

## WILMAR GROUP EXTERNAL PRIVACY POLICY

This is the external privacy policy of Wilmar International Limited and its subsidiaries (as defined in the Companies Act, Chapter 50 of Singapore), to the exclusion of Wilmar Europe Holdings B.V. and its subsidiaries and Yihai Kerry Arawana Holdings Co., Ltd and its subsidiaries.

Each Wilmar Group Entity (as defined hereinafter) which holds or processes your personal data shall herein be referred as the “**Data Controller**”.

Our personal data protection officer can be contacted at [pdpo@wilmar.com.sg](mailto:pdpo@wilmar.com.sg) and/or at Wilmar International Limited, 56 Neil Road, Singapore 088830 (Attention: Personal Data Protection Officer).

Our EU Representative is Wilmar Europe Holdings B.V.

### 1. About this Policy

#### Introduction

- 1.1 The Wilmar Group (as defined hereinafter) is committed to safeguarding your personal data.
- 1.2 We value your right to privacy and strive to protect your personal data in accordance with applicable data protection legislation and, more specifically, the GDPR (as defined hereinafter).
- 1.3 In this Privacy Policy (“**Policy**”), we set forth how we collect your personal data, how and for what purposes we may use your personal data and to whom your personal data may be disclosed by us. Further, this Policy includes important information regarding your rights with respect to the processing of your personal data. Therefore, we encourage you to read this Policy very carefully.
- 1.4 We do not ask for your consent to the processing of your personal data by means of this Policy. As we will further clarify in this Policy, we have other legal grounds to process your personal data. Nonetheless, in certain circumstances, we may require your consent for specific processing activities envisaged by us. Even if we have your consent, you may choose to withdraw it at any time.

#### Definition

- 1.5 In this Policy, the following terms shall have the meanings set out below and cognate terms shall be constructed accordingly:

“**Applicable Data Protection Law**” means the legislation protecting the fundamental rights and freedoms of individuals and, in particular, their right to privacy with respect to the processing of personal data, including the GDPR and the PDPA (as defined hereinafter);

“**Data Subject**” means a living individual who can be identified on the basis of his or her personal data;

“**GDPR**” means the Regulation (EU) 2016/679 of 27 April 2016 on the protection of natural persons with regard to the Processing of Personal Data and on the free movement of such data, and repealing Directive 95/46/EC (General Data Protection Regulation);

“**PDPA**” means the Personal Data Protection Act 2012 (No 12 of 2012);

**“Websites”** means collectively (a) Wilmar International Limited’s official website at [www.wilmar-international.com](http://www.wilmar-international.com); (b) websites of any Wilmar Group Entity which the official website redirects; and (c) other websites belonging to any Wilmar Group Entity. **“Website”** shall mean any of the aforementioned websites; and

**“Wilmar Group”** means Wilmar International Limited and each of its subsidiaries (to the exclusion of Wilmar Europe Holdings B.V.), and **“Wilmar Group Entity”** means any one of them.

1.6 When we use “we”, “us” or “our” in this Policy, we mean the Wilmar Group.

1.7 This Policy applies to your personal data that we collect, use and otherwise process regarding your relationship with us as a job applicant, business contact or anyone who has an interest (for whatsoever reason) in the Wilmar Group.

1.8 A reference to “Clause” or “Schedule” refers to a clause or schedule in this Policy.

#### Policy update

1.9 This Policy applies in conjunction with any other policies, notices, contractual clauses and consent clauses that apply in relation to our collection, use and disclosure of your personal data. The latest version is available at <http://www.wilmar-international.com/contact-us/>. This Policy was last updated on 12 October 2020.

1.10 We may revise this Policy from time to time without prior notice. If you are a job applicant, your continued participation in our recruitment process constitutes your acknowledgment and acceptance of such changes (if any). Your continual usage of our Websites constitutes your acknowledgement and acceptance of such changes (if any).

1.11 We encourage you to regularly review this Policy. You may also ask us to send you a copy of the most recent version of this Policy at your cost.

#### Your acknowledgment and consent

1.12 By using our services and/or our Website and by sharing your personal data with us, you acknowledge that your personal data will be processed in the manner as described in this Policy.

1.13 Nonetheless, Clause 1.10 does not constitute your consent to the processing of your personal data. We do not process your personal data on the basis of your consent, unless specifically indicated.

