Vital Farms Privacy Policy

Effective as of February 6, 2025

Please click <u>here</u> to view the previous version of our Privacy Policy.

<u>California notice at collection/US state law privacy notice</u>: See the US state law privacy rights section below for important information about your rights under applicable US state consumer privacy laws.

This Privacy Policy describes how Vital Farms, Inc. (collectively with its subsidiaries, "**Vital Farms**," "**we**", "**us**" or "**our**") processes personal information that we collect through our digital or online properties or services that link to this Privacy Policy (including as applicable, our website, social media pages, marketing activities, live events and other activities described in this Privacy Policy (collectively, the "Service")).

Index:

- Personal information we collect
- How we use your personal information
- How we share your personal information
- Your choices
- Other sites and services
- Security
- International data transfer
- Children
- Changes to this Privacy Policy
- How to contact us
- California notice at collection/US state law privacy notice

Personal information we collect

Information you provide to us. Personal information you may provide to us through the Service or otherwise includes:

- **Contact data**, such as your first and last name, salutation, email address, billing and mailing addresses, company name, and phone number.
- **Demographic data**, such as your city, state, country of residence, postal code, household size, grocery shopping habits and product preferences, and age.
- **Professional data**, such as professional title or occupation, farm and product details, criminal business activity, Federal Employer Identification Number (EIN), and any other information you provide when applying to become a retail, foodservice, farm, wholesale, grower, or other partner of ours.
- **Profile data**, such as the username and password that you may set to establish an online account on the Service, date of birth, redemption code, biographical details, photograph or picture, interests, preferences, information about your participation in our contests, promotions, or surveys, and any other information that you add to your account profile.

- **Communications data** based on our exchanges with you, including when you contact us through the Service or communicate with us via chat features, social media, or otherwise.
- **Transactional data**, such as information relating to or needed to complete your orders on or through the Service, including order numbers and transaction history.
- Marketing data, such as your preferences for receiving our marketing communications and details about your engagement with them.
- **Payment data** needed to complete transactions, including payment card information or bank account number. We may use a third-party vendor to collect and process your payment information.
- **Promotion data**, including information you share when you enter a competition, promotion or complete a survey. Please note that if you participate in a sweepstakes, contest or giveaway through the Service, we may ask you for your Contact Data to notify you if you win or not, to verify your identity, determine your eligibility, and/or to send you prizes. In some situations, we may need additional information as a part of the entry process, such as a prize selection choice. These sweepstakes and contests are voluntary. We recommend that you read the rules and other relevant information for each sweepstakes and contest that you enter.
- **Other data** not specifically listed here, which we will use as described in this Privacy Policy or as otherwise disclosed at the time of collection.

Third-party sources. We may combine personal information we receive from you with personal information we may obtain from other sources, such as:

- **Public sources**, such as government agencies, public records, social media platforms, and other publicly available sources.
- **Private sources,** such as data providers, social media platforms and data licensors.
- **Our affiliate partners**, such as our affiliate network provider and publishers, influencers, and promoters who participate in our paid affiliate programs.
- Marketing partners, such as joint marketing partners and event co-sponsors.

Automatic data collection. We, our service providers, and our business partners may automatically log information about you, your computer or mobile device, and your interaction over time with the Service, our communications and other online services, such as:

- **Device data**, such as your computer or mobile device's operating system type and version, manufacturer and model, browser type, screen resolution, RAM and disk size, CPU usage, device type (e.g., phone, tablet), IP address, unique identifiers (including identifiers used for advertising purposes), language settings, mobile device carrier, radio/network information (e.g., Wi-Fi, LTE, 3G), and general location information such as city, state or geographic area.
- Online activity data, such as pages or screens you viewed, how long you spent on a page or screen, the website you visited before browsing to the Service, navigation paths between pages or screens, information about your activity on a page or screen, access times and duration of access, and whether you have opened our emails or clicked links within them.
- **Communication interaction data** such as your interactions with our email, text or other communications (e.g., whether you open and/or forward emails) we may do this through use of pixel tags (which are also known as clear GIFs), which may be embedded invisibly in our emails.

Cookies and other technologies. We will also store a record of your preferences in respect of the use of these technologies in connection with the Service.

