

# PRIVACY AND COOKIE POLICY

## Wilmar Europe

### 1 Who are we?

We are Wilmar Europe Holdings B.V. and its subsidiaries and affiliates, situated in the European Union (**Wilmar Europe**). Wilmar Europe Holdings B.V., has its registered office at Rotterdam, the Netherlands, and its principal place of business at Delftseplein 27 G, (3013 AA) Rotterdam, the Netherlands, registered with the Dutch Commercial Register under number 24439170.

In the context of our activities, we collect, hold, disclose and/or otherwise process personal data. Pursuant to applicable data protection and privacy legislation, we qualify as the controller with respect to the personal data that we process.

### 2 We know your privacy is important to you

We value your right to privacy and strive to protect your personal data in accordance with applicable data protection legislation and more specifically, with the General Data Protection Regulation ("GDPR") and its national implementing legislation.

In this Privacy Policy we set forth how we collect your personal data, how and for what purposes we may use your personal data and to whom your personal data may be disclosed by us. Further, this Privacy Policy includes important information regarding your rights with respect to the processing of your personal data. Therefore, we encourage you to read this Privacy Policy very carefully.

From time to time, we may need to change this Privacy Policy. The most recent version of this Privacy Policy is available on our website [here](#). We encourage you to regularly review this Privacy Policy. You may also ask us to send you a copy of the most recent version of this Privacy Policy.

**Attention:** By using our services and/or our website and by sharing your personal data with us, you acknowledge that your personal data will be processed in the manner as described in this Privacy Policy.

**Note:** This does not constitute your 'consent' to the processing of your personal data. We do not process your personal data on the basis of your consent, unless specifically indicated.

### 3 Whose personal data do we collect?

In the context of our services, we may collect personal data relating to our customers, suppliers, representatives of the authorities or non-governmental organizations or visitors of our website. If you are a shareholder, director, corporate officer, manager, employee or appointed contractor of any business entity, we may collect your personal data when it is relevant to our business relationship with that entity.

### 4 How do we collect personal data relating to you?

We may collect personal data directly from you, for example in person when you meet our staff or representatives, or over the phone, by email or when you visit our website [Wilmar](#)

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[Europe](#).

We may also collect your personal data from third party sources without directly involving you. For example, we may obtain your personal data from your family members or a government agency. We may also obtain your personal data from market research organizations or publicly available resources such as telephone directories or business directories and through social media platforms such as LinkedIn. We may also obtain personal data relating to you by means of CCTV we use in and around our premises at our production facilities, or when you visit our website [Wilmar Europe](#) by means of cookies.

### 5 What personal data do we collect and for what purposes do we use your personal data?

We collect the following information about you and we use it for the following purposes:

| Personal data:   | Purposes:   |
|--|---|
| Your identification and contact information (name, address, telephone number, email address or other contact details)  | customer administration<br>supplier administration<br>administration and management intermediaries<br>to deliver the services or products the company you represent / are employed with ordered<br>for administrating payment of invoices and to collect debts<br>for marketing purposes<br>to raise your awareness on our sustainability programs or market developments (newsletters)<br>to handle disputes and ensure our legal position herein<br>to comply with legal obligations<br>in the context of a possible business transaction |
| We can also obtain identification and contact information via external databases which we purchase and combine this information with the data we have collected from you, in order to obtain more complete or accurate information | for making decisions about selecting you as a vendor/customer   |
| Camera images collected at the production sites  | for compliance with safety and security regulations applicable for the production sites, Wilmar Europe and Wilmar Group policies and procedures   |

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The legal grounds used for these processing activities are: balance of legitimate interests, legal obligation on our side or execution of contract between Wilmar Europe and the company you represent/are employed by.

For the processing of your identification and contact information (name, address, telephone number, email address or other contact details) for the purpose of providing you with our newsletter on our sustainability programs or market developments, we rely upon your consent. We note that you have the right to withdraw that consent at any time. You may do so by contacting your usual contact person at Wilmar Europe.

