

POLICY ON THE USE OF PERSONAL DATA

Parmalat Romania S.A. (hereinafter referred to as "Parmalat Romania" or "us"), a Romanian legal person, based in Tunari, Sos. Centura 12, informs you about this Policy on the use of personal data, in order to explain how we process and protect your personal data.

1. To whom this Policy applies to?

This Policy concerns the processing of personal data of:

- to visitors and users of our sites: www.parmalat.ro and www.santal.ro ("Users");
- to our contractual partners, such as suppliers, customers ("Business Partners");
- to candidates for the vacancies jobs in Parmalat Romania.

2. What kind of data do we collect about you?

We collect and process your personal data as follows:

- from information that you provide to us by filling out the contact forms on our sites;
- from information that you provide to us by mail, by phone, by email or in any other way.

The information you provide to us may include name, address, e-mail address and telephone number, as well as other information, as the case may be.

Through our activity on the site, we will not collect or process sensitive personal data related to you (*ie* information about racial or ethnic origin, political opinions, religious confession or philosophical beliefs, health, sexual life or sexual orientation), except the cases in which:

- we are obliged to do so by law; and /or
- in case if you have given us your explicit consent separately.

If you voluntarily provide us your personal data (including sensitive personal data) through your interaction with the www.parmalat.ro and www.santal.ro websites or by contacting us by phone, e-mail or in any other way, by your own intention and not by our request, we will be able to delete such personal data from our systems, unless we consider that processing is necessary for a legitimate purpose of Parmalat Romania.

3. What are the purposes of the processing of personal data and which is the legal basis of the processing?

We can process your personal data in the following cases:

- for communication purposes, when it is necessary to respond to any requests obtained through the contact forms on the websites www.parmalat.ro and www.santal.ro;
- for communication purposes, when it is necessary to award prizes as a result of campaigns organised by Parmalat Romania;
- for communication purposes, when we need to take all the necessary steps in order to conclude a contract with you or the company you represent;
- for communication purposes, when we have to execute a contract that we have concluded with you or the company you represent;
- for legal purposes, when we have to comply with a legal obligation;

When we are requesting personal data in order to comply with legal or contractual obligations, providing of such personal data by you is mandatory. That means that, if such personal data is not provided, we will not be able to manage the contractual relations or to comply with our imposed legal obligations. In all other cases, the providing of personal data is optional and you are not required to provide them.

We may process your personal data, such as your identification data, your data contact and address of residence, in order to exercise our legal rights or possible complaints against you in the future. This processing is based on our legitimate interest, being we need to exercise our rights in case of possible litigation.

We will use your personal information as follows:

Users:

When it is necessary to respond to the possible requests received through the contact forms from our sites www.parmalat.ro and www.santal.ro, we can use your provided personal data (name, first name, e-mail address or other personal data provided in the body of the message).

This processing is based on our legitimate interest in knowing the person to whom it is supposed to be addressed the answer.

Commercial partners:

For the purpose of concluding or executing contractual relations with the commercial partners of Parmalat Romania, as an administrator or as a representing of our business partner, we can process your personal data such as: name, surname, e-mail address, telephone.

This processing is based on:

- execution of a contract in which you, as an administrator or as a representative person of a trading partner, are a party;
- legal obligations imposed on us;
- our legitimate interest.

Being Commercial Partner, we can provide you with communications about our new products and services. If you don't want to receive these communications anymore, you can quit by sending us an email at: dpo@ro.lactalis.com.

Candidates for jobs:

In connection with your participation in the recruitment and selection process for one or more jobs mentioned as available within Parmalat Romania, we can collect and process your personal data (for example, the data in the resume you send us) for the purpose of the selecting, of assessing your professional competencies for the workplace you are applying, and for communicating with you during the recruitment process.

This processing is based on your intention to get an employment contract with Parmalat Romania and on the legitimate interest of Parmalat Romania.

We will not send your personal data for marketing purposes to third parties without your explicit consent in this regard.

4. To whom do we transmit the personal data?

Parmalat Romania will not transmit (by sale or lease) to third parties your information with personal character.

