

# Privacy Policy

Danone knows that you care how your personal data is used and we recognise the importance of protecting your privacy.

This Privacy Statement explains how Danone collects and manages your personal data as a Data Controller. It contains information on what data we collect, how we use it, why we need it and information on individuals' rights.

[Contact us](#) if you have any queries and comments, or if you want to make a request regarding any of your data subject rights.

This Privacy Statement was last updated on 9 August 2023.

## Basic principles and our privacy commitment

At Danone we are committed to protecting your right to privacy. We aim to protect any personal data we hold, to manage your personal data in a responsible way and to be transparent in our practices. Your trust is important to us. We have therefore committed ourselves to the following basic principles:

- You have no obligation to provide any personal data requested by us. However, if you choose not to provide any personal data requested by us, we may not be able to provide you with some services or products. You will be informed of this at the time of collection.
- We only collect and process your data for the purposes set out in this Privacy Statement or for specific purposes that we share with you and/or that you have consented to.
- We aim to collect, process and use as little personal data as possible.
- When we do collect your personal data, we aim to keep it as accurate and up to date as possible.
- If the personal data we collect is no longer needed for any purposes and we are not required by law to retain it, we will do what we can to delete, destroy or permanently de-identify it.
- Your personal data will not be shared, sold, rented or disclosed other than as described in this Privacy Statement.

## Who does this Privacy Statement apply to?

This Privacy Statement covers both our online and offline data collection activities. Depending on our relationship, we will collect and use your personal data in different ways and may aggregate personal data from different sources (for example from our website, an offline event or via social media engagement). Please read this Privacy Statement carefully as it contains important information on who we are and how and why we collect, store, use and share your personal data. It also explains your rights and how to contact us or our supervisory authority in the event you have any concerns we are unable to address.

## What this Privacy Statement contains:

**This Privacy Statement describes the following important topics relating to your personal data:**

1. Who are we?
2. What personal data do we collect and how?
3. The purpose and legal basis for collecting and using personal data
4. Profiling and automated decision making
5. Links to other websites
6. Social media and other User Generated Content
7. Children's personal data
8. Sharing your personal data with third parties
9. Sharing your personal data internationally
10. How we protect your personal data
11. How long we store your personal data
12. Your rights
13. How to contact us
14. Changes to our Privacy Statement

### **1. Who are we?**

#### **UK residents**

Nutricia Limited trading as Danone UK is responsible for the personal data that you share with us. When we say "Danone", "us", "our" or "we", we are referring to Nutricia Limited. Danone holds and processes your personal data in accordance with the UK Data Protection Act 2018 and the UK General Data Protection Regulations (the "UK GDPR"). When we collect or use your Personal Data, we are responsible as the "data controller" for the purposes of the UK GDPR.

#### **Nutricia Limited t/a Danone UK**

**Newmarket House, Newmarket Avenue, White Horse Business Park,  
Trowbridge, Wiltshire, BA14 0XQ**

Nutricia Limited is a subsidiary of Danone SA. If you would like to know more about Danone and its products or services, please visit <https://www.danone.co.uk>.

#### **European Economic Area ("EEA") based data subjects**

For Republic of Ireland residents visiting our co.uk websites, we hold and process your personal data in accordance with the Irish Data Protection Act 2018 and the EU General Data Protection Regulations.

In instances where your personal data is collected and processed by our Irish based entity, Nutricia Ireland Limited, Nutricia Ireland Limited is the "data controller".

#### **Nutricia Ireland Limited t/a Danone Ireland**

**Block 1, Deansgrange Business Park, Deansgrange, Co Dublin, A94 P9T3, Ireland**

Nutricia Ireland Limited is also a subsidiary of Danone SA.

**EEA Data Representative**

Danone SA is our data representative for EEA-based data subjects visiting our co.uk based websites and will act as a point of contact for EEA data subjects and supervisory authorities.

Danone SA

Data Protection Office, Danone SA, 17 Boulevard Haussmann, 75009, Paris, France

**2. What personal data do we collect and how?**

By personal data, we refer to any information about a person from which that person can be identified. This does not include data for which the identity has been erased (known as anonymous data).

