

PRIVACY POLICY

1. DEFINITIONS

Besides the terms defined elsewhere in this Privacy Policy, the terms with capital letters in this Privacy Policy have the meanings stated below.

Data Protection Legislation	means (i) Regulation (EU) 2016/679 of 27 April 2016 on the protection of natural persons with regard to the processing of personal data and on the free movement of such data, and repealing Directive 95/46/EC with effect from 25 May 2018; (ii) the Belgian law of 30 July 2018 on the protection of natural persons with regard to the processing of personal data and (iii) all other national laws that apply currently or in the future with regard to or impacting the processing of personal data and privacy.
Personal Data	means any information relating to an identified or identifiable natural person.
Social Media Channels	means the following social media profiles of Milcobel CV, including for example: LinkedIn ; Facebook ; Twitter ; Instagram ; YouTube .
Data Controller	means the natural or legal person, public authority, agency or other body which, alone or jointly with others, determines the purposes and means of the processing of Personal Data.
Website	means the Milcobel Group website you are currently visiting (www.dupontcheese.be) and/or the Social Media Channels.

2. SCOPE, IDENTITY AND CONTACT DETAILS

- 2.1. We attach the greatest of importance to the protection of your privacy and your Personal Data. This Privacy Policy describes how We intend to process your Personal Data in the context of your usage of the Website or the Social Media Channels and as described below in this Privacy Policy. This Privacy Policy applies to the Personal Data We collect through Our Website and Our Social Media Channels.
- 2.2. The various companies in the Milcobel Group are collectively the Data Controllers. A complete list of Milcobel companies can be found at the end of this privacy declaration, along with their full addresses.
- 2.3. The contact details of Our headquarters, to which you can address all your questions and/or comments regarding this Privacy Policy, are: **Milcobel CV**, Fabriekstraat 141, haven 1140, 9120 Kallo (Beveren), Belgium, with company registration number 0870.019.427. Milcobel CV is hereinafter also referred to as

“Milcobel”, the “Data Controller”, “We”, “Us”, “Ourselves” or “Our”.

2.4. You can send your questions by e-mail to Milcobel’s privacy manager at the e-mail address: privacy@milcobel.com.

3. PERSONAL DATA

We will process the following Personal Data concerning you:

- **Contact details** (surname, first name, address, e-mail address and telephone number), only if you share your details with Us in the context of obtaining information, membership, customer or supplier relations or events for which you register.
- **Technical information** (about the device you use, such as your IP address, browser type, geographical location and operating system, information about your browsing behaviour, such as how long you spend on the page, which links you click on, which pages you visit and how often you visit the page);
- **Data concerning health** (allergies), if you share this in the context of events for which you register;
- **Image**

4. PURPOSES AND LEGAL GROUNDS FOR PROCESSING

4.1. We process your Personal Data exclusively in connection with the following purposes and legal grounds.

Personal Data	Purpose of processing	Legal grounds
Contact details	<ul style="list-style-type: none"> • Milcobel processes your contact details to contact you if you register for an event organised by Milcobel or take part in a competition. • Milcobel processes your contact details to make it possible to respond to your complaint or question. • Milcobel processes your contact details when this is necessary to be able to defend Ourselves in a court procedure or other procedure. • Milcobel processes your contact details to conduct statistical analyses and thus improve Our Websites, products and services. 	<ul style="list-style-type: none"> • Necessary for the performance of the contract (see article 6.1.b) GDPR). • Necessary for Milcobel’s legitimate interest (i.e. to be able to respond appropriately to your requests for information and other requests, and to communicate with you) (see article 6.1.f) GDPR). • Necessary for Milcobel’s legitimate interest (i.e. to be able to defend Ourselves in (legal) proceedings) (see article 6.1.f) GDPR). • Necessary for Milcobel’s legitimate interest (i.e. to make ongoing improvement of Milcobel’s Websites, Social Media Channels, products and services possible) (see article 6.1.f) GDPR).