## **2. What is personal data**

Personal data is information about an individual who can be identified from that information or from that information and other information to which we have access.

## **3. Which type of personal data do we collect**

#### Whose personal data do we collect

3.1 We only collect personal data that is relevant to our relationship with you.

3.2 In the context of our services, we may collect personal data relating to our customers, suppliers, representatives of the authorities or non-governmental organizations or visitors of our Website. If

you are a shareholder, director, corporate officer, manager, employee or appointed contractor of any business entity, we may collect your personal data if it is relevant to our business relationship with you in that entity.

### Types of personal data

3.3 The personal data we collect, if you are a job applicant, includes but is not limited to:

- (a) personal particulars (e.g. name, gender, date of birth, nationality, identity card / passport details);
- (b) contact information (e.g. mailing address, telephone numbers, email address, facsimile numbers);
- (c) education details and professional qualifications (e.g. names of schools and institutions, types of qualification);
- (d) medical and health details (e.g. prior medical history);
- (e) financial details (e.g. income, expenses, credit card information);
- (f) employment details (e.g. employment history, salary, benefits, title, tenure);
- (g) photographs and other audio-visual information;
- (h) personal opinions that you make known to us;
- (i) marital status and spousal information; and/or
- (j) information about next-of-kin.

3.4 If you are not a job applicant, the personal data we collect includes but is not limited to:

- (a) personal particulars (e.g. name, gender, date of birth, identity card, passport details);
- (b) contact information (e.g. address, telephone numbers, email address, facsimile numbers); and/or
- (c) personal opinions that you make known to us.

3.5 The personal data we collect generally, when you browse our Websites, includes but is not limited to:

- (a) information about your use of our Websites, contact centres; and/or
- (b) information about your device and your geographical location (e.g. your Internet Protocol (IP) address or unique device identification).

## **4. How do we collect your personal data**

4.1 We may collect personal data:

- (a) directly from you;

- (b) through third party when they are duly authorized by you to collect and thereafter provide your personal data to us;
- (c) from third party sources (e.g. your family members, government agencies, market research organisations or publicly available resources such as telephone or business directories) without your involvement; and/or
- (d) through CCTV we use in and around our premises at our production facilities or other (monitoring) technologies.

4.2 Collection of personal data may be done in person when you meet our staff or representatives, over the telephone, by email or through our Websites. To the extent allowed under applicable law, we may also collect your personal data from third party sources without directly involving you.

## **5. When do we collect your personal data**

We collect personal data about you, when:

- (a) you apply for a job with us;
- (b) you enter into a business relationship with us;
- (c) you provide any services to us;
- (d) you visit our Websites;
- (e) you seek access to our business premises;
- (f) you attend our general meetings or results briefing sessions;
- (g) you contact us with feedback, queries or complaints; or
- (h) you request us to send you information or notify you of developments in the company via post, emails or telephone calls.

## **6. Why do we collect your personal data and how do we use your personal data**

6.1 Our key purpose in collecting your personal data is to process your application or request, to proceed with any business relationship with you or to contact you so as to provide you with information pertaining to the Wilmar Group. Further non-exhaustive examples of what personal data we collect and for what purposes we use your personal data may be found in Schedule 1 attached hereto.

6.2 If you are not a job applicant, we collect and use your personal data to:

- (a) facilitate the business or contractual relationship between you and us and where applicable, the performance of the contract between us;
- (b) facilitate the performance of the provision and performance of services to us;
- (c) if you are a shareholder, send you information on our company and/or facilitate your attendance at our annual general meetings or results briefing sessions; or
- (d) handle your feedback, queries or complaints.

- 6.3 If you are a job applicant, we collect and use personal data to process your job application.
- 6.4 We also use your personal data for other purposes connected to or relevant to our businesses, such as:
- (a) complying with our legal and regulatory obligations and requirements; or
  - (b) accounting, risk management and record keeping.

## **7. Special category of personal data – Sensitive personal data**

- 7.1 Certain data category such as information on your health is considered “sensitive personal data” as defined under the GDPR. Generally, we try to limit the circumstances where we would collect and process sensitive personal data.
- 7.2 If you are both an EU resident and a job applicant, we collect sensitive personal data, in particular, your medical details, your marital status and information on your spouse and next-of-kin, when you apply for a job with us.
- 7.3 We collect sensitive personal data to process your job application.

