



Froneri International Limited Privacy Policy (September 2018)

Welcome to Froneri International Limited's ("Froneri") privacy policy. Froneri is part of the Froneri Group of companies. You can find out more about our Group of companies on www.froneri.com.

Please note that Froneri is the parent company of a group of local trading entities which operate across the world and each trading entity is a data controller in its own right, responsible for collecting and managing personal data relating to its own customers, suppliers and other persons who interact with it (for example, our UK business is operated out of R&R Ice Cream (UK) Ltd). A list of the current Froneri Group trading entities and their websites (which include their local contact details) is set out in the Appendix. Please ensure you liaise with the right entity in the Froneri Group. If you contact us incorrectly, we will pass your details on to the relevant Froneri Group entity to respond.

Froneri respects your privacy and is committed to protecting your personal data. This privacy policy will inform you as to how we look after your personal data when interacting with us including when you visit our website and tell you about your privacy rights and how the law protects you. Please use the Glossary to understand the meaning of some of the terms used in this privacy policy.

1. Important information and who we are

Purpose of this privacy policy

This privacy policy aims to give you information on how Froneri collects and processes your personal data when you interact with us as a supplier or other person including any data you may provide through this website.

It is important that you read this privacy policy together with any other privacy policy or fair processing notice we may provide on specific occasions when we are collecting or processing personal data about you so that you are fully aware of how and why we are using your data. This privacy policy supplements the other notices and is not intended to override them.

Controller

Froneri is the controller and responsible for your personal data (referred to as Froneri, "we", "us" or "our" in this privacy policy). If you have any questions about this privacy policy, including any requests to exercise your legal rights, please contact us using the details set out below.

Contact details

- Full name of legal entity: Froneri International Limited
- Email address: privacy@froneri.com
- Postal address: Leeming Bar Industrial Estate, Leeming Bar, Northallerton, North Yorkshire, DL7 9UL
- Telephone number: (01677) 423397

You have the right to make a complaint at any time to the Information Commissioner's Office (ICO), the UK supervisory authority for data protection issues (www.ico.org.uk). We would, however, appreciate the chance to deal with your concerns before you approach the ICO so please contact us in the first instance.

Changes to the privacy policy and your duty to inform us of changes



This version was last updated on the date above and historic versions can be obtained by contacting us.

It is important that the personal data we hold about you is accurate and current. Please keep us informed if your personal data changes during your relationship with us.

Third-party links

This website may include links to third-party websites, plug-ins and applications. Clicking on those links or enabling those connections may allow third parties to collect or share data about you. We do not control these third-party websites and are not responsible for their privacy statements. When you leave our website, we encourage you to read the privacy policy of every website you visit.

2. The data we collect about you

Personal data, or personal information, means any information about an individual from which that person can be identified. It does not include data where the identity has been removed (anonymous data).

We may collect, use, store and transfer different kinds of personal data about you which we have grouped together follows:

- **Identity Data** includes first name, maiden name, last name, username or similar identifier, marital status, title, date of birth and gender.
- **Contact Data** includes billing address, email address and telephone numbers.
- **Financial Data** includes bank account and payment card details.
- **Transaction Data** includes details about payments to and from you and other details of products and services you have purchased from us.
- **Technical Data** includes internet protocol (IP) address, your login data, browser type and version, time zone setting and location, browser plug-in types and versions, operating system and platform and other technology on the devices you use to access this website.
- **Profile Data** includes your username and password, your interests, preferences, feedback and survey responses.
- **Usage Data** includes information about how you use our website.

We also collect, use and share **Aggregated Data** such as statistical or demographic data for any purpose. Aggregated Data may be derived from your personal data but is not considered personal data in law as this data does **not** directly or indirectly reveal your identity. For example, we may aggregate your Usage Data to calculate the percentage of users accessing a specific website feature. However, if we combine or connect Aggregated Data with your personal data so that it can directly or indirectly identify you, we treat the combined data as personal data which will be used in accordance with this privacy policy.

We do not collect any **Special Categories of Personal Data** about you (this includes details about your race or ethnicity, religious or philosophical beliefs, sex life, sexual orientation, political opinions, trade union membership, information about your health and genetic and biometric data). Nor do we collect any information about criminal convictions and offences.

