

Valeo Foods Group – Data privacy Policy

Introduction

Valeo Foods Group (and its subsidiaries) is committed to protecting the privacy and security of personal information. This Data Privacy Policy outlines our practices concerning the collection, use, and protection of personal data. The policy has established principles and legal obligations:

- **Lawfulness, Fairness, and Transparency:** Personal data collection and use must have a legitimate purpose, be fair to the individual, and be transparent about what data is collected and how it's used.
- **Purpose Limitation:** Data should only be collected for specific, clearly defined purposes and not used for any other reason without consent.
- **Data Minimisation:** Organisations should only collect and process the minimal amount of data necessary for their stated purposes.
- **Accuracy:** Data should be accurate and kept up to date. Individuals have the right to request corrections if information is inaccurate.
- **Storage Limitation:** Data shouldn't be retained for longer than necessary to fulfil its purpose.
- **Integrity and Confidentiality:** Appropriate security measures must be in place to protect data from unauthorised access, accidental loss, or destruction.
- **Accountability:** The organisation collecting the data is ultimately responsible for ensuring compliance with regulations.

Data privacy regulations around the world establish consequences for organisations that fail to protect personal data. Examples include:

General Data Protection Regulation (GDPR): A regulation in Europe with strict data protection requirements. Non-compliance can lead to significant fines.

We have measures in place to create a culture of data privacy within Valeo Foods Group, which contribute significantly to protecting user information and fostering trust in the digital landscape.

- **Risk Assessments:** Regularly evaluating data privacy risks helps organisations identify vulnerabilities and implement appropriate safeguards.
- **Employee Training:** Educating employees on data privacy principles and security procedures is vital to ensure responsible data handling practices within the organisation.
- **User Data Deletion Procedures:** Establishing clear procedures for handling user requests to delete their data demonstrates respect for user privacy rights.

Scope & Governance

This policy applies to all personal data collected, processed, and stored by Valeo Foods Group, whether obtained from customers, employees, suppliers, or other stakeholders. It is applicable to all Valeo Foods Group Personnel globally, agents, representatives and other associated persons such as contract/ subcontract and third-party employees of Valeo Foods Group including all subsidiaries, associates, joint ventures and affiliated companies (collectively, the “Valeo Foods Group” or the “Group”).

This policy has been approved by Valeo Foods Group’s executive management and approved by the Board of Directors.

Data Collection

- We collect personal data only for specified, legitimate purposes, and we do so transparently.
- The types of data we may collect include but are not limited to:
- Customer information (e.g., name, address, contact details)
- Employee information (e.g., payroll data, contact information)
- Supplier and partner information (e.g., business contact details)

Data Use

- We use personal data for legitimate purposes, including but not limited to:
- Fulfilling customer orders and requests
- Managing employee records
- Communicating with suppliers and partners
- Complying with legal and regulatory obligations

Data Security

Valeo Foods Group is committed to maintaining the security of personal data. We implement technical and organisational measures to protect data from unauthorised access, disclosure, alteration, or destruction.

Data Retention

We retain personal data only for as long as necessary to fulfil the purposes for which it was collected or as required by applicable laws and regulations.

Data Sharing

We may share personal data with third parties, such as service providers or regulatory authorities, when necessary to fulfil our obligations or as required by law. We do so in compliance with data protection laws.

Consent and Rights

Individuals have the right to access, rectify, or delete their personal data. They also have the right to withdraw consent when applicable. Requests regarding these rights can be made to line managers and the Group CFO.

Cookies and Tracking

We use cookies and similar technologies on our website for improving user experience and analytics. By using our website, you consent to the use of cookies as described in our Cookie Policy.

Changes to the Privacy Policy

Valeo Foods Group reserves the right to amend this privacy policy as necessary to reflect changes in data protection laws, technology, and our data handling practices. Any updates will be published on our website.

In addition, the policy is reviewed and monitored based on progress in strategic priorities. The GCIO (Group Chief Information Officer) has responsibility for the supervision and implementation of this policy. This policy is reviewed bi-annually and if any amendments are needed this will be actioned to comply fully with data privacy reporting and governance requirements in the jurisdictions in which we operate.

Compliance

We comply with all relevant data protection laws and regulations. If you have concerns about our data handling practices, please contact your line manager and the Group CPO.

Valeo Foods Group is committed to safeguarding the privacy of personal data and will continue to assess and enhance its data protection measures in accordance with applicable laws and best practices.

There may be circumstances when internal reporting of a breach of this Policy may not be possible. For circumstances such as these, Valeo has contracted an external whistle blowing helpline, available to all personnel anywhere in the Group. If the reporter wishes to remain anonymous and/or it is not appropriate to report the matter internally, the independent whistleblowing helpline can be called to maintain anonymity. The whistleblowing helpline is private and confidential and can be reached at any time of day or night via www.safecall.co.uk via which local contact details and local language reporting options are available.

Targets for Data Privacy

We are committed to continuous improvement in our data privacy practices. We have established a system of quantitative targets to measure our progress, including:

- Data Breach Prevention: We strive for a zero data breach target. We continuously monitor and improve our security systems to minimise the risk of unauthorised access to user information.

- **Employee Training:** We aim for all employees to complete annual data privacy training. This training educates employees on data handling procedures and best practices to safeguard user information.
- **Vendor Risk Management:** We have a target of completing security assessments of third-party vendors who handle user data. This helps ensure our partners adhere to robust data security practices.

We regularly review these targets internally and update them to reflect the evolving threat landscape and best practices in data privacy.

Any questions regarding this Policy can be addressed to the local divisional HR Lead or the Group Chief People Officer.

Last Updated: June 2024

Ronald Kers

Group CEO

Eveline Paternotte

Group CPO