### **Privacy Policy Poultry Data Services BV**

One of the core values at Poultry Data Services BV (PDS) is respect for the individual. This is the basic principle and you, as a customer entering into an Agreement with PDS or negotiating with PDS, or dealing with us as a relation, a visitor to our websites, a visitor to events organized by PDS, or as a trusted business partner/supplier providing us with services, can be confident that your personal data is protected.

We strive to treat and protect your personal data with the same respect and integrity as we would with our own data. Sometimes we use trusted business partners to help us deliver our services; in those cases, we share your data with these partners, but will ensure that they treat your data with the same respect and integrity.

With this privacy policy, we want to inform you what personal data we may process, why we do so, and how we ensure that your rights and your privacy are safeguarded. If you have any questions or concerns about this, you can always reach us by email at <a href="mailto:privacy@poultrydataservices.com">privacy@poultrydataservices.com</a> or you can contact your PDS representative.

### For whom is this Privacy Policy intended?

This Privacy Policy applies to all customers, who enters into an Agreement with PDS and use our software and apps or is negotiating with PDS, or who deal with us as a relation, visitor of our websites, visitor of events organized by PDS, trusted business partner/supplier providing services to us. This Privacy Policy also applies to former relations, as long as we still have data from you.

### Who is responsible for processing your data?

When the performance of the PDS services is accompanied by the processing of personal data that are included in the Customer data, PDS is considered to be the processor or sub processor (as defined in the General Data Protection Regulation (2016/679/EU) on behalf of the Customer in respect of these personal data.

# What bases do we use for processing?

In order to process personal data, we must be able to invoke one of the legal bases provided for this purpose by law. We invoke the following legal grounds:

- Necessary for execution of the Agreement such as, for example, for the access to PDS Website, to use software and applications.
- Execution of a legal obligation such as, for example, the sharing of data with the tax authorities.
- Legitimate interest such as, for example, improving the quality of our products and services, preventing fraud, marketing.
- Consent such as for example, to be allowed to send you personalized offers based on the data that PDS has from you.

Note: you have the right to withdraw your consent at any time.

## What personal data do we process?

Account data: we have your contact details, information about PDS services you used.

<u>Financial Data</u>: we have contact data to charge you for services used.

<u>Usage data</u>: when you use our online services, such as the Meggsius platform, this use creates data in our network such as location data, production data, etc.

<u>Audiovisual data</u>: when you visit our events or use our websites, we in some cases store your (personal) data in audiovisual form, such as surveillance images or recordings of telephone conversations with our customer service and foreign service.

<u>Note:</u> We do not record special personal data relating to your health, criminal matters, ethnicity, religious or political beliefs.

## Overview of main processing operations

Below you will find a general overview of the most important data processing by PDS

- (a) To establish a relationship with you and to provide services. If you are a customer or if you want to get access to PDS services, we need personal data, for example for registration on our website. We use your data to conclude and implement agreements with you in this respect.
- (b) Invoicing. We use personal data to receive payment from you as a customer, we prepare invoices based on your data.
- (c) Marketing. We use your data to communicate with you by email, SMS, post and telemarketing about our (new) services that you may be interested in.
- (d) To comply with legal obligations. Based on certain (international) laws and regulations sometimes require us to disclose information about you to a government agency or to a regulator.
- (e) Archival purposes. We may still retain the data for archival purposes. That is, they will only continue to be used in legal proceedings or for historical, statistical or scientific purposes.
- (f) Website. We collect data (cookies) when you visit our website and use certain functions on it. Data collected may include GEO location data.
- (g) Meggsius software system. Meggsius software products help chicken farmers and breeders manage and handle eggs and egg streams.

Some modules include:

Meggsius Connect: For digital dashboard of your Vencomatic products

- Meggsius Count & Control for counting eggs.
- Meggsius Detect for signaling leaking eggs.
- Meggsius Select for automatic egg inspection and grading.

Meggsius software modules can use GEO location data for better data analysis of measurements.

### Does PDS share my data with third parties and why?

To provide the best services, we use our international organization and a worldwide network of trusted partners. Therefore, it happens that we store your data in whole or in part with trusted business partners who assist us. Sometimes in order to comply with (local) laws and regulations, we may transfer data to the relevant authorities.

These include:

a) Government agencies.

We may transfer data to the authorities, for example to counter terrorism or prevent money laundering. In certain cases, we are required by law to share your data with external parties, including:

- Government agencies, regulatory authorities and regulators, such as the tax authorities.
- Judicial authorities such as the police, prosecutors and courts.
- Lawyers, for example in case of bankruptcy or for the purpose of collecting our invoices and company auditors.
- (b) Marketing.

We work closely with Orbem GmbH. Orbem GmbH has products and services that are revolutionary in our market and we therefore provide your e-mail address to Orbem GmbH. So that you can stay informed about these developments.

(c) Service providers working for PDS.

Sometimes we engage other companies to help us provide our services. These companies sometimes need access to your data in order to perform the work on our behalf, but are not allowed to disclose this data or use it for other purposes.

