

## Privacy and Cookie Policy Solina Group

Solina Group considers the privacy of your personal data as a matter of the utmost importance and is committed to processing your information in accordance with the law, the present Privacy and Cookie Policy (hereinafter the “Policy” or “Privacy Policy”), and the applicable standards of fair information practices.

This document offers you a description of how Solina Group uses this data, as well as your rights associated with Solina Group’s use of your data. This policy applies specifically to customers, applicants, suppliers, business partners, visitors of our website [www.solina-group.com](http://www.solina-group.com) , or other persons who contact us (e.g. via contact form).

Accessing or using the website implies your express approval (via handing us your personal information, or via opt-in) of this Privacy Policy. This means that you consent to how Solina Group collects, uses and processes your personal information. If you do not accept this Privacy Policy, you are no longer allowed to use the website of Solina Group. Solina Group may access or use your data either with your express approval, to perform the services detailed in an agreement or for any lawful basis.

Solina Group reserves the right to change, modify and update this Privacy Policy from time to time by posting a revised version on our website. Therefore, we recommend you regularly consult this Policy, to make sure that you are aware of any changes.

### Article 1 – GENERAL

- 1.1 The Solina Group entity that is responsible for your personal data (“data controller”) is the Solina Group entity in the jurisdiction where your personal data is collected. For more information about your data controller ask your Solina Group business contact, consult the the Solina Group public website [www.solina-group.com](http://www.solina-group.com) or contact us via the contact form <http://www.solina-group.com/contact-us> .
- 1.2 With regard to the personal data collected through the website, Solina Group SAS, incorporated under French law, having its registered office at P.A. du Hindré III, Rue des Ecotais 201, 35310 Bréal-Sous-Monfort, France, is the entity that is responsible for your personal data.
- 1.3 This Privacy Policy for the protection of your personal data is strictly compliant with the European Union Regulation of 2016 concerning the protection of individuals with regards to the processing of personal data, regarding the free movement of such data and repealing Directive 95/46/EC (“GDPR”).
- 1.4 If you have questions about this Privacy Policy, or the manner in which Solina Group collects, uses or otherwise processes your personal information, please contact us by sending an email to the following e-mail address: [dpo@solina-group.com](mailto:dpo@solina-group.com)

## Article 2 – WHICH PERSONAL DATA DOES SOLINA GROUP COLLECTS?

2.1 Solina Group may collect personal data that is provided by you or by third parties to the extent necessary or useful for the operation of the website or its services. Such information may consist of:

Activity	Personal data	Legal basis	Context
Applying for a job	<ul style="list-style-type: none"> <li>• Resume</li> <li>• Country</li> <li>• Civility</li> <li>• Cover letter</li> <li>• Phone number</li> <li>• Name</li> <li>• E-mail</li> <li>• Other application details</li> </ul>	Consent	Solina Group processes this information when you apply via the Job offer page on the website. We can also obtain this information through a personal interview.
Visiting the website	<ul style="list-style-type: none"> <li>• IP address</li> <li>• Cookies</li> <li>• Connection moments</li> <li>• Web pages</li> <li>• Click-behaviour, logs</li> <li>• Usage data</li> </ul>	Consent  Necessary for the performance of an agreement	Solina Group may collect usage data and other data about your interactions with the Solina Group website. This data is being collected by means of cookies (see art. 7 Cookies).
Subscribing to the newsletter	<ul style="list-style-type: none"> <li>• E-mail</li> </ul>	Consent and  Legitimate interest of the controller	When you subscribe to our newsletter, you will be included in our mailing list and will receive our newsletter. At any moment you can unsubscribe from the newsletter by clicking the unsubscribe-link, included in every e-mail communication.
Contacting Solina Group	<ul style="list-style-type: none"> <li>• Name</li> <li>• E-mail</li> <li>• Phone number</li> </ul>	Necessary for the performance of an agreement	When you contact Solina Group via the contact form on the website, Solina Group collects the information you provide to us.
Doing business with Solina Group	<ul style="list-style-type: none"> <li>• Name</li> <li>• E-mail</li> <li>• Phone number</li> </ul>	Necessary for the performance of an agreement  Legitimate interest of the controller	Solina Group collects contact details of contact persons working for a (potential) customer or (potential) supplier of Solina Group in order to provide the

			ordered products or services. When a customer has made an account, he can access the Customer Area on the website where he/she can download documents like brochures or technical data sheets. Another example of this practice is when a contact person hands out his business card at a food fair.
Taking atmosphere photos at events	<ul style="list-style-type: none"> <li>• Picture</li> </ul>	Consent	Solina Group may take atmosphere photos of the Solina stand at fairs and events. If Solina Group wants to publish photos where you are the center of the photo, Solina Group will ask for your consent.

