Where a user indicates he or she is under the age of 13 at the time of entry on a Mixed-use service, or in all cases for a predominately child-directed portion of a service, we may use the child’s online contact information to notify him or her as to what to give his or her parents to complete the promotion process. Or, we may set up a system for multiple contacts with the child regarding the promotion, in which case we will also obtain the parent’s e-mail and give the parent notice and an opportunity to unsubscribe the child, as required by COPPA. In either case, we will not use such e-mails for other purposes not permitted by COPPA, such as marketing.

### **3. Parental Choices and Controls**

At any time, parents can refuse to permit us to collect further personal information from their children, and can request that we delete from our records the personal information we have collected in connection

with those children. Parents can request access to, change, or delete their child's personal information by contacting us at [https://www.kelloggsfamilyrewards.com/en\\_US/contactUs.html](https://www.kelloggsfamilyrewards.com/en_US/contactUs.html). To protect children's privacy and security, we will take reasonable steps to help verify a parent's identity before granting access to any personal information.

#### **4. When Information Collected From Children Is Available To Others**

In addition, and notwithstanding anything to the contrary, we may share or disclose personal information collected from children in a limited number of instances as permitted by COPPA, including the following:

- We may share information with our service providers if necessary for them to perform certain "internal operations" (as defined by COPPA) functions for us.
- We may disclose personal information if permitted or required by law, for example, in response to a court order or a subpoena. To the extent permitted by applicable law, we also may disclose personal information collected from children (i) in response to a law enforcement or public agency's (including schools or children services) request; (ii) if we believe disclosure may prevent the instigation of a crime, facilitate an investigation related to public safety or protect the safety of a child using our sites or applications; (iii) to protect the security or integrity of our sites, applications, and other technology, as well as the technology of our service providers; or (iv) enable us to take precautions against liability.
- As otherwise permitted or required by COPPA or other applicable law.