Cookies and similar technologies. Some of the automatic collection described above is facilitated by the following technologies:

- **Cookies**, which are small text files that websites store on user devices and that allow web servers to record users' web browsing activities and remember their submissions, preferences, and login status as they navigate a site. Cookies used on our sites include both "session cookies" that are deleted when a session ends, "persistent cookies" that remain longer, "first party" cookies that we place and "third party" cookies that our third-party business partners and service providers place.
- Local storage technologies, like HTML5, that provide cookie-equivalent functionality but can store larger amounts of data on your device outside of your browser in connection with specific applications.
- Web beacons, also known as pixel tags or clear GIFs, which are used to demonstrate that a webpage or email was accessed or opened, or that certain content was viewed or clicked.

How we use your personal information

We may use your personal information for the following purposes or as otherwise described at the time of collection:

Service delivery and operations. We may use your personal information to:

- provide, operate and improve the Service and our business;
- personalize the service, including remembering the devices from which you have previously logged in and remembering your selections and preferences as you navigate the Service;
- establish and maintain your user profile on the Service;
- communicate with you about the Service, including by sending Service-related announcements, updates, security alerts, and support and administrative messages;
- communicate with you about events or contests in which you participate;
- understand your needs and interests, and personalize your experience with the Service and our communications; and
- provide support for the Service, and respond to your requests, questions and feedback.

Research and development. We may use your personal information for research and development purposes, including to analyze and improve the Service and our business and to develop new products and services.

Marketing and advertising. We, our service providers and our third-party advertising partners may collect and use your personal information for marketing and advertising purposes:

• **Direct marketing**. We may send you direct marketing communications and may personalize these messages based on your needs and interests. You may opt out of our marketing communications as described in the <u>Opt-out of marketing</u> section below.

• Interest-based advertising. Our third-party advertising partners may use cookies and similar technologies to collect information about your interaction (including the data described in the automatic data collection section above) with the Service, our communications and other online services over time, and use that information to serve online ads that they think will interest you. This is called interest-based advertising. We may also share information about our users with these companies to facilitate interest-based advertising to those or similar users on other online platforms.

Events, promotions and contests. We may use your personal information to:

- administer events, promotions and contests;
- communicate with you about events, promotions or contests in which you participate; and
- contact or market to you after collecting your personal information at an event.

Service improvement and analytics. We may use your personal information to analyze your usage of the Service, improve the Service, improve the rest of our business, help us understand user activity on the Service, including which pages are most and least visited and how visitors move around the Service, as well as user interactions with our emails, and to develop new products and services.

Compliance and protection. We may use your personal information to:

- comply with applicable laws, lawful requests, and legal process, such as to respond to subpoenas, investigations or requests from government authorities;
- protect our, your or others' rights, privacy, safety or property (including by making and defending legal claims);
- audit our internal processes for compliance with legal and contractual requirements or our internal policies;
- enforce the terms and conditions that govern the Service; and
- prevent, identify, investigate and deter fraudulent, harmful, unauthorized, unethical or illegal activity, including cyberattacks and identity theft.

To create aggregated, de-identified and/or anonymized data. We may create aggregated, de-identified and/or anonymized data from your personal information and other individuals whose personal information we collect. We make personal information into de-identified and/or anonymized data by removing information that makes the data identifiable to you. We may use this aggregated, de-identified and/or anonymized data and share it with third parties for our lawful business purposes, including to analyze and improve the Service and promote our business.

Further uses, in some cases, we may use your personal information for further uses, in which case we will ask for your consent to use of your personal information for those further purposes if they are not compatible with the initial purpose for which information was collected.

How we share your personal information

We may share your personal information with the following parties and as otherwise described in this Privacy Policy, in other applicable notices, or at the time of collection.

Affiliates. Our corporate parent, subsidiaries, and affiliates.

Service providers. Third parties that provide services on our behalf or help us operate the Service or our

business (such as hosting, information technology, customer support, email delivery, marketing, consumer research, merch and apparel store providers (including PrintGlobe, Inc.) and website analytics).

