

## PRIVACY POLICY

This Privacy Policy governs the processing of your personal data by an entity of the Milcobel group as listed in **Annex 1** (hereinafter: “**Milcobel**”, “**we**”, “**us**”, “**our**”) whenever you:

- a) visit one of our websites (hereinafter: “**Websites**”);
- b) communicate with us via e-mail, telephone, fax and social media (hereinafter: “**Social Media Channels**”, such as Facebook, LinkedIn, Instagram and so on); or
- c) want to interact with us at fairs and events.

**Remark:** for the processing of your personal data in the context of (a) your application with us, (b) your participation in a contest, (c) the usage of extranet for our member-suppliers or (d) the usage of cookies, social plugin or similar technologies, separate notification may be provided for. When this is the case, it will always be clearly indicated on the websites.

### 1. GENERAL

- 1.1. Your personal data are processed by an entity of the Milcobel group, acting in the capacity of controller.

The contact details of our headquarters are: Milcobel, Fabriekstraat 141, haven 1140, 9120 Kallo (Beveren) Belgium, with corporate registration number 0870.019.427. You can always contact our headquarters when you have questions and/or remarks with regard to this Privacy Policy.

You can contact the responsible for privacy within Milcobel with questions via the e-mail address: [privacy.brands@milcobel.com](mailto:privacy.brands@milcobel.com).

- 1.2. The concept within this Privacy Policy must be interpreted in line with the General Data Protection Regulation (Regulation (EU) 2016/679 of 27 April 2016 on the protection of natural persons with regard to the processing of personal data and on the free movement of such data and repealing Directive 95/46/EC).

- 1.3. Where reference is made to certain laws or regulations, such reference shall also include any change, replacement or annulment of said laws or regulations, including any related executive decisions.

- 1.4. Milcobel reserves the right to modify or amend this Privacy Policy at its own discretion and from time to time. Each modification or amendment shall be communicated via the Website.

**2. TYPES OF PERSONAL DATA THAT WE PROCESS**

2.1. Whenever you use our Website and Social Media Channels, we may collect:

- **technical information** associated with the device you use, such as your IP address, browser type, geographical location and operating system;
- information concerning your **browsing behavior**, such as how long you visit, what links you click on, what pages you visit and how many times you visit a page.

2.2. When you fill out the contact form on our Websites, or contact us via e-mail, telephone, fax or Social Media Channels with a concrete question or complaint or to receive our newsletter, we collect:

- the **basic identity information** you provide us with, such as name, e-mail address, postal address, telephone number;
- the **content of your communication** and the **technical details of the communication** itself (with whom you correspond at our end, date and time, etc.);
- **publicly available information** of your profile on Social Media Channels;
- **any other personal data** you choose to provide to us (such as allergies).

2.3. When you resolve a contest question on our Websites or Social Media Channels, we collect:

- the **basic identity information** you provide us with, such as name, e-mail address, postal address, telephone number and address;
- **the answers to the questions.**

2.4. When you submit a sponsorship via e-mail, telephone, fax or Social Media Channels, we collect:

- the **basic identity information** you provide us with, such as name, e-mail address, postal address, telephone number, the company you work for, your current employment;
- information about **the sponsored event** such as the nature of the event, the data and location of the event and other information you provide to us;
- your **picture.**

2.5. When we organize events where you are present, we collect:

- the **basic identity information** you provide us with, such as name, e-mail address, postal address, telephone number, the company you work for, your current employment;
- **information regarding your stay in a hotel**, such as the location of the hotel, the time of the stay, type hotel:
- your **picture** when we take pictures of the events.

2.6. Whenever you leave us your business card or interact with us at fairs and events at which we are present, we may collect:

- the **basic identity information** you provide us with, such as name, e-mail address, postal address, telephone number, the company you work for, your function (i.e. when such information is provided by you or shown on your business card);
- your **picture**.

2.7. When you want to use an e-coupon, we collect from you:

- the **basic identity information** you provide us with, such as name, e-mail address, postal address;
- your **consumption habits**;
- **electronic identification data**.

### 3. PURPOSES FOR WHICH MILCOBEL USES YOUR PERSONAL DATA

3.1. Milcobel processes your personal data to make it possible to respond to your complaint and/or request or to communicate with you at a fair or event.

3.2. Milcobel processes your personal data to contact you if you have won a contest in which you participated.

3.3. Milcobel processes your personal data to process your request for sponsorship and possibly to conclude a sponsorship agreement with you.

3.4. Milcobel processes your personal data when this is necessary in order to be able to defend us in judicial or other proceedings.