Within Parmalat Romania, only a limited number of staff members have access to your personal dates, "on a need to know basis ". Members of Parmalat Romania personnel have the right to manage the personal data only on the basis of the instructions communicated by Parmalat Romania, in relation to its job responsibilities.

Personal data may be communicated to government authorities, tax authorities and / or law enforcement bodies, if required by applicable law or if necessary for the exercise of our rights, including conditions of use, or for protection of our legitimate interests (including the legitimate interests of third parties) in accordance with the laws applicable.

Your personal data may also be disclosed to third parties as follows:

- To business partners, suppliers and subcontractors, for the execution of all contracts on which we conclude with you, in order to provide products and services requested by you;
- To service providers that offer administrative, professional and technical support to Parmalat Romania;

- To external consultants (ie lawyers, accountants, auditors) for specific purposes, when it is necessary.

Parmalat Romania is conducting an appropriate prior assessment in selecting of the third parties f services suppliers and requires to them to maintain technical and organizational security measures appropriate in view of the protection of personal data and processing of personal data, only according to the instructions specified by Parmalat Romania.

Service providers will have the right to use subcontractors for the providing of services for Parmalat Romania, with the condition that each subcontractor shall comply with the same data protection obligations as service providers.

5. What is the period of keeping the personal data?

We will keep your personal data for the time required to meet the goals listed in this Policy or for the period applicable by national law required, in compliance with the applicable legal minimum retention periods and / or as necessary for us to exercise our legitimate rights (and legitimate rights of others).

If your personal data has been collected as part of your voluntarily enrollment campaigns runned by Parmalat Romania, we will keep your data for maximum 60 days after the end of the campaign.

If you are a business partner, we will keep your personal data for the the duration of the contractual exertion relationship with you.

If you are a candidate for one or more jobs published by Parmalat Romania, we will keep your personal data throughout the process of recruitment and selection, plus one year more after the completion of recruitment process (if the candidate was not employed in the company).

6. The transfer of personal data outside the country

During the storage in Parmalat Romania, your data may be accessible and / or transferred to the Parmalat and / or Lactalis groups, groups to which Parmalat Romania belongs.

7. What rights do you have?

According to the relevant legislation, you have the following rights :

- the right of access to your personal data, in order for us to confirm you whether your personal data are processed or not by us, and to provide you with a copy of your personal data;
- the right to request the rectification or deletion of your personal data;
- the right to request the restriction of the processing of your personal data;
- the right to oppose to the processing of your personal data;

- the right to request the portability of your personal data;
- the right to withdraw your consent at any time without affecting the lawfulness of the processing made on the basis of consent prior to its withdrawal;
- the right to lodge a complaint with the National Supervisory Authority of the Proceesing the Personal Data.

Please be aware that your rights described above may be limited in certain situations and are subject to the applicable laws and regulations on personal data personal.

In order to exercise one or more of these rights, please contact us at the email address dpo@ro.lactalis.com

8. The confidentiality of personal data for minors

The www.parmalat.ro and www.santal.ro websites do not knowingly collect identification personal data from people under the age of 16.

If the parent or the legal guardian has been informed that minor under their custody has provided on websites www.parmalat.ro and www.santal.ro his/her personal data, it must immediately inform Parmalat Romania, at the email address: dpo@ro.lactalis.com.

If we find out that a person who has not reached the age of 16 years provided personal data on the websites: www.parmalat.ro and www.santal.ro, we will destroy this information from our servers immediately, unless the parent or the legal guardian gives his/her explicit consent for the processing by our sites the personal data of the child, for the specified purposes.

9. Contact

If you have any questions or unclear concerns regarding the processing of your personal data by Parmalat Romania or through the websites www.parmalat.ro and www.santal.ro or if you want to exercise one or more of your rights, please contact us at our email address: dpo@ro.lactalis.com.

Please do not disclose sensitive personal data (for example, information about the racial origin or ethnic origin, political opinions, religious or other beliefs, health or membership to a trade union) or social security numbers when you contact us.

Note: We may periodically update this Policy and keep you informed of any changes, by posting the new Policy versions on www.parmalat.ro and www.santal.ro websites.

Please refer periodically to the Privacy Policy page, to be at current with the new changes.

Last updated: October 17, 2019.