#### 6 With whom do we share your personal data?

In the context of the purposes as listed above, we may share your personal data with third parties, such as service providers we use (e.g. IT service providers or marketing agencies). Your personal data can also be disclosed to our affiliated companies such as Wilmar International Limited and its subsidiaries, associates and joint ventures (**Wilmar Group**).

We will ensure that, where relevant, contractual safeguards are implemented to ensure the protection of your personal data when disclosing your personal data to a third party. For example, we will enter into data processing agreements with relevant parties (providing for restrictions on the use of your personal data and obligations with respect to the protection and security of your personal data).

The parties to whom we may disclose your personal data as referred to above may be located in countries outside the European Economic Area, which countries may offer a lower level of data protection than in the country where you are located. For example, such shall be the case in the following situations:

- When we comply with our legal and regulatory obligations and requirements;
- When we deal with our accounting, risk management and record keeping;
- When we facilitate your performance of business or contractual relationships with us;
- When you visit our web site;
- When you contact us with feedback, queries or complaints.

In such case, Wilmar Europe shall ensure that the international transfer of your personal data shall comply with the applicable data protection laws. For instance, this applies to Wilmar Europe sharing certain personal data with our affiliated companies in Wilmar Group. In connection herewith Wilmar Europe and Wilmar International Limited have entered into a data transfer agreement based on the EU Model Clauses (a copy of which can be obtained from us via the contact details below). We do not sell your personal data to any third parties.

#### 7 How long do we store your personal data?

Your personal data will not be stored for longer than is necessary in relation to the purposes

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for which we process them (we refer to the purposes as listed above in paragraph 5). Only where we are legally obliged to, or where this is necessary for defending our interests in the context of judicial proceedings (e.g. in case of a dispute), we will store the personal data for longer periods.

For example, the following storage periods apply:

| Personal data  | Storage period   |
|--|--|
| Contact details we use for facilitation of your awareness on our sustainability programs and market developments (newsletters) | As long as we have your consent  |
| The data we use for making decisions about selecting you as a vendor/customer  | 5 years upon obtaining the data  |
| Contact details we use for marketing purposes, in the context of (possible) business transaction                               | As long as you represent / are employed with a company we have a business relation with – in case we have no other grounds for keeping your personal data after the end of your representation / employment as referred above, your data will be deleted when we are informed by you or a third party on such change of your situation |
| Information we keep for administration purposes  | 7 years  |
| Camera images at the production sites  | 4 weeks (when applicable), with a possibility to extend in case of registered offenses   |

The full text of the most recent version of our data retention policy can be provided to you upon your request by email following this link: [WEH-GDPR](#).

### 8 How do we protect your personal data?

We will implement the necessary administrative, technical and organizational measures for ensuring a level of security appropriate to the specific risks that we have identified. We protect your personal data against destruction, loss, alteration, unauthorized disclosure of or access to personal data transmitted, stored or otherwise processed. More specifically, we implement industry standards security controls to protect your personal from unauthorized access and alteration and loss. These include:

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- Safeguards to detect and prevent data breaches in our networks, servers and data-bases;
- Controls to limit access to data stored on our systems;
- Stringent processes to govern how data is accessed, processed and stored on our systems.

Further, we seek to ensure that we keep your personal data accurate and up-to-date. In view thereof, we kindly request you to inform us of any changes to your personal data (such as a change in your contact details).

### 9 What are your rights and how you can exercise them?

You have the right to:

- Information about and access to your personal data;
- Rectify your personal data;
- Erase your personal data ('right to be forgotten');
- Restrict processing of your personal data;
- Object to the processing of your personal data;
- Receive your personal data in a structured, commonly used and machine readable format and to (have) transmit(ted) your personal data to another organization.

To read more about these rights, and circumstances under which you can use these rights, in particular your **right to object**, please click [here](#).

Finally, you have the right to lodge a complaint with the *Dutch Data Protection Authority* relating to the processing of your personal data by us.

