

## NUTRECO GLOBAL PRIVACY STATEMENT FOR APPLICANT DATA

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*When Nutreco process your personal data, we apply two key principles:*

*Keep it safe*

*Keep it private*

*Personal data needs to be well protected. Keep it safe.*

*Personal data can only be shared on a need-to-know basis. Keep it private.*

*You can download the privacy statement for customer, supplier and business partner data [here](#).*

*You can download the privacy statement for job applicant data [here](#).*

*These privacy statements do not address the processing of personal data of employees in the context of their employment relationship with Nutreco.*

### 1. INTRODUCTION – WHO WE ARE

The local Nutreco entity is the company responsible for the processing of your personal information (data controller), see [Skretting entities](#) and [Trouw Nutrition entities](#).

The local Nutreco entity may share your personal information with Nutreco N.V., Stationsstraat 77, 3811 MH Amersfoort, The Netherlands, and/or with SHV Holdings N.V. Rijnkade 1, 3511 LC Utrecht, The Netherlands and/or its relevant Groups, see [SHV Family of companies - SHV](#).

The relevant local Nutreco entities and Nutreco N.V. and SHV Holdings N.V. are referred to as “Nutreco” and “we”, “our” or “us”.

This Privacy Statement is applicable to the processing of your personal data when you -as a candidate or job applicant- are involved in our recruitment activities, when you use our websites or apps or when you interact with us (“you” or “your”).

### 2. PURPOSES FOR WHICH WE PROCESS YOUR PERSONAL DATA

#### 2.1 Social networks, such as LinkedIn, and other publicly available websites

We collect your personal data from public profiles on LinkedIn or other social networks and other publicly-available websites if you reacted to our recruitment initiatives on such social networks and websites, or signed up via integrated functionality of such social networks, recruitment websites or our own websites. We also collect your personal data from such sources when you provided a link to your profile on any such site as part of your job application or curriculum vitae submitted with your job application.

We may also obtain your contact details from publicly available sources, including content that you have made public on LinkedIn or other social network sites or similar sites for professional purposes to make an initial contact with you for recruitment purposes. We will only contact you if you have made your contact

details available to us to contact you for recruitment purposes and will provide you with clear option to ask us stop contacting you for career opportunities and remove your personal data from our systems.

*For this purpose, we process your personal data based on our legitimate interest.*

We process your personal data to find suitable candidates for our vacancies.

*Which personal data do we process for this purpose?*

For this purpose, we process the personal data you have made public through your public profiles on LinkedIn or other social networks and any correspondence between you and our recruiters. This includes your name, contact details if made available, current and past job titles, employment history, educational information, skills, recommendations, and curriculum vitae if you made it available.

## **2.2 If you apply to us through our career websites, we process your personal data:**

*A) To receive, review and reply to your job application*

If you contact one of our recruiters, apply for a vacancy or register through our careers websites, e.g. [at this website](#), we include the personal data you provide us in our recruitment database. Also, we will process your personal data to manage and update our recruitment database.

*We process your personal data for this purpose as a preparatory step to possibly entering into an employment contract with you.*

You are not obliged to provide us with any personal data for this purpose and free to step out of the application process at any time.

*Which personal data do we process for this purpose?*

For this purpose, we process your name, contact details, address (optional), country of residence, citizenship status, the role you apply for, and any recruitment information you provide to us, such as a link to your public social media account (for instance, LinkedIn) (optional), your curriculum vitae, employment history, education history, skills, motivation, gender, disability (optional), current compensation, and whether you are subject to a non-solicitation agreement. Also, we process your correspondence with Nutreco with regard to job applications.

*B) To verify your job application information, check your references and assess your suitability for the role you applied for*

Depending on the role you apply for, the job application process could include some assessments, tests or interviews to determine your fit for the job and/or Nutreco's culture. We will process your personal data to manage and execute this process and process the feedback received about you. Our recruiter will inform you about the specific job application process for the role you applied for. In addition, our recruiters will check the references you provided.

*We process your personal data for this purpose as a preparatory step to possibly entering into an employment contract with you.*

You are not obliged to provide us with any personal data for this purpose and free to step out of the application process at any time.

*Which personal data do we process for this purpose?*

For this purpose, we process the information you provided to us following 2.2(a), feedback received from the interviewers who spoke with you, the outcomes of any assessments, tests or interviews you completed and any communications between us.