- Buckaroo and Twikey for handling of online payments;
- Making and processing payments;
- Debt collection;

- Payment services;
- ICT management and hosting of web environments;
- ICT security scan of mail addresses of business partners with whom we regularly do business. We do this for the sole purpose of detecting irregularities in mail traffic and thus preventing fraud.
- The design and maintenance of internet tools and web applications;
- Marketing activities, events or communication with relations;
- Preparation of reports and statistics;
- Placement of advertisements in apps, on websites and on social media;

In those cases, where we share your data within third parties, we ensure that they only have access to (personal) data necessary for their specific work and that they treat your data with the same respect and integrity as we do. We also conclude so-called processor agreements for this purpose, intended in particular to protect your interests.

When we share your personal data internally or with third parties in other countries, we always ensure appropriate safeguards to protect this data.

Note: We will never sell your data to third parties.

### Where will my data be processed?

From time to time we may choose to process all or part of your data, both inside and outside the European Union. In doing so, we always comply with existing regulations and ensure that your data is handled in a secure manner. When your data is transferred outside the EU, this is done using appropriate security provisions and regulations. PDS will adopt appropriate technical and organizational measures against the unauthorized or unlawful processing of data that the Customer has entered through certain PDS Services and against incidental loss, destruction or damage.

#### How long will my data be kept?

We keep personal data for as long as it is necessary for the purpose for which we collected and for which they are processed.

After that, they are in principle deleted as soon as possible, unless there is a legal obligation to keep certain data longer.

# How is my data protected?

We value the protection of your personal data and we will implement all appropriate technical and organizational security measures to adequately protect the personal data, which we process, from manipulation, loss, destruction or unauthorized access.

Depending on the development of available security products and services, we continuously improve our security measures.

## What are my rights?

Right of access

You can request a free extract showing which personal data we process in relation to you.

This extract will be sent to the address registered in our systems.

You can also choose to pick it up - after identification - at a visiting address of PDS.

Right of rectification

You have the right to update (or have updated) your data.

Right of deletion

In the following cases, you may request that your personal data be deleted immediately:

- when the data is no longer needed for the purposes for which it was collected for

- when the processing is based solely on your consent and you withdraw your consent, for example, when you terminate your subscription;
- when the law requires the data to be deleted;
- where unlawful processing has taken place;
- if you have legitimately objected to the processing of your data.

#### Right of objection

You have the right to object at any time to the processing of your personal data for direct marketing. This is an absolute right, so once you object, we will stop further use of your data for direct marketing.

You also have the right to object to the processing of your data for a legitimate interest. If you object, you must specify in detail what you are objecting to and why.

We must then demonstrate convincing legitimate reasons for processing that override the interests, rights and freedoms of you, or show that we are processing the data for establishing, asserting or refuting legal claims.

### Right to restriction of processing

You have the right to request a temporary restriction on the processing of your data. This can be done in the following cases:

- if you believe that your data is incorrect and you have therefore requested us to correct these data. While we are validating your data, you can ask us to restrict the processing of your data;
- when the data is processed unlawfully and you do not want your data to be deleted, but instead you request whether the use of your data can be restricted;
- when you need your data to establish, assert or refute legal claims, even if we no longer need to process your data;
- when you have objected to the processing.

## Right of data portability

You have the right to request data, which you have provided to us yourself or which we have obtained from you automatically (e.g. GEO location data), to be used elsewhere. This right only applies if our processing of your data is based on the legal ground that you have given us permission to process it or if you have entered into a contract with us.

We will comply with the above requests unless we have a compelling legitimate interest in not deleting the data that outweighs your privacy interest.

Once we have deleted the data, for technical reasons we may not be able to delete all copies of the data immediately from our systems and backup systems.

We may refuse to comply with the foregoing requests if they are unreasonably frequent, require unreasonable technical effort, or have unreasonable technical impact on our systems or compromise the privacy of others.

You may make the aforementioned requests or raise the aforementioned objection by sending a letter accompanied by your name, address, telephone number and a copy of a valid identification document to our mailing address: <a href="mailto:privacy@poultrydataservices.com">privacy@poultrydataservices.com</a>.

Remember to make your identification number illegible and cover the passport photo on your copy of the identification document before sending it. You will receive a reply within 4 weeks.

## Are there consequences if I do not provide my personal data?

Failure to provide the personal data, which we process on the basis of a contractual and/or legal obligation, may result in us not being able to provide our services and products, or not providing them in full.

#### How do I contact PDS?

If you think that your data are being processed in violation of current regulations, please report this as soon as possible. You can always contact us or make an appointment with your PDS representative.

We can be reached as follows:

E-mail: privacy@poultrydataservices.com.

Phone: +31 497 517 380

Postal address: Venco Campus Poultry Data Services B.V. Meerheide 200 5521 DW Eersel Nederland

### Complaints

Of course we are happy to help you if you have complaints about the processing of your data. If you suspect that PDS does not comply with the legislation, please inform us by return. Should you nevertheless have a complaint about our use of your data, you also have the right, under privacy legislation, to file a complaint with the data protection authority in your country.

## Changes

This Privacy Policy may be amended to reflect changed laws and regulations and/or the way we process personal data. The most recent version can be found on our website.