Payment processors. Any payment card information you use to make a purchase on the Service is collected and processed directly by our service provider's payment processors, such as authorize.net. Authorize.net may use your payment data in accordance with its privacy policy, https://wsa.visa.com/legal/privacy-policy.html.

Advertising partners. Third-party advertising companies for the <u>interest-based advertising purposes</u> described above.

Business and marketing partners. Third parties with whom we co-sponsor events or promotions, with whom we jointly offer products or services, or whose products or services may be of interest to you.

Professional advisors. Professional advisors, such as lawyers, auditors, consultants, bankers and insurers, where necessary in the course of the professional services that they render to us.

Authorities and others. Law enforcement, government authorities, and private parties, as we believe in good faith to be necessary or appropriate for the <u>Compliance and protection purposes</u> described above.

Business transferees. We may disclose personal information in the context of actual or prospective business transactions (*e.g.*, investments in Vital Farms, financing of Vital Farms, public stock offerings, or the sale, transfer or merger of all or part of our business, assets or shares), for example, we may need to share certain personal information with prospective counterparties and their advisers. We may also disclose your personal information to an acquirer, successor, or assignee of Vital Farms as part of any merger, acquisition, sale of assets, or similar transaction, and/or in the event of an insolvency, bankruptcy, or receivership in which personal information is transferred to one or more third parties as one of our business assets.

Your choices

In this section, we describe the rights and choices available to all users. Users who are located in California or other applicable US states with omnibus consumer privacy laws can find additional information about their rights below.

Access or update your information. If you have registered for an account with us through the Service, you may review and update certain account information by logging into the account.

Opt-out of communications. You may opt-out of marketing-related emails by following the opt-out or unsubscribe instructions at the bottom of the email, or by <u>contacting us</u>. Please note that if you choose to opt-out of marketing-related emails, you may continue to receive service-related and other non-marketing emails.

If you receive text messages from us, you may opt out of receiving further text messages from us by replying STOP to our message.

Cookies. Most browsers let you remove or reject cookies. To do this, follow the instructions in your browser settings. Many browsers accept cookies by default until you change your settings. Please note that if you set your browser to disable cookies, the Service may not work properly. For more information about cookies, including how to see what cookies have been set on your browser and how to manage and delete them, visit <u>www.allaboutcookies.org</u>. You can also configure your device to prevent images from loading to prevent web beacons from functioning.

Blocking images/clear gifs: Most browsers and devices allow you to configure your device to prevent

images from loading. To do this, follow the instructions in your particular browser or device settings.

Advertising choices. You may be able to limit use of your information for interest-based advertising through the following settings/options/tools:

- Browser settings. Changing your internet web browser settings to block third-party cookies.
- **Privacy browsers/plug-ins.** Using privacy browsers and/or ad-blocking browser plug-ins that let you block tracking technologies.
- **Platform settings.** Google and Facebook offer opt-out features that let you opt-out of use of your information for interest-based advertising. You may be able to exercise that option at the following websites:
 - Google: <u>https://adssettings.google.com/</u>
 - Facebook: <u>https://www.facebook.com/about/ads</u>
- Ad industry tools. Opting out of interest-based ads from companies that participate in the following industry opt-out programs:
 - Network Advertising Initiative: <u>http://www.networkadvertising.org/managing/opt_out.asp</u>
 - Digital Advertising Alliance: optout.aboutads.info.
 - AppChoices mobile app, available at <u>https://www.youradchoices.com/appchoices</u>, which will allow you to opt-out of interest-based ads in mobile apps served by participating members of the Digital Advertising Alliance.
- **Mobile settings.** Using your mobile device settings to limit use of the advertising ID associated with your mobile device for interest-based advertising purposes.

You will need to apply these opt-out settings on each device and browser from which you wish to limit the use of your information for interest-based advertising purposes.

We cannot offer any assurances as to whether the companies we work with participate in the opt-out programs described above.

Do Not Track. Some Internet browsers may be configured to send "Do Not Track" signals to the online services that you visit. We currently do not respond to "Do Not Track" signals. To find out more about "Do Not Track," please visit <u>http://www.allaboutdnt.com</u>.

Declining to provide information. We need to collect personal information to provide certain services. If you do not provide the information we identify as required or mandatory, we may not be able to provide those services.