2.2 Solina Group does not collect sensitive personal information of its visitors, customers or suppliers (e.g. data relating to race or ethnic origin, religious beliefs, criminal record, physical or mental health, or sexual orientation). Solina Group shall, where necessary, obtain your explicit consent to collect and use such information.

2.3 You are not obligated to provide us with your personal data, however, the performance of several services may not be possible if you choose not to provide your personal data.

### Article 3 – HOW WILL MY PERSONAL DATA BE USED?

#### 3.1 General Purpose

Solina Group collects and processes your personal information in order to offer you a safe, comfortable, and personalized experience each time you visit the website or utilize our services.

The information we collect about you is primarily processed to help us ensure proper technical functioning and to improve the quality and content of our website and services – based on the lawful purposes of “consent” for the website, “legal obligations” and “contractual necessity” for services, or “legitimate interest” as allowed under GDPR.

With that said, your personal data will only be processed for the following (internal) purposes:

<b>Activity</b>	<b>Purpose</b>
Applying for a job	We collect these data to evaluate your application and allows us to pursue a recruitment policy.
Visiting the website	We collect these data to provide you with a better user experience when you visit our website and allows us to optimize our website. The information collected by cookies on the website is also used for online marketing purposes (see art. 7 Cookies for more information). Certain data, such as logs, allows us to resolve any problems/bugs you report.
Subscribing to the newsletter	We collect your e-mail address to send you the newsletter you have subscribed to. The newsletter allows us to inform you about our food products and services.
Contacting Solina Group	We collect this data to respond to your question or concern.
Doing business with Solina Group	We collect these data for the purpose of executing the agreement, maintaining the professional relationship between you and Solina Group.
Taking atmosphere photos at events	We collect this information for internal communications or marketing purposes. For example, we may use a photo of an event on our website to promote the Solina Group and our products.

### 3.2 **Direct marketing:**

Solina Group may also use your personal information for the purpose of marketing our products and services. If you do not want to receive marketing material from us, you may opt out or exercise your right to object (Article 5) by sending us an email to : [dpo@solina-group.com](mailto:dpo@solina-group.com).

### 3.3. **Transfer of Personal Data**

In order to process your personal data, we provide access to our employees.

Solina Group will not disclose your personal data to third parties, unless it is necessary in the context of providing our products or services and/or optimising them. To that end, Solina Group may disclose your personal data to third parties who assist Solina Group in the execution, management and control of its activities, including reporting, support, customer service, computer security or offering specific services and products. It may happen that a third party is commissioned to collect, process and/or analyse the data. Furthermore, it may be necessary to provide the personal data to a third party in order for Solina Group to be able to supply a product or service that you have ordered. These third parties may only use the data for the aforementioned purposes and instructions of Solina Group. Any other use is not included and is prohibited.

Consequently, Solina Group will not sell, hire out or pass on your personal data to third parties, except in the situations provided for in this Policy or unless you explicitly provide prior consent.

In addition, it is also possible that Solina Group will disclose your personal data:

- If Solina Group is obligated to do so, following a court order or to comply with imperative laws and/or regulations, or permitted by applicable law in order to safeguard and defend our rights or protect the property or safety of others.
- In case of whole or partial reorganization or cession of Solina Group’s activities, whereby Solina Group reorganizes, transfers or ceases business activity, your personal data may be transferred to new entities or third parties.

