



Social Security Number Privacy Protection Policy

This Social Security Privacy Protection Policy (this "Policy") applies to U.S. Social Security Numbers ("SSNs") that Pinnacle Agriculture Holdings, LLC and its subsidiaries obtain in the course of doing business. Safeguarding the personally identifiable information that we collect from our employees, customers and others is important to us. We use systems, policies, and procedures to protect personally identifiable information, including SSNs, from loss, misuse, or alteration.

Specifically, our policies mandate the following with respect to protecting the confidentiality of sensitive personally identifiable information we have collected, including SSNs:

Such information should be collected only when necessary to conduct business effectively and its use limited to the stated or reasonably implied purposes for which it was collected. For example, we collect SSNs to support legal and regulatory requirements, to provide products or services to you, and to fulfill our human resources needs.

Access and/or disclosure of such information must be restricted to employees, agents, and authorized third parties who have a legitimate business need for access. We may disclose such information to other third parties as legally required.

Such information must be stored and transmitted in a safe and secure manner. To the extent SSN data is collected over the public internet, encryption is required.

All data containing such information, whether hard copy or electronic, must be destroyed securely in a manner that protects the confidentiality of the underlying data.

Unlawful or improper use or disclosure of SSN information is prohibited. Those who violate this Policy are subject to disciplinary action, up to and including termination.

Occasionally we may update this Policy. If we update this Policy, the new Policy will be posted ten (10) days prior to the changes taking effect.

Last Revised: November 2015