If you fail to provide personal data

Where we need to collect personal data by law, or under the terms of a contract we have with you and you fail to provide that data when requested, we may not be able to perform the contract we have or are trying to enter into with you. In this case, we may have to cancel a product or service but we will notify you if this is the case at the time.

3. How is your personal data collected?

We use different methods to collect data from and about you including through:

- **Direct interactions.** You may give us your Identity, Contact and Financial Data by filling in forms or by corresponding with us by post, phone, email or otherwise. This includes personal data you provide when you:
 - become a supplier or enter into other business relationships with us;
 - contact us with an enquiry or complaint;
 - interact with us using social media; or
 - give us some feedback.
- **Automated technologies or interactions.** As you interact with our website, we may automatically collect Technical Data about your equipment, browsing actions and patterns. We collect this personal data by using cookies, and other similar technologies. We may also receive Technical Data about you if you visit other websites employing our cookies.
- **Third parties or publicly available sources.** We may receive personal data about you from various third parties and public sources as set out below
 - Technical Data from the following parties:
 - (a) analytics providers such as Google based outside the EU;
 - (b) advertising networks based inside or outside the EU; and
 - (c) search information providers based inside or outside the EU.
 - Contact, Financial and Transaction Data from providers of technical, payment and delivery services inside or outside EU.
 - Identity and Contact Data from publicly available sources such as Companies House and the Electoral Register based inside the EU.

4. How we use your personal data

We will only use your personal data when the law allows us to. Most commonly, we will use your personal data in the following circumstances:

- Where we need to perform the contract we are about to enter into or have entered into with you.
- Where it is necessary for our legitimate interests (or those of a third party) and your interests and fundamental rights do not override those interests.
- Where we need to comply with a legal or regulatory obligation.

Purposes for which we will use your personal data

We have set out below, in a table format, a description of all the ways we plan to use your personal data, and which of the legal bases we rely on to do so (this does not include those scenarios where we rely on your consent). We have also identified what our legitimate interests are where appropriate.

Note that we may process your personal data for more than one lawful ground depending on the specific purpose for which we are using your data. Please contact us if you need details about the specific legal ground we are relying on to process your personal data where more than one ground has been set out in the table below.

Purpose/Activity	Type of data	Lawful basis for processing including basis of legitimate interest
To register you as a new supplier	(a) Identity (b) Contact	Performance of a contract with you
To address your enquiry or complaint	(a) Identity (b) Contact	(a) Performance of a contract with you (b) Necessary to comply with a legal obligation (in some circumstances) (c) Necessary for our legitimate interests (to monitor our business and operational performance)
To process receive your goods / services including: (a) Manage payments, fees and charges (b) Collect and recover money owed to us / make payments due from us	(a) Identity (b) Contact (c) Financial (d) Transaction (e) Marketing and Communications	(a) Performance of a contract with you (b) Necessary for our legitimate interests (to recover debts due to us)
To manage our relationship with you which will include: (a) Notifying you about changes to our terms or privacy policy (b) Asking you to leave a review or take a survey	(a) Identity (b) Contact (c) Profile (d) Marketing and Communications	(a) Performance of a contract with you (b) Necessary to comply with a legal obligation (c) Necessary for our legitimate interests (to keep our records updated and to study how third parties work with us)
To detect, prevent, investigate or remediate crime, illegal or prohibited activities or to otherwise protect our legal rights (including liaison with regulators and law enforcement agencies)	(a) Identity (b) Contact (c) Financial (d) Transaction (e) Profile	(a) Necessary to comply with a legal obligation (b) Necessary for our legitimate interests (to protect our business and our legal rights)
To administer and protect our business and this website (including troubleshooting, data analysis, testing, system maintenance, support, reporting and hosting of data)	(a) Identity (b) Contact (c) Technical	(a) Necessary for our legitimate interests (for running our business, provision of administration and IT services, network security, to prevent fraud and other crime and in the context of a business sale or reorganisation or group restructuring exercise) (b) Necessary to comply with a legal obligation
To use data analytics to improve our website, products/services, marketing, customer relationships and experiences	(a) Technical (b) Usage	Necessary for our legitimate interests (to define types of customers for our products and services, to keep our website updated and relevant, to develop our business and to inform our marketing strategy)

Marketing

Froneri does not normally engage in marketing; this would be a matter for our Group trading entities (see the Appendix).

