

# PRIVACY POLICY

## NATURLI' FOODS A/S

This Privacy Policy describes how Naturli' Foods A/S ("Naturli'", "we", "our", or "us") processes your personal information according to your relationship with Naturli'. You are encouraged to read this Privacy Policy carefully.

### **1. DATA CONTROLLER**

The entity responsible for the processing of your personal information is:

Naturli' Foods A/S

CVR (Company Registration) No. 25476573

Grønvangsallé 2a

6600 Vejen

Denmark

Email: [gdpr@dragsbaek.dk](mailto:gdpr@dragsbaek.dk)

Phone number: +45 33 18 75 10

## 2. DESCRIPTION OF THE PROCESSING

Purpose	Categories of personal data	Sources of the personal data	Legal bases for the processing	Recipients	Data retention
<b>WHEN YOU VISIT NATURLI'S WEBSITE</b>					
<p><u>Business development and optimization of user experience and website:</u></p> <p>When you visit our website, your personal data are collected, e.g. through the use of cookies. We make use such information in order <u>to</u> optimize the user experience on Naturli's website; <u>to</u> optimize the services offered by us; and <u>to</u> compile statistics relating to the use of our website. For more details see our <a href="#">Cookie Policy</a>.</p> <p>Third-party cookies are also used i.a. to remember your settings, for traffic measurement, to show you targeted advertisements; to track your use of the website and watching of YouTube videos; and for statistical purposes. For these types of processing, Naturli' will in some cases be a joint controller with the provider of the third-party cookie(s). You can read more about this and also find links to the relevant third parties' own privacy policies in the cookie overview that can be found in Dragsbæk's Cookie Policy at the bottom of the website under "Cookies".</p> <p>You may at any time withdraw or change your consent by opting-out cookies in the cookie overview, just as you can block cookies in your browser.</p>	<p>We process the following categories of personal data about you:</p> <p><u>Ordinary personal data:</u></p> <p>IP-address and information about your IT equipment (such as browser, operating system and MAC address) as well as information about your behaviour, including your use of our website</p>	<p>We collect your personal data from the following source(s):</p> <ul style="list-style-type: none"> <li>• Directly from you through your use of our website.</li> </ul>	<p>We process your personal data as described on the following legal basis:</p> <ul style="list-style-type: none"> <li>• Article 6.1.f (necessary for the pursuit of our legitimate interest in operating and optimizing our website, as well as business and product development).</li> </ul>	<p>We share your personal data with:</p> <ul style="list-style-type: none"> <li>• Business partners, including IT suppliers and support, with whom we work to assist our company</li> <li>• Group entities</li> </ul>	<p>Information about your use of Naturli' website, etc. is retained for up to two years. The exact retention period depends on the individual cookie.</p> <p>See also Naturli's Cookie Policy</p>
<b>WHEN YOU ARE SHOPPING ON NATURLI'S WEBSHOP</b>					

<p><u>Webshop:</u></p> <p>Your personal data are collected and processed when you purchase commodities on our webshop.</p> <p>We use such data to execute your order and dispatch it to you.</p>	<p>We process the following categories of personal data about you:</p> <p><u>Ordinary personal data:</u></p> <p>Name, private address, email address, telephone number, and payment information.</p> <p>Additionally, in cases where the delivery address is different from the billing address, the same personal data is collected about the recipient of the package.</p>	<p>We collect your personal data from the following source(s):</p> <ul style="list-style-type: none"> <li>• Directly from you</li> <li>• From the person placing the order on your behalf</li> </ul>	<p>We process your personal data as described on the following legal bases:</p> <ul style="list-style-type: none"> <li>• Article 6.1.b (necessary for the performance of a contract with our customers).</li> <li>• Article 6.1.c (necessary to comply with our legal obligations, including the Danish Bookkeeping Act).</li> <li>• Article 6.1.f (necessary for the pursuit of our legitimate interest in entering into agreements for the sale of goods from our webshop, despatching them to the recipient and customer service in this regard).</li> </ul>	<p>We share your personal data with:</p> <ul style="list-style-type: none"> <li>• Business partners, including IT suppliers and support, with whom we work to assist our company</li> <li>• Group entities</li> <li>• Carriers</li> </ul>	<p>As a main rule, the information will be kept for five years as from the end of the year in which the purchase/payment has taken place, cf. the Danish Bookkeeping Act in this regard.</p> <p>However, we may store the personal data for an extended period if deemed necessary in a specific case, especially if required for establishing or defend legal claims or exercising such claims, e.g. in connection with a complaint.</p>
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**WHEN YOU ARE AN EMPLOYED WITH OR HAVE A RELATION TO NATURLI'S CUSTOMERS, SUPPLIERS AND BUSINESS PARTNERS**