#### **Article 4 – HOW LONG WILL WE HOLD YOUR PERSONAL DATA?**

Solina Group only processes your personal information for as long as necessary. This means that we do keep a record of your data for as long as it is required or justified by the law or by another legal obligation, or for the period for which this would be necessary for the aforementioned purposes. Based on the activities described in Section 2.2, we hold your data associated with these activities as follows:

<b>Activity</b>	<b>Retention period</b>
Applying for a job	No longer than 3 years after the last qualitative contact with the applicant
Visiting the website	With regards to cookies the retention period may vary depending on the specific cookie, ranging from 1 year to 3 years. Other electronic identification data will be kept no longer than 3 years.
Subscribing to the newsletter	Your e-mail address will be kept for as long as you wish to receive the newsletter.
Contacting Solina Group	Solina Group will hold the data for 3 years after your first request.
Doing business with Solina Group	No longer than 10 years after the end of the professional relationship.
Taking atmosphere photos at events	Maximum 3 years

#### **Article 5 – YOUR RIGHTS AS A DATA SUBJECT**

##### **5.1. Right of access and right to obtain a copy**

You have the right to obtain access to your personal data, as well as to be informed about the purpose of the processing by Solina Group.

##### **5.2. Right to rectification, erasure, or restriction**

You have the choice to share your personal data with Solina Group. You also have the right to request Solina Group to rectify your personal data or have it erased. You can also request the processing of your personal data to be restricted.

When you choose not to share data, or when you request that we erase your personal data, we may be prevented from providing you with several services and access to the website or the Solina Group Platform.

### 5.3. **Right to object**

You have the right to object to the processing of your personal data when you have legitimate reasons to do so. You also have the right to object to the use of your personal data for purposes of direct marketing. In such case specific reasoning will not be requested.

You may opt out of receiving email communications by using one of the following methods:

- Select the email "opt out" or "unsubscribe" link, or follow the opt-out instructions included in each email communication.
- Contact us via the contact form <http://www.solina-group.com/contact-us> . Be sure to provide your name, relevant contact information, and specific relevant information about Solina Group communications that you no longer wish to receive.

Please be aware that when you opt out of receiving certain subscription communications, it may affect the services you have chosen to receive from Solina Group where accepting the communications is a condition of receiving the services.

### 5.4. **Right to data portability**

You have the right to obtain your personal data which is processed by Solina Group in a structured, commonly used and machine-readable format and/or to transfer this data to another data controller.

### 5.5. **Right to withdraw consent**

When the processing is based on prior consent you have the right to withdraw this consent.

### 5.6. **Automated decisions and profiling**

The processing of your personal data does not include profiling, nor shall you be subjected to automated decisions.

### 5.7. **Exercising your rights**

To exercise the above-mentioned rights, or to raise a question, comment or complaint, send an e-mail with an enclosed copy of the frontside of your identity card to [dpo@solina-group.com](mailto:dpo@solina-group.com)

## 5.8. Right to file a complaint

If you have any complaints about the way Solina Group collects, uses and/or processes your personal data, you have the right to file a complaint with the French Data Protection Authority or Supervisory authority, which is the Lead Supervisory Authority of Solina Group:

Commission Nationale de l'Informatique et des Libertés

3 Place de Fontenoy - TSA 80715 - 75334 PARIS CEDEX 07,

Tel.: 01 53 73 22 22

However, you are always free to contact your own European or EU-vested authority.

## Article 6 – SAFETY AND CONFIDENTIALITY

- 6.1 Solina Group undertakes all reasonable efforts as required by applicable law to prevent (i) unauthorized access to your personal information, and (ii) loss, abuse or alteration of your personal data, by using physical, administrative and technological measures to protect the information maintained.
- All data transmitted from and to our website is encrypted (HTTPS/TLS)
  - All data is stored on secure datacentres
- 6.2 In the unlikely and unfortunate event that your personal information under Solina Group's control is compromised by an information security breach, Solina Group will immediately act to identify the cause of such breach and take action through adequate remedial measures. If necessary, Solina Group will notify you as well as the Data Protection Authority of this incident in accordance with applicable law.
- 6.3 You shall be solely responsible for your own user content, such as content you upload to the website, and the consequences of posting submitting and/or publishing it. Solina Group is not responsible or liable to you or any third party for the content or accuracy of any user content posted by you or any other user of the website or web services, and Solina Group expressly disclaims any and all liability in connection with user content to the fullest extent permitted by applicable law.
- 6.4 Solina Group assumes no responsibility regarding the privacy policy of the websites or digital platforms that are linked on the website. Moreover, Solina Group shall not be liable in any way for direct or indirect damages caused by a wrongful or improper use of your personal data by such third parties.

## 7.1 What is a cookie?

A “cookie” is a small text file that can be sent from a web server to your computer that is then stored on your computer. When a cookie is stored on your computer each subsequent request to the same domain name will also send along the data stored in the cookie until the cookie expires or is deleted. A server can only give you a cookie if you make a request to that server. The cookie is only stored if your browser/client is configured to store cookies.

