



PUBLIC



Privacy & Data Protection

# PRIVACY CUSTOMER HANDBOOK



## Information Notice for Customers

### Processing of your personal data

December 2024



**YOUR DATA,  
YOUR RIGHTS!**

# Preamble



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## Quick introduction to data protection and privacy

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There are many definitions of "Data Privacy". The easiest way to think about it is that individuals (customers, employees, anyone!) need to know what personal data organizations collect about them and how they use it. Sure, that's a simplistic way of approaching the subject, but it's useful for setting the scene.

The principle of "Data Privacy" goes far beyond security and the protection of personal data. It all depends on how our organizations use this personal data.

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*Our company must process personal data ethically and lawfully.*

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This does not mean that the processing of personal data is now prohibited by data protection laws, but it does mean that we need to be transparent about what personal data we collect and how it is used.

We know the significant risks of cyberattacks and data breaches that we protect against, but we also put in place measures to protect the "rights and freedoms of individuals".

### About this manual

The data protection landscape is complex and continues to evolve. This presents many challenges for our business by creating uncertainty on several levels as to whether, how and when to process personal data. The implementation of the GDPR (General Data Protection Regulation) and the consideration of new local data protection regulations have a serious impact on our organization's ability to update and align its practices with ever-changing regulatory requirements.

We have defined a data protection policy and implemented data protection management software to try to simplify the application of regulatory requirements and help us improve our data protection compliance program.

These measures are put in place to ensure that we treat your data – as a customer – ethically and in compliance with regulatory requirements and our corporate rules.

This manual contains useful information and resources to inform you about the processing of your data in accordance with data protection best practices and how to exercise your rights. Your first right is the right to information. We want to act transparently through the communication of this handbook on data protection and privacy to customers.



## Why is data protection important?

Companies that do not protect personal data and comply with data protection regulations do not only risk financial penalties. They are also exposed to operational inefficiencies, regulatory intervention, and most importantly, the permanent loss of customer and employee trust.

### Regulatory

Data protection regulators can impose mandatory audits, request access to documentation and evidence, or even require an organization to stop processing personal data.

### Reputational

Failure to comply with the law could damage brand image and lead to a loss of trust on the part of customers and employees.



### Financial & Criminal

Fines and, in some countries, potential prison sentences, could be applied depending on the violation. We could also incur revenue losses and high litigation and remediation costs.

### Operational

Most data protection and privacy laws give people more rights over their data, such as the right to access their data or the right to delete it. These rights can represent a significant operational burden if they are not implemented effectively.

<p><b>Data controller</b>                  Roquette Frères                  RCS Arras 357.200.054                  Registered office: 1 rue de la Haute Loge                  62136 LESTREM France</p>	<p><b>Joint Data Controllers</b>                  The subsidiaries of the Roquette Group.</p>
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For more information: [Roquette in the world - List of locations](#)

# Processing of your personal data

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## Data collected

The data we may collect about you is categorized:

- *Identity data*

<b>Identification data</b>	Title, surname, first names...
<b>Contact data</b>	Business telephone number, business address (including billing location), business email addresses, etc.

- *Employment status data*

<b>Employment status data</b>	Profession, economic category, activity, internal processing code allowing the identification of the customer, accounting identification code...
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- *Transaction data*

<b>Payment method data</b>	Data relating to the bank card (number, expiry date, CVV), bank transfer (RIB) or cheque, CVV of the bank card if applicable, etc.
<b>Transaction data</b>	Transaction number, details of the purchase, subscription, good or service subscribed...

- *Data relating to the monitoring of the commercial relationship*

<b>Order data</b>	Requests for documentation, requests for samples, product purchased, services for which the order and invoice are issued, quantity, amount, periodicity, date and amount of the order and invoice, invoice due date, etc.
<b>Delivery data</b>	Delivery conditions and address, history of purchases and services, return of products, origin of sale (seller, representative, partner, affiliate) ...
<b>Service data</b>	Orders, invoices, correspondence with the customer and after-sales service, customer satisfaction surveys, person(s) in charge of customer relations...

- *Information Request Data*



<b>Data relating to the person making the request</b>	Location, interest, subject of the request, content of the request.
<b>Investigation data</b>	As part of the use of digital tools, controls and investigations can be carried out to supervise and secure the Roquette Group's information system.

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## Why does the company process your data?

The processing of your personal data serves the following purposes:

- ***Contract and loyalty program management***
  - Management of orders, delivery, performance of the service or supply of the good.
  - Sending emails to manage contractual and pre-contractual relationships, to send and receive communications, include data in contact calendars, control the message, its content and attachments for security, and archive communications. \*
- ***Bookkeeping***
  - Accounting, tax obligations, etc.
- ***Customer relationship monitoring***
  - Satisfaction surveys, complaint management, after-sales service.
  - Contact form from the roquette.com website. \*
  - Creating an account and using platforms (e.g. Roquette Beauty, Food & Nutrition - Innovation Hub, etc.). \*
  - Maintenance of the register of suppliers. \*
- ***Client selection/studies/surveys***
  - Sales statistics.
- ***Commercial prospecting actions***
  - Prospecting by e-mail, based on the preferences selected by the customer in the reference center. \*

\*The detailed privacy notices are available on the Roquette website at the following address: <https://www.roquette.com/data-protection/privacy-notices>. It is possible to select the appropriate jurisdiction and language.

