

# Data Protection Policy

## Definitions

<b>Ammega</b>	means Ammega Group BV and its subsidiaries
<b>Data Subject</b>	an identified or identifiable living natural person
<b>Personal Data</b>	means any information relating to a Data Subject, including (i) any data that can be used to learn about, record or decide something about an individual; (ii) and data relating to racial or ethnic origin, political opinions, religious or philosophical beliefs, trade union membership, health, sex life/sexual orientation, genetic data or biometric data
<b>Responsible Person</b>	means the General Counsel
<b>Register of Systems</b>	means a register of all systems or contexts in which Personal Data is processed by Ammega

## 1 Data protection principles

- a. Ammega collects and/or processes Personal Data in accordance with its obligations under applicable data protection legislation.
- b. The Responsible Person is accountable for Ammega's ongoing compliance with this policy and the law.
- c. This policy applies to all Personal Data (of employees or business partners) collected or processed by Ammega in any of the countries where Ammega does business.

## 2 Ammega's use of Personal Data

Personal Data is:

- a. processed lawfully, fairly and in a transparent manner;
- b. collected for specified, explicit and legitimate purposes and not further processed in a manner that is incompatible with those purposes;
- c. adequate, relevant and limited to what is necessary in relation to the purposes for which they are processed;
- d. accurate and, where necessary, kept up to date;
- e. kept in a form which permits identification of data subjects for no longer than is necessary for the purposes for which the Personal Data are processed; and
- f. processed in a manner that ensures appropriate security of the

Personal Data, including protection against unauthorised or unlawful processing and against accidental loss, destruction or damage, using appropriate technical or organisational measures.

### **3 Register of Systems**

- a. To ensure that processing of Personal Data is lawful, fair and transparent, Ammega's ICT function maintains a Register of Systems.
- b. The Register of Systems is reviewed at least annually.
- c. Individuals have the right to access their Personal Data and any such requests made to Ammega are dealt with promptly and in accordance with applicable legislation.

### **4 Lawful purposes for processing Personal Data**

- a. All Personal Data processed by Ammega is done on one of the following lawful bases:
  - i. with the Data Subject's consent;
  - ii. in performance of a contract where the Data Subject is a party, or in order to take steps at the request of the Data Subject prior to entering into a contract;
  - iii. in compliance with a legal obligation to which Ammega is subject;
  - iv. for the protection of the vital interests of the Data Subject or of another natural person, where the Data Subject is physically or legally incapable of giving consent;
  - v. in performance of a task carried out in the public interest or in the exercise of official authority; or
  - vi. in the legitimate interests of Ammega.
- b. Ammega records the appropriate lawful bases in the Register of Systems.
- c. Where consent is relied upon as a lawful basis for processing Personal Data, evidence of opt-in consent is kept with the Personal Data and the consent is unambiguous, informed freely given, and for one or more specific purposes.
- d. Where communications are sent to individuals based on their consent, the option for the individual to revoke their consent is clearly available and systems are in place to ensure such revocation is reflected accurately in the Register of Systems.

## 5 Rights of Data Subjects

- a. Ammega recognises that, subject to relevant legislation, Data Subjects have the following rights:
  - i. the right to know what Personal Data Ammega collects, why it does so and for how long it will be stored;
  - ii. the right of access to, and a copy of, their Personal Data collected and/or processed by Ammega;
  - iii. the right to require Ammega to correct inaccuracies in their Personal Data held and/or to complete any incomplete Personal Data;
  - iv. the right to require Ammega to erase their Personal Data, in certain circumstances;
  - v. the right to require Ammega to restrict its processing of their personal data, under certain circumstances;
  - vi. the right to receive (in a structured, commonly used and machine-readable format) a copy of their Personal Data for transmission to another company, or to require Ammega to transmit the data directly to another company;
  - vii. the right to object to the processing of their Personal Data by Ammega under certain circumstances; and
  - viii. the right not to be subject to a decision based solely on automated processing which produces legal effects or otherwise significantly affects the Data Subject.

## 6 Data minimisation

Ammega ensures that Personal Data are adequate, relevant and limited to what is necessary in relation to the purposes for which they are processed.

## 7 Accuracy

- a. Ammega takes reasonable steps to ensure Personal Data is accurate.
- b. Where necessary for the lawful basis on which Personal Data is processed, steps are put in place to ensure that Personal Data is kept up to date.

## 8 Archiving / removal

- a. To ensure that Personal Data is kept for no longer than necessary, Ammega has an archiving policy for each area in which Personal Data is processed and reviews this process annually.
- b. The archiving policy specifies what data should/must be retained, for how long, and why.

## **9 Security**

- a. Ammega ensures that Personal Data is stored securely using software that is kept-up-to-date.
- b. Access to Personal Data is limited to personnel who need access to do their jobs and appropriate security is in place to avoid unauthorised sharing of information.
- c. When Personal Data is deleted this is done safely such that the Personal Data is irrecoverable.
- d. Appropriate back-up and disaster recovery solutions are in place.

## **10 Breach and sanctions**

- a. In the event of a breach of security leading to the accidental or unlawful destruction, loss, alteration, unauthorised disclosure of, or access to, Personal Data, Ammega must assess the risk to people's rights and freedoms and (if appropriate) report the breach within 72 hours of its occurrence to the relevant national data protection regulator. Ammega's regulator is the Dutch Data Protection Authority (Autoriteit Persoonsgegevens) <https://autoriteitpersoonsgegevens.nl/en>
- b. Ammega is aware of the substantial fines that may be levied for violations of data protection laws.

## **11 Ask for guidance**

If you have any doubt about your legal obligations in relation to Personal Data, please contact the Chief Compliance Officer.

## **12 Policy review**

This Data Protection Policy is approved by the Group Executive Committee and will be reviewed regularly to ensure that it is appropriate, adequate and effective.

**October 2022**