Other sites and services

The Service may contain links to websites, mobile applications, and other online services operated by third parties. In addition, our content may be integrated into web pages or other online services that are not associated with us. These links and integrations are not an endorsement of, or representation that we are affiliated with, any third party. We do not control websites, mobile applications or online services operated by third parties, and we are not responsible for their actions. We encourage you to read the privacy policies of the other websites, mobile applications and online services you use.

Security

We employ technical, organizational and physical safeguards designed to protect the personal information we collect. However, security risk is inherent in all internet and information technologies and we cannot guarantee the security of your personal information.

International data transfer

We are headquartered in the United States and may use service providers that operate in other countries. Your personal information may be transferred to the United States or other locations where privacy laws may not be as protective as those in your state, province, or country.

Children

The Service is not intended for use by anyone under 18 years of age. If you are a parent or guardian of a child from whom you believe we have collected personal information in a manner prohibited by law, please <u>contact us</u>. If we learn that we have collected personal information through the Service from a child without the consent of the child's parent or guardian as required by law, we will comply with applicable legal requirements to delete the information.

Changes to this Privacy Policy

We reserve the right to modify this Privacy Policy at any time. If we make material changes to this Privacy Policy, we will notify you by updating the date of this Privacy Policy and posting it on the Service or other appropriate means. Any modifications to this Privacy Policy will be effective upon our posting the modified version (or as otherwise indicated at the time of posting). In all cases, your use of the Service after the effective date of any modified Privacy Policy indicates your acknowledging that the modified Privacy Policy applies to your interactions with the Service and our business.

How to contact us

 Email: For general inquiries: info@vitalfarms.com For privacy inquiries: privacy@vitalfarms.com
 Mail: Vital Farms Inc., 3601 S. Congress Ave, Suite C100, Austin, Texas 78704
 Phone: 877-455-3063

California notice at collection/US state law privacy notice

Except as otherwise provided, this section only applies to residents of California and other states with privacy laws applicable to us that grant their residents the rights described below. For purposes of this section, "personal information" has the meaning given to "personal data", "personal information" or similar terms under the applicable privacy laws of the state in which you reside. Please note that not all rights listed below may be afforded to all users and that if you are not a resident of the relevant states, you may not be able to exercise these rights. In addition, we may not be able to process your request if you do not provide us with sufficient detail to allow us to confirm your identity or understand and respond to it.

In some cases, we may provide a different privacy notice to certain categories of residents of these states, such as job applicants, in which case that notice will apply with respect to the activities it describes instead of this section.

Your privacy rights. You may have some or all of the rights listed below. However, these rights are not absolute, are subject to certain exceptions, and in certain cases we may decline your request as permitted by law.

- **Right to know.** You can request the following information about how we have collected and used your Personal Information during the past 12 months:
 - The categories of Personal Information that we have collected.
 - The categories of sources from which we collected Personal Information.
 - The business or commercial purpose for collecting, selling, or sharing Personal Information.
 - The categories of third parties to whom we disclose Personal Information.
 - The categories of Personal Information that we sold, disclosed, or shared for a business purpose.
 - The categories of third parties to whom the Personal Information was sold, shared, or disclosed for a business purpose.
- **Right to access/portability.** You can request a copy of certain personal information that we have collected about you during the past 12 months.
- **Right to correction**. You can request that we correct inaccurate personal information that we have collected about you.
- **Right to deletion.** You can request that we delete personal information that we collected from you.
- **Right to opt out.** If we "sell" or "share" your personal information as defined by the California Consumer Privacy Act ("CCPA"), you can opt out of those disclosures.
 - Opt-out of the "sharing" of personal information (i.e., tracking for targeted advertising purposes). You can opt out of certain tracking activities for targeted advertising (also known as interest-based advertising) purposes.
 - **Opt-out of the "sale" of personal information**. You may ask us not to sell personal information.
- **Nondiscrimination**. You are entitled to exercise the rights described above free from discrimination as prohibited by applicable state privacy laws.