The personal data we collect varies depending on our relationship with you, the purpose of the collection, and the product or service we are providing to you.

For further details on the personal data that we collect, please see the section(s) below that best describes our relationship with you.

**We will collect personal data directly from you.** You may give us personal data about yourself by:

- visiting our websites or apps;
- creating an account with us;
- ordering products or services from us;
- registering to receive our newsletters or communications (including marketing messages) by any means (e.g. email, SMS, WhatsApp, instant messaging, etc.);
- entering or participating in a survey, research activity, game, contest or competition run by us or third parties on our behalf;
- submitting an enquiry or request to us or contacting us by phone, email or other means;
- filling in our forms (both online and offline);
- registering for an event, congress or seminar (online or offline) or contacting us in relation to an event, congress or seminar; or
- engaging (for example posting or commenting) on our social media pages (such as Facebook, Instagram, TikTok or LinkedIn) or engaging with our other digital media communications.

While we collect most of your personal information directly from you, **we may also collect personal data about you from third parties such as:**

- our business partners, including marketing agencies, market research companies, companies that co-sponsor our promotions or competitions, retailers;

- family, friends and others who provide your personal data to us because you have consented to or they think you may be interested in our products and services or they want to share a product or service with you;
- other third parties such as media providers/owners, public and third party websites, advertising platforms, or depending on your privacy settings for social media services, we may also collect information from social media platforms, and our suppliers or our group companies (referred to in this Privacy Statement as "third parties" or "suppliers").

Some of your personal data is also collected via cookies and similar tracking technologies - see our [cookie statement](#) for further details on this.

### **Visitors to our websites and users of our apps and services**

We, or third parties on our behalf, may collect and use information about you such as the following:

1. personal contact data, such as your name, email address, physical address and telephone number(s);
2. account login details, such as your user ID, email username, password and photo;
3. communication data between you and us, which may include details of our conversations via chat and contact forms available on our websites and/or apps;
4. social media or 3rd party account profile information where you use your social media or 3rd party account to create an account and login or where you share this with us;
5. where you submit content to our websites and/or apps (such as a personal testimonial or review);
6. health data where you provide this to us – please also see the "Special categories of data" section below;
7. your entry into a survey, game, contest, promotion or competition (including the entry itself, which may include audio or visual information such as your likeness in a video or photo, a comment or answer to a question);
8. any information you provide to us when signing-up for, or as a member of, any clubs, communities or schemes offered by us;
9. your preferences in receiving marketing from us and our third parties and your communication preferences;
10. your email subscription preferences;
11. demographic information and interests, such as your age, gender, preferred products and lifestyle preferences. Lifestyle preferences may include your preferences for some of the products or services we offer, and your interests related to those products or services. We may also infer certain preferences and interests about you based on your browsing habits, your purchase history, your feedback and responses to surveys or market research, and your demographic information; information about people other than you, such as personal data about your family members, when you provide such information directly to us; where we are able to collect this, information about how you engage with our messages and communications (e.g. emails, SMS, instant messages) including whether they are delivered to you, whether you open them, links you click in them and whether you unsubscribe to them;

12. any updates to personal data provided to us; and
13. personal data created and recorded as you use our websites, apps and/or services, including:
  1. technical information– this includes the Internet Protocol (IP) address used to connect your device to the internet address; the type of device you use; the website address and country from which you access information; the files requested; browser type and version; browser plug-in types and versions; operating system; and platform; and
  2. information about your visit and your behavior on our websites and/or apps (such as the pages that you click on) – this may include time and length of visits to certain pages, page interaction information (such as scrolling, clicks, and mouse-overs, information shared with others, including through email and social media), methods used to browse away from the page, traffic data, location data, weblogs and other communication data and information provided when requesting further service or downloads.

#### **People who contact us with enquiries (e.g. via our consumer contact centres)**

We, or third parties on our behalf, may collect and use some information about you such as the following:

1. your name including your title;
2. your postal address;
3. your email address;
4. your telephone number;
5. your date of birth;
6. your contact preferences;
7. information provided when you correspond with us (such as via our care lines and/or customer service lines or social media) which may include call recordings if you call us directly – to the extent this includes information about your health, please see the "Special categories of data" section below;
8. information about people other than you, such as personal data about your family members, when you provide such information directly to us; and any updates to information provided to us.

