

Volac Group Data Protection Policy

1. Scope of this Policy

Volac is committed to protecting and respecting the privacy of individuals who trust us with their personal information.

This policy sets out the basis on which personal data will be processed by the Volac Group (which consists of the companies referred to below and is referred to as "Volac") in accordance with applicable Data Protection laws. It covers all Volac companies and any subsidiaries, including all officers, employees and agents. It is designed to support and govern all Volac's processing activities. Please take time to review this Policy as it tells you how your personal information will be treated by us. We do not sell, rent or loan any identifiable information regarding our customers to any third party. Only in the circumstances described within this Policy would we share your information with any third party.

This Policy will form the basis for any Fair Processing Notices provided to individuals.

2. Responsibilities

POLICY MAINTENANCE AND DATA PROTECTION RESPONSIBILITY

This Policy has been prepared by and is maintained by Volac International Limited on behalf of the Volac Group.

For further enquiries please contact the relevant contact details below.

DATA CONTROLLER DETAILS

Depending on your activities with Volac, your data may be processed by one or more of the following business units (each acting as a Data Controller):

Data Controller	Contact details
Volac International Limited (UK)	personaldata@volac.com
Volac Renewable Energy Ltd (UK)	personaldata@volac.com
Volac Wilmar Feed Ingredients Holdings Ltd (UK)	personaldata@volac.com
Volac Wilmar Feed Ingredients (UK)	personaldata@volac.com
Volac Socoor Srl (Italy)	personaldata@volac.com
Volac Argrobest s.p.o.l. (Czech)	personaldata@volac.com
Volac Feeds Ltd (Ireland)	personaldata@volac.com
Ecosyl Inc	personaldata@volac.com

For further information contact

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PRIVACY PRINCIPLES

Volac will comply with each of the fundamental principles for protecting the privacy of individuals, set out in Article 5 of the UK General Data Protection Regulation (GDPR):

- **Lawfulness, fairness and transparency:** Personal information shall be processed lawfully, fairly and in a transparent matter in relation to the data subject.
- **Purpose limitation:** Personal information shall be collected for specified, explicit and legitimate purposes and not further processed in a manner which is incompatible with those purposes.
- **Data limitation:** Personal information collected shall be adequate, relevant and limited to what is necessary in relation to the purposes for which they are processed
- **Accuracy:** Personal information shall be accurate and, where necessary, kept up to date.
- **Storage limitation:** Personal information shall be kept in a form which permits identification of data subjects for no longer than is necessary for the purposes for which the personal data are processed.
- **Security:** Personal information shall be processed in a manner that ensures its appropriate security, including protection against unauthorised or unlawful processing and against accidental loss, destruction or damage, through the adoption of appropriate technical and/or organisational measures.

VOLAC PROCESSING ACTIVITIES

Volac is committed to processing data fairly, lawfully and transparently. This section explains the nature of Volac's processing activities.

Why do we process personal data?

Volac works hard to produce and market the best dairy nutrition products globally. Our processing of personal data takes place in this context, to enable us to provide manufacturing services, promote our goods and services, maintain our accounts and records and to support and manage our staff.

The sections below describe the reasons for and the basis on which Volac will process specific categories of personal data.

What categories of data do we process?

Volac and its business units will process the personal data of its customers, suppliers, employees and their families (or prospective employees), consultants, temporary workers, website or social media users and others with whom it does business.

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For all such categories, Volac will process key contact details including name, job title and company that you work for, email address and, where required, correspondence address and telephone numbers in order to administrate its relationship with you.