How to exercise your rights to know, access/portability, correction, and deletion. You may submit requests to exercise your right to know, access, deletion and correction to <u>Privacy Requests</u>, via email to <u>privacy@vitalfarms.com</u>, or by calling 1- 877-455-3063. The rights described above are not absolute, and in certain cases, we may decline your request as permitted by law. We cannot process your request if you do not provide us with sufficient detail to allow us to understand and respond to it. You may also have the right to appeal any denial of your request in the same manner through which you may submit a request.

Exercising your right to opt-out of tracking for targeted advertising purposes. Like many companies, we use services that help deliver interest-based ads to you as described above. You can submit requests to

opt-out of tracking for targeted advertising purposes here: **Do Not Sell or Share My Personal Information**. Your request to opt-out will apply only to the browser and the device from which you submit the request. You can also broadcast the Global Privacy Control (GPC) to opt-out for each participating browser system that you use. Learn more at the <u>Global Privacy Control website</u>.

Verification of identity; Authorized agents. We may need to verify your identity to process your requests to exercise your rights to know, access, deletion, and correction, and we reserve the right to confirm your California residency.

Your authorized agent may make a request on your behalf upon our verification of the agent's identity and our receipt of a copy of a valid power of attorney given to your authorized agent pursuant to applicable state law. If you have not provided your agent with such a power of attorney, we may ask you and/or your agent to take additional steps permitted by law to verify that your request is authorized, such as information required to verify your identity and that you have given the authorized agent permission to submit the request.

Additional information for California residents: The following describes our practices currently and during the past 12 months:

- **Sensitive personal information**. We do not use or disclose sensitive personal information for purposes that California residents have a right to limit under the CCPA.
- Sales. We do not "sell" personal information as defined by the CCPA and have not sold personal information in the preceding 12 months except to the extent that use of the interest-based advertising services, analytics, and/or other tracking technologies as described above constitutes a "sale" under the CCPA. We do not have actual knowledge that we have sold or shared the personal information of California residents who are under 16 years of age.
- **Retention**. The criteria for deciding how long to retain personal information is generally based on whether such period is sufficient to fulfill the purposes for which we collected it as described in this notice, including complying with our legal obligations.
- **Deidentification.** We do not to attempt to reidentify deidentified information derived from personal information, except for the purpose of testing whether our deidentification processes comply with applicable law.
- **Collection and disclosure**. The chart below describes the personal information we collect by reference to the categories of personal information specified in the CCPA (Cal. Civ. Code §1798.140), and the categories of third parties to whom we disclose it. The terms in the chart refer to the categories of information and third parties described above in this Privacy Policy in more detail. Information you voluntarily provide to us, such as in free-form webforms, may contain other categories of personal information not described below.

Personal Information ("PI") we collect	CCPA statutory category	Categories of third parties to whom we "disclose" PI for a business purpose	Categories of third parties to whom we "sell" or "share" PI
• Contact data	 Identifiers (online) Identifiers (other) Commercial information 	 Affiliates Service providers Payment processors 	 Advertising partners (to facilitate online advertising) Business and marketing

	• California customer records	 Advertising partners Professional advisors Authorities and others Business transferees Business and marketing partners 	partners
• Demographic data	 Identifiers (online) Identifiers (other) California customer records 	 Affiliates Service providers Payment processors Advertising partners Professional advisors Authorities and others Business transferees Business and marketing partners 	 Advertising partners (to facilitate online advertising) Business and marketing partners
• Professional data	 Identifiers (online) Identifiers (other) Commercial information California customer records 	 Affiliates Service providers Payment processors Advertising partners Professional advisors Authorities and others Business transferees Business and marketing partners 	 Advertising partners (to facilitate online advertising) Business and marketing partners
• Profile data	 Identifiers (online) Identifiers (other) Commercial information California customer records 	 Affiliates Service providers Payment processors Advertising partners Professional advisors Authorities and others Business transferees Business and marketing 	 Advertising partners (to facilitate online advertising) Business and marketing partners