<p><u>Business operations:</u></p> <p>We process your personal data as part of our ordinary business operations, including production, quality assurance, sale and distribution of Naturli's products, invoicing, as well as other contacts with suppliers, business partners and customers.</p> <p>We will in this connection process your personal data in case you are employed with or have a relation to one of Naturli's customers, suppliers or business partners.</p> <p>We collect such personal data when you act on behalf of your employer and as your employer's contact person, e.g. when entering into contracts, providing services, product development, quality assurance of</p>	<p>We process the following categories of personal data about you:</p> <p><u>Ordinary personal data:</u></p> <p>Name, email address, telephone number, workplace, job title and signature.</p> <p>In connection with claims and complaints about Naturli's products, information about your experience related to the complaint may also be processed.</p>	<p>We collect your personal data from the following source(s):</p> <ul style="list-style-type: none"> <li>• Directly from you</li> <li>• The company you work for or have a relation to; Naturli's customer, supplier or business partner</li> <li>• Group entities</li> </ul>	<p>We process your personal data as described on the following legal bases:</p> <ul style="list-style-type: none"> <li>• Article 6.1.c (necessary to comply with our legal obligations, including the Danish Bookkeeping Act in connection to issuing invoices).</li> <li>• Article 6.1.f (necessary for the pursuit of Naturli's legitimate interest in business operations, including communication with our customers, suppliers and business</li> </ul>	<p>We share your personal data with:</p> <ul style="list-style-type: none"> <li>• Business partners, including IT suppliers and support, with whom We work to assist our company</li> <li>• Group entities</li> </ul>	<p>As a main rule, we will retain your personal data for up to five years as from the end of the year in which the last purchase or delivery was made, or as from the of the relationship/collaboration with Naturli's customer, supplier or business partner.</p> <p>However, we may store the personal data for an extended period if deemed necessary in a specific case, e.g. for establishing legal claims.</p>
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our production, products and food security, handling of payments and general communication.			partners, production, sale and distribution of goods, as well as quality assurance and auditing of our production, products and food safety).		
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**WHEN YOU HAVE A RELATION TO NATURLI' AS AN END CUSTOMER (CONSUMER)**

