

# Milk Sustainability Center Privacy Statement

This statement describes when, how and for what purposes data about any identified or identifiable individual ("**Personal Data**") is processed (e.g. collected, generated, held, used, reproduced, combined modified and disclosed) in relation to the Milk Sustainability Center platform (the "**MSC**"), available via the website https://www.milksustainabilitycenter.com (collectively the "**Service**").

#### **DATA CONTROLLER**

DairyDataWarehouse B.V., with registered address Stationplein 14, 9401 LB, Assen, The Netherlands ("DDW"), is, unless otherwise stated, the data controller responsible for such processing of Personal Data. Note that DDW may not be subject to the same data and privacy laws that apply to You (DDW is subject to the data and privacy laws of the Netherlands and the European Union) and that DDW primarily holds data on computer servers in the European Union (see further below). Also note that DDW may, subject to your approval, transfer personal data to other parties as set out in the "Recipient" section below, and that such parties may be located in countries or territories that do not provide the same level of protection of data and privacy as European Union law does.

# **CATEGORIES OF DATA**

The following categories of Personal Data may be collected or generated by DDW in connection with the Service:

- (a) Public data about You (e.g. company name, registration number and postal address) may be collected and You may be asked to provide data about You and any individual authorised to use the Service on Your behalf (e.g. name, e-mail address, postal address and telephone number).
- **(b)** Personal data may be collected or generated concerning payment of applicable licence and/or subscription fees (if applicable).
- (c) Personal data may be automatically collected or generated concerning the device and software used in connection with the Service (e.g. IP address, device type and operating system) and concerning the use of the Service (e.g. user, access times and, if applicable, licence key).
- (d) Personal data entered into, generated by or available through the Service (as well as raw data upon which such available data is based) may be automatically available to (e.g. if



part of an online service), or automatically or manually (e.g. using functions in the Service) transferred to, DDW. This may include data from any software, service, system or product that is managed or monitored by the Service.

#### **PURPOSES OF PROCESSING**

The Personal Data that is collected or otherwise processed by DDW in connection with the Service may be further processed to administer and operate the Service and related fees (if applicable), to detect and prevent unauthorised use of the Service (e.g. validate that the user has a valid license, if applicable), to monitor and analyse the use of the Service, to optimise the functionality and content of the Service, to further develop the Service, to provide support, to develop customized offerings, to provide notices to You, to provide services to You and, subject to applicable law, to send You information about DDW's services. The Personal Data may also be processed for market research, product and service development, and provision of products and service to other parties (e.g. as de-identified benchmark figures – see information on disclosure of data under "Recipients" below). In de-identified form (names of individuals, legal entities, farms, etc. will be removed or replaced).

# **LEGAL BASIS**

It is normally not required to disclose any Personal Data in connection with the use of Service, except that basic data about You may be needed for the administration or operation of Service (failure to disclose such data may prevent use of the Service). DDW will process the Personal Data only as compatible with the purposes set out above and will keep the Personal Data in a form which permits identification only for as long as necessary for such purposes. The legal basis for processing of the Personal Data is that the processing is necessary for legitimate interests (the purposes specified above) which, based on a balance of interests, has been deemed not to be overridden by the individual's interests or fundamental rights and freedoms. Certain processing of Personal Data may also be necessary for compliance with legal obligations.

# **DATA STORAGE AND TRANSFERS**

DDW primarily holds Personal Data in the European Union, but Personal Data may, for the purposes and with the limitations set out above, be transferred to any location where the You are located. Where – in any other case than when requested or approved by You, when necessary for conclusion, performance or support of a contract that is made in Your interest or when necessary for establishment, exercise or defense of legal claims – data will be transferred by DDW from the European Union, DDW will apply appropriate safeguards to



keep the data protected (e.g. "standard contractual clauses" adopted by the EU Commission). The individual to whom the Personal Data relates may contact DDW to get information about which service providers that are engaged to process the Personal Data, which countries and territories that Personal Data is transferred to and which safeguards that have been implemented.

#### **YOUR RIGHTS**

Subject to restrictions under applicable law, the individual to whom the Personal Data relates has the right to request information about DDW's processing of such Personal Data, to access such Personal Data (in a structured, commonly used and machine-readable format, with the right to forward such data) and to request DDW to correct, complete, update, block or delete any such Personal Data that is inaccurate, incomplete, confusing, outdated or unlawful. Such individual also has the right to object, on legitimate grounds, to processing of data relating to him or her (in particular if entitled to do so under applicable data protection legislation) and to withdraw, with prospective effect only, any consent given by him or her regarding processing of such data. If the individual considers that the processing of Personal Data relating to him or her infringes applicable law, the individual may also lodge a complaint with the relevant supervisory authority.

Requests concerning DDW's processing of Personal Data can be made to [support@milksustainabilitycenter.com]

In relation to DDW, the relevant supervisory authority is the Dutch Data Protection Authority (Autoriteit Persoonsgegevens).

# **RECIPIENTS**

DDW will not make Personal Data available to third parties other than subject to Your approval, but DDW may, for the purposes set out above, use service providers to process data on DDW's behalf (e.g. for data storage), in which case appropriate safeguards will be implemented to keep the data protected.

# **SECURITY**

DDW (or, as applicable, its service providers) has implemented physical, technical and organisational measures to ensure a level of security appropriate to the risks represented by the processing and the nature of the data that is collected or generated by DDW in connection with the Service. Such measures are implemented to: (a) ensure that the data



can be accessed only by authorised personnel; (b) ensure that no personnel is authorised to access the data other than those requiring access to such data; (c) ensure that all such authorised personnel are subject to appropriate obligations to keep the data confidential; and (d) protect the data against unauthorised disclosure and access and accidental or unlawful destruction, loss and alteration.

## **FURTHER INFORMATION**

Requests for further information concerning the processing of data in connection with the Service can be made to [support@milksustainabilitycenter.com]

## **UPDATES OF THIS STATEMENT**

New versions of the Service may be provided in the future. DDW will update this statement to describe how and for what purposes DDW will process Personal Data in relation to such new versions. DDW may also update this statement to describe additional scope or purposes of processing of data in connection with the Service.