

# Privacy Statement

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## Introduction

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

This Privacy Statement explains how Danone collect and manage your personal data. It contains information on what data we collect, how we use it, why we need it and how it can benefit you.

Contact [contact-top100@2024.danone.com](mailto:contact-top100@2024.danone.com). if you have any queries and comments, or if you want to make a request regarding any of your data subject rights.

## 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, we may not be able to provide you with some services or products;
- 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.

## What personal data do we collect?

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 deleted and cannot identify a person (anonymous data).

The personal data we collect varies depending upon the purpose of the collection.

Generally, we may collect the following types of personal data from you directly:

- a) Personal contact data, such as your first name and last name, email address, job title, country, mobile phone
- b) Account login details, such as e-mail username. This is necessary to create a personal user account on one of our online communities
- c) Browser history, such as pages accessed, date of access, and IP address
- d) Travel details (to organize the logistics & transfers), needs for invitation letters etc
- e) Information related to your health (diet, food allergies, ...)

We may also collect personal data about you indirectly when:

- a) you share content on social media pages, websites or applications related to our program or in response to our promotional material on social media; or
- b) we read or collect personal data about you by reading information collected by other websites (for instance, we may place an ad on a third party website, and when you click on that ad, we may receive information about you and other website visitors in order to measure the reach and success of that ad).

In the event that Danone does collect and process sensitive data, it will do so in accordance with legal requirements.

### Why do we collect and use your personal data?

We collect your personal data so we can provide you with the best program experience and to provide you with a high-quality service. In particular we may collect, hold, use and disclose your personal data for the following purposes:

- a) To communicate information to you and to manage your registration
- b) To process and answer your inquiries or to contact you in order to answer your questions and/or requests;
- c) To develop and improve our, services, communication methods and the functionality of our website, registration platform and application;
- d) Logistic needs: hotel booking, transfers organization with our partner agency...

We may also need your personal data to comply with legal obligations or in the context of a contractual relationship that we have with you.

When we collect and use your personal data for purposes mentioned above or for other purposes, we will inform you before or at the time of collection.

Where appropriate, we will ask for your consent to process the personal data. Where you have given consent for processing activities, you have the right to withdraw your consent at any time.

## Your rights

Where we process your personal data, according to applicable legislation, you might be entitled to a number of rights and, when applicable, you 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, when eligible to, via the email address indicated at the end of this document.

In the context of the participation in the program, if the Participant wishes to delete his/her User Account, Danone will be unable to manage his/her participation, which will result in the cancellation of his/her participation.

Specifically, the rights you might be entitled to are the following:

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

You may have the right to access, correct or update your personal data at any time.

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

You may have right to request that we delete your data if:

- a) your personal data is no longer necessary in relation to the purposes for which we collected it; or
- b) Legal Guardians withdraw the consent that they had previously given us to process your personal data, and there is no other legal ground to process that personal data; or
- c) you object to us processing your personal data for direct marketing purposes; or
- d) you object to us processing your personal data for Danone's legitimate interests (such as improving overall user experience on websites);
- e) the personal data is not being processed lawfully; or
- f) your personal data needs to be deleted to comply with the law.

In any case, you may ask Danone to delete your personal data.

In the context of your participation in the program, if you ask for the deletion of your personal data, Danone may be unable to process your participation in the program, which might result in the cancellation of your participation.

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

When we process your personal data on the basis of your Legal Guardians' consent, the Legal Guardians may have the right to withdraw their consent at any time. However, such withdrawal does not affect the lawfulness of the processing that took place prior to this withdrawal.

Please note that if the Legal Guardians withdraw their consent, the Participant may not be able to use and access certain sections of the Platform anymore, nor receive newsletters you subscribed for.

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

You may have the right to restrict the processing of your personal data if:

- a) you do not believe the personal data we have about you is accurate; or
- b) the personal data is not being processed lawfully, but instead of deleting the personal data, you would prefer us to restrict processing instead; or
- c) 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
- d) 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 object to processing**

You may have the right to object to the processing of your personal data at any time.

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

Your personal data may be portable. This means it may be moved, copied or transmitted electronically. However, this right only applies where:

- a) The processing is based on your legal guardians' consent;
- b) The processing takes place for the performance of a contract;
- c) The processing takes place by automated means.

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

You may have the right to lodge a complaint directly with supervisory authority about how we process your personal data.

The competent European supervisory authorities are listed on the following link:

[https://ec.europa.eu/justice/article-29/structure/data-protection-authorities/index\\_en.htm](https://ec.europa.eu/justice/article-29/structure/data-protection-authorities/index_en.htm)

In some other countries and in accordance to local laws and regulation you might have additional rights such as provide us with instructions on the use of your personal data after your death.

**In all cases, 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.**

## 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 misuse, interference, loss, unauthorized access, modification or disclosure. We have implemented a number of security measures to help protect your personal data. For example, we implement access controls, use firewalls and secure servers, and we encrypt personal data.

## Sharing of your personal data

When we share your personal data with our affiliates, other organizations or trusted third parties, 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.

Trusted third parties may assist us in providing IT services, such as platform providers, hosting services, maintenance and support on our databases as well as on our software and applications that may contain data about you or to perform on our behalf statistical analyses.

**Your personal data will not be shared, sold, rented or disclosed other than as described in this Privacy Statement. We may, however, share your data when required by law and/or government authorities.**

## Sharing data internationally

Your personal data are stored on servers located within the European union and are not transferred outside the European Economic Area.

However, if Danone were to transfer your data outside the European Economic Area (EEA) or outside your country of residence if you are located outside of the EEA, it would take appropriate measures to ensure that your personal data is adequately protected in the destination country. In this case, we put in place contractual measures and controls regarding technical and organizational measures in accordance with the regulations to ensure that personal data is processed with the same level of security as required by the European regulations.

Therefore, you agree and accept that if you provide us with your personal data, you consent on the transfer of your personal data as described herein.

## Personal Data retention period

We will only retain your personal data for the time necessary to achieve the purposes for which we collected it, including to comply with any legal or accounting requirement.

To determine the appropriate retention period for personal data, we take into account the quantity, nature and sensitivity of personal data, the potential risk of harm resulting from the unauthorized use or disclosure of your personal data, the

purposes for which we process your personal data and the possibility of attaining those purposes by other means, as well as the applicable legal requirements.

After the established deadlines, the data is either deleted or retained after being anonymized, especially for statistical purposes. It may be retained in case of pre-litigation and litigation. It should be noted that deletion or anonymization are irreversible operations, and that Danone is no longer able, thereafter, to restore this data.

## Cookies and other technologies

We may also collect personal data about you through the use of cookies and other technologies. This may occur when you visit our sites or third-party sites, view our online promotions, or use our/third-party mobile applications and may include the following information:

- a) Information about your device browser and operating system;
- b) The IP address of the device you are using;
- c) Web pages of ours that you view;
- d) Links that you click while interactive with our services.

## How to contact us

If you have any questions, comments or complaints regarding this Privacy Statement or the processing of your personal data, or if you want to make a request regarding any of your data subject rights, please contact us at the following email address [contact-top100@2024.danone.com](mailto:contact-top100@2024.danone.com)

You can also contact our Data Protection Officer using the following email address: [dpo.group@danone.com](mailto:dpo.group@danone.com)

Data Protection officer  
Danone  
17 boulevard Haussmann  
75009 Paris

## Changes to this Privacy Statement

Danone is free to modify this Privacy Statement periodically to reflect the evolution of our practices in this area. We encourage you to periodically review this Privacy Statement to be updated on how Danone protects your data.

This privacy statement was last updated on April 1<sup>st</sup>, 2023.