

## 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 intends to issue this statement in order to inform all Data Subjects who may be involved in the processing activities described below of the information required by Article 13 of the GDPR.

### PURPOSE OF PROCESSING

The data may be processed by the Controller for the purposes described below:

1. to fulfil obligations arising from contracts or to fulfil, before the conclusion of the contract, specific requests;
2. to comply with legal obligations, including fiscal and accounting obligations;
3. to manage the dispute with the Supplier or another Third Party, both in the judicial and extra-judicial phase.

### LEGAL BASIS FOR THE PROCESSING

- (a) performance of a contract performance of pre-contractual measures: purpose No. 1;
- (b) fulfilment of a legal obligation to which the Controller is subject: purpose No. 2;
- (c) pursuit of the legitimate interest of the Controller: purpose No. 3.

### PROVISION OF DATA

Failure to provide the data processed for the above purposes makes it impossible for the Controller to provide the information and/or service requested and to conclude the contract with the Data Subject.

### 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.

JANOUŠEK 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, financial administrations, law firms, arbitrators, debt collection companies, customers and/or suppliers of the Controller, shippers and carriers, consultants, and offices of the Public Administration. 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, finally, for the pursuit of a legitimate interest. The data will not be disseminated.

## TRANSFER OF PERSONAL DATA TO THIRD COUNTRIES

As a rule, the data processed for the above purposes will not be transferred to third countries.

## 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 the 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 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 protecting the rights of the Controllers (by way of example: limitation periods).

In the event that some processing operations are subject to dispute and/or some data are necessary for the exercise of a right, the storage may exceed the above limits, extending until the resolution of the dispute.

## RIGHTS OF THE DATA SUBJECT

The Controller informs you that you, as a Data Subject, have 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).

You, therefore, 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), we would like to inform you that you as Data Subject have the right to revoke such consent at any time (without prejudice to the lawfulness of processing based on consent given prior to revocation).

Finally, it is recalled that if you, as Data Subject, consider that the processing of your personal data is in breach of the Regulation, you have 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.