Depending on which category you fall into, some data is processed for specific purposes. In each case, the following general points should be read in conjunction with any specific Fair Processing Notices provided to you:

<i>If you are an Employee, Officer, Consultant, Interim or Temporary Worker:</i>		
Categories of data	Purposes of processing	Lawful basis of processing
<ul style="list-style-type: none"> ▪ personal details ▪ family details ▪ lifestyle and social circumstances ▪ financial details ▪ employment and education details ▪ driving licence details and driving history ▪ visual images, personal appearance and behaviour ▪ physical or mental health details ▪ offences and alleged offences ▪ racial or ethnic origin ▪ religious or other beliefs ▪ trade union membership ▪ genetic and biometric 	<ul style="list-style-type: none"> ▪ to carry out our obligations under your Employment or other contract with us ▪ to assess your application prior to entering into a contract of employment with you ▪ to administrate your employee file as required by law, or in accordance with our legitimate interests as an employer ▪ to provide you with information about your employment ▪ to provide security for access systems and facility management ▪ to undertake company promotion 	<p><i>Please check the wording of any Privacy Notice provided to you for the specific lawful basis that apply to Volac's processing, however the following are the most likely to apply:</i></p> <ul style="list-style-type: none"> ▪ the processing is necessary for the performance of your Employment contract ▪ the processing is necessary for Volac to comply with its legal obligations ▪ the processing falls within Volac's legitimate interests (when fairly balanced against your individual privacy interests) ▪ the processing is necessary for the purposes of occupational medicine, for the assessment of your working capacity or for medical diagnosis

Further information is provided in the **Employee Handbook**, relevant **Application Form** and in the relevant **Contract** with you.

<i>If you are a Customer or a Supplier:</i>		
Categories of data	Purposes of processing	Lawful basis of processing
<ul style="list-style-type: none"> ▪ Account contact details ▪ Payment details ▪ Order history ▪ Sign-ups for promotional material 	<ul style="list-style-type: none"> ▪ to administrate or otherwise carry out our obligations arising from any contracts entered into between you or to take steps to enter into any contracts between you and us 	<p><i>Please check the wording of any Privacy Notice provided to you for the specific lawful basis that apply to Volac's processing, however the following are the most likely to apply:</i></p>

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	<ul style="list-style-type: none"> ▪ to provide you with the information, products and services that you request from us and to provide customer service ▪ to provide you with information about other goods and services we offer that are similar to those that you have already purchased or enquired about ▪ to notify you about changes to our service 	<ul style="list-style-type: none"> ▪ you have provided us with your specific consent to the processing of your personal data ▪ the processing is necessary for the performance of our contract of sale with you ▪ the processing is necessary for Volac to comply with its legal obligations ▪ the processing falls within Volac's legitimate interests (when fairly balanced against your individual privacy interests)
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Further information is provided under the terms of your **agreement** with us.

<i>If you are a Website visitor or you interact with us on Social Media:</i>		
Categories of data	Purposes of processing	Lawful basis of processing
<ul style="list-style-type: none"> ▪ information about you that you give us by filling in forms on any of our web sites that are governed by this Policy may include your name, address, e-mail address and phone number, financial and credit card information, personal description and photograph ▪ information you provide when you register to use our site, subscribe to our service, search for a product, place an order on our site, participate in discussion boards or other social media functions, enter a competition, promotion or survey ▪ cookie information to distinguish you from other users of our website ▪ responses to surveys 	<ul style="list-style-type: none"> ▪ to ensure that content from our services is presented in the most effective manner for you and for your computer. ▪ to allow you to participate in interactive features of our service, when you choose to do so ▪ to provide you with a good experience when you browse our website and also allow us to improve our site and services ▪ to fulfil any requests you have made or orders placed, or to contact you with information relevant to your interaction with us. ▪ for our business purposes, including data analysis, audits, fraud monitoring and prevention, developing new products, enhancing, improving or modifying our services, identifying usage trends, determining the 	<p><i>Please check the wording of any Privacy Notice provided to you for the specific lawful basis that apply to Volac's processing, however the following are the most likely to apply:</i></p> <ul style="list-style-type: none"> ▪ you have provided us with your specific consent to the processing of your personal data ▪ the processing is necessary for the performance of any contract entered into with you ▪ the processing is necessary for Volac to comply with its legal obligations ▪ the processing falls within Volac's legitimate interests (when fairly balanced against your individual privacy interests)

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	effectiveness of our promotional campaigns and operating and expanding our business activities.	
Further Categories:		
Categories of data	Purposes of processing	
CCTV images	Individuals may be captured by CCTV at one of our sites. The system is there to maintain the security of the premises and for preventing and investigating crime.	

