

PRIVACY AND GDPR POLICY

The purpose of this privacy policy (hereinafter “the Policy”) is to inform users (hereinafter Users) of the <http://ajinomoto-fingerfood.eu> website (hereinafter “the Website”) about how AJINOMOTO FOOD EUROPE (hereinafter “the Company” or “Organising Company” or “we”) collects, uses and shares the personal data that Users provide via the Website.

1- APPLICABLE LEGISLATION

The Policy is established pursuant to the specifications laid down by the General Data Protection Regulation (EU Regulation 2016/679 of 27 April 2016) (hereinafter “GDPR”) as well as any French regulations relating to the protection of personal data.

This Policy governs how personal data is collected, processed, hosted and stored.

AJINOMOTO FOODS EUROPE undertakes to collect, process, use and transfer any personal data in accordance with the provisions in force and in particular the GDPR.

2- WHAT IS PERSONAL DATA?

Personal data refers to any information relating to an identified or identifiable natural person; an identifiable natural person is one who can be identified, directly or indirectly, in particular by reference to an identifier such as a name, an identification number, location data, an online identifier, or to one or more factors specific to the physical, physiological, genetic, psychological, economic, cultural or social identity of that natural person.

3- WHO IS THE DATA CONTROLLER?

The Company, whose registered office is located at 32 rue Guersant, 75017 Paris, entered in the Paris Trade and Companies Register under number 572 233 955, is responsible for the processing of the personal data of the User of the Website, published and operated by the latter in the context of the operation (hereinafter “Operation”) set up and managed by the latter for Users.

4. WHAT DATA IS COLLECTED?

The User’s personal data that we collect is:

- Within the context of consultation of the Website: their login data
- Within the context of ordering product samples: their login details, first name, surname, postal address, mobile number, email address
- Within the context of a co-financing request for the creation/design and printing on paper of new menus: their login details, first name, surname, postal address, mobile number, email address

All the information provided by the User during their visit to the Website is strictly confidential.

5. WHO ARE THE DATA RECIPIENTS?

Your personal data is transmitted:

- To our internal departments, by persons who must have access to it. The processing conditions are strictly regulated and each employee is regularly trained in the handling of personal data;
- To our customers, partners or subcontractors within the meaning of the GDPR, in particular for processing orders of product samples, and/or co-financing (hereinafter “the Operation”), carrying out communication campaigns and providing hosting services for the data flows generated in the context of the Operation.

We only provide them with the information they need to perform the service and ask them not to use Users’ personal data for any other purpose.

We always make every effort to ensure that all of these third parties with whom we work maintain the confidentiality and security of Users’ data.

6. WHAT ARE THE PURPOSES OF THE DATA PROCESSING?

The purpose of data processing corresponds to the main objective, justifying the use of your data.

The User's personal data is required for the following purposes:

- Website access authentication,
- Authentication to receive product samples,
- Authentication to record, process and deliver orders for product samples,
- Authentication to receive email, SMS or postal mail from the Company or one of its partners,
- Authentication in the context of a co-financing request for the creation/design and printing of new menus on paper,
- Pre-litigation and litigation management,
- Compliance with legal obligations

7. WHAT IS THE LEGAL BASIS FOR PROCESSING?

The legal basis for processing is the foundation on which the use of your data rests in order to be lawful.

- The User concerned has consented to the processing of their personal data.
- Processing is necessary:
 - o Within the context of the Operation and management of the Website.
 - o For the pursuit of the legitimate interest of the Data Controller in establishing proof of a right or contract
 - o To comply with a legal obligation.

8. HOW LONG IS DATA RETAINED?

The data retention period corresponds to the period during which your data must be used in relation to the purpose pursued, unless the law allows or requires it to be retained for longer.

The personal data collected via the Website is kept for as long as the site is active (at least 12 months), plus 24 months from the closure or deletion of the site, unless other legal obligations require a longer retention period.

The data collected will be communicated only to the company's personnel and is retained for the following periods:

- o Data necessary to carry out commercial prospecting operations with persons who have agreed to communicate their data: three (3) years from the date the data was collected;
- o Data regarding prospecting opt-out lists: three (3) years.

At the end of these retention periods, your data may be retained for longer in order to comply with a legal obligation or to prevent any litigation. In this case, your data is archived in a separate database. Access to this database is secure and limited to strictly authorised personnel, for legal limitation periods in accordance with the provisions of the French Civil Code or the French Commercial Code (e.g. 5 years in commercial matters or 10 years in accounting matters), before its removal or permanent anonymisation.

9. WHAT ARE THE DATA STORAGE CONDITIONS?

The data we collect from Users is stored in France by us or our trusted service providers.

However, it may, at any time, be transferred, accessed and stored in a country located within the European Economic Area (the "EEA") or the United Kingdom. It may also be processed by a member of staff operating in the EEA who works for us or for one of our service providers.