	<ul style="list-style-type: none"> • Milcobel processes your contact details to comply with legal obligations or to fulfil any reasonable request from authorised officers or representatives of the police, judicial authorities, government bodies or institutions, including the competent data protection authorities. Milcobel may transfer your contact details on its own initiative to the police or judicial authorities as evidence or if there is a justified suspicion of an illegal activity or crime that you have committed by using or with the help of the Websites, Our Social Media Channels or other communication with Us. • To protect Milcobel’s legitimate interests and those of its partners, or a third party if there is one, and if your use of the Websites or communication through Our Social Media Channels can be considered to be (a) a violation of the applicable conditions of use, the intellectual property rights or another third-party right, (b) a threat to the security or integrity of the Website, (c) a danger to the Website or one of the underlying systems of Milcobel or its subcontractors due to viruses, Trojan horses, spyware, malware or any other form of harmful code or (d) in any manner whatsoever, hateful, obscene, discriminating, racist, defamatory, bigoted, offensive or in any other way that is inappropriate or illegal. • Milcobel may process your contact details to inform any third party in the context of a possible merger with, takeover of/by or demerger from that third party or a comparable transaction under corporate law, even when that third party is located outside the EU. • Milcobel processes your contact details for marketing purposes, i.e. to provide targeted communication, promotions, offers and other advertisements from Milcobel. 	<ul style="list-style-type: none"> • Consent (see article 6.1.a) GDPR and 4.3 below). • Necessary to enable Milcobel to comply with the legal obligations to which We are subject (see article 6.1.c) GDPR). • Necessary for Milcobel’s legitimate interest (i.e. to make ongoing improvement of Milcobel’s Websites, Social Media Channels, products and services possible) (see article 6.1.f) GDPR). • Necessary for Milcobel’s legitimate interest (i.e. to protect Our commercial and business interests and deal with changing market conditions) (see article 6.1.f) GDPR).
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	<ul style="list-style-type: none"> For the purposes of marketing similar products or services that Milcobel itself supplies, if you are an existing Milcobel customer and Milcobel has obtained your contact details directly from you in the context of the sale of a product or service, where Milcobel indicates that you can object to this use of your data at any time easily and free of charge. 	<ul style="list-style-type: none"> Consent (see article 6.1.a) GDPR and 4.3 below). Or the ‘Soft Opt-In’ (see 4.4 below).
Technical information	<ul style="list-style-type: none"> Milcobel processes your contact details to conduct statistical analyses and thus improve Our Websites, products and services. 	<ul style="list-style-type: none"> Consent (see article 6.1.a) GDPR and 4.3 below).
Data concerning health (allergies)	<ul style="list-style-type: none"> Milcobel processes data concerning your health to make it possible to respond to your complaint. 	<ul style="list-style-type: none"> For the vital interests of the data subject (see article 6.1.d) GDPR and article 9.2.e) GDPR); the fact that the processing relates to Personal Data that has manifestly been revealed by the data subject
Photo	<ul style="list-style-type: none"> Milcobel processes this data to share on Our Website or on Social Media 	<ul style="list-style-type: none"> Consent (see article 6.1.a) GDPR and 4.3 below).

4.2. If the processing of your Personal Data according to the table above is necessary to **perform a contract or comply with a legal obligation**, We cannot execute the contract or fulfil the legal obligation unless you provide Us with your Personal Data.

4.3. Where our Privacy Policy indicates that we process your Personal Data on the basis of consent granted by you, you will need to have given your consent via a consent form in order for us to process that data (e.g. by ticking opt-in boxes). This Privacy Policy is available on Our Website, and We will retain the original consent form so that We can demonstrate that you have given Us your consent. You have the right to withdraw your consent at any time. The withdrawal of your consent is free of charge and will not affect the lawfulness of the processing based on your consent before you withdrew it.

4.4. In some cases, it is permitted to send direct marketing by e-mail, text message or other electronic means without your consent, for example because We have obtained your **electronic contact details** in the context of the sale of products or services, and because Our commercial messages relate to Our comparable products or services (**‘Soft opt-in’**). You can object to receiving any more of Our direct marketing messages by clicking on “UNSUBSCRIBE”. All direct marketing e-mails include the option to unsubscribe. You can also unsubscribe by sending an e-mail to privacy@milcobel.com.

4.5. When Milcobel processes the aforementioned Personal Data for the cited purposes, based on the legal ground of **legitimate interest**, the specific legitimate interest of Milcobel is indicated in brackets. Milcobel believes, after careful consideration of the various interests, that its own interests outweigh those of the data subject for the aforementioned purposes. To these ends, Milcobel can demonstrate that:

1. the interests pursued by the processing can be acknowledged as legitimate (the “**purpose test**”);

2. the intended processing is necessary for the realisation of these interests (the “**necessity test**”); and
3. the balancing of these interests in relation to the interests, fundamental freedoms and basic rights of data subjects favours the Data Controller (the “**balancing test**”).

For more information about any balancing of interests, you are always welcome to send an e-mail to privacy@milcobel.com.

