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WADDINGTON EUROPE PRIVACY POLICY

Last modification: v1.01 14th May 2018

1. At Waddington Europe, we strive to honor the privacy and security of our users, customers and suppliers, as well as their representatives, in relation to all products, services, applications and websites provided by Waddington Europe and any of its affiliates acting as a Controller under relevant data protection rules and regulations. You can find a list and contact details of such Waddington Europe Controller entities on the following page [Waddington Europe Data Controllers](#).

If you have any questions or comments regarding this policy or data privacy at Waddington Europe, please contact us at hr@waddingtoneurope.com.

PERSONAL DATA

2. When you submit a request or electronically pass information to any Waddington Europe entity (including, but not limited to, contact details), you are sometimes asked to provide certain information, including, but not limited to, your name, title, company, address, phone number, e-mail address and line of business. You may also be providing us with data regarding your device, your client or supplier account, etc. These kinds of data will in many circumstances be considered as **personal data** under applicable data protection legislation.

3. Please consult the table below to see for which purposes we process (use, store, etc.) personal data, as well as the legal grounds for such processing and the relevant retention period.

Purpose	Categories of personal data	Legal grounds
Customer management (provision of services; invoicing; customer support; ...)	Identification data (name, address, telephone, ...) Electronic identification data (e-mail, IP-addresses, cookies, ...) Financial characteristics (bank account number, credit card details, ...) Personal characteristics of data subjects and, in some cases family members (age, gender, civil status, ...)	Performance/conclusion of a contract with you Legitimate interests of Waddington Europe in managing our customer relationships* Legal obligation to process data
Direct consumer sales customer management (provision of services;	Identification data (name, address, telephone, ...)	Performance/conclusion of a contract with you Legitimate interests of Waddington Europe in



<p>invoicing; customer support; ...)</p>	<p>Electronic identification data (e-mail, IP-addresses, cookies, ...) Financial characteristics (bank account number, credit card details, ...) Personal characteristics (age, gender, civil status, ...)</p>	<p>managing our customer relationships* Legal obligation to process data Your consent</p>
<p>Know your customer (anti-fraud; anti-money-laundering; ...)</p>	<p>Identification data (name, address, telephone, ...) Electronic identification data (e-mail, IP-addresses, cookies, ...) Financial characteristics (bank account number, credit card details, ...) Personal characteristics (age, gender, civil status, ...)</p>	<p>Performance/conclusion of a contract with you Legitimate interests of Waddington Europe in managing our customer relationships* Legal obligation to process data</p>
<p>Direct marketing**</p>	<p>Identification data (name, address, telephone, ...) Electronic identification data (e-mail, IP-addresses, cookies, ...)</p>	<p>Legitimate interests of Waddington Europe in promoting and improving our products and services* Your consent</p>
<p>Supplier management (accounting; ...)</p>	<p>Identification data (name, address, telephone, ...) Electronic identification data (e-mail, IP-addresses, cookies, ...) Financial characteristics (bank account number, credit card details, ...) Personal characteristics (age, gender, civil status, ...)</p>	<p>Performance/conclusion of a contract with you Legitimate interests of Waddington Europe in managing our supplier relationships* Legal obligation to process data</p>
<p>Maintaining the security of our people and assets</p>	<p>Identification data (name, address, telephone, ...) Electronic identification data (e-mail, IP-addresses, cookies, ...) Financial characteristics (bank account number, credit card details, ...) Personal characteristics (age, gender, civil status, ...)</p>	<p>Performance/conclusion of a contract with you Legitimate interests of Waddington Europe in protecting our business and employees* Legal obligation to process data</p>
<p>Litigation management</p>	<p>Identification data (name, address, telephone, ...) Electronic identification data (e-mail, IP-addresses, cookies, ...)</p>	<p>Performance/conclusion of a contract with you Legitimate interests of Waddington Europe in protecting our business</p>



	Financial characteristics (bank account number, credit card details, ...) Personal characteristics (age, gender, civil status, ...)	and defending our legal interests* Legal obligation to process data
Product/service improvement & business intelligence	Identification data (name, address, telephone, ...) Electronic identification data (e-mail, IP-addresses, cookies, ...) Financial characteristics (bank account number, credit card details, ...) Personal characteristics (age, gender, civil status, ...)	Legitimate interests of Waddington Europe in promoting and improving our products and services* Your consent

* Based on a balancing test. For more information, see above for our contact details.

** If you wish to object to the use of your personal data for these purposes, see section 9.3 below.

4. In addition, we may, pursuant to valid legal process, such as a search warrant, subpoena, or court order, allow access to any information (including such categories of personal data) provided to Waddington Europe, in order to comply with such process and to protect our rights and property. If warranted, we may also allow access to this information in special emergencies where physical safety is at risk.

Waddington Europe moreover reserves the right to disclose any information obtained from or about you to third parties in connection with a merger, acquisition, bankruptcy or sale of all or substantially all of Waddington Europe's assets.

