

# GENERAL PRIVACY POLICY DOLE PACKAGED FOODS EUROPE BV

Effective Date: 1.1.2021

Dole Packaged Foods Europe BV and its affiliated companies are aware that your privacy and the security of your Personal Data is an important concern. We, therefore, take the protection of your Personal Data very seriously. This General Privacy Policy, which is applicable only to Personal Data of EU data subjects, explains the types of Personal Data we collect and how we process and protect that Personal Data. We also explain to you the rights you have and how to contact us.

At the end of this General Privacy Policy, you will find definitions of capitalized terms we used throughout this General Privacy Policy.

## **1. Responsible organization for processing your Personal Data**

The entity that is responsible for processing your Personal Data and that is contracting with you is Dole Packaged Foods Europe BV (“**Dole**”, “**we**”, “**us**” or “**our**”). This will be the entity that provides you with this document. For example, for Dole Employees the Dole employer entity, for suppliers and customers the Dole contracting entity.

## **2. Contact details of our data protection department**

The Dole competent data protection department can be contacted as follows:

Email: [privacy.officer@doleintl.com](mailto:privacy.officer@doleintl.com).

Address: Weena 200, Unit 2.A, Rotterdam, Netherlands, 3012NJ

### **3. An overview over how we process your data**

In this General Privacy Policy, your Personal Data refers to data such as your name, address, email address, phone number or any other personal or factual data relating specifically to a certain natural person or identifiable natural person.

The Personal Data we collect from you includes:

- i. Personal data you directly provide us with
- ii. Personal data we collect automatically when you access our websites
- iii. Personal data we collect from other sources such as third party providers.

The below list shall provide you with an overview over what Personal Data we process for what Purposes:

We process your following Personal Data for the following purposes.

In addition, we may collect additional data categories and / or add additional processing purposes based on:

- Consent
- Performance of a contract
- Compliance with legal obligations
- Protection of vital interests of individual
- Legitimate business interest of Dole

#### **3.1. Employees, Trainees, Temporary workers and Applicants**

The legal basis for the following processing is the performance of the employment contract with you or, if you are an applicant, administration of your application. Only in few cases and after prior information, we will process data on the basis of your consent or on the basis of justified interests of Dole.

If you are our Employee, Trainee or Temporary worker, we process the following categories of Personal Data:

- Identification data and personal characteristics (e.g. name, date of birth, age, gender, email address, phone number(s), picture and other contact details)
- Terms of employment, qualifications, job description, background checks
- Financial data (salary, bonus information, performance evaluations, tax information, pensions schemes calculation)
- Connection data (Password, employee ID, IP address)
- Where relevant, unique national identification number (Social security number)
- Personal data processed in the framework of ethics hotline and included in the reported facts, information gathered in the framework of verification of the reported facts, in the report of the verification operations and in the follow-up to the report

We process your Personal Data for the following purposes:

- Management of employment contracts
- Overview of employees' performances and appraisals
- Annual leave and sick leave follow up
- Management of electronic mail
- Training of employees
- Management of corporate events
- Management of employees' pension schemes
- Tax filings
- Audit
- Management of ethics hotline

### **3.2. Customer or Contact Person of Customer**

If you are a customer or a contact person of one of our customers, we process the following categories of Personal Data:

- Name and contact details (identity, email address, phone numbers, addresses)
- Customers financial information banking and invoicing

- Communication and IT use (Password, IP address)

We process your Personal Data for the following purposes:

- Marketing and customer relationship management
- QA and emergency contact details, and
- Compliance and regulatory requirements (customs and tax audit)

The legal basis for this processing is performance of the customer contract and the customer relationship management. Only in few cases and after prior information, we will process data on the basis of your consent or on the basis of justified interests of Dole.

### **3.3. Consumer**

If you are a consumer, we process the following categories of Personal Data:

- Name and contact details (identity, email address, phone numbers, addresses)

We process your Personal Data for the following purposes:

- Consumer complaints, and questions management, and
- Development of quality statistics

The legal basis for this processing is knowledge of consumer expectations and performance of the quality of our services. Only in few cases and after prior information, we will process data on the basis of your consent or on the basis of justified interests of Dole.

### **3.4. Supplier**

If you are a supplier, we process the following categories of Personal Data:

- Name and contact details (identity, email address, phone numbers, addresses),
- Financial information (banking and invoicing), and
- Communication and IT use (Password, IP address)

We process your Personal Data for the following purposes:

- Management of purchases / replenishment

- Traceability of products,
- Quality audits, and
- Customs and tax audits

The legal basis for this processing is performance of the supplier contract with you. Only in few cases and after prior information, we will process data on the basis of your consent or on the basis of justified interests of Dole.