#### **Attendees or prospective attendees at Danone-related events (online and offline)**

##### **People we interact with during the course of business who do not fall within any of the above categories (other than suppliers)**

When Danone interacts with you in your capacity as an external stakeholder who does not fall within any of the above categories, such as where you are a representative of one of our clients, an agent of an industry or peer company, a scientist, a health care professional, an academic, a representative of a non-governmental or consumer organization, a politician, a policy-maker, a regulator, an investor, an extra-financial rating agencies, a journalist, a trade associations representative, etc., we, or third parties on our behalf, may collect and use the following information about you:

1. professional contact data, such as your title, name, email address, physical address, telephone number(s), social media handles, language of communication;
2. your employment details (job title, organization, any other position you may hold) and/or political party affiliation (only when it has been manifestly made public by you);
3. the field of expertise in which you are active, your professional qualifications and activities, and professional details such as data related to your educational/professional employment history; and
4. any other information that you provide to us in the course of our interactions with you.

If you are, or act for, a supplier of Danone, this Privacy Statement does not apply to you. The appropriate privacy statement will be made available to you separately.

### **People whose personal data we collect indirectly**

We may also collect personal data about you from other sources when:

1. you search for our products and services and when you share content on social media pages, websites or apps related to our products, services or a Danone-related event, or in response to our promotional material on social media;
2. we collect your personal data from other public sources (e.g. comments on other websites than ours) that mention Danone or ones of its brands. **We may also collect publicly available data about you in your capacity as a public figure** for business objective purposes;
3. when you open or click on a link in an email one of our third parties have sent to you on our behalf. This allows us to see how well our communications with you are performing;
4. your data is provided to us by media providers and retailers, such as your purchasing history data and your loyalty card profile; and
5. your insights data is provided to us by third parties (i.e. media providers, marketing technology or advertising technology solutions), such as your demographic data (e.g. age, parental status), your location, your interests and your purchase intent. Some of this data may have been collected from the use of cookies and other similar tracking technologies.

### **Special categories of data**

In principle Danone does not seek to process sensitive data relating to you. However, some of the personal data that we collect about you or which you provide to us may be special categories of data, often relating to health and wellbeing.

We will only collect and process this type of data if you give your explicit consent to do so, or in any other circumstances permitted by law (such as defense of legal claims or in order to comply with our legal and regulatory obligations in relation to the promotion and marketing of infant food & milk products).

### 3. The purpose and legal basis for collecting and using personal data

The table below shows the purposes for which we collect and use your personal data, as well as the legal bases for our use of your personal data. Further information on our legal bases is set out below the table.

Please note that not all of the uses below will be relevant to every individual:

