

## DATA PROTECTION POLICY

We are pleased that you are visiting this website ("Site"). This Data Protection Policy is maintained by Integral Commodities, a company established under the laws of the Switzerland with its principle place of business at its Via F. Pelli 13 B 6900 Lugano, Switzerland (Telephone: +41912083157 and fax +41912083167).

Integral Commodities is committed to protect and respect your privacy. Integral Commodities will only collect and process personal data to the extent it is allowed to do so, and will process personal data in a lawful, fair and transparent manner. This document explains what personal data we collect, for what purpose, to whom we disclose the data, and for how long we keep the data. Additionally, we describe your rights and how you can invoke them. For the purpose of this Policy, "Integral Commodities" means all Integral Commodities business units and entities as well as affiliates that are controlled by Integral Commodities. The objective of this Data Protection Policy is to provide a uniform minimum standard for Integral Commodities with respect to its protection of Personal Data worldwide. Integral Commodities recognizes that certain local laws may require stricter standards than those described in this Policy, in which case the stricter standards prevail. Where local law provides a lower level of protection of Personal Data than the level established by this Data Protection Policy, the latter prevail. This Policy applies to any digital and non-digital means of collecting your personal data. When we collect your personal data, we will provide you with more details and explain the purpose for such processing.

### WHAT PERSONAL DATA DO WE COLLECT AND PROCESS?

In order to provide certain services, products and information to you, we may ask that you register and provide us with information about you and/or your company such as contact information and identifying, authenticating, location and/or professional data. Integral Commodities processes your personal data when you have given consent, the processing is needed for the performance of a contract, when Integral Commodities is legally obliged to do so, or when the processing is necessary for the legitimate interest of Integral Commodities.

In addition, Integral Commodities will process personal data for the purpose for which it is collected. We will not use your contact information for product or promotional advertising unless you have specifically requested to receive product information.

If you provide us with personal data about other individuals, please ensure that they have given you consent to do so and that they are aware of our Data Protection Policy.

We use cookies to make this Site easier and better to use, to tailor our products and services to your interests and needs and marketing purposes. Cookies are files or pieces of information that may be stored on your computer (or other devices) when you visit a site. Please see our Cookie Policy for further details about the cookies we use to operate this (and other) Site(s) and how you can disable or enable them.

### FOR WHAT PURPOSES DO WE USE YOUR PERSONAL DATA?

We will process your data for the purposes for which it is collected, such as commercial processes (e.g. commercial contacts, billing or invoicing sales, product delivery, processing orders, making or receiving payments for goods and/or services, permissible marketing activities, purchasing materials, supplies, equipment, supplier due diligence, customer screening processes, licensing agreements and non-disclosure agreements, etc.), monitoring and ensuring compliance with applicable laws, regulatory requirements, communications, responding and complying with requests, career opportunities within Integral Commodities and safety and security.

## WHAT DO WE DO TO PROTECT YOUR PERSONAL DATA?

Integral Commodities has taken appropriate technical, physical, and organizational measures to protect your personal data against unauthorized access or disclosure, unlawful processing, accidental loss or damage, and unauthorized destruction.

Among other things, we use the following measures:

- Access control
- Security awareness and training
- Security breach procedures
- Contingency/emergency planning
- Device and media controls
- Audit controls
- Data Integrity Controls
- Storage and Transmission Security
- Secure disposal

Integral Commodities will require third party service providers, who process Personal Data on its behalf, to implement similar security and confidentiality measures.

## TO WHOM DO WE DISCLOSE YOUR PERSONAL DATA AND WHY?

To fulfill the purposes above, Integral Commodities may need to disclose to, transfer or otherwise share your personal data within Integral Commodities or with a third party service provider to whom we have outsourced the processing of personal data. When Integral Commodities outsources processing activities, it will ensure the service provider is bound to implement and maintain adequate data protection and security measures and will comply with applicable privacy laws.

In some instances, Integral Commodities may share the personal data of persons residing in the European Union as described above with entities located in countries outside of the European Economic Area (so called "third countries") where applicable laws may not offer the same level of data protection as in the European Union. In such cases, Integral Commodities takes measures to ensure an appropriate level of data protection and security.

## HOW LONG DO WE KEEP YOUR PERSONAL DATA?

As required by law, we will only hold your personal data as long as necessary to fulfill the purposes for which the data is collected before making it non-identifiable (anonymous) or deleting it. Unless there is a contractual or legal requirement to retain data for a longer period (such as required by trade or tax regulations).

## WHAT ARE YOUR RIGHTS?

Integral Commodities is committed to transparently processing your data. Depending upon your jurisdiction, you may have the right to request access to your personal data, rectification/correction, erasure (subject to above-mentioned limitations), and data portability. Under certain conditions, you may also object to the processing of your personal data or restrict the processing. If you have given consent for processing your personal data, you have the right to withdraw your consent.

If you wish to exercise your rights, please send your request by email to [dataprotection@Integral-commodities.com](mailto:dataprotection@Integral-commodities.com).

## HOW CAN YOU FILE A COMPLAINT?

If you have a complaint regarding the manner in which Integral Commodities processes your personal data, or suspect that a personal data breach has occurred, please contact us at [dataprotection@Integral-commodities.com](mailto:dataprotection@Integral-commodities.com) and provide sufficient details for us to revert to you. If, in your view, the complaint is not dealt with satisfactory, you may have the right to lodge a complaint with the Data Protection Supervisory Authority established in your country or residence.

#### HOW CAN YOU CONTACT US?

Please contact us if you have any questions about our Data Protection Policy and/or the manner in which we process your personal data by sending an email to [dataprotection@Integral-commodities.com](mailto:dataprotection@Integral-commodities.com).

This Data Protection Policy is subject to change. We advise you to check it regularly.

Version 5 February 2021