In this case, we will transfer personal data outside the EEA only in a secure manner and in compliance with the legislation in force. As some countries may not have laws governing the use and transfer of personal data, we undertake to take all necessary steps to ensure that, where appropriate, the relevant third parties will comply with the terms set out in this Policy. These measures may include monitoring the personal data protection and security standards applied by such third parties and/or signing appropriate contracts (based on the model adopted by the European Commission). For further information, please refer to the "Contact" section below.

10. DATA SECURITY POLICY

We attach great importance to the protection of the personal data of Users, and to this end take all reasonable precautions. We require trusted third parties who manage it on our behalf to undertake contractually to do the same.

We do everything we can at all times to protect the personal data of Users. Upon receipt of it, we apply strict security procedures and measures to endeavour to prevent unauthorised access.

As data transmission via the Internet is not completely secure, we cannot guarantee the security of personal data that is transmitted to our Website through this channel. Therefore, any transmission is at your own risk.

11. LINKS TO THIRD-PARTY SITES

The Website may, from time to time, contain links to websites belonging to our partner networks, advertisers and affiliates. These sites have their own personal data protection policies. The Company cannot in any way be held responsible for

application of these policies. We encourage Users to read the terms of these policies before sending any personal data to these websites.

12. SPECIFIC USER RIGHTS

Pursuant to the specifications laid down by the GDPR, the User has a right of access to their personal data, a right to rectification or erasure of their personal data, a right to restriction of processing of their personal data, a right to object to the processing of their personal data, a right to data portability, and a right to decide what happens to their personal data after their death.

Users may exercise their rights:

- Either by sending their request by email to the following address: GDPR_contact@afe-emea.eu
- Either by post addressed to: Ajinomoto Foods Europe, 32 rue Guersant, 75017 Paris, FRANCE.

13. DATA PROTECTION OFFICER / CONTACT

For any request for information or to exercise their rights under the GDPR, the User is invited to contact:

- Bertrand Vigna
- DPO AJINOMOTO FOOD EUROPE
- Ajinomoto Foods Europe, 32 rue Guersant, 75017 Paris, FRANCE.
- GDPR_contact@afe-emea.eu

NOTICE ABOUT COOKIES:

The Website also uses cookies necessary for its proper functioning and for the provision of the services offered.

The Company has drawn up this Cookie Notice in order to clearly inform you of the various cookies used on the Website and the processing carried out on the data collected through them.

What is a cookie?

A "cookie" is a connection identifier in the form of a text file that may be stored, subject to the choice expressed by the User, in a dedicated space on the hard drive of their device, during consultation of the Website. A cookie allows its issuer to identify the device where it is stored during the cookie's period of validity or storage and must therefore be considered personal data.

The User may object to the storage of these cookies by using their browser settings. However, without these cookies the User will not be able to use the website normally and their experience could be diminished.

What cookies are used on the Website?

- Browsing cookies:

These are cookies that are essential for browsing the Website and that allow Users to access the main features of the Website with a secure connection. As these cookies are necessary for the proper functioning of the Website, their placement is not subject to the prior consent of the User.

The User may object to the storage of these cookies by using their browser settings. However, without these cookies the User will not be able to use the website normally and their experience could be diminished.

Types of cookies:

Cookie name	Purpose	Lifespan	ISSUER
user_locale	Show the user's default language	12 months	https://www.ajinomoto-fingerfood.eu

- Analytics and audience measurement cookies

These are the cookies used on the Website to establish statistics relating to the number of visits to our Website by determining, for example, the number of visits and which pages are visited most or least, by analysing the browsing of Users and by identifying any technical malfunctions. These cookies are limited solely to measuring the audience

of the Site on our behalf and only produce anonymous statistical data. Pursuant to the applicable regulations, their use is therefore not subject to obtaining prior consent from the User.

Types of cookies:

Cookie name	Purpose	Lifespan	ISSUER
_gat	This cookie is associated with Google Universal Analytics. It is used to limit the flow of requests, which limits the collection of data on high traffic sites.	1 min	https://www.ajinomoto-fingerfood.eu
_ga	This cookie is associated with Google Universal Analytics, which is an important update to the most widely used Google analytics service. This cookie is used to distinguish unique users by assigning a randomly generated number as a customer identifier. It is included in every page request on a site and is used to calculate visitor, session and campaign data for site analysis reports.	2 years	https://www.ajinomoto-fingerfood.eu
_gid	This cookie is associated with Google Universal Analytics. It stores and updates a unique value for each page visited.	1 day	https://www.ajinomoto-fingerfood.eu

How cookies are stored:

Users can manage and modify how cookies are stored using the configuration settings of the browser software on the computer they are using to connect to the Website, so that they are saved or rejected as a matter of course, either in their entirety or depending on their issuer.

Deleting stored cookies may prevent access to a number of features that are nevertheless necessary to browse certain areas of the Website, such as:

- Access to the content or services offered on the Website, which involves an identification protocol,
- Recognition of the browser type, and of the language and display settings used by the computer to connect to the Website,

Where applicable, we do not accept any liability for the consequences of refusing or deleting cookies on the Website.