Our purpose(s) for processing your personal data	Our legal basis
<p><b>Managing our relationship with you</b></p> <ul style="list-style-type: none"> <li>To enable you to access, use and place orders via our apps and websites and facilitate delivery of those orders.</li> <li>To manage your subscription to our newsletters or other marketing communications (where relevant).</li> <li>To receive, and respond to, enquiries from you, including through our websites, apps and social media platforms, about our products or services or business.</li> <li>To register you to attend an event organised by us or via a third party, for example to place you on a guest-list to the event, to provide associated support with your attendance at the event, and to help us better understand what products and services you would like to receive information about in the future following the event.</li> <li>To ask you to leave a review, provide feedback or complete a survey or to participate in market research.</li> <li>To communicate information to you and to manage your registration (and attendance) at an event, or participation in a competition, game, contest or promotion organised by us or a third party acting on our behalf in accordance with its terms.</li> <li>To send you service communications: for example, information about your order, information related to a service or club that you have requested from us, information about the availability of a product you wanted to purchase and have asked us to inform you about, information such as reminders, updates related to an event or information about any changes to our terms and conditions or this Privacy Statement.</li> <li>To keep track of our interactions with you.</li> <li>To verify your credentials, authenticate your identity and create and administer your account(s).</li> <li>To keep a record of your consent or acknowledgements given and to manage your data subject rights requests (where applicable).</li> </ul>	<ul style="list-style-type: none"> <li>Contractual necessity</li> <li>Legitimate interest</li> <li>Compliance with legal obligations</li> </ul>
<p><b>Marketing our products or services</b></p> <ul style="list-style-type: none"> <li>To send you Danone brand updates, news, promotional, marketing and other personalised communications, targeted advertising and content by any means (e.g. online, email, social media, instant messaging apps, telephone or post), with consent (where required by applicable laws), unless you have told us that you would rather not hear from us.</li> <li>To determine the effectiveness of these communications and any promotional and advertising campaigns, including by analysing information collected with the help of external sources.</li> <li>To recommend relevant products and services, including based on your health data where we have obtained your explicit consent.</li> <li>To send information about or to invite you to meetings, congresses or other Danone - related events that you may be interested in.</li> <li>To show you personalised content or advertising either directly or through third party websites and apps, as well as through traditional and online social media campaigns.</li> <li>To create profiles for online advertising and remarketing purposes (e.g. groups that may have common characteristics) based on your interests, preferences and other information (or a combination of them) that help us to understand which products and services will appeal to you, unless you have told us that you would rather not have your data used in this way.</li> <li>To create lookalike audiences (consumer segments) of people that may share characteristics, interests and preferences similar to you for the purposes of showing these audiences online advertising of our products or services that they are likely to be</li> </ul>	<ul style="list-style-type: none"> <li>Legitimate interest</li> <li>Consent (where you have given it)</li> </ul>

<p>interested in, unless you have told us that you would rather not have your data used in this way.</p> <ul style="list-style-type: none"> <li>• To use your review or feedback to promote our products and services and display any testimonials or reviews you leave on our websites, apps and services for other customers to see.</li> <li>• Where we take photographs in public areas at our events, we may use these images in our marketing materials, unless you have told us that you would rather not have your data used in this way.</li> <li>• To understand your interactions on social media where you mention one of our brands and to create brand communities.</li> <li>• To understand and build our corporate and brand image and reputation.</li> </ul>	
<p><b>Managing and improving our processes and business operations</b></p> <ul style="list-style-type: none"> <li>• To provide, improve, maintain, keep secure and provide technical support in relation to our websites and apps.</li> <li>• To recognise you when you return to our websites and apps, to store information about your preferences, and allow us to customise our websites and apps according to your interests.</li> <li>• To evaluate your visit to our websites and apps and your use of our services and prepare reports to compile statistics to understand the type of people who use our websites, apps and services, how they use our websites, apps and services and how to make our websites, apps and services more intuitive.</li> <li>• To manage, develop and improve our products, services and marketing communications.</li> <li>• To manage our network and information security systems.</li> <li>• For fraud prevention purposes including Third Party Vetting (where applicable).</li> <li>• For training and quality assurance purposes.</li> <li>• For internal corporate reporting, business administration, ensuring adequate insurance coverage for our business, ensuring the security of company facilities, research and development, and identifying and implementing business efficiencies.</li> </ul>	<ul style="list-style-type: none"> <li>• Legitimate interest</li> <li>• Consent (where you have given it)</li> </ul>
<p><b>Other purposes</b></p> <ul style="list-style-type: none"> <li>• To follow applicable laws and regulations.</li> <li>• To respond to requests from competent public authorities.</li> <li>• To authenticate your identity for security purposes, as well as where we are required to do so in accordance with a legal obligation.</li> <li>• To comply with our transparency, anti-corruption and antibribery obligations.</li> <li>• For health and safety records and management.</li> <li>• To ensure your safety and security and that of others, by the use of CCTV (video surveillance).</li> <li>• To establish exercise or defend our legal rights.</li> <li>• To investigate and take action against illegal or harmful behaviour.</li> <li>• To protect Danone, your vital interests, or those of another person</li> <li>• To drive company engagement among an ecosystem of stakeholders with a view to developing common solutions.</li> <li>• To provide our expertise for more informed decision-making, in a collaborative and transparent environment with decision-makers and other relevant stakeholders.</li> <li>• To deliver on our sustainability agenda and to follow all applicable laws and regulations.</li> </ul>	<ul style="list-style-type: none"> <li>• Legitimate interest</li> <li>• Compliance with legal obligations</li> </ul>

When we collect and use your personal data for new purposes, we will inform you before or at the time of collection (and ask for your consent when required) unless we reasonably consider that this purpose is compatible with the original one as detailed above.