## On what legal basis?

The data protection law in force (in particular the GDPR) authorizes the processing of your personal data, provided that:

- This processing is necessary to comply with our legal obligations,
- This processing is necessary for the performance of commercial contracts,
- This processing is necessary for our legitimate interest,
- This processing is carried out with your consent.

For detailed information on the different purposes of processing, please consult the information notice on the website on the page [Information notice of the website | Roquette](#).

## Who can access your data?

Within our company:

- Authorized Roquette services,
- The various subsidiaries of the Roquette group,
- Under certain conditions, IT administrators and audit and investigation teams.

External recipients:

- Roquette's auditors, insurance companies and various government authorities and agencies,
- The various service providers to whom we may outsource the management of certain activities (such as IT service providers, marketing service companies, consultants),
- Certain selected third parties, for example to facilitate the management of deliveries,
- The entities responsible for auditing and our financial control,
- Where applicable, entities authorized to audit our company as part of legal obligations or certifications.

## Security measures

The technical and organizational measures implemented by the controller must ensure an appropriate level of security, taking into account the nature, scope, context and purpose of the processing, as well as the risks to the rights and freedoms of natural persons.

### Types of measures implemented:

- *Measures for pseudonymization and encryption of personal data, where applicable.*
- *Measures to ensure the confidentiality, integrity, availability, and resiliency of processing systems and services when needed.*
- *Measures to ensure the ability to restore the availability of and access to personal data in a timely manner in the event of a physical or technical incident.*
- *The process of regularly testing, evaluating and assessing the effectiveness of technical and organizational measures to ensure the security of processing.*
- *Measures for identifying and authorizing users.*
- *Data protection measures during transmission.*
- *Data protection measures during storage.*
- *Measures to ensure the physical security of the places where personal data is processed.*
- *Measures to ensure the recording of events.*
- *Measures to ensure system configuration, including default configuration.*
- *Measures for the internal governance and management of information technology and information security.*
- *Process and product certification/assurance measures.*
- *Measures to ensure data minimization.*
- *Measures to ensure data quality.*
- *Measures to limit data retention.*

The Roquette Group has a CyberVadis certification. As a customer, you can ask us for access to the report. To do this, contact [dpo@roquette.com](mailto:dpo@roquette.com).

## Location of your data

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Your data is kept and stored on:

- Roquette's internal servers, located in Lestrem, France, in the European Union,
- Cloud service servers located in the European Union,
- Servers of other services for which you have user accounts.

As part of the processing activities, your data may be transferred outside the European Union. The transfer of your data in this context is secured by means of the following mechanisms:

- Either this data is transferred to a country that has been deemed to offer an adequate level of protection by a decision of the European Commission;
- Either we enter a specific contract with our processors governing the transfer of your data outside the European Union, based on the standard contractual clauses between a controller and a processor approved by the European Commission;
- Through the establishment and signing of an Intragroup Data Transfer Agreement between the legal entities of the Roquette Group as importers and exporters of data, based on the standard contractual clauses between data controllers approved by the European Commission.

## How long we keep your data

### ***Data relating to the performance of contracts:***

- The data is kept for the duration of the contractual relationship.
- After the contract has been executed, the data is stored in interim archiving, for compliance with legal obligations or in the event of a dispute and within the limit of the applicable limitation period.

### ***Data used for commercial prospecting purposes:***

- The data is kept for the duration of the business relationship, then for a period of 3 years from the end of the business relationship.
- Data relating to a non-customer prospect is kept for a period of three years from the date of collection by the data controller or the last contact from the prospect.
- At the end of these 3 years, Roquette may contact you again to find out if you wish to continue to receive commercial solicitations. In the absence of a positive and explicit response from the person, the data must be deleted or archived for a period of time in accordance with the provisions in force.

### ***Data related to the creation of an online account by customers:***

- The data is kept until the account is deleted by the user.
- When you exercise your rights, the data collected in this context may be kept until Roquette responds to your request.
- Data collected on the basis of your consent will be kept until you withdraw your consent.

# Your rights over Your Data

## What are your rights?

### The right to information

To be fair and lawful, the collection of your personal data must be accompanied by clear and precise information on:

- the identity of the controller;
- the purpose of the processing;
- the recipients of the data;
- your rights (right of access, rectification, deletion or opposition);
- any data transfers to countries outside the EU.

**The information is prior to the collection of the data.**

The medium of this information varies according to the characteristics of the processing (e.g. information panel for video surveillance, information mention on a form or application, etc.).