		partners	
• Communications data	 Identifiers (online) Identifiers (other) Commercial information California consumer records Internet or Network Information 	 Affiliates Service providers Payment processors Advertising partners Professional advisors Authorities and others Business transferees Business and marketing partners 	 Advertising partners (to facilitate online advertising) Business and marketing partners
• Transactional data	 Commercial information California consumer records Financial information 	 Affiliates Service providers Payment processors Advertising partners Professional advisors Authorities and others Business transferees Business and marketing partners 	 Advertising partners (to facilitate online advertising) Business and marketing partners
• Marketing data	 Identifiers (online) Identifiers (other) Commercial information California customer records Internet or Network Information 	 Affiliates Payment processors Professional advisors Authorities and others Business transferees 	 Advertising partners (to facilitate online advertising) Business and marketing partners
• Relationship data	 Identifiers (online) Identifiers (other) California customer records 	 Affiliates Service providers Payment processors Advertising partners Professional advisors 	 Advertising partners (to facilitate online advertising) Business and marketing partners

• Payment data	 Commercial information Financial information California consumer records 	 Authorities and others Business transferees Business and marketing partners Affiliates Service providers Payment processors Advertising partners Professional advisors Authorities and others Business transferees Business and marketing partners 	 Advertising partners (to facilitate online advertising) Business and marketing partners
• Promotion data	 Identifiers (online) Identifiers (other) Commercial information California customer records Internet or Network Information 	 Affiliates Payment processors Professional advisors Authorities and others Business transferees 	 Advertising partners (to facilitate online advertising) Business and marketing partners
• Data about others	 Identifiers (online) Identifiers (other) California consumer records 	 Affiliates Service providers Payment processors Advertising partners Professional advisors Authorities and others Business transferees Business and marketing partners 	 Advertising partners (to facilitate online advertising) Business and marketing partners
• Device data	 Identifiers (other) Internet or Network Information 	 Affiliates Service providers Payment processors 	• Advertising partners (to facilitate online advertising)

• Online activity data	 Identifiers (other) Commercial information Internet or Network Information 	 Advertising partners Professional advisors Authorities and others Business transferees Business and marketing partners Affiliates Service providers Payment processors Advertising partners Professional advisors Authorities and others Business transferees Business and marketing partners 	 Business and marketing partners Advertising partners (to facilitate online advertising) Business and marketing partners
• Communication interaction data	 Identifiers (online) Identifiers (other) Commercial information California consumer records Internet or Network Information 	 Affiliates Service providers Payment processors Advertising partners Professional advisors Authorities and others Business transferees Business and marketing partners 	 Advertising partners (to facilitate online advertising) Business and marketing partners
• Data derived from the above	• Inferences	 Affiliates Service providers Advertising partners Authorities and others Business transferees Business and marketing partners 	 Advertising partners (to facilitate online advertising) Business and marketing partners
• Other Sensitive	• Protected	• N/A	• None

Personal Information	Classification Characteristics	
We do not intentionally collect this information, but it may be revealed in identity data or other information we collect		

Notice of Financial Incentive. We may invite you to receive marketing emails from Vital Farms as part of our "Join the Flock" program, which may constitute a "financial incentive" under the CCPA. If you choose to participate in our Join the Flock program, you will receive marketing emails from us including exclusive offers such as a discount off your next order. By participating in our Join the Flock program, you may provide us personal information including your Contact data, Device data, or Online activity data. You have the right to withdraw from this program at any time and may do so by following the unsubscribe link in our marketing emails.

The value of any incentive is reasonably related to the value of your data, including as applicable: the benefit and insights that we realize and expect to realize from your participation in our programs (such as product preferences); the quantity and quality of information that you provide to us through your participation; your purchase history; sales directly or indirectly generated from your participation in the program; and any increased goodwill towards us.

Shine the Light law. Under California's Shine the Light law (California Civil Code Section 1798.83), California residents may ask companies with whom they have formed a business relationship primarily for personal, family or household purposes to provide the names of third parties to which they have disclosed certain personal information (as defined under the Shine the Light law) during the preceding calendar year for their own direct marketing purposes, and the categories of personal information disclosed. You may send us requests for this information to privacy@vitalfarms.com. In your request, you must include the statement "Shine the Light Request," and provide your first and last name and mailing address and certify that you are a California resident. We reserve the right to require additional information to confirm your identity and California residency. Please note that we will not accept requests via telephone, mail, or facsimile, and we are not responsible for notices that are not labeled or sent properly, or that do not have complete information.