## 7.2 Why do we use cookies?

Cookies help provide additional functionality to the site or to help us analyse site usage more accurately. For instance, our server may set a cookie that keeps you from having to enter a password more than once during a visit to one of our sites. In order to manage the website, Solina Group collects information on the IP address used when the computer that a user is using connects to the Internet.

We only use the IP addresses collected through the website to ensure the appropriate and secure management and operation of the Solina Group's services. In addition to preventing unauthorised access, the collection of IP addresses enables quick identification of the cause and restoration of normal operations in the event of a failure of the website. We do not use or disclose IP addresses in connection with individuals' personal information.

While we collect information on how you use the website's services, we preserve the anonymity of individual users in the use or disclosure of this information. However, when we deem it necessary for the protection of the website or of its users/visitors, we may implement measures by using IP addresses to identify individuals.

In addition to the earlier mentioned cookies, the website also uses cookies from trusted third parties (including Google analytics, Facebook pixel and Hubspot). For cookies placed by third parties please refer to the policies that these parties provide on their respective websites. Please note that we do not have any influence on the content of these policies or on the content of these third-party cookies.

- **Google analytics** which is one of the most widespread and trusted analytics solutions on the web for helping us to understand how you use the site and ways that we can improve your experience. These cookies may track things such as how long you spend on the site and the pages that you visit so we can continue to produce engaging content.
- **Facebook pixel** allows us to contact you via Facebook and Instagram and divide website visitors into groups. Based on this pixel, Solina Group can contact you back on Facebook and/or Instagram.



- **Hubspot** cookies may track things such as how long you spend on the site and the pages that you visit so we can continue to produce engaging content. As we sell products it's important for us to understand statistics about how many of the visitors to our site actually make a purchase and as such this is the kind of data that these cookies will track. This is important to you as it means that we can accurately make business predictions that allow us to monitor our advertising and product costs to ensure the best possible price.
- **Social media plugins** allow you to connect with your social network in various ways. For these to work the following social media sites including; Instagram, Facebook, Twitter, LinkedIn, will set cookies through our site which may be used to enhance your profile on their site or contribute to the data they hold for various purposes outlined in their respective privacy policies.

### 7.3 Kinds of cookies we use:

- **Strictly necessary cookies** - As the name suggests these cookies are strictly necessary to enable you to move around or remain logged into the websites or to provide certain information that you have requested.
- **Tracking cookies** - These cookies are used to record information such as how a visitor initially came to a website and how long they stayed and which pages they viewed. These tracking cookies are also third-party cookies (see below).
- **Third party cookies** - For cookies set by third parties we kindly refer you to the statements set forth by these parties on their respective websites. Beware, we do not have any influence on the content of these statements nor on the content of the cookies of these third parties. Though these cookies can also be disabled by browser settings.

### 7.4. Your permission

When you first visit our website, you express your implicit approval to accept our different kinds of cookies.

You can block cookies by altering your browser's settings. The rejection of these cookies may inhibit some functionalities on the Websites.

Currently, some browsers offer a "do not track" or "DNT" option which sends a signal to websites visited indicating a visitor's tracking preference. Solina Group does not currently respond to these signals, because no common industry standard for DNT has been adopted by industry groups, technology companies or regulators. The third-party providers Solina Group uses may or may not do anything in response to this signal.

More information on cookies can also be found via the following link: <http://www.allaboutcookies.org/>

More information on online behavioral advertising and online privacy can be found via the following link: <http://www.youronlinechoices.eu/>

#### **Article 8 – APPLICABLE LAW AND JURISDICTION**

This Privacy and Cookie Policy is managed, interpreted and executed in accordance with the laws of France which exclusively applies to every potential dispute.

The competent courts of Rennes (France) shall have exclusive jurisdiction in relation to any kind of disagreement that could arise from the interpretation or execution of the present Privacy Policy.

#### **Article 9 – QUESTIONS**

Questions, comments and requests regarding this Policy are welcomed and should be addressed to

Solina Group HQ  
P.A. du Hindré III  
Rue des Ecotais 201  
35310 Bréal-Sous-Monfort  
France

Or electronically to [dpo@solina-group.com](mailto:dpo@solina-group.com)