<p><u>Customer service, customer inquiries, claims and complaints:</u></p> <p>We process your personal data in connection with ongoing customer service and responding to customer inquiries, including processing claims and complaints, as well as providing our services to end customers.</p> <p>In addition, we process your personal data for the purpose of ordinary business operations, e.g. product development, quality assurance of our production, products and food safety, as well as for general communication purposes.</p>	<p>We process the following categories of personal data about you:</p> <p><u>Ordinary personal data:</u></p> <p>Name, possibly username, email address, private address, telephone number, and information that you may choose to submit to us with regarding your inquiry.</p> <p>In connection with claims and complaints, additional information is processed about your bank account details for the purpose of reimbursement, as well as information regarding your experience/reason for the complaint.</p> <p>We also process any pictures that you may send to us in connection with questions, claims and complaints, and the like.</p> <p><u>Sensitive personal data:</u></p> <p>In special cases, we may process personal data concerning your health if you choose to submit such information to us in connection with a customer inquiry. However, such information is deleted as soon as possible, and you are encouraged</p>	<p>We collect your personal data from the following source(s):</p> <ul style="list-style-type: none"> <li>• Directly from you</li> <li>• From the store/customer to whom you may have sent a complaint or a claim, which has subsequently been forwarded to us.</li> <li>• Group entities</li> </ul>	<p>We process your personal data as described on the following legal bases:</p> <ul style="list-style-type: none"> <li>• Article 6.1.b (necessary for the performance of a contract).</li> <li>• Article 6.1.c (necessary comply with our legal obligations in connection with the handling of claims and complaints, quality assurance of our food production, and the retention of accounting records, etc.).</li> <li>• Article 6.1.f (necessary for the pursuit of our legitimate interest in customer service, in responding to customer inquiries, business and product development, quality assurance of our production, products and food safety, establishing and maintaining contact and communication with our end customers, as well as handling claims and complaints).</li> <li>• Article 9.2.f (necessary for the establishment, exercise</li> </ul>	<p>We share your personal data with:</p> <ul style="list-style-type: none"> <li>• Business partners, including IT suppliers and support, with whom we work to assist our company</li> <li>• Social media if we communicate through such media</li> <li>• Suppliers in connection with handling an inquiry, claim or complaint</li> <li>• Group entities</li> </ul>	<p>As a main rule, we will retain ordinary customer inquiries from you for one year as from the date of our response to your inquiry.</p> <p>If the inquiry leads to an inspection or quality control of our products, the inquiry is kept until the inspection or quality control has been concluded.</p> <p>However, if we reimburse an amount due to a claim or complaint, personal data from the accounting records will be retained for up to five years from the end of the year in which the reimbursement occurred, in accordance with the rules of the Danish Bookkeeping Act.</p> <p>Personal data may be retained for a longer period if there are specific reasons for doing so, especially if it is necessary for establishing or defending a legal claim, or exercising such claim, for instance in connection with a complaint.</p>
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	<p>to consult your own physician instead.</p> <p>Additionally, we may process personal data concerning your health in connection with claims and complaints about Naturli's products, to the extent that you choose to provide such information.</p>		<p>or defence of legal claims - if you send us personal data concerning your health in connection with a claim or complaint).</p>		
<b>WHEN YOU RECEIVE MARKETING COMMUNICATIONS AND NEWSLETTERS FROM NATURLI' AND PARTICIPATE IN NATURLI'S COMPETITIONS</b>					
<p><u>Marketing communications, newsletters and competitions:</u></p> <p>Your personal data are used for marketing-related purposes, including</p> <p><u>to</u> target our communication with you based on your areas of interest and focus;</p> <p><u>to</u> hold competitions and similar marketing activities; as well as</p> <p><u>to</u> send you relevant marketing information in the form of newsletters about Naturli's assortment, competitions, recipes, news, etc.</p>	<p>We process the following categories of personal data about you:</p> <p><u>Ordinary personal data:</u></p> <p>Name, private address, telephone number, email address, IP-address, the time you signed up for the newsletter, your areas of interest, as well as any information you may choose to submit to us in connection with a competition or other marketing activities.</p>	<p>We collect your personal data from the following source(s):</p> <ul style="list-style-type: none"> <li>• Directly from you</li> </ul>	<p>We process your personal data as described on the following legal basis:</p> <ul style="list-style-type: none"> <li>• Article 6.1.f (necessary for the pursuit of our legitimate interest in marketing activities, holding competitions, as well as the operation and development of our business).</li> </ul>	<p>We share your personal data with:</p> <ul style="list-style-type: none"> <li>• Business partners, including IT suppliers and support with whom we work to assist our company</li> <li>• Group entities</li> <li>• Social media</li> </ul>	<p>Marketing material and information collected in connection with marketing activities are usually retained for up to two years for documentary purposes. If We give out prizes in connection with a competition, we may, however, store any accounting records for a period of five years, pursuant to the rules of the Danish Bookkeeping Act.</p> <p>Information in relation to marketing is kept for as long as we are legally allowed to send newsletters to you. If you also are a customer, the information may be stored as long as you are an active customer and for one year thereafter. An active customer is a customer with whom we have been in contact within the last two years in other contexts than sending out marketing communications. Therefore, such personal data are deleted within three years following the last contact.</p>

