

# Global External Policy for Processing of Personal Data

Sveriges Stärkelseproducenter, förening u.p.a. – SSF

Solam GmbH

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## 1. BACKGROUND AND DESCRIPTION

### 1.1 Background

This Group Policy relates to processing of personal data and is a binding document for Sveriges Stärkelseproducenters Förening (SSF) and its Subsidiaries (“SSF”).

### 1.2 Description

SSF supports and respects international laws and standards on human rights. In SSF we recognise that privacy is important to our customers, clients and employees (hereinafter data subjects) and we are committed to respect and safeguard our data subjects’ privacy.

## 2. SCOPE AND PURPOSE

### 2.1 Scope

This Group Policy applies to SSF and for its Subsidiaries as their own binding policy. In addition, SSF works towards adopting this Policy’s principles and objectives in all other operations in which SSF has ownership interests.

There is a Group Internal policy connected to this Group External Policy which specifies what each subsidiary is obliged to adhere to in order to comply with SSF’s global privacy values.

### 2.2 Purpose

The purpose of this policy is to set high and consistent SSF standards to respect privacy of our customers, clients and employees. The primary objective is to ensure that data subjects feel confident that SSF respects and safeguards their privacy. The second objective is to reduce legal and regulatory risks as well as reputational and brand exposure in this respect. SSF is a global producer and wholesaler of starch, starch based products and flavoured food, mainly B2B and we aim to ensure network integrity and data security to protect privacy throughout our corporate structure.

It is SSF’s objective to live by the letter and spirit of the law. Any obligations and regulations in the laws that may impose stricter rules or additional limits concerning processing of personal data shall remain unaffected by this policy. The type of personal data SSF collects about individuals, when SSF collects it and how SSF processes it, may be further regulated in conjunction with particular services and in the contractual terms for the respective services or otherwise by local legislation.

The latest version of this Group Policy is published on each subsidiaries website.

## 3. PRINCIPLES

The following principles shall apply for the activities under this Group Policy:

- Use best practice in each market to inform data subjects that SSF is collecting their personal data and to explain how this data will be used.
- Process personal data only if the processing relies on a legitimate processing criteria.

- Ensure that the most relevant legal ground for processing is used in each specific case. If consent is used as legal ground for processing of personal data it shall be unambiguous and informed, ensuring transparency and allowing data subjects to withdraw their consent.

When the law allows the user to object to processing, the method should be user friendly.

- Collect only personal data which is relevant and not excessive in relation to the purpose for which it is collected and only collect it for explicit and legitimate purposes.

- Process personal data fairly and lawfully in all operations including when processing such data outside the country where it has been collected. Process personal data only to the extent necessary for performing the processing explicit purpose applicable, while always paying attention to the protection of data subjects privacy.

- Processing of personal data should be limited to what is needed for operational purposes, efficient data subject care and relevant commercial activities, including the processing of anonymous user patterns.

- Not retain personal data longer than is legally required or necessary for operational purposes, efficient data subject care and relevant commercial activities. When personal data is no longer necessary to fulfil the explicit purpose in question, which legitimised its original collection and processing, we shall permanently delete or make anonymous such data.

- Keep personal data accurate and reasonably up-to-date. Provide user friendly measures for data subjects to obtain information and copies about the personal data processed about them and to correct inaccuracies.

- Only provide personal data to authorities to the extent required by law or with the data subject's permission and in accordance with predefined approved processes.

- On a regular basis assess privacy risks associated with the processing of personal data and develop appropriate mitigation strategies to address these risks.

- Require suppliers, in line with the level of protection in this Group Policy, to exercise special care to prevent loss, theft, unauthorised disclosure or inappropriate use of personal data collected by SSF. Expect suppliers to process such data fairly and lawfully in all operations, including when such data is processed outside of the country where it was collected or received.

- Protect, with appropriate technical and organizational measures, personal data as well as messages and related information that are transferred in SSF networks and communications services as well as information concerning the location of a subscription or terminal device.

- Identify and address the impacts of this Group Policy in change, development and procurement activities and embed privacy safeguards into design of our processes and infrastructure from the earliest stage of development.
- Expect every SSF employee to respect duty of confidentiality by law and written agreements regarding non-disclosure.
- Govern and manage privacy within SSF so that legal, contractual and business requirements are fulfilled and ensure that relevant and sufficient organizational resources are in place and secured to ensure proper implementation of this Group Policy and take corrective measures when necessary.

These principles apply to the extent that they do not place SSF in violation of domestic laws and regulations.

#### 4. ROLES AND RESPONSIBILITIES

Each CEO and vice president, reporting to the CEO of SSF is responsible for ensuring that this Group Policy is duly communicated and implemented, and that the employees within his/her area of responsibility are familiar with and follow this Group Policy. All SSF employees are individually responsible for reading, understanding and following this Group Policy. Violations against the Group Policy can lead to disciplinary action, up to and including termination.