Privacy Notice

Our handling of your personal data and your rights
- Information pursuant to Articles 13, 14 and 21 of the General Data Protection Regulation (GDPR) -

Dear Customer, Business Partner, Stakeholder, Communications & Public Affairs Contact,

The following information will provide you with an overview of the processing of your personal data by us and your rights under data protection law.

The data processed and how it is used depends largely on the services requested or agreed upon or the purposes of the legitimate interests pursued by us.

1. Data controllers and contact points

This privacy notice covers processing by the following data controllers of Nordzucker Group:

- Nordzucker AG (NordzuckerCommunications@nordzucker.com)
- Norddeutsche Flüssigzucker GmbH & Co. KG (NordzuckerCommunications@nordzucker.com)
- Nordzucker Polska S.A. (opalenica@nordzucker.com)
- Povasky Cukor a.s (info.sk@nordzucker.com)
- Sucros Oy/Suomen Sokeri Oy (info.sucros@nordicsugar.com)
- Nordzucker Ireland Ltd. (info@nordzuckerireland.ie)
- Nordic Sugar AB (sugarinfo@nordicsugar.com)
- Nordic Sugar A/S (sugarinfo@nordicsugar.com)
- AB Nordic Sugar Kedainiai (kedainiai@nordicsugar.com)
- UAB Nordzucker Business Services (NordzuckerCommunications@nordzucker.com)

For all data controllers listed above, contact can also be made via:

Nordzucker AG
Küchenstraße 9
38100 Braunschweig
Germany
Tel: +49 (0)531 2411-0
e-mail: NordzuckerCommunications@nordzucker.com

You can reach the Data Protection Officer of Nordzucker Group at dataprotection@nordzucker.com

2. Which sources and data do we use?

We process personal data, which we receive from you in connection with our business relationship. In addition, we process personal data, which we have legitimately received from other companies (e.g. credit agencies) for the execution of orders, for the fulfilment of contracts or based on your consent, insofar as necessary for the provision of our services. Moreover, we process personal data, which we have obtained and are permitted to process from publicly accessible sources (e.g. debtor directories, land registers, commercial and association registers, press and media).

Relevant personal data are *personal details* (name, address and other contact data, date and place of birth and nationality). In addition, this may also include *contractual data* (e.g. order data), *data arising from the fulfilment of our contractual obligations* (e.g. delivery), *information about your financial situation* (e.g. creditworthiness data), *advertising and sales data* (including advertising scores), *documentation data* (e.g. minutes of meetings), *registry data*, *data regarding your use of our tele media offered* (e.g. time of calling up our websites, apps or newsletters, pages clicked or entries) as well as other data comparable with the above-mentioned categories.

3. Why do we process your data (purpose of processing) and on which legal basis?

We process personal data in accordance with the provisions of the EU General Data Protection Regulation (GDPR) and relevant national data protection laws:

3.1 Fulfilment of contractual obligations (Article 6(1)(b) GDPR)

The processing of personal data (Article 4 No. 2 DSGVO) takes place for the purpose of providing and arranging our services, in particular for the execution of our contracts or pre-contractual measures with you and the execution of your orders, as well as all activities required for the operation and administration of a company.

The purposes of the data processing depend primarily on the specific product or order.

Further details regarding the purpose of data processing can be found in the respective contract documents and terms and conditions.

3.2 Within the scope of the balancing of interests (Article 6 (1)(f GDPR)

If necessary, we shall process your data beyond the scope of the actual fulfilment of the contract in the interest of protecting our own legitimate interests or those of third parties, such as in the following cases:

- Ensuring IT security and IT operations,
- Analysis and optimization of procedures for needs assessment and direct approach of customers,
- Addressing persons of public interest,
- Provider management, customer management,
- Advertising or market and opinion research, unless you have objected to the use of your data;
- Assertion of legal claims and defence in legal disputes,
- Measures for business management and continued development of services and products,

- Consultation and data exchange with credit agencies (e.g. SCHUFA) to determine creditworthiness and default risks,
- Prevention and investigation of criminal offences.