					Information may be retained for a longer period if there are special reasons for doing so, including the need to establish, defend or exercise a legal claim.
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**WHEN YOU PARTICIPATE IN ONE OF NATURLI'S EVENTS OR ARRANGEMENTS**

<p><u>Participation in events or arrangements</u></p> <p>Your personal data may be collected and processed in connection with your participation in an event or arrangement held by Naturli'.</p> <p>We process your personal in order to be able to hold such events, e.g. managing your registration and participation.</p> <p>Additionally, if you participate in an event that includes eating, such as Naturli's cooking school, we may also process your food preferences so that we can serve food that you prefer to eat.</p>	<p>We process the following categories of personal data about you:</p> <p><u>Ordinary personal data:</u></p> <p>Name, age, private address, telephone number, email address and food preferences.</p> <p>At certain events, we may also take pictures, including pictures of participants. This is described more precisely in the "purpose" paragraphs of the other sections below.</p>	<p>We collect your personal data from the following source(s):</p> <ul style="list-style-type: none"> <li>• Directly from you</li> </ul>	<p>We process your personal data as described on the following legal bases:</p> <ul style="list-style-type: none"> <li>• Article 6.1.b (necessary for the performance of a contract).</li> <li>• Article 6.1.f (necessary for the pursuit of our legitimate interest in marketing activities, including events or arrangements, managing registrations and participations, and serving food that the participants prefer to eat).</li> </ul>	<p>We share your personal data with:</p> <ul style="list-style-type: none"> <li>• Business partners, including IT suppliers and support, with whom we work to assist our company, e.g. in connection with organising events</li> <li>• Group entities</li> </ul>	<p>Personal data that we process in connection with your participation in events or arrangements are usually only retained until the termination of the event but may in some cases be retained for up to 1 year after the event if the nature of the event necessitates documentation in the time after the event.</p> <p>However, if you have participated in an event where the registration requires payment, we will keep the accounting records for a period of five years, pursuant to the rules of the Danish Bookkeeping Act.</p> <p>In addition, if you have consented to receiving newsletters from us. or if we, for other reasons, are allowed to send you news about other events or arrangements, we will retain your information for as long as we may continue to send you such information - for more information, see the description above under the paragraph "purpose" regarding marketing communications and newsletters.</p>
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**WHEN YOU VISIT US, COLLECT GOODS OR DELIVER GOODS TO NATURLI', INCLUDING NATURLI'S OFFICES AND BUILDINGS**

<p><u>Video surveillance and access control:</u></p> <p>If you visit our buildings or offices, we may use your personal information to issue an access card to be used within our premises.</p> <p>For security and crime prevention purposes, there may also be video surveillance in our premises.</p>	<p>We process the following categories of personal data about you:</p> <p><u>Ordinary personal data:</u></p> <p>When you access Naturli's premises, we may process information about your behaviour and movement around our premises - including in the form of video surveillance recordings and logging registrations of your use of the access card to enter our premises.</p> <p><u>Information about criminal offences:</u></p> <p>We process information about criminal offences if you commit any criminal offence in a location where our video surveillance is filming you.</p>	<p>We collect your personal data from the following source(s):</p> <ul style="list-style-type: none"> <li>• Directly from you, including from your movements within Naturli's premises.</li> </ul>	<p>We process your personal data as described on the following legal bases:</p> <ul style="list-style-type: none"> <li>• Article 6.1.f (necessary for the pursuit of Naturli's legitimate interest in access control, crime prevention and prosecution for property damage).</li> <li>• Section 8 (3) of the Danish Data Protection Act (Naturli' has a legitimate interest in crime prevention and prosecution for property damage.)</li> </ul>	<p>We share your personal data with:</p> <ul style="list-style-type: none"> <li>• Business partners, including IT suppliers and support, with whom we work to assist our company</li> <li>• Group entities</li> <li>• Public authorities, including the Police</li> </ul>	<p>Video recordings from the video surveillance as well as logs from the access control are deleted after no later than 30 days - unless the recordings are required for a longer period for the purpose of a specific a case, such as a criminal case or claim for damages.</p>
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**WHEN YOU MENTION OR INTERACT WITH NATURLI' ON THE INTERNET, INCLUDING SOCIAL MEDIA**