<p>3.5. Milcobel processes your personal data to perform statistical analyses so that we may improve our Websites, our products and services or develop new products and services.</p>
<p>3.6. Milcobel processes your personal data to arrange your stay if you come to a fair or event organised by us, for which we take care of the arrangement of your stay.</p>
<p>3.7. Milcobel processes your personal data to share your personal data on our Websites or Social Media channels.</p>
<p>3.8. Milcobel processes your personal data to provide you with an e-coupon.</p>
<p>3.9. Milcobel processes your personal data to comply with legal obligations or to comply with any reasonable request from competent law enforcement agents or representatives, judicial authorities, governmental agencies or bodies, including competent data protection authorities. Your personal data may be transferred upon Milcobel's own initiative to the police or the judicial authorities as evidence or if there are justified suspicions of an unlawful act or crime committed by you through the use of the Websites, our Social Media Channels or other communication with us.</p>
<p>3.10. Milcobel may process your personal data for the preservation of the legitimate interests of Milcobel, its partners or a third party if the use of the Websites, Social Media Channels or other communication channels can be considered (a) a violation of any applicable terms of use or the intellectual property rights or any other right of a third party, (b) a threat to the security or integrity of the Websites, (c) a danger to the Websites or any of AWE's or its subcontractors' underlying systems due to viruses, Trojan horses, spyware, malware or any other form of malicious code, or (d) in any way hateful, obscene, discriminating, racist, slanderous, spiteful, hurtful or in some other way inappropriate or illegal.</p>
<p>3.11. Milcobel may process your personal data for informing any third party in the context of a possible merger with, acquisition from/by or demerger by that third party, even if that third party is located outside the EU.</p>
<p>3.12. Milcobel processes your personal data for marketing purposes i.e. to provide you with targeted communications, promotions, offerings and other advertisements of Milcobel and selected partners. Unless you are an existing customer who has already purchased similar goods or services from us and who we wish to target with our own marketing material, <b>AWE will only send you communications, promotions, offerings, newsletters and other advertisements via e-mail or other person-to-person electronic communications channels if you have <u>explicitly consented</u> to receiving such communications, promotions, offerings, newsletters and other advertisements.</b></p>

<b>4. LEGAL BASIS FOR PROCESSING YOUR PERSONAL DATA</b>
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- 4.1. The processing of your personal data for the purposes described in clauses 3.2, 3.6, 3.7 and 3.8 is based on your consent.

In the event that we process your personal data (such as information about your allergies) in the context of a question or a complaint addressed to us as set out in clause 3.1, you acknowledge that asking the question or complaint implies your consent to the processing of these personal data.

If we collect your personal data and you are not yet an existing customer of ours as described in clause 3.12, we also ask for your consent. **By consenting to the processing of your personal data for the purpose of sending communications, promotions, offers, newsletters and other advertisements via email or other electronic communication channels from person-to-person, you consent to our processing of your personal data for this purpose in the manner and under the conditions set out in this Privacy Policy.**

- 4.2. The processing of your personal data for the purpose described in clause 3.3, is necessary for the step we take before concluding an agreement with you.

- 4.3. The processing of your personal data for the purpose described in clause 3.9 is necessary to enable Milcobel to comply with its legal obligations.

- 4.4. The processing of your personal data for the purposes described in clauses 3.1, 3.4, 3.5, 3.10, 3.11 and 3.12 is necessary for Milcobel's legitimate interest, namely to:

- be able to respond appropriately to your requests concerning information and other requests and to communicate with you;
- to enable us to defend ourselves in judicial proceedings;
- continuously improve the Milcobel Websites, the Social Media channels, products and services to enable;
- safeguard our Websites, Social Media channels, products and services from misuse and illegal activities;
- protect our commercial and business interests and meet the needs of changing market conditions;
- enabling the marketing and promotion of our products, services, brands and the successful commercialisation of our products and services.

**5. RECIPIENTS AND TRANSFERS**

5.1. Except for the situation described in clause 5.2, Milcobel does not send your personal data in an identifiable manner to any third party without your explicit consent to do so. You understand, however, that if you use our Social Media Channels, your personal data is also processed by the social media providers. You can find more information on how these social media providers process your personal data in their respective privacy policies.

5.2. Milcobel relies on third parties such as IT service providers and marketing service providers to provide you with the Websites, to allow us to advertise and to process your personal data for our benefit. These third party processors may only process your personal data on Milcobel's behalf on the basis of explicit written instructions from Milcobel. Milcobel guarantees that all external processors are selected with due care and obliges them to respect the security and integrity of your personal data.

**6. QUALITY ASSURANCES**

6.1. Milcobel does its utmost to process only those personal data which are necessary to achieve the purposes listed under the purpose for processing.