We may also ask you for other optional information such as what sort of equipment/device/software you use and what other subjects interest you. If you choose to give us this information, we will use it to help us to provide you with the best possible service that is personalised to your needs and preferences.

Although we do not make it compulsory to give us every item of information we ask for, the more information volunteered by individuals (and the more accurate it is), the better we can match our services to the needs of individuals.

FAIR PROCESSING INFORMATION

For each processing activity for which Volac is the data controller, certain additional information shall be set out in a privacy notice which will include the following:

- Details of Volac as the data controller, including contact details;
- The purposes and legal basis for the processing, including any legitimate interests Volac is relying on;
- The categories of personal information;
- The recipients of the personal information;
- Details of any transfers out of the EEA;
- The period for which the data will be retained or the criteria used to determine it;
- Details of the data subject's rights, including the right to withdraw consent if applicable;
- The right to lodge a complaint with the Information Commissioner's Office;
- The source of the data;
- Whether there are statutory or contractual requirements relating to the provision of personal information;
- Details of any automated decision making.

DISCLOSURES OF PERSONAL DATA

We may disclose aggregated information about users of our Services, and information that does not identify any individual, without restriction.

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Other than the disclosures referred to in this Policy, we will not disclose any personal information without your permission unless we are legally obliged or entitled to do so (for example, if required to do so by Court order or for the purposes of identifying fraud or other crime).

Transfers to third parties

Volac shall only transfer personal information to, or allow access by, third parties when it is assured that the information will be processed legitimately and protected appropriately by the recipient in accordance with applicable Data Protection laws.

Certain Volac services, such as payment processing, the provision of IT services, payroll services and our broader HR systems, are offered in conjunction with our (third-party) business partners. In such cases, we may need to share your personal information with them in order to provide these services. In this instance, please note that certain services may be unavailable if you do not want to disclose the personal information you are asked for.

Where our services make use of hosted tools, hosted data storage and payment services provided by third parties any of your personal information stored by such third parties shall be subject to their privacy provisions.

Joint controllers: Where the third party is deemed to be a data controller, Volac will enter into an arrangement with the Controller to clarify each party's responsibilities in respect to the Personal Data transferred. A list of such arrangements is available as appropriate upon request.

International Transfers

Volac may only transfer personal information to third party recipients (whether data processors or data controllers) located in another country where that country is recognised as having an adequate level of legal protection for the rights and freedoms of the relevant data subjects. For a list of appropriate relevant countries, you must consult personaldata@volac.com.

There may be situations where managers and senior personnel access personal data outside the EEA in order to discharge their functions for Volac whilst abroad. Where this occurs Volac will ensure:

- that any required transfers of data outside of Volac's systems are minimised;
- that any transfers are necessary and lawful under Data Protection legislation;
- that all appropriate safeguards have been applied to the data to ensure no accidental loss or damage to the data.

RETENTION OF PERSONAL DATA

Volac will not keep information longer than necessary for the particular purpose for which it was collected (including addressing any legal or regulatory obligations relevant to the information). In order to provide clear criteria and/or timescales for retaining your data, Volac has developed and will adhere to the retention schedules for the categories of information outlined below:

