

# Policy

## Data Privacy

The deugro-group is firmly committed to working with the highest standards of business ethics, including international compliance with data protection laws. We view it as our duty, as a trusted international corporation, to comply with the various legal regulations around the world that govern the collection and processing of personal data, in order to protect the privacy and personal data of everyone we do business with, including our clients, suppliers, employees and contractors.

Our Data Protection Policies and Procedures apply to the deugro-group entities worldwide and reflect current global principles and standards on handling personal information of individuals and ensuring adequate levels of protection, abiding by the European General Data Protection Regulation and where applicable, by other national data protection laws.

The main principles of data protection on which our Policies and Procedures are based include:

### 1. Lawfulness, Fairness and Transparency

deugro companies shall only process personal data of individuals lawfully, fairly and for specified, explicit and legitimate business purposes and with an appropriate justification (legal basis) under applicable data protection laws. This justification can be consent of the individual, the performance of an agreement or taking steps prior to entering into an agreement, a legal obligation, or a legitimate interest of our company that is not outweighed by the interests or fundamental rights and freedoms of the individual. Where our company is required by applicable law or by internal policies to request and obtain the consent of the individual prior to the processing of certain personal data then company shall seek such consent and honour it. Company shall keep a record of consents that it obtains and put in place effective means for individuals to withdraw their consent.

### 2. Purpose Limitation

deugro companies shall not further process the personal data for subsequent incompatible purposes, unless permitted or required by applicable data protection laws or with the consent of the individual.

### 3. Data Minimization

deugro companies shall limit their processing of personal data to the minimum amount of information necessary to pursue the established purpose or purposes. Where possible, the company shall rely on information that does not identify individuals.

deugro companies shall minimize the extent of their processing, access to and retention of personal data to what is necessary for the established purpose or purposes. Access shall be limited to a need-to-know basis. Save exceptions, Personal Data shall not be made accessible to an indefinite number of individuals.

### 4. Accuracy, Integrity and Confidentiality of personal data

deugro companies shall at all times maintain the integrity of the personal data they process and take reasonable steps to keep personal data accurate, complete, up-to-date and reliable for its intended use. Our companies shall implement security measures to protect personal data, in particular in case of transmissions of personal data over a network or the storage of personal data on portable devices or media. These security measures shall take into account the risks represented by the processing, the nature of personal data concerned, the state of the art and the cost of the implementation of the security measures.

deugro companies, shall only disclose personal data to third parties, such as law enforcement authorities and court, business partners, suppliers or clients where specifically authorized to do so by applicable laws. When relying on processors, we shall select processors carefully and subject them to contractual controls in order to protect the confidentiality and security of the personal data concerned and meet the requirements of applicable data protection laws.

#### 5. Storage Limitation – retention of personal data

deugro companies shall not retain personal data for longer than necessary. Personal data shall be destroyed or anonymized in compliance with applicable company policies and record retention schedules. Our company policies and record retention schedules take into account the company's business needs, its legal obligations, and scientific, statistical or historical research considerations.

When deugro-group companies process personal data in ways that may present a high risk to the rights and freedoms of individuals, we shall perform privacy impact assessments. Such high-risk processing operations include any large-scale processing of sensitive or special categories of personal data, as defined by applicable laws, or other processing operations set out in applicable data protection laws. In case the privacy impact assessments reveal high risks to the rights and freedoms of individuals despite company's mitigating measures, we may consult with the competent supervisory authority.

As part of our risk-based approach, we integrate data protection concerns into every aspect of our processing activities, guided by the "data protection by design and by default" principles. When acquiring or developing new IT systems, services, products and processes that involve processing of personal data; when developing organizational policies, processes, business practices and/or strategies that have privacy implications; embarking on data sharing initiatives or using personal data for new purposes, we consider privacy and data protection issues from the conception stage by integrating safeguards into our processing to protect individuals' rights. Additionally, we systematically strive to put in place appropriate security measures, like encryption of data, pseudonymization of data when possible, minimizing the processing of personal data, ensuring transparency, and creating and improving our security features.

All deugro-group personnel is responsible for complying with the Data Protection Policies and Procedures when they process personal data of individuals in connection with their normal work activities. Senior management of each deugro-group company is responsible for enforcing compliance with the adopted Data Protection Policies and Procedures, including the maintenance of an appropriate governance structure and the allocation of resources necessary to ensure compliance and enforcement.

The data protection risks, including the associated reputational risks, shall be assessed by Executive Management at least once a year and evaluated with regard to possible effects on business processes. The results of the risk assessment shall be documented and, if significant to the group, included in a central risk management process.

If you have any questions or concerns regarding privacy matters, how we might use your personal data or would like to exercise any of your rights under the data protection laws, please contact us at: [dpo@deugro-group.com](mailto:dpo@deugro-group.com)

This Policy first took effect in May 2018 and is reviewed annually.

Thomas C. Press  
Chairman and Co-CEO

Pfaffikon SZ, November 2023