## **8. Legal basis for using your personal data**

- 8.1 If you are an EU resident, we are required, under the GDPR, to disclose the legal basis for processing your data. We will only process your personal data when we have a legal basis to do so.
- 8.2 The following are our legal basis for processing your personal data:
- (a) you work for a business entity with whom we have a business relationship or with whom we are exploring a business relationship;
  - (b) you applied for a job with us and we have to use your personal data to assess and evaluate your suitability for the job;
  - (c) you have consented to us using your information for any particular purpose;
  - (d) we have received your deemed consent, as defined under the PDPA, to use your information for a particular purpose;
  - (e) we have a legitimate interest to do so; or
  - (f) we are required by legal or regulatory obligations and requirements.

## **9. Where do we process your personal data**

- 9.1 Your personal data will be collected and processed by the relevant Wilmar Group Entity.
- 9.2 If you are a job applicant, your personal data will be processed by the relevant Wilmar Group Entity to which you submitted your job application and such personal data may thereafter be transferred and processed by the relevant Wilmar Group Entity.

## 10. Confidentiality

- 10.1 Subject to the provisions in this Clause 10, we shall keep secret and strictly confidential by not disclosing or divulging to any person or to enabling or causing any person besides you, without your consent, to become aware of the contents of your personal data.
- 10.2 Notwithstanding Clause 10.1, each Wilmar Group Entity may disclose your personal data to other Wilmar Group Entities for business improvement purposes, for purposes consistent with the purpose of that collection and/or for any other purposes allowed under Applicable Data Protection Law.
- (a) For more details on our Wilmar Group, please visit our Website.
  - (b) We may from time to time disclose your personal data to any Wilmar Group Entity's directors, officers, employees, agents and advisers, including accountants, legal counsels and other advisers (it being understood that the persons to whom such disclosure is made will be informed of the confidential nature of such information and instructed to keep such information confidential) if such personal data is necessary to be disclosed to such persons on a need-to-know basis.
- 10.3 Notwithstanding Clause 10.1, we may disclose information to you upon you submitting a valid request in accordance with Clauses 14.

### Transfer of information to third parties

- 10.4 Notwithstanding Clause 10.1, we may disclose or share your personal data with the following third parties for the following purposes:
- (a) third parties which provide products and services requested by you;
  - (b) our third-party service providers, such as our IT systems maintenance provider who perform services that may involve data processing;
  - (c) law firms and law courts, to prepare, apply or enforce any contract with you;
  - (d) accountants and auditors who maintain or are required to audit our financial records;
  - (e) bankers, credit reference agencies and anti-fraud screening service providers to process payments or carry out fraud screening;
  - (f) law enforcement agencies to enforce our rights and protect our properties;
  - (g) regulatory, governmental and tax authorities to comply with any legal or regulatory obligations or industry requirements;
  - (h) requirement by applicable laws or regulations, including the Applicable Data Protection Law, or by any subpoena or similar legal process; or
  - (i) your representatives (such as your lawyer or the executor, administrator or trustee of your estate).

We will ensure that, where relevant, contractual safeguards are implemented to ensure the protection of your personal data when we disclose your personal data to a third party.

- 10.5 We shall make reasonable efforts to ensure that your personal data is accurate and complete before we transfer your personal data to any of the aforementioned third party.

## Transfer of information overseas

- 10.6 The parties to whom we may disclose your personal data with a legal basis may be located in countries outside the European Economic Area, which may offer a lower level of data protection than the country where you are located.
- 10.7 In such situations, the relevant Wilmar Group Entity shall ensure that the international transfer of your personal data shall comply with Applicable Data Protection Law.

## **11. Our obligations to you**

We agree and warrant that:

- (a) we do not provide your personal data to third parties for purposes other than or related to those set out above;
- (b) we do not sell your personal data to any third parties;
- (c) your personal data has been received by the Wilmar Group in accordance with the relevant provisions of Applicable Data Protection Law; and
- (d) we will be processing your personal data only on behalf of the Wilmar Group and in accordance with Applicable Data Protection Law and this Policy.