### **3.5. Website users**

You can visit our website without providing us any Personal Data. If you, however, consent to the use of cookies or similar tracking technologies and/or fill in forms, contact us or otherwise provide us with your information, we will process such information for the purpose of providing you the website and the related service.

The legal basis for this processing is providing you the services or your consent.

## **4. Your free decision or your duty to provide Personal Data to us**

### **4.1. Necessary Personal Data**

It may be necessary for you to provide your Personal Data to us to enable us to process your application for an employment or to maintain records for your employment, perform the supplier or customer agreement, perform our services with you as consumer

Please note that should you decline to provide such necessary Personal Data, we may not be able to process your application or maintain you as an Employee, or to perform the supplier or customer agreement we contracted with you, or to provide our services to you as a consumer.

### **4.2 Consent**

In certain instances, we only process your Personal Data if you have provided your prior consent, for example in certain cases where we process your Personal Data as customer or consumer for marketing purposes. Where we process your Personal Data on the basis of your consent, we will ask for your consent in a transparent manner. If your consent is the legal basis for the processing of your Personal Data, you can withdraw your consent at any time. This will not affect the lawfulness of the processing based on your consent before the withdrawal. You can withdraw your consent by sending us an email, in your account or by calling us under the phone number listed below.

## **5. Using EU/EEA service providers and other processors**

We use service providers that process your Personal Data for us. If necessary, we also transfer your Personal Data to third party recipients. Such service providers and recipients are often members of the Dole Group of Companies.

### **5.1. Service Providers that may receive your Personal Data**

We may provide your Personal Data to the following entities acting as data processors for us:

- Our parent company
- Subsidiaries
- Related and associated companies
- Our business partners
- Clients
- Vendors and other relocation companies, and
- Third party service providers

Unless otherwise required by applicable Data Protection Laws and regulations, we will agree with these service providers to protect your Personal Data as so-called “data processors” as required under applicable Data Protection Laws and regulations following a period of 12 months after the publication of this General Privacy Policy.

### **5.2. Recipients of your Personal Data (Third Parties)**

If necessary, we transfer your Personal Data to third party recipients, who may use your Personal Data for their own purposes – usually the same purpose we process your Personal Data.

We shall not disclose your Personal Data to any third party without consent except:

- When lawfully permitted or required under the law or in relation to any order or judgment of a court
- When required for the purpose of prevention of crime, illegal/unlawful activities or fraud or for the apprehension or prosecution of offenders or for an investigation relating to any of these
- When required to protect our rights and defend us and our property

- When required or requested by you, and
- When required to carry out any of the Purposes stated above

### **5.3. Using non-EU/EEA service providers and recipients**

As we operate internationally, your Personal Data may be processed outside the European Union, where data protection and privacy regulations may not offer the same level of protection as in the European Union.

We have taken all reasonable steps to ensure that any of our Dole entities, service providers and third party recipients shall not use your Personal Data for any other reason than the purpose they are contracted by us.

We oblige all service providers and third party recipients located outside the EU/EEA to adequately safeguard your Personal Data as required under EU Data Protection Laws (adequate level of data protection). If and to the extent your Personal Data is transferred to Dole entities outside the EU/EEA, we have guaranteed an adequate level of data protection by way of European Commission approved standard contractual clauses included in our Data Transfer Agreement. With other service providers or third party recipients, we rely on statutory permissions or contractual provisions.

## **6. Deletion of your Personal Data; archiving**

As a general rule, we will delete or restrict the use of your Personal Data, once we do not need it any longer for any of the above purposes for which we have collected or received the Personal Data, unless we are required by law to retain your Personal Data, or unless we need to retain your Personal Data in order to continue providing a service.

We shall not keep your Personal Data longer than is necessary for the fulfillment of the purpose for which it was to be processed unless such retention is necessary for us to discharge any regulatory function, under any law or in relation to any order or judgment of a court or to comply with our internal record retention policy.

We shall take all reasonable steps to ensure that all Personal Data is destroyed or permanently deleted if it is no longer required for the purpose for which it was to be processed.

## **7. Cookies policy**

### **7.1. How we use cookies and similar technologies**

Like most websites, we use cookies and similar technologies including web beacons, embedded scripts and e-tags (together referred to as “cookies”, unless otherwise stated) to provide users an efficient experience in using the Website.

A cookie is a small data file that is placed on your computer or mobile device by your web browser. It is a tool that stores information about website visits, recognizes you and your preferences each time you visit the Website, and ensures website functionality and enables us to provide the service which our customers request.