*C) To make you an offer*

If you have successfully completed a job application procedure, we will prepare and email you an offer letter. This letter will include the employment conditions we would like to offer you at Nutreco. This offer could be subject to a pre-employment screening (see point D below).

*We process your personal data for this purpose as a preparatory step to possibly entering into an employment contract with you.*

You are not obliged to provide us with any personal data for this purpose and free to step out of the application process at any time.

*Which personal data do we process for this purpose?*

For this purpose, we process the information you provided to us following 2.2(a), the role you will be offered, the salary, benefits and other compensations that will be offered to you. Also, we will process your personal details required for entering into a contract with you.

*D) For pre-employment screening*

Depending on the role, a pre-employment screening may be done for verification of information provided by you to us and/or to verify information about conflicts of interests, criminal convictions, unfair practices or other serious unlawful conduct. Where relevant, we will either perform the pre-employment screening ourselves or through our contracted provider.

*We process your personal data for this purpose as a preparatory step to possibly entering into an employment contract with you.*

You are free to provide your personal data for this purpose. However, if we cannot perform a satisfactory pre-employment screening, we are not able to consider you for certain roles at Nutreco. We only perform pre-employment screenings to the extent permitted by applicable law in the relevant country.

*Which personal data do we process for this purpose?*

When we use our contracted providers, we provide your contact details to our contracted provider, who will inform you what information is needed for the pre-employment screening.

**2.3 If you have been rejected for a particular role, we process your personal data to inform you and can communicate with you about other job opportunities.**

Sometimes, we just do not have the right role available for you yet. During the recruitment process you can make the choice whether or not we can keep your data in our data base for future job opportunities. We will keep information about you in our database (in most cases for 12 months - as detailed when you make

that choice) and can contact you if we have a new vacancy that may be of interest to you. We may also invite you for recruitment activities or communicate with you about job opportunities.

*For this purpose, we process your personal data based on your consent.*

If you give us your consent to process your personal data for this purpose, you have the right to withdraw your consent at any time by sending an e-mail to [privacy@nutreco.com](mailto:privacy@nutreco.com). Please note that this will not affect the lawfulness of any processing based on your consent before the withdrawal.

*Which personal data do we process for this purpose?*

For this purpose, we process your contact details (such as your address and email address), the information you submitted to us in the course of previous job applications (for example, your resume) and a summary of how you performed during previous job applications with us.

#### **2.4 To comply with the law**

In some cases, Nutreco processes your personal data to comply with the laws and regulations in all countries where Nutreco is operating or conducting recruitment processes. For example, human resources related obligations, employment laws, anti-discrimination laws or regulations related to subsidies. Following laws and regulations, we may need to disclose your personal data to third parties, like government institutions or supervisory authorities.

*For this purpose, we process your personal data to comply with the law.*

We will only process your personal data if there is a legal obligation for us to do so.

*Which personal data do we process for this purpose?*

For this purpose, we process only the personal data required to comply with our specific legal obligations.

### **3. COOKIES**

Any processing of your personal data via cookies and/or similar technologies will take place in accordance with our Cookie Statement on the relevant website.

### **4. HOW LONG WE RETAIN YOUR PERSONAL DATA**

We will retain your personal data for these purposes as long as the application procedure for the relevant position is not completed, unless 1) a longer retention period is necessary to comply with legal requirements or protect our interests or 2) when you chose to keep your data for a longer period, which is usually 12 months or the term mentioned or selected when you made the choice.

If Nutreco employs you within any of its affiliates, Nutreco will retain your personal data and may use it and disclose it internally to others for personnel, administrative, or other purposes related to your job application or employment with Nutreco.

If you submit a job application and was unsuccessful, Nutreco may retain your personal data for a period as selected by you on the career website you used (see 2.3 above). In case no selection was made, your data will be removed. In the Netherlands the retention term for application data is one month. For other

countries longer terms may apply, if a longer retention period is necessary to comply with legal requirements or protect our interests.

After the expiry of the relevant retention period, your personal data will be deleted from our systems.

## 5. INTERNATIONAL DATA TRANSFERS AND ACCESS TO YOUR PERSONAL DATA

Your personal information may be stored and processed in the countries where we are doing business or in which we engage service providers (mostly in Europe, but also in countries like the USA and India, see examples of third parties at the end of this paragraph 5).

Where our processing of your personal information is subject to the EU's General Data Protection Regulation ("GDPR") and we transfer your personal information outside the European Economic Area ("EEA") to one of our affiliates, we do so in compliance with our Binding Corporate Rules, the SHV Privacy Code for Employee Data ([the "SHV Privacy Code"](#)).