Cookies and similar technologies

These are small files that are widely used in order to make websites work more efficiently. Most web browsers allow some control of cookies through browser settings. To find out more about cookies, including how to see what cookies have been set and how to manage or delete them from your computer, visit www.allaboutcookies.org.

You can set your browser to refuse all or some browser cookies, or to alert you when websites set or access cookies. If you disable or refuse cookies, please note that some parts of this website may become inaccessible or not function properly.

On this website, we use:

Cookie / Technology	Purpose	Information
ASP.Net	Necessary cookie	The standard cookies in ASP.Net are used to remember your web browser and allow you to access and use the website.
Google Analytics	Third party performance cookie / analytics technology	Google Analytics uses "cookies", to help the website analyse how users use the websites, applications or services. The information generated by the cookie about your use of the websites, applications or services (including your IP address) will be transmitted to and stored by Google on servers in the United States. Google will use this information for the purpose of evaluating your use of the websites, applications or services compiling reports on website activity for website operators and providing other services relating to website activity and internet usage. Google may also transfer this information to third parties where required to do so by law, or where such third parties process the information on Google's behalf. Google will not associate your IP address with any other data held by Google. You may refuse the use of cookies by selecting the appropriate settings on your browser or within the application, however please note that if you do this you may not be able to use the full functionality of this website. By using our websites, applications or services you consent to the processing of data about you by Google in the manner and for the purposes set out above. To find out more, see "How Google uses data when you use our partners' sites or apps", (located at www.google.com/policies/privacy/partners/ , or any other URL Google may provide from time to time). To opt out of being tracked by Google Analytics across all websites visit: http://tools.google.com/dlpage/gaoptout .

Change of purpose

We will only use your personal data for the purposes for which we collected it, unless we reasonably consider that we need to use it for another reason and that reason is compatible with the original purpose. If you wish to get an explanation as to how the processing for the new purpose is compatible with the original purpose, please contact us.

If we need to use your personal data for an unrelated purpose, we will notify you and we will explain the legal basis which allows us to do so.

Please note that we may process your personal data without your knowledge or consent, in compliance with the above rules, where this is required or permitted by law.

5. Disclosures of your personal data

We may have to share your personal data with the parties set out below for the purposes set out in the table in paragraph 4 above.

- Internal Third Parties as set out in the *Glossary* (below).
- External Third Parties as set out in the *Glossary* (below).
- Third parties to whom we may choose to sell, transfer, or merge parts of our business or our assets. Alternatively, we may seek to acquire other businesses or merge with them. If a change happens to our business, then the new owners may use your personal data in the same way as set out in this privacy policy.

We require all third parties to respect the security of your personal data and to treat it in accordance with the law. We do not allow our third-party service providers to use your personal data for their own purposes and only permit them to process your personal data for specified purposes and in accordance with our instructions.

6. International transfers

We may share your personal data within the Froneri Group. This will involve transferring your data outside the European Economic Area (**EEA**).

Many of our external third parties are based outside the European Economic Area (**EEA**) so their processing of your personal data will involve a transfer of data outside the EEA.

Whenever we transfer your personal data out of the EEA, we ensure a similar degree of protection is afforded to it by ensuring at least one of the following safeguards is implemented:

- We will only transfer your personal data to countries that have been deemed to provide an 'adequate' level of protection for personal data by the European Commission. For further details, see European Commission: Adequacy of the protection of personal data in non-EU countries.
- Where we use certain service providers, we may use specific contracts approved by the European Commission which give personal data the same protection it has in Europe. For further details, see European Commission: Model contracts for the transfer of personal data to third countries.
- Where we use providers based in the US, we may transfer data to them if they are part of the Privacy Shield which requires them to provide similar protection to personal data shared between the Europe and the US. For further details, see European Commission: EU-US Privacy Shield.

7. Data security

We have put in place appropriate security measures to prevent your personal data from being accidentally lost, used or accessed in an unauthorised way, altered or disclosed. In addition, we limit access to your personal data to those employees, agents, contractors and other third parties who have a business need to know. They will only process your personal data on our instructions and they are subject to a duty of confidentiality.