<p><u>Use of the internet, especially social media:</u></p> <p>Your personal data are collected when you visit our pages on social media, when you tag, recommend or mention Naturli', our brands and products on the internet, including on social media, and when you communicate with us in this context.</p> <p>We have profiles on Facebook, Twitter, Google My Business, LinkedIn, YouTube and Instagram.</p> <p>We also make use of providers of media monitoring to monitor any comments regarding our company, products and brands on the internet, including on social media - and we regularly receive reports on such comments.</p> <p>We especially use Facebook for marketing on social media, and together with Facebook We are joint data controller for the collection of personal data about you, when you visit our Facebook page. You can read more in the agreement on joint data controllership <a href="#">here</a>.</p> <p>Your personal data are also processed as described in <a href="#">Facebook's cookie and privacy policy</a>.</p>	<p>We process the following categories of personal data about you:</p> <p><u>Ordinary personal data:</u></p> <p>Name, profile picture, username, contents of posts related to Naturli', the personal data that can be deduced from your social-media profile and your behaviour, as well as any information you choose to give us in connection with our interaction.</p> <p>We generally process personal data about you when you visit our profiles on social media and communicate with us through these, e.g. questions in connection with a direct inquiry from you to us</p> <p>For further information about your contact with Naturli', including for customer service, see the section "WHEN YOU HAVE A RELATION TO NATURLI' AS AN END CUSTOMER (CONSUMER)" above.</p>	<p>We collect your personal data from the following source(s):</p> <ul style="list-style-type: none"> <li>• Directly from you</li> <li>• Social media</li> <li>• Media monitoring providers</li> </ul>	<p>We process your personal data as described on the following legal basis:</p> <ul style="list-style-type: none"> <li>• Article 6.1.f (necessary for the pursuit of our legitimate interest in marketing, keeping track of publicity regarding Naturli' and Naturli's brand and products, and communicating with our end customers and followers on social media.)</li> </ul>	<p>We share your personal data with:</p> <ul style="list-style-type: none"> <li>• Business partners, including IT suppliers and support, with whom we work to assist our company</li> <li>• Group entities</li> <li>• Social media</li> </ul>	<p>Deletion of the personal data that we receive in connection with your communication with us on social media, including on our Facebook and Instagram pages, depends on the contents of the communication, see the other retention periods specified in this Privacy Policy.</p> <p>As a main rule, inquiries received in our inboxes on social media are deleted when Naturli' has completed the processing of the inquiry.</p> <p>However, comments and similar public reactions on our profiles and social media posts are generally not deleted - unless you choose to delete your comments yourself.</p> <p>Reports regarding the mention of Naturli', our brands and products on the internet are deleted within a year after the report was generated.</p> <p>Additionally, the personal data on social media, such as Facebook and Instagram, will be retained by the social media services as described in their own privacy policies.</p>
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**WHEN YOU ARE A MODEL, INFLUENCER OR OTHERWISE APPEAR ON POSTS, PICTURES OR RECORDINGS MADE ON BEHALF OF NATURLI'**