- 4.6. We will provide you with relevant information if We intend to use your Personal Data for purposes other than those described in this Privacy Policy.

5. **RECIPIENTS OF PERSONAL DATA:**

- 5.1. Your Personal Data is processed by Us. We may also transfer your Personal Data to third parties that provide services to Us, including but not limited to the providers of marketing services and IT services. This enables Us to advertise and process your Personal Data for Our benefit. These external data processors may only process your Personal Data for Milcobel’s benefit on explicit written instructions from Milcobel. Milcobel guarantees that all external processors are selected with the necessary care and obliges them to consider the security and integrity of your Personal Data.
- 5.2. Milcobel may share your Personal Data with other entities in the Milcobel group if that is necessary for one of the purposes described above in article 4. In any event, We guarantee that whenever your Personal Data is processed by entities in Our group, this processing will occur in accordance with this Privacy Policy.
- 5.3. Otherwise, Milcobel does not transfer your Personal Data in an identifiable manner to third parties without your explicit consent.
- 5.4. If you use Our Social Media Channels, you moreover consent to your Personal Data also being processed by the providers of these Social Media Channels. You can find more information about the way these providers process your Personal Data in their respective privacy declaration(s).
- 5.5. We may transfer your Personal Data to third parties if the law or a court order obliges Us to do so.
- 5.6. In the event of a full or partial sale (including a merger or takeover) or a reorganisation of Our company, your Personal Data may be transferred to third parties.

6. **TRANSFER OF PERSONAL DATA**

- 6.1. Your Personal Data will only be processed in the European Economic Area (EEA).

7. **STORAGE PERIOD FOR PERSONAL DATA**

- 7.1. We will store your Personal Data for as long as necessary to process your Personal Data for the aforementioned purposes, with a maximum of two years from receipt of the personal data, or for as long as We are legally obliged to store it.

8. **YOUR RIGHTS**

- 8.1.** In compliance with and according to the conditions of the Data Protection Legislation, you have the right to request from Us (a) access to your Personal Data, (b) rectification of your Personal Data, (c) erasure of your Personal Data and (d) restriction of processing of your Personal Data. Furthermore, you have (e) the right to object to processing of your Personal Data and you can ask to receive your Personal Data from Us (f) in a structured, commonly used and machine-readable format. You also have the right to submit a complaint to a competent supervisory authority (in Belgium, this is the Data Protection Authority <https://www.dataprotectionauthority.be/>), or another authority that replaces the Belgian Data Protection Authority.
- 8.2.** You can exercise the aforesaid rights by sending a letter to **Milcobel CV**, attn. Milcobel Privacy, Fabriekstraat 141, haven 1140, 9120 Kallo (Beveren), or by sending an e-mail to privacy@milcobel.com, or by means of any other technical solution on Our Website.

9. AMENDMENTS TO THIS PRIVACY POLICY

- 9.1.** We may amend the conditions of this Privacy Policy. We will announce every new version of the Privacy Policy and ask for your consent in accordance with article 4 of this Privacy Policy.

List of joint Data Controllers

- Milcobel CV, with its registered office at Fabriekstraat 141, 9120 Kallo, Belgium, registered in the Crossroads Bank for Enterprises under number 0870.019.427;
- Milcobel Dairy NV, with its registered office at Fabriekstraat 141, 9120 Kallo, Belgium, registered in the Crossroads Bank for Enterprises under number 0870.017.447;
- Camal SA, with its registered office at Rue Léqipont 12/OOOD, 4671 Blégny, Belgium, registered in the Crossroads Bank for Enterprises under number 0412.859.912;
- Kaasimport Jan Dupont NV, with its registered office at Lieven Bauwensstraat 9, 8200 Bruges (Sint Andries), Belgium, registered in the Crossroads Bank for Enterprises under number 0405.109.216;
- Ysco NV, with its registered office at Fabriekstraat 141, 9120 Kallo, Belgium, registered in the Crossroads Bank for Enterprises under number 0472.336.451;
- Ysco FRANCE SAS, with its registered office at 53 Avenue de la 2e D.B., 61206 Argentan, France, with company registration number 43531711000011;
- Cheeseline NV, with its registered office at Lieven Bauwensstraat 9, 8200 Bruges (Sint Andries), Belgium, registered in the Crossroads Bank for Enterprises under number 0441.187.078; and
- Kaasbrik NV, with its registered office at Industriepark 1216, 3445 Halen, Belgium, registered in the Crossroads Bank for Enterprises under number 0423.910.091.