A cookie file can contain information such as a user ID that the site uses to track the pages you have visited, but the only personal data a cookie can contain is information you supply yourself. A cookie cannot read data off your hard disk or read cookie files created by other sites. Some parts of the Website use cookies to track user traffic patterns. Dole does this in order to determine the usefulness of the Website information to our users and to see how effective our navigational structure is in helping users reach that information. Dole does not correlate this information with data about individual users, nor does it share this information or sell it to any third party. By using our Website you accept our use of these cookies. If your browser settings are set up as ‘Do Not Track’, we will not use cookies and tracking technologies.

Some additional things you should know about our use of cookies:

- you may encounter cookies from our third party service providers, that we have allowed on our Website that assist us with various aspects of our Website operations and services, such as Google Analytics.
- you also may encounter cookies from third parties on certain pages of the websites that we do not control and have not authorized. For example, if you view a web page posted as a link from our Website, there may be a cookie placed by that web page.

We use various types of cookies, including session cookies, persistent cookies, local shared objects, pixels, gifs and other tracking technologies, such as third party tags, session and persistent technologies, first and third-party cookies. Cookies can be persistent by remaining on your computer until you delete them or be based on your browsing session where they delete once you close your browser. First party cookies are used and controlled by us to provide services on the Website.

## **7.2. Purposes of Cookies**

We may use cookies for a variety of purposes, including providing you the Service you have requested, to enhance your online experience, for example, by viewing preferences from a previous use of our Website, for when you later return to the Website. In particular, our use of cookies falls into four categories:

- **Strictly necessary cookies:** these are essential in order to enable you to move around the Website and use its features. Without these cookies, the Services you have asked for cannot be provided. Usually used to maintain an anonymous user session by the server. These cookies will be dropped and used even if you do not consent to the use of cookies.
- **Performance cookies:** these cookies are used to improve how our Website works and to distinguish unique users by assigning a randomly generated number as a client identifier. They collect information about how users use our Website, for instance which pages are visited most often, and if they get error messages from web pages. All information collected by these cookies is aggregated and therefore anonymous. We use these cookies only if you have consented via the cookie banner.
- **Functionality cookies:** these cookies allow us to remember what choices you make (such as your username, language or the region you are in) and provide enhanced, more personal features. The information these cookies collect may be anonymized and they cannot track your browsing activity on other websites. We use these cookies only if you have consented via the cookie banner.
- **Targeting/Advertising Cookies:** These cookies are used to deliver adverts more relevant to you and your interests. They are also used to limit the number of times you see an advert as well as help measure the effectiveness of the advertising campaigns. They remember that you have visited the Website and this information may be shared with other organizations, e.g. advertisers. We use these cookies only if you have consented via the cookie banner.
- **Third party cookies:** our websites allow third parties to download cookies to your device. For example, you will see embedded “share” buttons on some of our web pages. These enable you to easily share content through a number of popular social networks (e.g. Facebook, Twitter). When you click on one of these buttons, a cookie may be set by the service you have chosen to share content through. These third party cookies are not under our control, so we suggest that you check the respective privacy policies for these external services to help you to understand what data these organizations hold about you and what they do with it. For instance, the Facebook Data Use Policy, the Twitter privacy policy and the Pinterest privacy policy give further information about those services. We use these cookies only if you have consented via the cookie banner.

Our use of cookies may change over time, but will generally fall into the above categories. Please visit this page regularly so that you are aware of any changes.

### 7.3. Analytics Services

This Website uses Google Analytics to collect information about how users use the Website. The information generated by the cookie about your use of the Website will be transmitted to and stored by Google on servers in the United States. In case IP-anonymization is activated on this Website, your IP address will be partially used within the European Union or just in the European Economic Area if it is used by other parties. Only in exceptional cases will the full IP address be transferred to a Google server in the United States, and then shortened so it is only partially used there. The IP-anonymization is active on this Website.

Google will use this information on behalf of the operator of this Website for the purpose of analyzing your use of the Website, compiling reports on Website activity for Website operators and providing them other services relating to Website activity and internet usage. You may refuse the use of cookies by selecting the appropriate settings on your browser; please note, however, that if you do this you may not be able to use the full Website. You can also opt-out from being tracked by Google Analytics in the future by downloading and installing 'Google Analytics Opt-out Browser Add-on' for your current web browser: <http://tools.google.com/dlpage/gaoptout?hl=en>

#### 7.4. How to manage the cookies we use

You can find more information under the following link: <http://www.google.com/intl/en/privacypolicy.html>

##### How to manage the cookies we use

You may control and block the cookies used by the Website by modifying the settings in your browser or on your device that allows you to refuse the setting of all or some cookies. However, if you use your browser or device settings to block all cookies you may not be able to access all or parts of our Website.

Most modern browsers allow you to manage cookies saved on your computer:

##### Google Chrome

To amend the cookies settings:

1. Click on the chrome menu.
2. Select **settings**.
3. Click + **Show advanced settings** at the bottom of the page
4. Under the Privacy section click the **Content settings** button

5. In the Cookies section you are able to change the settings, such as allow cookies, remove all cookies, block third party cookies.