6. Except as otherwise set forth herein, we do not sell, trade, or rent your personal data with any third parties outside of Waddington Europe.

DATA TRANSFERS

7. These categories of personal data may be transferred to other Waddington Europe entities for such purposes, as well as to any third parties to whom the relevant Waddington Europe entity subcontracts all or part of this processing. This may for instance include e-marketing service providers, hosting providers and any other relevant roles.

8. In the event of transfer of personal data to a country outside of the European Economic Area, Waddington Europe systematically ensures the application of an adequate level of protection of such personal data by approved means (e.g. selecting "Privacy Shield"-certified processors or putting in place standard contractual clauses on the processing of personal data, in accordance with the EU Commission model clauses). You can request more information about such measures (including copies where relevant) by getting in touch with Waddington Europe through the contact details above.

YOUR RIGHTS



9. Subject to applicable law, you may have some or all of the following rights in respect of your personal data. You can exercise these rights by submitting your request (i) to your local customer service team; or (ii) to our Data Privacy Committee at hr@waddingtoneurope.com. You will need to include your personal details as well as some means of verifying your identity (e.g. copy of identity card or driving licence). Please note that Waddington Europe may reject requests that are excessive or a misuse of the relevant right.

9.1. Access right. You may have the right to obtain confirmation of whether Waddington Europe processes personal data in relation to you and, if so, gain access to a copy thereof. For certain kinds of data, you may also have a right to data portability.

9.2. Data accuracy: right of rectification and right to erasure. You may have the possibility to rectify or obtain the erasure of your personal data, provided that the applicable legal requirements are met. The right to erasure is subject to various exceptions, notably as regards personal data whose processing is necessary to support litigation or for compliance with statutory retention requirements.

9.3. Limits to processing: right to restriction, right to object & consent withdrawal. In addition, you may have the right to object to the processing of personal data based on Waddington Europe's legitimate interests (see table above) and to otherwise obtain the restriction of certain forms of processing in specific circumstances. In particular, in relation to the processing of personal data for direct marketing purposes, you may have the right to object at any time thereto. Where any processing is based on consent, you may have the right to withdraw such consent at any time (without this affecting the processing prior to the consent withdrawal).

9.4. Right to lodge a complaint with the supervisory authorities. You may have the right to lodge a complaint with the supervisory authority, in particular the data protection authority that is competent for your place of residence or the lead supervisory authority for Waddington Europe, namely The Information Commissioner's Office of Wycliff House, Water Lane, Wilmslow, Cheshire SK9 6AF, United Kingdom, www.ico.co.uk.

CHILDREN

10. Waddington Europe does not knowingly collect information from children. If Waddington Europe learns that a child has provided it with personal data, it will use reasonable efforts to remove such information from its files.

USER'S ACKNOWLEDGMENT OF THIS POLICY

11. By visiting the Web Site, you acknowledge that you have (had the opportunity to) become familiar with Waddington Europe's privacy policy.

12. We reserve the right, at our sole discretion, to change, modify, add, or remove portions from this privacy policy at any time. We shall notify any such changes in accordance with applicable data protection legislation.

COOKIES & OTHER MEANS OF IDENTIFICATION

13. Our websites use cookies, pixel tags and other forms of identification and local storage (together referred to as "tags/files" hereunder) to distinguish you from other users of our website and of websites of our network. This helps us provide you with a



good experience when you browse our website and websites of our network and also allows us to improve our website and our services.

14. In many cases, these tags/files lead to the use of your device's processing or storage capabilities. Some of these tags/files are set by Waddington Europe itself, others by third parties; some only last as long as your browser session, while others can stay active on your device for a longer period of time.

15. These tags/files can fall into several categories: (i) those that are necessary for functionality or services that you request or for the transmission of communications (functionality tags/files); (ii) those that we use to carry out performance and audience metrics regarding our website (analytics tags/files) and (iii) the rest (tracking across a network of other websites, advertising, etc.) (other tags/files).

16. Internet browsers allow you to change your cookie settings, for instance to block certain kinds of cookies or files. You can therefore block cookies by activating the setting on your browser that allows you to refuse the setting of all or some cookies. However, if you use your browser settings to block all cookies, you may not be able to access all or parts of our website, due to the fact that some may be functionality cookies. For further information about deleting or blocking cookies, please visit: <http://www.allaboutcookies.org/manage-cookies/>.

17. Functionality tags/files do not require your consent. For analytical and other tags/files, however, we request your consent before placing them on your device. You can give your consent by continuing to use our website, or by clicking on the appropriate button on the banner displayed to you.

18. You can find out more information about the cookies that we use on our websites by reading our cookie policies using the links provided on our websites.

19. You can find more information about cookies and similar tags/files at the following addresses:

- <http://www.allaboutcookies.org/>;

- <http://www.youronlinechoices.eu/> (a guide to behavioral advertising and online privacy, produced by the internet advertising industry).