<p><u>Use of pictures:</u></p> <p>Naturli' processes personal data in the form of pictures and recordings of private individuals, actors, and influencers.</p> <p>This includes situational pictures from events in which you have participated, including Naturli's cooking school and other events held by, or in collaboration with, Naturli'.</p> <p>Naturli' may also process your pictures/video recordings if you choose to send them to us, e.g. in order to enter a contest, or if you otherwise choose to "tag" Naturli' in a post which is subsequently used by Naturli'.</p> <p>Naturli' processes pictures for marketing purposes, including proper advertisements and posts on social media.</p> <p>As a main rule, when using pictures or video footages of you, Naturli' will always either enter into a contract with you on this matter or obtain your consent through a declaration of consent - unless the picture and the nature of the purpose do not require neither consent nor contract.</p>	<p>We process the following categories of personal data about you:</p> <p><u>Ordinary personal data:</u></p> <p>Name, picture, video recording, information related to the picture/recording (where it is from, what is going on, who you are, etc.).</p> <p>Additionally, if you are an influencer or we have entered into a contract for the use of your picture/recording, we may process personal data about your address, bank account details, and CPR (civil registration) number to enable us to transfer money or send you a package.</p>	<p>We collect your personal data from the following source(s):</p> <ul style="list-style-type: none"> <li>• Directly from you</li> <li>• Through the internet, including your profiles on social media</li> <li>• Through publicly available databases</li> </ul>	<p>We process your personal data as described on the following legal bases:</p> <ul style="list-style-type: none"> <li>• Article 6.1.a (consent)</li> <li>• Article 6.1.b (necessary for the performance of a contract)</li> <li>• Article 6.1.f (necessary for the pursuit of our legitimate interest in marketing and making use of pictures from events or arrangements).</li> </ul>	<p>We share your personal data with:</p> <ul style="list-style-type: none"> <li>• Business partners, including IT suppliers and support, with whom we work to assist our company, e.g. in connection with organising events</li> <li>• Group entities</li> <li>• Social media</li> </ul>	<p>We will retain personal data in the form of pictures and video recordings of you for as long as we use them for marketing purposes. This retention period depends on how the information is used, e.g. whether it is a "repost" on Instagram, a post on social media or is used in another context, such as printed marketing material.</p> <p>However, if we process your personal data on the basis of your consent, your information will only be used for as long as we continue having your consent, but for documentary purposes, it will be retained for up to 1 year after you have withdrawn your consent.</p> <p>If we process your information based on a contract, we will retain your personal data in accordance with what is agreed in the contract. Unless otherwise agreed in the contract, we will retain the personal data indefinitely for as long as we intend to use your pictures or video recordings for marketing purposes or social media posts.</p>
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### **3. AUTOMATIC DECISIONS**

No automated individual decision-making will be made pursuant to Article 22 of the GDPR.

### **4. TRANSFERS TO COUNTRIES OUTSIDE THE EU/EEA**

Your personal data may be transferred to countries outside the EU/EEA when we use Microsoft services, as Microsoft uses sub-processors in such countries.

In some cases, the country has been deemed by the Commission of the European Union to have an adequate level of protection of personal data, and if not, we will ensure that there are appropriate safeguards for the transfer through the use of "Model Contracts for the Transfer of Personal Data to Third Countries", as published by the Commission of the European Union, or any other contractual agreement or certification approved by the competent authorities. You may obtain a copy of the contract/agreement by contacting us at [gdpr@dragsbaek.dk](mailto:gdpr@dragsbaek.dk).

### **5. MANDATORY INFORMATION**

We only collect the information needed for the described purposes. If you do not provide the information, there is a risk that we will not be able to provide services to you, maintain cooperation with you and/or the company in which you are employed, or fulfil our obligations.

### **6. YOUR RIGHTS**

You have the following rights:

- You have the right to request access to, rectification or erasure of your personal data.
- You also have the right to have the processing of your personal data restricted.
- If processing of your personal information is based on your consent, you have the right to withdraw your consent at any time. Your withdrawal will not affect the lawfulness of the processing carried out before you withdrew your consent. You may withdraw your consent and exercise your rights as set forth below.
- You have the right to receive personal information provided by yourself, in a structured, commonly used and machine-readable format (data portability).
- You may always lodge a complaint with a data protection supervisory authority, e.g. The Danish Data Protection Agency.

**Furthermore, you have the right to object to our processing of your personal data as follows:**

- **If our processing of your personal data is based on Article 6(1)(e) (public interest or exercise of public authority) or Article 6(1)(f) (balance of interests), see above regarding legal basis, you have the right at any time to object to the processing of your personal data, on grounds relating to your particular situation.**
- **Also, you have an unconditional right to object to our processing of your personal data when your personal data are processed for direct marketing purposes.**

You can exercise your rights by contacting us on [gdpr@dragsbaek.dk](mailto:gdpr@dragsbaek.dk).

There may be conditions or limitations on these rights. It is therefore not certain that you have the right of e.g. data portability in a specific case - this depends on the specific circumstances of the processing activities.

*Last updated: 17.06.2020*