We have put in place procedures to deal with any suspected personal data breach and will notify you and any applicable regulator of a breach where we are legally required to do so.

8. Data retention

How long will you use my personal data for?

We will only retain your personal data for as long as necessary to fulfil the purposes we collected it for, including for the purposes of satisfying any legal, accounting, or reporting requirements.

To determine the appropriate retention period for personal data, we consider the amount, nature, and sensitivity of the personal data, the potential risk of harm from unauthorised use or disclosure of your personal data, the purposes for which we process your personal data and whether we can achieve those purposes through other means, and the applicable legal requirements.

By law we must keep basic information about our business relationships including Contact, Identity, Financial and Transaction Data for six years after they end for tax purposes. We set our data retention policies considering legal requirements and the factors identified above.

In some circumstances you can ask us to delete your data: see *'Your Legal Rights'* below for further information.

In some circumstances we may anonymise your personal data (so that it can no longer be associated with you) for research or statistical purposes in which case we may use this information indefinitely without further notice to you.

9. Your legal rights

Under certain circumstances, you have rights under data protection laws in relation to your personal data. These rights are explained at the end of this notice. If you wish to exercise any of the rights set out at the end of this notice, please contact us.

No fee usually required

You will not have to pay a fee to access your personal data (or to exercise any of the other rights). However, we may charge a reasonable fee if your request is clearly unfounded, repetitive or excessive. Alternatively, we may refuse to comply with your request in these circumstances.

What we may need from you

We may need to request specific information from you to help us confirm your identity and ensure your right to access your personal data (or to exercise any of your other rights). This is a security measure to ensure that personal data is not disclosed to any person who has no right to receive it. We may also contact you to ask you for further information in relation to your request to speed up our response.

Time limit to respond

We try to respond to all legitimate requests within one month. Occasionally it may take us longer than a month if your request is particularly complex or you have made a number of requests. In this case, we will notify you and keep you updated.

10. Glossary

LAWFUL BASIS

Legitimate Interest means the interest of our business in conducting and managing our business to enable us to give you the best service/product and the best and most secure experience. We make sure we consider and balance any potential impact on you (both positive and negative) and your rights before we process your personal data for our legitimate interests. We do not use your personal data for activities where our interests are overridden by the impact on you (unless we have your consent or are otherwise required or permitted to by law). You can obtain further information about how we assess our legitimate interests against any potential impact on you in respect of specific activities by contacting us.

Performance of Contract means processing your data where it is necessary for the performance of a contract to which you are a party or to take steps at your request before entering into such a contract.

Comply with a legal or regulatory obligation means processing your personal data where it is necessary for compliance with a legal or regulatory obligation that we are subject to.

THIRD PARTIES

Internal Third Parties

Other companies in the Froneri Group acting as controllers or processors and who are based in the United Kingdom, EU and outside the EU and provide IT and system administration services, centralised Group services (such as customer support or marketing), any products or services you have requested and undertake leadership reporting.

External Third Parties

- Service providers acting as processors based in the UK, EU and outside the EU (typically in the US) who provide IT and system administration services or other services for and on our behalf (such as satisfaction survey monitoring or quality assurance services);
- Customers of ours (and their audit providers) acting as processors or joint controllers based in the United Kingdom, EU or outside the EU who require reporting of processing activities in certain circumstances (for example relating to suppliers we engage);
- Professional advisers acting as processors or joint controllers including lawyers, bankers, auditors and insurers based in the UK, EU and outside the EU who provide consultancy, banking, legal, insurance, auditing, quality assessment and accounting services;
- HM Revenue & Customs, regulators and other authorities acting as processors or joint controllers based in the United Kingdom who require reporting of processing activities in certain circumstances;
- Third parties acting as processors or joint controllers based in the United Kingdom, EU and outside the EU used to facilitate payment transactions, for example clearing houses, clearing systems, financial institutions and transaction beneficiaries;
- Credit reference and fraud prevention agencies, crime prevention and law enforcement agencies and regulators acting as processors or joint controllers based in the United Kingdom who require reporting to prevent fraud or other criminal offences in certain circumstances;
- Any third party in the context of actual or threatened legal proceedings, provided we can do so lawfully (for example in response to a court order);
- Another organisation if we sell or buy (or negotiate to sell or buy) any business or assets;
- Another organisation to whom we may transfer our agreement with you; and
- Government departments where reporting is mandatory under applicable law.