Where our processing of your personal information is subject to the GDPR or the UK GDPR and we transfer your personal information outside the EEA or the UK to third parties, we rely on the following safeguards:

- Adequacy Decisions: The UK Secretary of State and the European Commission have recognized certain countries as providing an adequate level of data protection, so that personal information can be transferred to those countries without additional safeguards. For transfers from the EEA, the full list of these countries is available [here](#). For transfers from the UK, the full list of these countries is available [here](#).
- Standard Contractual Clauses: For transfers of personal information from the UK and/or EEA to countries outside the UK and EEA, which are not covered by an Adequacy Decision, we have put in place standard contractual clauses to protect your personal information. You may obtain a copy of these measures by contacting us (for contact details see paragraph 7 below) or by following this [link](#).

### *Access to your personal data within Nutreco*

Our employees are authorised to access personal data only to the extent necessary to serve the applicable purpose and to perform their jobs.

Your personal data can be accessed by relevant Nutreco departments such as recruiters, hiring managers, employees directly involved in your job application process, employment counsel or other HR functions involved, and legal, privacy or ethics & compliance officers to the extent strictly necessary to fulfil their respective tasks. If your application indicates interest in working internationally, we may provide your personal data to our global affiliates, in connection with possible opportunities at those affiliates.

### *Access to your personal data by third parties*

Third parties may have access to your personal data where relevant for the provisioning of their products or services to us and to the extent that such processing is necessary for the purpose of processing agreed with us.

The following third parties have access to your personal data where relevant for the provisioning of their products or services to Nutreco:

- Recruitment and selection agencies
- Service Providers that support us in: 1) assessing applicants 2) running our IT processes, for example to help us maintain our IT network and related infrastructure and security, including forensic specialists; 3) performing any other purpose mentioned in this privacy statement.

In other cases, your personal data will not be supplied to third parties, except when required by law. In specific situations we may be required to respond to requests from public and government authorities including public and government authorities outside your country of residence. Only if we are required to do so by law or sectorial recommendation to which Nutreco is subject, the relevant personal information will be provided to supervisory agencies, fiscal authorities or investigative agencies.

## 6. SECURITY

We seek to use reasonable organizational, technical and administrative measures to protect personal information within our organization.

Unfortunately, no data transmission or storage system can be guaranteed to be 100% secure. If you have reason to believe that your interaction with us is no longer secure (for example, if you feel that the security of any account you might have with us has been compromised), please immediately notify us of the problem by contacting us in accordance with the contact details provided in this Privacy Statement.

## 7. YOUR RIGHTS AND CONTACTING US

If you would like to request to access, correct, update, suppress, restrict, or delete personal information, object to or opt out of the processing of personal information, withdraw your consent (which will not affect the lawfulness of processing prior to the withdrawal), if you would like to request to receive a copy of your personal information for purposes of transmitting it to another company, so called data portability, (to the extent these rights are provided to you by applicable law), you may contact us (for contact details see at the end of this paragraph 7).

In your request, please make as clear as possible what personal information your request relates to. We may request you to provide verification of your identity before responding to your request.

We will respond to your request consistent with applicable law. Please note that we may need to retain certain information for recordkeeping purposes and/or to complete any transactions that began prior to your request for correction, updating or deletion. There may also be residual information that will remain within our databases and other records, which will not be removed. If we do not grant your request, we will explain to you why.

Individuals from the European Economic Area or the United Kingdom may lodge a complaint with (1) an EU/EEA data protection authority for their country or region where they have their habitual residence or place of work or where an alleged infringement of applicable data protection law occurs. A list of EEA data protection authorities is available [here](#); or (2) the [UK's Information Commissioner](#).

If our processing of your personal information is subject to the SHV Privacy Code, additional information about your rights, including your third-party beneficiary rights, and how you may exercise them are available in [the SHV Privacy Code](#).

#### *Questions?*

If you have any questions or complaints about this Privacy Statement, please contact your local Nutreco entity via the webform on the relevant website or via your regular contact person. You can also choose to contact us by sending an e-mail to [privacy@nutreco.com](mailto:privacy@nutreco.com). Because email communications are not always secure, please do not include sensitive information in your emails to us.

Where multiple Nutreco entities are involved in the data processing (joint controllers), we have arranged for a co-ordinated or central handling (for example where data is processed in a global IT system). You may obtain the essence of this arrangement upon request to our privacy office via the e-mail address above.