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Type of record	Retention period or recommendation
Job applications and interview records of unsuccessful candidates	15 months
Written particulars of employment, contracts of employment, and changes to terms and conditions, training records	While employment continues and up to 6 years after employment ceases
Annual leave records	6 years
Payroll and wage records for companies	6 years from the financial year-end in which payments were made
Pensions and Life Assurance	For the duration of the administration of the employee's pension and life assurance arrangements
Maternity records	6 years after the end of the tax year in which the maternity pay period ends
Any reportable accident, death or injury in connection with work	For up to 7 years from the date the report was made
Consents for the processing of personal and sensitive data	For as long as the data is being processed and up to 6 years afterwards
Customer and Delivery Account details (contact details, payment details and order history)	For as long as the data is being processed and up to 6 years afterwards
Customer Complaints	For up to 6 years from the latest date a response was given by Volac to a complaint made
Customer Sign-ups for promotional material	For as long as the data is being processed and up to 3 years afterwards

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Type of record	Retention period or recommendation
Website / social media registration information	For as long as the data is being processed and up to 3 years afterwards
Website / social media payment information	For as long as the data is being processed and up to 6 years afterwards
Survey responses	2 years
CCTV images	For as long as the data is being processed and up to 6 years afterwards

If you would like to request retention information for any of your data which is not covered within the table above, then please contact personaldata@volac.com.

SECURITY AND SECURITY BREACHES

We have implemented technology and policies to help safeguard your privacy from unauthorised access and improper use. For example, transactions conducted through the site are encrypted and user log-in is subject to password protection. We will continue to monitor and update security measures as new technology becomes available as appropriate to the site. All information you provide to us is stored on our secure servers. Any payment transactions will be encrypted using up to date technology.

Where we have given you (or where you have chosen) a password which enables you to access certain parts of our site, you are responsible for keeping this password confidential.

Volac's IT Systems Security Policy sets out how your data will be kept secure and the specific restrictions in place to ensure lawful use of your data. Such measures include:

- IT access restrictions to email and internet/intranet services;
- Password refresh procedures;
- Restrictions on bypassing Volac systems;
- Putting users on notice that company-provided systems are subject to reasonable and proportionate monitoring processes;
- Regular updating and patching of systems.

INDIVIDUAL REQUESTS

Keeping our records accurate:

We aim to keep our information about you as accurate as possible. If you would like to review or change the details you have supplied to us, please contact personaldata@volac.com.

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Reviewing our processing approach:

You have the **right to object** to processing that we are carrying out where that processing is taking place in accordance with our legitimate interests or where we are marketing directly to you.

In addition, you can request that we **restrict** any processing that is unlawful, unnecessary, inaccurate or is the subject of an objection by you.

You can also request that we **erase** your data in certain circumstances (for example, if the data is no longer needed for its original purpose), or if you have previously given your consent for the data to be used and you are now withdrawing that consent.

We take all such requests extremely seriously and will always aim to comply with your request unless we have a compelling and lawful reason to maintain the processing. Even in such situations, we will aim to comply with your request as far as it is possible to do so. If you wish to make a request for Volac to review its processing approach for your personal data, please contact personaldata@volac.com.

Access Requests:

You have the right to access information held about you

Volac will provide, following a request made in writing and upon verification of your identity, the following information about your personal data:

- The purposes of the collection, processing, use and storage of personal information;
- The source(s) of the personal data, if it was not obtained from you directly;
- The categories of personal information stored;
- The recipients or categories of recipients to whom the personal information has been or may be transmitted, along with the location of those recipients;
- The envisaged period of storage for the personal information or the rationale for determining the storage period;
- The use of any automated decision-making, including profiling;
- What other rights you can exercise and how you can bring a complaint.

You also have the right to be provided with a copy of your information, including in some circumstances to be provided with a 'portable' copy, (i.e. in a structured, commonly used, machine-readable format).

TRAINING AND COMPLIANCE

All employees of Volac are required to complete GDPR training from time to time. This Policy will be reviewed by the General Counsel and Company Secretary and, if necessary updated and reapproved, at least once in every 24-month period, beginning on the 25th May 2018 and recommencing on the date of each subsequent approval.

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