YOUR LEGAL RIGHTS

You have the right to:



Request access to your personal data (commonly known as a "data subject access request"). This enables you to receive a copy of the personal data we hold about you and to check that we are lawfully processing it.

Request correction of the personal data that we hold about you. This enables you to have any incomplete or inaccurate data we hold about you corrected, though we may need to verify the accuracy of the new data you provide to us.

Request erasure of your personal data. This enables you to ask us to delete or remove personal data where there is no good reason for us continuing to process it. You also have the right to ask us to delete or remove your personal data where you have successfully exercised your right to object to processing (see below), where we may have processed your information unlawfully or where we are required to erase your personal data to comply with local law. Note, however, that we may not always be able to comply with your request of erasure for specific legal reasons which will be notified to you, if applicable, at the time of your request.

Object to processing of your personal data where we are relying on a legitimate interest (or those of a third party) and there is something about your particular situation which makes you want to object to processing on this ground as you feel it impacts on your fundamental rights and freedoms. You also have the right to object where we are processing your personal data for direct marketing purposes. In some cases, we may demonstrate that we have compelling legitimate grounds to process your information which override your rights and freedoms.

Request restriction of processing of your personal data. This enables you to ask us to suspend the processing of your personal data in the following scenarios: (a) if you want us to establish the data's accuracy; (b) where our use of the data is unlawful but you do not want us to erase it; (c) where you need us to hold the data even if we no longer require it as you need it to establish, exercise or defend legal claims; or (d) you have objected to our use of your data but we need to verify whether we have overriding legitimate grounds to use it.

Request the transfer of your personal data to you or to a third party. We will provide to you, or a third party you have chosen, your personal data in a structured, commonly used, machine-readable format. Note that this right only applies to automated information which you initially provided consent for us to use or where we used the information to perform a contract with you.

Withdraw consent at any time where we are relying on consent to process your personal data. However, this will not affect the lawfulness of any processing carried out before you withdraw your consent. If you withdraw your consent, we may not be able to provide certain products or services to you. We will advise you if this is the case at the time you withdraw your consent.

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Appendix – Froneri Group trading entities as at May 2018

Country	Entity	Website
Adriatics	Froneri Adriatic doo Stata Pazova	www.icecreamland.rs
Argentina	Froneri Argentina S.A.	www.froneri.co.ar
Australia	Australasian Food Group Pty Ltd	www.peters.com.au
Austria	Froneri Austria GmbH	www.froneri.at
Brazil	Froneri Brasil Distribuidora de Sorvetes e Congelados Ltda	www.froneri.com.br
Bulgaria	Froneri Bulgaria EOOD	www.icecreamland.bg
Egypt	Froneri Ice Cream Egypt S.A.E.	www.froneri.eg
Finland	Froneri Finland Oy	www.froneri.fi
France	Froneri France S.A.S	www.froneri.fr
Germany	<ul style="list-style-type: none"> Froneri Schoeller GmbH Froneri Ice Cream Deutschland GmbH Erlenbacher Backwaren GmbH 	www.froneri.de www.froneri-schoeller.de www.erlenbacher.de
Greece	Froneri Hellas Ice-Cream S.A.	www.icecreamland.gr
Italy	<ul style="list-style-type: none"> Eskigel S.r.L Froneri Italy S.r.L 	www.froneri.it
Philippines	Froneri Philippines Inc.	www.froneri.ph
Poland	Froneri Polska Sp Zoo	www.froneri.pl
Romania	Froneri Ice Cream Romania S.R.L	www.icecreamland.ro
Russia	Froneri Rus LLC	www.froneri.ru
South Africa	Froneri South Africa (Pty) Limited	www.dairymaid.co.za
Spain	Froneri Iberia S.L.	www.froneri.es
Switzerland	Froneri Switzerland S.A.	www.froneri.ch
United Kingdom	R&R Ice Cream (UK) Limited	www.froneri.uk.com