### 10 Use of cookies

We use certain cookies on our website. Cookies are small pieces of data that are stored on your computer or mobile device via your browser. Cookies collect information about users of the website and their visit, such as their Internet protocol (IP) address, how they arrived at the website (e.g. through a search engine or a link from another website) and how they navigate within the website. Some of them are essential to make our website work, others serve to provide you a better, faster and safer user experience. We use cookies to facilitate your internet sessions, offer you services according to our preferred settings, track visitor use of our website and to compile statistics about website activities.

### 11 How can you manage / delete these cookies?

All major internet browsers offer the option to manage the cookies that were installed on your computer or mobile device.

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In case you do not wish the Wilmar Europe website to place cookies on your computer or mobile device, you may limit or delete these easily by adjusting your mobile or browser settings. In addition, you can set your mobile or browser settings in such a way that you get a notification every time you receive a cookie on your computer or mobile device, so that you can decide whether you wish to accept this cookie or not.

Please note that when you disable certain cookies of which we are making use, the possibility exists that certain parts of our website will no longer function properly and you will no longer enjoy an optimal user experience.

### 12 Contact

If you have any questions, comments or complaints in relation to this Privacy Policy or the processing of your personal data by us, please feel free to contact us by regular mail at Wilmar Europe Holdings B.V. at Delftseplein 27G, 3013 AA Rotterdam, The Netherlands, marked to the attention of HR Department or via email following this link: [WEH-GDPR](#).

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**ANNEX**

|   |   |
|---|---|
| <b>Right to information and right to access your personal data</b>              | You may at any time request more information on our processing activities and the personal data that we are keeping from you.   |
| <b>Right to rectification of inaccurate or incomplete personal data of</b>      | You have the right to require us to, without undue delay, rectify or complete any of your personal data that is inaccurate or incomplete.   |
| <b>Right to deletion of your personal data ('right to be forgotten')</b>        | <p>You may request us to delete (part of) your personal data in the following situations:</p> <ul style="list-style-type: none"> <li>– when the processing is no longer necessary for achieving the purposes for which they we collected or otherwise processed these; or</li> <li>– when the processing was based on your consent and you have decided to withdraw that consent;</li> <li>– when you have other reasonable grounds to object to the processing of your personal data;</li> <li>– when we would unlawfully process your personal data;</li> <li>– when your personal data have to be erased in compliance with a legal obligation directed to us.</li> </ul> <p>We note that in some case, we may refuse to delete your personal data: (i) for exercising the right of freedom of expression and information; (ii) for compliance with a legal obligation; or (iii) for the establishment, exercise or defence of legal claims.</p> |
| <b>Right to restriction of processing</b>                                       | <p>You may request us to (temporarily) restrict the processing of your personal data in the following situations:</p> <ul style="list-style-type: none"> <li>– when you have contested the accuracy of your personal data, for a period enabling us to verify this accuracy; or</li> <li>– when the processing appears to be unlawful and you request us the restriction of use of your data instead of the deletion of this data; or</li> <li>– when we no longer need the personal data for the purposes of the processing, but you need them for the establishment, exercise or defence of legal claims; or</li> <li>– pending verification whether our legitimate grounds override yours in the framework of an objection.</li> </ul>   |
| <b>Right to object to the processing of your personal data (free of charge)</b> | You may under certain circumstances object to the processing of your personal data, when such processing is based on our "legitimate interests". If we agree, we will no longer process your personal data, unless we have compelling legitimate grounds to do so, or because such a processing is necessary.   |
| <b>Right to data portability</b>  | <p>In some cases, you have the right to receive all your personal data in a structured, commonly used and machine-readable format and have the right to transmit those data to another controller. This right applies:</p> <ul style="list-style-type: none"> <li>– in case the processing is based on consent or on the necessity for the performance of a contract; and</li> <li>– in case the processing is carried out by automated means.</li> </ul>   |

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