**Legal basis**

**We consider that the legal bases for using your personal data as set out in this Privacy Statement are as follows:**

**a) Contractual necessity:** our use of your personal data is necessary to perform our obligations under any contract with you or to take steps prior to entering a contract with you.

**b) Compliance with legal obligations:** our use of your personal data is necessary for complying with our legal obligations.

**c) Legitimate Interests:** our use of your personal data is necessary for our legitimate interests or the legitimate interests of others. Our legitimate interests might include the following:

1. running, growing and developing our business;
2. operating and ensuring the security of our websites and apps;
3. ensuring a safe working environment for our staff and visitors;
4. marketing, market research and business development;
5. providing services to our customers;
6. placing, tracking and ensuring fulfilment of orders with our suppliers;
7. investing in and rolling out new products to benefit the communities in which we operate;
8. for internal group administrative purposes; and
9. for online targeting or retargeting marketing purposes. We do this by creating profiles and lookalike audiences of people that may share characteristics, interests and preferences similar to you for the purposes of showing these audiences online advertising of our products or services that they are likely to be interested in, unless you have told us that you would rather not have your data used in this way. More information on how your personal data is used and how to opt out is explained below in the "Profiling and automated decision making" section of this Privacy Statement below.

Whenever we collect and use your personal data on the legal basis of legitimate interests, we take care to ensure that it does not outweigh your privacy rights as an individual or have a significant privacy impact.

**d) Consent:** We may process your personal data on the basis of your consent.

Where you have given consent, but you later change your mind, you may withdraw your consent by contacting us and we will stop doing processing your personal data in this way. However, if you withdraw your consent, this may impact our ability to provide our products and associated services to you.

#### **Opting out of marketing-related communications**

As described above, we may use your personal data to send you communications that may be of interest to you and/or information about our products or services, including updates, exclusive offers, promotions or new services or products.

Where legally required or where it is appropriate, we will ask for your consent to process your personal data for promotional or marketing-related purposes. We usually do this via an untick-box(es) located at our data collection points (e.g on registration or sign up pages) or via our customer service representatives by answering the question(s) posed to you.

If you would prefer not to receive marketing-related communications from us or from our third parties operating on our behalf, you can ask us or our third parties to stop sending you these communications at any time by following the unsubscribe links in our marketing-related communications or by contacting us at any time. If you have an account with us, you can also update your marketing preferences in your profile at any time.

You have the right to withdraw your consent at any time by informing us of your decision. If you wish to withdraw your consent, please see the **“Your Rights”** section of this Privacy Statement below.

Where you chose to opt out of receiving these marketing-related communications, please note that, this will not apply to personal data provided to us as a result of a product/service purchase, product/service experience or other transactions where you may still receive service-related communications from us, such as an order update or notifications about your account (e.g. account confirmations, password changes, etc.), and other important non-marketing related communications.

#### **4. Profiling and automated decision making**

We may analyse information about you in order to create profiles (e.g. by compiling individuals into groups that we believe to have certain common characteristics) for online advertising or retargeting purposes. We use these profiles to personalize our websites, apps, services or products, as well as our communications to you (e.g. by sending/displaying content that may be relevant and useful to you, subject to applicable data protection and e-privacy laws).

We may also use your personal data to create lookalike audiences of people that may share characteristics, interests and preferences similar to you for the purposes of showing these audiences online advertising of our products or services that they are likely to be interested in.

We may also use these insights to display relevant advertising to you either on our websites or apps, or via third-party websites.

Where we do this, we will inform you via our Privacy Statement and you will have an opportunity to object to these processes, please see the **“Your Rights”** section of this Privacy Statement below.

We will also obtain your consent where this is required by law, for instance where information about you is collected via certain types of cookies that we use – please see our [cookie statement](#) for further details on our use of cookies. Please contact us for further information on this type of processing.