### Rights of access and rectification

Anyone may:

- access all information concerning them (Article 15 of the GDPR);
- to know the origin of the information concerning him/her;
- access information on which the controller has relied to make a decision about them (e.g., what would have been used to opt out of a promotion to you);
- obtain a copy of it;
- demand that their data be rectified, supplemented, updated (Article 16 of the GDPR) or deleted (Article 17 of the GDPR), as the case may be).

### The right to object

Every person has the right to object, **on legitimate grounds**, to the processing of their data, unless it meets a legal obligation.

If your data is processed on the basis of legitimate interests, you can object to its processing (Article 21 of the GDPR). To do this, you must let us know the reasons for your objection in view of your personal situation. For example, these may be interests whose secrecy must be protected.

In the event of an objection, we must refrain from any further processing of your data, unless there are compelling legitimate grounds for such processing which override your interests, rights and freedoms, or if the processing is necessary for the establishment, exercise or defence of legal claims.

## The right to restriction of data processing

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You have the right to demand the restriction of the processing of your personal data (Article 18 of the GDPR) in the following cases:

- Where you have disputed the accuracy of your personal data, you can request that we do not use your data during the entire accuracy verification phase.
- In the event of unlawful processing of data, rather than the deletion of your data, you can demand the restriction of its use.
- If you need your personal data for the establishment, exercise or defence of legal claims and we no longer need the data, you can demand that we restrict the processing solely for the purpose of exercising the legal claims.
- If you have objected to data processing and it has not yet been established whether our interests in the processing outweigh yours, you can request that your data not be used for any other purpose during the duration of the review.

## The prohibition of automated decisions

Decisions we make that have legal consequences for you or that significantly affect you must not be based solely on automated processing of your personal data (Article 22 GDPR).

This prohibition does not apply if the automated decision is:

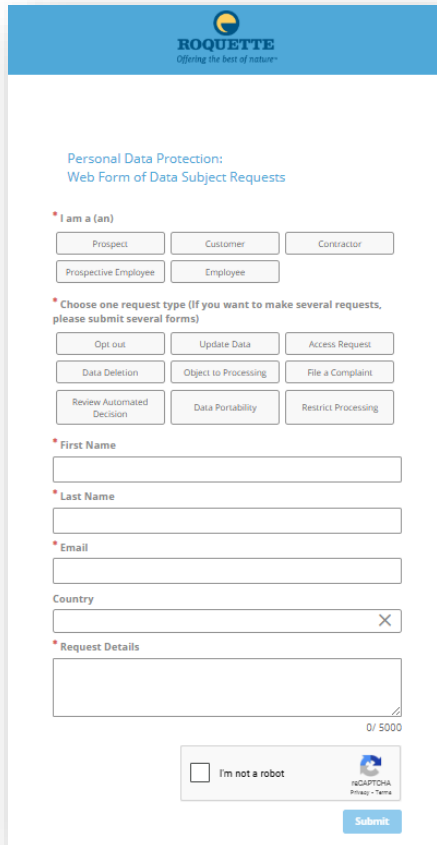
- necessary for the conclusion or performance of a contract with you;
- permitted by law, subject to appropriate measures to ensure that your rights are protected; legitimate interests and freedoms, or
- made with your express consent.

To find out more: [Rights to control your personal data | CNIL](#)

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## How to exercise your rights over your data?

For any request, please fill out this [form to exercise your rights](#).



The screenshot shows a web form titled "Personal Data Protection: Web Form of Data Subject Requests" from Roquette. The form includes a header with the Roquette logo and tagline "Offering the best of nature". Below the title, there are sections for identifying the user, selecting a request type, and providing contact information. The "I am a (an)" section has buttons for Prospect, Customer, Contractor, Prospective Employee, and Employee. The "Choose one request type" section has buttons for Opt out, Update Data, Access Request, Data Deletion, Object to Processing, File a Complaint, Review Automated Decision, Data Portability, and Restrict Processing. The form also includes fields for First Name, Last Name, Email, and Country, and a large text area for Request Details. At the bottom, there is a CAPTCHA checkbox labeled "I'm not a robot" and a "Submit" button.

It is also available on:

Roquette.com > Data Protection (footer)

<https://www.roquette.com/data-protection>

<https://www.roquette.com/data-protection/privacy-rights>

Contact person for questions or requests about the protection of your data

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**Jennifer GODIN**

**Data Protection Officer**



Email : [dpo@roquette.com](mailto:dpo@roquette.com) or [jennifer.godin@roquette.com](mailto:jennifer.godin@roquette.com)

## Defending your rights

In the event of a complaint, you can contact the competent supervisory authority at any time. For Roquette Frères, the competent supervisory authority is the CNIL. You also have the right to take legal action (Article 78 GDPR) against a supervisory authority. You can also take legal action (Article 79 GDPR) against our company.

