



## KEDALE DATA PRIVACY POLICY

### COLLECTION AND PROCESSING DATA FAIRLY AND LAWFULLY

#### OPENESS ABOUT THE PERSONAL DATA WE COLLECT AND USE

We inform individuals about the use of their personal data when collecting personal data, **KEDALE** informs clearly, honestly and transparently about the nature of personal data it collects and what it intends to do with it. The use of personal data by KEDALE for a different purpose than initially communicated is **NOT AUTHORISED**, unless adequate information is shared with the concerned individuals and where applicable, written consent for the intended use is given to KEDALE. In general, KEDALE is authorized to use Personal Data for secondary purposes when implementing internal controls, audits, and complying with its statutory and regulatory obligations.

### RESPECTING INDIVIDUALS' RIGHTS AND CHOICES

#### RESPECTING INDIVIDUAL'S RIGHTS

We respond to any requests or complaints made by individuals regarding their personal data and KEDALE recognizes the rights of individuals to:

- a) Request access to the personal data collected from them by KEDALE and the reason for KEDALE having such data.
- b) Obtain a copy of the personal data obtained from them and held in our database.
- c) Request the rectification or deletion of inaccurate or incomplete personal data.
- d) Withdraw consent given to KEDALE for the collection of their personal data at any time, including the right to unsubscribe or to opt out of marketing communications and commercial publications of KEDALE.
- e) KEDALE will respond to requests made by individuals exercising their rights within a reasonable period of time after the individual's request or within any specific period that may be required by applicable local laws.
- f) KEDALE will handle and investigate complaints made by individuals about any breach of these rules or data privacy laws and will respond to such complaints in a timely manner.

### MANAGING DATA RESPONSIBLY

#### TAKING APPROPRIATE SECURITY MEASURES

We adhere and observe appropriate technical and organizational security measures to protect personal data.

KEDALE implements adequate security measures to ensure the confidentiality, integrity and availability of personal data and to prevent the risk of unauthorized or unlawful access, alteration, destruction or disclosure of such data. The measures for protection are based on impact assessments taking into account the risk to the individual related to the specific personal data stored by KEDALE. These measures include security and organizational measures adapted to the type of processing and the nature of the data to be protected.

KEDALE will notify individuals promptly of any privacy breach that has compromised their personal data and will report such incident to the relevant authorities as required by applicable laws.

We strictly ensure that our suppliers or partners also adopt appropriate and equivalent security measures

KEDALE requires from its suppliers or sub- contractors that they fully comply with KEDALE Data Privacy Policies, with any applicable data protection and privacy legislation and maintain adequate technical and organizational security arrangements to protect personal data.

KEDALE ensures that employees maintain the confidentiality of personal data processing by limiting access to personal data to its employees or suppliers who need to perform specific tasks in relation with such Data. Adequate Awareness, training, and confidentiality undertakings are in place to ensure that Personal Data is not shared or disclosed to unauthorized persons, including any other KEDALE employees who do not need to access such Personal Data.