For some services and products, we may process your personal data using automated means such as using a chatbot. Essentially this means that decisions

are taken automatically without human intervention. We will not make decisions based solely on automated decision making to the extent that they have a legal effect or significant impact on you without first notifying you and providing you with clear information about any such automated decision-making, including our lawful basis for carrying it out and the ability to have a human intervention for reviewing the decision.

Please see the "How to contact us" section of this Privacy Policy for further information on such processing or to opt out.

## **5. Links to other websites**

Our websites and apps may contain hyperlinks to third party websites, plug-ins or applications that are not operated by us. These hyperlinks are provided for your reference and convenience only and do not imply any endorsement of the activities of such third-party websites or any association with their operators.

This Privacy Statement only applies to the personal data that we collect or which we receive from third party sources and over which we act as a data controller, and we cannot be held responsible for personal data about you that is collected and stored by third parties. Third party websites have their own terms and conditions and privacy policies, and you should read these carefully before you submit any personal data to these websites.

We do not endorse or otherwise accept any responsibility or liability for the content of such third-party websites or third-party terms and conditions or policies.

## **6. Social media and other User Generated Content**

Some of our websites and apps allow users to submit their own content. Please remember that any content submitted on our product/brand page(s) on social media platforms can be viewed by the public and reposted, and you should be cautious about providing certain personal data e.g. financial information or address details. We are not responsible for any actions taken by other individuals if you post personal data on one of our product/brand page(s) on social media platforms. We reserve the right to delete user generated content that doesn't comply with the relevant terms & conditions.

## **7. Children's personal data**

Most of our websites are designed and intended for use by adults. Where one of our websites is intended for use by a younger audience, we understand the importance of taking extra precautions to protect the privacy and safety of children.

If our websites are ever intended for young audiences, we will in all cases respect our external commitments on responsible marketing, and we will ensure that

before we collect personal data, consent is validly obtained from the parent(s) or legal guardian(s) to the extent that this is required by applicable laws and regulations (the age at which this is necessary varies from country to country). If we discover that we have collected personal data from a child without consent from a parent or legal guardian where such consent should have been obtained, we will delete that personal data as soon as practical.

## **8. Sharing your personal data with third parties**

When we share your personal data with Danone affiliates and other organizations, we make sure we only do so with organizations that safeguard and protect your personal data and comply with applicable privacy laws in the same or similar way that we do.

Your personal data will never be sold or rented. We may, however, share or disclose your personal data as described in this Privacy Statement.

Your personal data will be shared with the following third parties for the purposes described:

1. **Other Danone Group companies/affiliates:** Where it is in our legitimate interests to do so for internal administrative purposes (for example, ensuring consistent and coherent delivery of products to our customers, corporate strategy, merger and acquisition operations, compliance, auditing and monitoring, research and development and quality assurance).
2. **Third party service providers and subcontractors:** Including those which:
  - i) assist us to carry out your requests, respond to your inquiries, allow personalised conversations with our consumer contact centre teams, fulfill your orders, honor coupons, provide you with samples, enable you to participate in sweepstakes, promotions and competitions, such as logistics providers, sponsors and customer support providers;
  - ii) perform core information technology and other business-related services, such as website/app development providers, cloud hosting providers, management and evaluation service providers, data analysts, payment processors, utility providers, insurers;
  - iii) assist in the organization of our events, marketing, advertising and promotional activities and facilitation of surveys, market research, sourcing testimonials, reviews and feedback such as marketing & design agencies, research agencies, events management agencies and events management platforms such as Eventbrite, Inc; or
  - iv) provide analytics and optimization services relating to our websites and apps.
    1. **Social media platforms:** When our web pages use social plug-ins from these businesses (such as the "Like" and "Share" buttons). These other

businesses may receive and use personal data about your visit to our sites or apps. If you browse our website or view content on our apps, personal data they collect may be connected to your account on their site. For more information on how these businesses use personal data, please read their privacy policies.

1. **Business transfer recipients:** Where we sell or buy any business or assets, (such as a merger/absorption), to the prospective seller or buyer of such business or assets, or where substantially all of our or any of our affiliates' assets are acquired by a third party, in which case personal data held by us will be one of the transferred assets. Where appropriate, in such case, the buyer acting as the new data controller processes your data and its privacy statement governs the processing of your personal data.
1. **Law enforcement agencies and regulatory bodies:** Where we are obliged by law to disclose your personal data (e.g. to government or law enforcement bodies) or where disclosure is required to protect our rights or those of our staff, customers or other third parties.