## **12. Technical and organizational security measures**

- 12.1 When each Wilmar Group Entity processes your personal data, the processing activity is subject to adequate technical and organisational security measures in order to safeguard your personal data. Please contact our Personal Data Protection Officer (“**PDPO**”), details as set forth in Clause 18, if you would like to find out more about the security measures that we have put in place.
- 12.2 These technical and organisational security measures are appropriate to protect personal data against accidental or unlawful destruction or accidental loss, alteration, unauthorised disclosure or access, in particular where the processing involves the transmission of data over a network, and against all other unlawful forms of processing, and that these measures ensure a level of security appropriate to the risks presented by the processing and the nature of the data to be protected having regard to the state of the art and the cost of their implementation as per Group IT’s security policies.

## **13. How long we will retain your personal data**

Subject to Clause 14, we will retain your personal data for as long as necessary to fulfil the purpose (such as those stated in Clause 6 and Schedule 1) for which it was collected, or for any commercial or legal purposes required by any Wilmar Group Entity.

## **14. Rights of Data Subjects**

### Non-EU Data Subjects

#### 14.1 Right of Access

- (a) You have the right to request to be provided with your personal data in our possession.

- (b) You have the right to ask for details on how we have (or may have) used your personal data in the one-year period preceding your request.

#### 14.2 Right to request for correction

- (a) You have the right to make corrections to your inaccurate or outdated personal data in our possession.
- (b) We will respond to your request for access as soon as reasonably possible. If we are unable to provide you with the requested personal data, we will inform you why we are not able to do so (except where we are not required to do so by applicable laws).

#### 14.3 Right to withdraw consent

You have the right to withdraw your consent to our usage of your personal data. Withdrawal of consent may be made in writing to your usual contact person from the relevant Wilmar Group Entity or our PDPO at the address stated below.

### EU Data Subjects

14.4 If you are an EU resident, you may have certain rights in relation to personal data in our possession.

#### 14.5 Right of Access

- (a) You have the right to:
  - (i) know whether we process your personal data, and if we do, to request for a copy of your personal data in our possession; and
  - (ii) request for a summary description of security measures we have implemented when processing your personal data.
- (b) Exceptions to your right of access include situations where:
  - (i) your request also relates to other persons who have not consented to the disclosure of their personal data; and
  - (ii) your requested information is legally privileged.
- (c) We may charge an administration fee for responding to your request if you request for more than one copy of your personal data.

#### 14.6 Right to request for correction

You have the right to make corrections to your inaccurate, outdated or incomplete personal data in our possession. While we assess whether your personal data in our possession is inaccurate, outdated, or incomplete, you may exercise your right to restrict our processing of the applicable data (as described below).

#### 14.7 Right to restrict processing

Other than for storage purposes, you have a right to stop us from processing your personal data. Please note however that if there are valid grounds, we may continue the processing of such personal data if it is necessary for us to do so (e.g. for defending legal claims or for the protection of another person).



#### 14.8 Right to withdraw consent

Where the legal basis of our processing of your personal data is consent, you have the right to withdraw your consent to our usage of your personal data. Withdrawal of consent may be made in writing to the any of your contact person in the Wilmar Group Entity or our PDPO at the address below.

#### 14.9 Right to deletion

- (a) Upon your request for the deletion of your personal data, we shall delete or procure for the deletion of such personal data promptly from our records, and to certify to you that we have done so. To delete your personal data, we will remove information that identifies you from the data we hold in our active systems.
- (b) In some circumstances, deletion of your personal data may mean that we will not be able to provide you with your requests for information.
- (c) Notwithstanding Clause 14.9(a):
  - (i) a separate and restricted copy of your personal data may be retained for any period required by Applicable Data Protection law, law enforcement, national authorities and legal proceedings; and
  - (ii) certain elements that relate to a contract between you and Wilmar Group Entity may be retained, for our own legal and auditing purposes,and we shall ensure the confidentiality of such personal data as required by Clause 10 and shall ensure that such personal data is only retained or processed as necessary for the purpose(s) specified above.
- (d) Notwithstanding Clause 14.9(a), we cannot delete your personal data:
  - (i) so long as you have a contractual relationship with us; and
  - (ii) if you have made a complaint and the complaint is still open or we are required to keep such personal data for a certain period after a prior complaint.

