

## Information on the processing of personal data pursuant to Regulation (EU) 679/2016

### DATA CONTROLLER

The Data Controller is JANOUŠEK S.P.A. with sole shareholder, with registered office at Strada per i Laghetti n°3, Muggia (TS) (hereinafter also “JANOUŠEK” or the “Controller”).

In order to exercise the rights recognised by REGULATION (EU) 2016/679 (hereinafter “GDPR” or “Regulation”) or to ask for any clarification regarding the processing of personal data, you can contact the Controller at the following addresses: telephone (+39 402397911), email [janousek@janousek.com](mailto:janousek@janousek.com)

### Under the GDPR:

- The Data Controller is the natural or legal person who, individually or together with others, determines the purposes and means of the processing of personal data;
- personal data is any information relating to an identified or identifiable natural person (“Data Subject”);
- the Controller is obliged to inform the interested parties in advance about the processing of their personal data.

In the light of the foregoing, JANOUŠEK hereby releases the information required by Articles 13 and 14 of the GDPR to all Data Subjects who may be involved in treatment activities.

### PURPOSE OF PROCESSING

- 1) **Primary purpose.** This expression means the performance of all those activities strictly for the purpose of satisfying the requests of the Data Subject, of supplying the product and/or service chosen, and of concluding contracts, as well as for all related or instrumental activities, functionally linked to the operation of the Company or to the protection of its rights. This includes all the activities necessary to provide the information required to send quotes and to conclude contracts.

We also believe that these activities are connected with and instrumental to, for example: insurance purposes; the verification of internal quality through checks, controls and audits (including third-party audits); the fulfilment of legal, accounting, tax and administrative obligations; and the management of potential litigation with the customer, both in and out of court.

The aforementioned forms of processing are lawful because they are necessary for the execution of a contract or for the execution of pre-contractual measures adopted at the request of the Data Subject, to enable the Company to fulfil a legal obligation to which it is subject or, ultimately, for its legitimate interest.

- 2) **Direct sale of products or similar services.** The Data Controller reserves the right to use for the purposes of the direct sale of its products or services, the email addresses already provided in the context of the sale of a product or a similar service, but the Data Subject has the right to object, at any time and free of charge, to the sending of such communications. The legal basis for this processing is the legitimate interest of the Controller.

### PROVISION OF DATA AND CONSEQUENCES OF A POSSIBLE REFUSAL

Failure to provide the indicated data processed for the primary purposes makes it impossible for the Controller to provide the service requested and to conclude the contract.

The provision of personal data for purpose 2) is, however, free and optional: any failure to provide data or consent will have no consequence, bar from preventing the Company from sending the above communications.

### CATEGORIES OF RECIPIENTS OF PERSONAL DATA

Only persons authorised to process personal data and persons who, processing data on behalf of the Data Controller, have been appointed as Data Processors, may have access to the personal data. Such persons shall be bound to secrecy and confidentiality, including on the basis of specific internal rules.

JANOUSEK is part of the Carbery Group, Synergy Flavours UK division and, in particular, is controlled by Carbery Food Ingredients LTD, based in Ireland. For this reason, some personal data may be shared within the group of companies exclusively for internal administrative and accounting purposes. However, it shall ensure that the data will not be transferred outside the European Economic Area.

The data collected for the purposes listed above may be disclosed to banks, insurance companies (for the management of any insured risks), financial administrations, law firms, arbitrators, debt collection companies (for judicial or extra-judicial protection), shippers and carriers and, if necessary to fulfil the contract concluded, to other companies and / or companies (including partners of the Controller), etc. Such communications of personal data are necessary because they are made on the basis of a legal or contractual obligation or requirement for the conclusion of a contract or, ultimately, for the pursuit of a legitimate interest.

The data will not be disseminated.

### **TRANSFER OF PERSONAL DATA TO THIRD COUNTRIES**

The data processed for the above purposes will not - as a rule - be transferred outside the European Economic Area.

### **DATA RETENTION CRITERIA**

Personal data are processed for the time necessary to achieve the purposes for which they were collected or for any other related legitimate purpose. Therefore, if personal data are processed for different purposes, such data will be kept until the purpose expires with the longest term; however, they will no longer be processed for those purposes for which the retention period has expired.

Personal data which are no longer required or for which there is no longer a legal basis for their storage will be irreversibly anonymised (or permanently deleted).

In particular, the personal data provided for the primary purposes will be kept for a period identified according to criteria of strict necessity because of the different purposes pursued and, in any case, in compliance with current legislation on the protection of personal data, the storage of accounting records and commercial documentation (in accordance with the provisions of Article 2220 of the Italian Civil Code) and according to the logic of protection of the rights of the Controller (limitation periods under the Italian Civil Code).

With regard to the processing of personal data for marketing purposes, it is always possible to object to the receipt of further communications.

In the event that certain information is challenged and/or is necessary for the exercise of a right in court, it may be kept even beyond the limits indicated above.

### **RIGHTS OF THE DATA SUBJECT**

The Controller states that the Data Subject has the right to request:

- access to personal data and information (Article 15 of the GDPR);
- the correction or deletion of the same (Articles 16 and 17 of the GDPR);
- the limitation of the processing of personal data (Article 18 of the GDPR).

Finally, the Data Subject may:

- oppose the processing of personal data under the conditions and within the limits set out in Article 21 of the GDPR;
- exercise the right to data portability (Article 20 GDPR).

With regard to processing operations based on consent (in accordance with Articles 6(1)(a) and 9(2)(a) of the GDPR), it is recalled that the Data Subject has the right to revoke such consent at any time (without prejudice to the lawfulness of processing based on consent given prior to revocation).

Finally, if the Data Subject considers that the processing of his/her personal data is in breach of the Regulation, he/she has the right to lodge a complaint with a supervisory authority (Data Protection Supervisor or any other competent authority) in accordance with Article 77 et seq. of the GDPR.

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