Save as expressly detailed above, we will never share, sell or rent any of your personal data to any third party without notifying you and, where necessary, obtaining your consent. Further details about our third parties are available on request.

### **9. Sharing your personal data internationally**

Your personal data may be used, stored and/or accessed by Danone staff operating outside the EEA or the UK working for us, other members of our group or trusted third parties.

Depending on the processing activity such as creating lookalike audiences or registering you for an event via Eventbrite Inc. your personal data may be transferred to for example the United States.

If we provide any personal data about you to any such non-EEA and non-UK members of our group or trusted third-parties, we will take appropriate measures to ensure that the recipient protects your personal data adequately, such as:

1. ensuring that there is an adequacy decision by the European Commission in the case of transfers out of the EEA or by the UK Secretary of State in the case of transfers out of the UK;
2. having in place standard contractual clauses with the recipient which have been approved by the European Commission (or the UK Secretary of State for transfers out of the UK);
3. any other safeguarding mechanism permitted by law.

Further details about our international transfers are available on request.

### **10. How we protect your personal data**

We understand that the security of your personal data is important. We make our best efforts to protect your personal data from being accidentally lost or used or accessed unlawfully. We have implemented a number of security measures to help protect your personal data, and we require that trusted third parties who

handle your personal data for us do the same. For example, we implement access controls, use firewalls and secure servers, and we encrypt personal data.

In the course of providing your personal data to us, your personal data may be transferred over the internet. Although we make every effort to protect the personal data which you provide to us, the transmission of information over the internet is not completely secure. As such, you acknowledge and accept that we cannot guarantee the security of your personal data transmitted to our website and that any such transmission is at your own risk. Then, once we have received your personal data, we will use strict procedures and security features to prevent unauthorized access to it.

Where we have given you (or where you have chosen) a password which enables you to access your online account, you are responsible for keeping this password confidential.

### **11. How long we store your personal data**

We keep your personal data for no longer than necessary for the purposes for which the personal data is processed. The length of time for which we retain personal data depends on the purposes for which we collect and use it, for the duration of your contractual relation with us and/or as required to comply with applicable laws and regulations as well as to establish, exercise or defend our legal rights.

For example, where you make a purchase online with us or register for a webinar, we will keep the personal data related to your purchase or registration, so we can perform the specific contract you have entered. After that, we will keep the personal data for a period which enables us to handle or respond to any complaints, queries or concerns relating to the purchase or registration.

After the established deadlines, the data is either deleted or retained after being anonymized, especially for statistical purposes. It should be noted that deletion or anonymization are irreversible operations, and that Danone is no longer able, thereafter, to restore this data. Further details about retention periods are available on request.

### **12. Your rights**

Where we process your personal data, you are entitled to a number of rights established in the relevant applicable laws and can exercise these rights at any point. We have provided an overview of these rights below together with what this entails for you. You can exercise your rights by contacting us [here](#).

We will consider all such requests and, in accordance with the applicable laws, will provide our response within a reasonable period, or within the period prescribed by law. Please note, however, that we may rely on certain exemptions

to complying with your requests in certain circumstances, for example if we need to keep using the information to comply with our own legal obligations or to establish, exercise or defend legal claims. If an exemption applies, we will tell you this when responding to your request.

We may request you provide us with information necessary to confirm your identity before responding to any request you make.

### **The right to be informed**

You have the right to obtain clear, transparent and easily understandable information about how we use your personal data, and your rights. This is why we are providing you with the information in this Privacy Statement.

### **The right to access your personal data and correction**

You have the right to access the personal data we hold about you, as well as correct, update or complete it at any time.

### **The right to deletion of your personal data**

You have right to request that we delete your personal data. However, this is not an absolute right, and we may have legitimate, legal and regulatory reasons to retain your personal data.