#### 14.10 Data Portability

- (a) You have the right to request for a presentable softcopy of any data, that you have provided to us and/or generated by your activities in using our product and/or services, in our possession or under our control.
- (b) You also have a right to request for a transfer of such personal data to a third party with a Singapore presence. We have no obligation, but may however choose to do so voluntarily, to transfer such personal data to a third party if the third party is based overseas.
- (c) We can only transfer the data to a third party if it is technically feasible (i.e. the data is in the form of a commonly used machine-readable format), you have provided details of the party to whom you wish the personal data to be transferred and our provision of such data will not interfere with the rights of another person.
- (d) Appropriate technical and organisational security measures will be imposed to ensure the security of your data transferred to the third-party.

- (e) Once transferred, we will not be responsible for the security of the data or how it will be processed.

## **15. Exercising your rights**

- 15.1 To exercise any of your rights, such as those provided in Clause 14, please write to the PDPO at the address below, with sufficient particulars to enable us to verify your identity, setting out your request and the grounds for your request.
- 15.2 In many circumstances, we may need to process your personal data in order to proceed with your application or request. If you do not provide us with the required personal data, or if you withdraw your consent to our usage of your personal data for such purposes, it may be impossible for us to proceed further with your application or respond to your request.

## **16. Cookies Policy**

- 16.1 Our Websites implant cookies, which are the small text files placed on your computer or mobile device, on your computer or mobile device when you visit our Websites.
- 16.2 By using our Website, you consent to our use of cookies to collect and process your personal data for the purposes of collecting website usage data and to facilitate your internet sessions, track visitor's use of our websites and compile statistics on website activities.
- 16.3 The personal data we collect from visitors of our Websites include but are not limited to your IP address, how you arrived at the Website (e.g. through a search engine or from an external website), how you navigate within the Website, what device you use to access our Website and your geographical location.
- 16.4 In the event that you do not wish for our placement of cookies on your computer or mobile device, you can change the settings in your web browser to block cookies, or you may manually remove cookies stored on your computer or mobile device. In addition, you may set up your mobile or browser settings such that you receive a notification every time you receive a cookie on your computer or mobile device, so that you can decide whether you wish to accept this cookie. However, please note that if you decide to block cookies, you may not be able to use certain features and functions of our Websites.
- 16.5 By continuing your visit to our Websites, you agree to this Clause 16 and any other relevant Clauses in this Policy.

## **17. Other matters**

### Third party Websites

- 17.1 Our Websites may contain links to other websites which are not maintained by the Wilmar Group. This Policy only applies to our Websites, and not third-party websites.

### Other rules and processes

- 17.2 In certain cases, there may be specific rules or processes that govern our use of your personal data, which are not stated in this Policy. If any such rules or processes apply, we will make them known to you in advance.

**18. How to contact us**

- 18.1 To contact us on any aspect of this Policy or your personal data in our possession, you can e-mail the PDPO at [pdpo@wilmar.com.sg](mailto:pdpo@wilmar.com.sg) or write in to the Personal Data Protection Officer at Wilmar International Limited, 56 Neil Road, Singapore 088830.
- 18.2 All requests, complaints and feedback will be evaluated by the PDPO in a timely manner. After the PDPO has completed his or her evaluation, he or she will respond to you in writing.

**Schedule 1**

We collect the following non-exhaustive personal information for the following non-exhaustive purposes:

<b>Personal data</b>	<b>Purposes</b>
your identification and contact information (name, address, telephone number, email address or other contact details)	<ul style="list-style-type: none"><li>• customer administration</li><li>• supplier administration</li><li>• administration and management intermediaries</li><li>• to deliver the services or products that the company you represent or are employed with ordered</li><li>• for administrating payment of invoices and collecting debts</li><li>• for marketing purposes</li><li>• to raise your awareness on our sustainability programs or market developments (newsletters)</li><li>• to handle disputes and ensure our legal position herein</li><li>• to comply with legal obligations</li><li>• in the context of a possible business transaction</li></ul>
identification and contact information obtained from external databases which we have purchased and thereafter combined with the data that we have collected from you in order to obtain a more complete or accurate set of information	for making decisions about selecting you as a vendor/customer
camera images collected at production sites	for compliance with safety and security concerns in the production sites