3.3 Based on your consent (Article 6(1)(a) GDPR)

If you have given us consent to process personal data for specific purposes (e.g. passing on data, evaluation of user data for marketing purposes or dispatch of the Nordzucker Post or other newsletters), the lawfulness of this processing is given based on your consent. A given consent can be revoked at any time. This also applies to the revocation of declarations of consent, which were issued to us before the application date of the GDPR, i.e. before 25 May 2018.

Please note that the revocation will only take effect for the future. Processing that has taken place before the revocation is thus not affected.

3.4 Based on legal requirements (Article 6 (1)(c) GDPR) or in the public interest (Article 6 (1)(e) GDPR)

In addition, as a stock company we are subject to various legal obligations, i.e. legal requirements (e.g. Stock Corporation Act, Commercial Code, tax laws). The purposes of processing include identity verification, the fulfilment of fiscal control and reporting obligations as well as the assessment and management of risks.

4. Who will receive my data?

Within our company, those departments which need your data to fulfil our contractual and legal obligations will have access to it. In addition, data processors (service providers) contracted by us (Article 28 GDPR) may receive data for these purposes. These are companies in the categories of IT services, logistics, printing services, telecommunications, debt collection, consulting, sales and marketing.

Concerning the passing of data to recipients outside our company, it should be noted that we only pass on your personal information if required by law, if you have consented or if we are authorized to provide information.

Under these preconditions, recipients of personal data can be:

- Public bodies and institutions (e.g. authorities) where there is a legal or official obligation.

Other data recipients may be those for whom you have given us your consent for data transmission.

5. How long will my data be stored?

If necessary, we process and store your personal data for the duration of our business relationship, including, for example, the initiation and processing of a contract.

In addition, we are subject to various storage and documentation obligations by law.

6. Is data transferred to a third country or to an international organization?

Data will only be transferred to third countries (states outside the European Economic Area - EEA) if this is necessary for the execution of your orders, is legally required or you have given us your consent. We will inform you separately about the details, if required by law.

7. Which data protection rights do I have?

Every data subject has the right of **access** pursuant to Article 15 GDPR, the right of **rectification** pursuant to Article 16 GDPR, the right of **erasure** pursuant to Article 17 GDPR, the right of **restriction of processing** pursuant to Article 18 GDPR and the right of **data portability** pursuant to Article 20 GDPR. In addition, there is a right of complaint to a data protection supervisory authority (Article 77 GDPR).

8. Is there an obligation to provide data?

Within the scope of our business relationship, you must only provide personal data which is necessary for commencing, executing and terminating a business relationship or which we are legally obliged to collect. Without this data, we will generally have to refuse the conclusion of the contract or the execution of the order or will no longer be able to execute an existing contract and may have to terminate it.

9. To what extent is there automated decision-making in individual cases?

As a matter of principle, we do not use fully automated decision-making processes pursuant to Article 22 GDPR for establishing and performing a business relationship. Should we use such processes in individual cases, we will inform you of this separately if law requires this.

10. To what extent is my data used for profile formation (scoring)?

We do not use profiling according to article 22 GDPR. Should we use this procedure in individual cases, we will inform you of this separately if required by law.

Information about your right of objection
pursuant to Article 21 of the General Data Protection Regulation (GDPR)

1. You have the right, for reasons arising from your individual situation, to object at any time to the processing of your personal data based on Article 6(1)(e) GDPR (data processing in the public interest) and Article 6(1)(f) GDPR (data processing based on a balancing of interests).

   If you object, we shall no longer process your personal data unless we have compelling legitimate grounds for such processing, which override your interests, rights and freedoms, or, alternatively, such processing serves to assert, exercise or defend legal claims.

   If you object to the processing for purposes of direct marketing, we will no longer process your personal data for these purposes.

   Objections may be submitted informally and addressed to:

   dataprotection@nordzucker.com