### **The right to object**

Under certain circumstances, you have the right to object to certain types of processing based on grounds relating to your particular situation when such processing is based on our or another's legitimate interest. If you exercise this right, we will stop using your personal data for this purpose and add you to a suppression list, unless we can demonstrate compelling legitimate grounds to continue processing your personal data that would outweigh your interests, rights and freedoms. You have the right to object to the processing of your personal data for direct marketing activities (for example, by clicking on the unsubscribe link in our emails or by contacting us directly via [DPO.UKIE@danone.com](mailto:DPO.UKIE@danone.com)).

### **The right to withdraw consent**

Where we rely on your consent to process personal data, you have the right to withdraw consent at any time, without affecting our processing of your personal data before you withdrew consent.

### **The right to restriction of processing**

Under certain circumstances you have the right to restrict the processing of your personal data if:

1. you do not believe the personal data we have about you is accurate; or
2. you consider that the personal data is not being processed lawfully, but instead of deleting the personal data, you would prefer us to restrict processing instead; or
3. we no longer need your personal data for the purposes we collected it, but you require the data in order to establish, exercise or defend legal claims; or

4. you have objected to the processing of your personal data and are awaiting verification on whether your interests related to that objection outweigh the legitimate grounds for processing your data.

### **The right to data portability**

Your personal data is portable. This means it can be moved, copied or transmitted electronically. However, this right only applies to personal data you have provided to us and where the processing: (i) is based on your consent or takes place for the performance of a contract; and (ii) it takes place by automated means.

### **The right to lodge a complaint with a supervisory authority**

If you think that we have not met the data protection or privacy requirements, you have the right to make a complaint to the data protection authority in the country where you usually live or work, or where an alleged infringement of applicable data protection laws has taken place.

If you want to bring a specific complaint against Danone for the way your personal data has been processed or if you are not able to resolve a problem directly with us, you can raise a complaint directly with the UK Information Commissioner's Office <https://ico.org.uk/for-the-public>.

UK Information Commissioner's Office

Mailing Address: Wycliffe House Water Lane, Wilmslow, Cheshire SK9 5AF

Phone Numbers: +44 303 123 1113

Email Address: [casework@ico.org.uk](mailto:casework@ico.org.uk)

Alternatively, for Republic of Ireland residents, you can raise a complaint directly with the Irish Data Protection Commission's

Office <https://www.dataprotection.ie/>.

Irish Data Protection Commission:

Mailing Address: Canal House, Station Road, Portarlinton, R32 AP23 Co. Laois

Phone Numbers: +353 57 8684800 or +353 (0)761 104 800

Email Address: [info@dataprotection.ie](mailto:info@dataprotection.ie)

You can also contact our Data Protection Officer directly at [DPO.UKIE@danone.com](mailto:DPO.UKIE@danone.com).

### **13. How to contact us**

If you have any questions, comments or complaints regarding this Privacy Statement or the processing of your personal data, please contact us via our [contact page](#) or write to us at Data Protection Office, Nutricia Limited, Newmarket House, Newmarket Avenue, White Horse Business Park, Trowbridge, Wiltshire, BA14 0XQ

For Republic of Ireland residents, you can write to Nutricia Ireland Limited at Data Protection Office, Nutricia Ireland Limited, Block 1, Deansgrange Business Park, Deansgrange, Co Dublin, A94 P9T3, Ireland or [contact us](#).

You can also contact us via [DPO.UKIE@danone.com](mailto:DPO.UKIE@danone.com).

Lastly, you can contact our Group Data Protection Officer, Adrien Migeon at our Data Protection Office via email at [dpo.group@danone.com](mailto:dpo.group@danone.com) or write to us at Data Protection Office, Danone SA, 17 Boulevard Haussmann, 75009, Paris, France.

#### **14. Changes to our Privacy Statement**

This Privacy Statement was last updated on 9 February 2024.

We may update our Privacy Statement from time to time (for example, to comply with changes in laws or regulations, our practices, procedures and organizational structures, requirements imposed or recommended by supervisory authorities or otherwise). Any changes we make to our Privacy Statement in the future will be posted on this page and will be applicable on the effective date of implementation. Where we are legally required to do so, we will notify you of any changes. Please check back frequently to see any updates or changes to our Privacy Statement.