6.2. Your personal data are only processed for as long as needed to achieve the purposes which are described above or up until such time where you withdraw your consent for processing them. Note that withdrawal of consent may imply that you can no longer use the whole or part of the Websites. Milcobel will de-identify your personal data when they are no longer necessary for the purposes outlined in the purpose for processing, unless there is:

- an overriding interest of Milcobel or any other third party in keeping your personal data identifiable;
- a legal or regulatory obligation or a judicial or administrative order that prevents Milcobel from de-identifying them.

6.3. Milcobel will take the appropriate technical and organizational measures to keep your personal data safe from unauthorized access or theft as well as accidental loss, tampering or destruction. Access by personnel of Milcobel or its third party processors will only be on a need-to-know basis and subject to strict confidentiality obligations. You understand, however, that safety and security are best efforts obligations only, which can never be guaranteed.

**7. YOUR RIGHTS**

7.1. You have the right to request access to all personal data processed by Milcobel pertaining to you. You must always specify the processing activities in respect of which you wish to exercise your right to access.

Milcobel is, however, entitled to reject certain requests to access if these requests are clearly aimed at causing inconvenience. Milcobel is also entitled to refuse a request to access if its granting has disproportionately negative implications for the rights and freedoms of others, including Milcobel itself.

7.2. You have the right to ask that any personal data pertaining to you that are inaccurate, are corrected free of charge. If a request for correction is submitted, such request shall be accompanied of proof of the flawed nature of the data for which correction is asked.

7.3. You have the right to withdraw your earlier given consent under clause 4.4 for processing your personal data.

7.4. You have the right to request that personal data pertaining to you will be deleted if they are no longer required in light of the purposes which are outlined above or if you withdraw your consent for processing them. However, you need to keep in mind that a request for deletion will be evaluated by Milcobel against:

- overriding interests of Milcobel or any other third party;
- legal or regulatory obligations or administrative or judicial orders which may contradict such deletion.

Instead of deletion you can also ask that Milcobel limits the processing of your personal data if and when (a) you contest the accuracy of that data, (b) the processing is illegitimate or (c) the data are no longer needed for the purposes which are outlined above, but you need them to defend yourself in judicial proceedings.

7.5. You have the right to object to the processing of personal data if you are in a particular and specific situation that justifies such an objection. However, you must communicate your situation to us so that we can assess your request correctly. However, if the intended processing can be regarded as direct marketing, you have the right to object this processing free of charge and at any time.

7.6. You have the right to receive from us in a structured, commonly used and machine-readable format all personal data you have provided to us as described in clauses 4.1 and 4.2.

- 7.7. To exercise your rights as described in this Privacy Policy, you can contact the responsible for privacy within Milcobel. You must submit a written request to this effect to the above e-mail address, stating the right to which your request relates and the reasons for your request. In addition, you must add a copy of your valid identity card, on which the validity date and your signature are clearly visible, in order to prevent illegal or fraudulent requests.
- 7.8. As soon as your request is received by the responsible for privacy within Milcobel, you will receive an acknowledgement of receipt. Your request will then be dealt with within a reasonable period of time.
- 7.9. If you are still dissatisfied, you can contact the Belgian Data Protection Authority.



## ANNEX I

The Milcobel group consists of and this Privacy Policy therefore applies to the following entities:

- a) **Milcobel CVBA**, Fabriekstraat 141, port 1140, 9120 Kallo (Beveren) Belgium, with corporate registration number 0870.019.427. Note that this entity is the headquarters of the Milcobel group. Any questions and/or comments regarding this Privacy Policy will be directed to, and subsequently answered by, this entity in accordance with this Privacy Policy;
- b) **Milcobel 3 F CVBA**, Fabriekstraat 141, port 1140, 9120 Kallo (Beveren) ) Belgium, with corporate registration number 0424.899.491;
- c) **Belgomilk CVBA**, Fabriekstraat 141, port 1140, 9120 Kallo (Beveren) ) Belgium, with corporate registration number 0870.017.447;
- d) **Kaasimport Jan Dupont NV**, Lieven Bauwensstraat 9, 8200 Brugge ) Belgium, with corporate registration number 0405.109.216;
- e) **Dupontcheese Nederland BV**, Escudoweg 1, 2153 PC Nieuw-Vennep, the Netherlands with CoC number 28047982;
- f) **Camal SA**, Rue Léqipont 12, 4671 Blégny ) Belgium, with corporate registration number 0412.859.912 and
- g) **Ysco NV**, Fabriekstraat 141, port 1140, 9120 Kallo (Beveren) ) Belgium, with corporate registration number 0472.336.451.