Further, more detailed instructions are available here: <http://support.google.com/chrome/bin/answer.py?hl=en-GB&answer=95647>

### Internet explorer 8, 9 and 10

1. Select the Tools menu (ALT-X)
2. Select **Internet Options**
3. Click the **Privacy** tab
4. Move the slider to choose your preferred settings.
5. For more specialised settings click on the **Advanced** button, check the **Override cookie handling** checkbox and modify the settings to suit your requirements.

Further instructions are available here: <http://windows.microsoft.com/en-us/internet-explorer/delete-manage-cookies#ie=ie-10>

### Mozilla Firefox

1. Select **Options**
2. Click the **Privacy** tab

To clear cookies, select the remove individual cookies link. To amend the cookie settings, change the **Firefox will** dropdown in the History section to **Use custom settings for history**.

Further instructions are available here: <http://support.mozilla.org/en-US/kb/enable-and-disable-cookies-website-preferences>

### Safari

1. Choose Safari settings menu
2. Select **Preferences**
3. Click the **Privacy** tab.

4. In the Block cookies section, specify whether the browser should accept or reject cookies from websites.

If you want to see which websites store cookies on your computer, click **Details**.

If you set Safari to block cookies, you may need to temporarily accept cookies to open a page. Repeat the above steps, selecting Never in the “Block cookies” section. When you’re done with the page, block cookies again, and then remove the page’s cookies.

Further details are available here: <http://support.apple.com/kb/ph21411>

## Other browsers

With new devices being created all the time, including tablets and phones it is not possible to list every browser for every device. The best advice is to consult the manufactures website for further instructions regarding cookies.

## 8. Your rights

If you have questions about how we process your Personal Data, complaints or other queries, you have a number of rights under applicable EU Data Protection Laws:

- From time to time, we may ask you to update your Personal Data when there are changes and you have the right to review your Personal Data to ensure that it is complete, accurate and not misleading.
- You may seek access to the personal information we hold about you. You may also exercise request for the rectification of your Personal Data, object to the processing of your Personal Data and exercise your right to data portability. In that respect, all requests related to the processing of your Personal Data should be directed to our competent data protection department by email at [privacy.officer@doleintl.com](mailto:privacy.officer@doleintl.com) or by writing to the address below:

Dole Packaged Foods Europe BV, Weena 200, Unit 2.A, Rotterdam, Netherlands 3012NJ

- Should you consider that the processing of Personal Data relating to you does not comply with the applicable Data Protection Laws, you may have the right to lodge a complaint with the supervisory authority of your habitual residence, place of work or place of the alleged infringement.
- For further information and to address complaints, you may also contact the competent Data Protection Department of Dole as follows:  
Data Protection Department  
Email: [privacy.officer@doleintl.com](mailto:privacy.officer@doleintl.com)  
Address: Weena 200, Unit 2.A, Rotterdam, Netherlands, 3012NJ

Dole Packaged Foods Europe BV

Download the Dole Packaged Foods Europe BV Privacy Policy PDF [here](#).

## 9. Further questions and contact

If at any time you have questions about this General Privacy Policy or Dole practices relating to the processing of your Personal Data, or wish to provide feedback about this policy, please contact us via the contact details indicated in the previous section.

## 10. Definitions

**Applicable Law or Applicable Data Protection Law:** means the local laws and data protection laws applicable to the respective Controller.

**EU Data Protection Law:** means:

- EU data protection laws applicable to the respective Controller or
- in case of a Processor the EU data protection laws applicable the EU Controller or
- in case the Controller is not located within the EU, the EU data protection laws applicable the EU transferee of the Personal Data.

**Controller:** means a data controller as defined by applicable EU Data Protection Law.

**GDPR:** Regulation (EU) N° 2016/679 of the European Parliament and of the Council of 27 April 2016, referred as the “General Data Protection Regulation”.

**Data Transfer Agreement:** means the Agreement concluded between Dole entities to ensure an adequate level of protection when transferring data to Dole entities outside the EU/EEA.

**Employee:** means any member of management, employee or employee-like freelancer of a Dole Entity.

**Dole:** means the Dole Group in general including its entities.

**Individual:** means EU and non-EU data subjects as defined by the GDPR or other applicable EU Data Protection Laws.

**Personal Data:** means personal data as defined in Art. 4 (1) of the GDPR (irrespective of whether such data has any connection to the EU/EEA or not).

**Processing:** means processing of Personal Data as defined in Art. 4 (2) of the GDPR.

**Processor:** means a data processor as defined by applicable EU Data Protection Law.