



PRIVACY NOTICE

December 2018



PRIVACY NOTICE

GENERAL

This Online Privacy Notice ("Notice") provides you with important information about how Olenex processes your personal data, particularly in relation to Regulation (EU) 2017/679 ("GDPR"). Olenex is committed to protecting the confidentiality, accuracy and integrity of your personal data. Below you will find information for website users, suppliers and customers. Olenex reserves the right to change or update this Notice at any time.

Controller

OLENEX Sàrl
A. One Business Center
La Pièce 3
CH-1180 Rolle
Switzerland

Data Protection Officer

ATTN: Data Protection Officer Olenex
A. One Business Center
La Pièce 3
CH-1180 Rolle
Switzerland

WEBSITE USERS

Purpose and Legal Basis

Log Data

When you visit our website, your Internet browser automatically transmits information to our web server (log data). Some of this information is stored in log files, e.g.

- Date of access
- Time of access
- URL of the referring website
- Retrieved file
- Amount of transferred data
- Browser type and version
- Operating system
- IP address

We generally only evaluate log data further in order to remedy malfunctions in the operation of our website or to clarify security incidents. For troubleshooting or to secure evidence in case of security incidents, it may be necessary for us to collect additional personal data. In such cases we do so on the basis of statutory permission.

This processing is based on Article 6(1)(f) of the GDPR. Our legitimate interest is in the technical provision, security and optimisation of our site.

Contact

You can contact us via the contact form. The personal data you enter into the form will be processed by us to respond to your request, or to handle your request further. Some personal data is mandatory; these fields are marked with an Asterix.

This processing is based on Article 6(1)(f) of the GDPR. Our legitimate interest is to respond to your request and provide you with further information and assistance where this is required.

Newsletter and marketing

You may choose to subscribe to our newsletter. The personal data that is necessary for the successful delivery of our newsletter has been marked; additional personal data from you voluntarily will help us to personalise our communications with you. To send you our newsletter and marketing materials, we request your consent.

In order to verify whether the registration for the newsletter has actually been made by the owner of an e-mail address, we use the "double opt-in procedure". The newsletter is only to be subscribed if the owner of the e-mail address explicitly confirms the activation of the newsletter by clicking on the link from the confirmation e-mail. As proof, we record the execution of the individual phases of the double-opt-in procedure.

If you sign up to receive our newsletter and agree to receive it, your personal data will only be processed for this purpose. You can revoke this consent at any time. Each newsletter contains a link in order to do this. Your choice to unsubscribe is recorded in our database. The personal data will be deleted as soon as it is no longer necessary for the purpose of its collection. The e-mail address of the user is therefore stored as long as the subscription to the newsletter is active.

This processing is based on Article 6(1)(a) of the GDPR. Your consent can be withdrawn at any time with future effect by contacting us or alternatively by clicking on the link provided with the communication.

Recipients

We only share your personal data with further recipients where it is necessary for the relevant purpose. We will never share your personal data unnecessarily. Below are recipients with whom we may need to share your personal data:

Internal

We may share your personal data with our affiliates and/or subsidiaries where it is necessary for the purposes as stated above. This includes internally at Olenex, or with our affiliates Archer Daniels Midland and Wilmar.

Service Providers

We may share your personal information with unaffiliated third parties who perform administrative, marketing, professional or technological support functions, for example, Mailchimp and Survey Monkey, or other parties who perform tasks on our behalf, such as deliveries. We only do this where it is necessary for fulfilling the relevant purpose or in pursuance of the contractual agreement that we have with you or your entity.

Authorities

We may be required to disclose personal information by law or legal process. We reserve the right to contact appropriate authorities when activities that are illegal or violate our policies occur on our website.

Transfers to third countries and/or international organisations

Even if you are located in the European Union, personal data collected whilst you use this website may be processed in a country where the adequacy of that country's data protection laws have not been approved by an adequacy decision of the European Commission. Where we transfer personal data in this manner, we will ensure that any such agreements involving the processing of your personal data will be concluded so that your personal information is protected by adequate safeguards, including under standard EU contractual clauses for the transfer of data.

If you would like more information as to how we protect your personal data in these circumstances, please contact us using the contact details that we have provided above.

Storage

We only store your personal information for a period reasonable for our purposes of processing and/or for a period of time as required by law. If you would like more information about our retention periods, please contact us using the contact details that we have provided above.

Website Cookies

Our website uses cookies. Cookies are small text files that are stored on your device when you visit our website. Each time you visit, this cookie information is returned to us. This allows us to recognize you, for example, or to help you navigate by using the information in the cookies. Cookies cannot be used to launch programs or to transfer viruses to a computer. The reading of cookies is only possible through the web server from which they originated.

You can also view our website without cookies. To prevent the use of cookies, you may disable the use of cookies through the settings of your internet browser. The help functions of your Internet browser will generally tell you how to deactivate and/or delete cookies. Please note that disabling and/or deleting cookies may cause certain features on our site to stop functioning as expected.

Cookies that we use for certain functions include:

- (1) Cookies that store certain user preferences (e.g. search or language settings);
- (2) Cookies that store data to ensure trouble-free playback of video or audio content;
- (3) Cookies that temporarily store certain user entries;
- (4) Cookies used to identify or authenticate our users.

We store this cookie data until the end of the term of a particular cookie or until the cookies are deleted by you.

These processing operations are based on Article 6(1)(f) of the GDPR. Our interest is the ongoing optimization and usability of our website.

Google Cookies & Analytics

This website uses Google Cookies & Analytics. These are cookies managed by Google Inc. ("Google") for the purpose of analysing internet and website usage, and often also for advertising. Personal data processed in this context is your IP address (which will entail your location data) and further information produced by your movements on the internet in connection with that IP address.

This data is fully pseudonymised. The IP address sent by your browser as part of Google Analytics is not combined with other data held by Google. In some cases, the truncating of your IP address occurs so swiftly that no personal data is stored by Google for these purposes. This means in those circumstances, the information collected by Google is entirely anonymised. Some processing by Google will only occur in the European Union. For some cookies, the processing will occur on servers located in the United States. Safeguards for your personal data where this occurs are that Google Inc. is Privacy Shield certified, meaning your personal data is processed to a standard acceptable under EU expectations.

Below you will find information about the sort of Google cookies used by this website. You are able to manage the way Google uses your information and/or the way Google cookies track you on this site. All Google cookies preferences can be managed at the following link: <https://policies.google.com/technologies/managing?hl=en>

Cookies used in this context on this site are:

- a) *Google Analytics*: Google Analytics is a web analysis service provided by Google. Google uses this information on behalf of the website operator to evaluate the way you use the website, to collate reports on website activities and to provide the website operator other services related to website and Internet use.
- b) *Google Tag Manager*: Google Tag Manager is a tag management service. It is a service provided by Google that facilitates the updating of tags for conversion tracking, site analytics and other Google cookie management.
- c) *DoubleClick*: Doubleclick is an advertisement management and bidding service that streamlines advertisements. As a user, this means that cookies allow Google to serve ads based on previous visits to our or other websites on the Internet based on your movements.
- d) *DoubleClick Floodlight*: Doubleclick Floodlight is a system used in conjunction with Doubleclick to track and report conversions.

By using our webpages, you agree to the processing of the data collected about you by Google in the manner described above. You can prevent the storage of such cookies by ensuring your settings are set accordingly in your internet browser, including by using the link provided above. Please note, your use of our website may be affected where you block or ban tracking cookies. If you would like further information about Google's Privacy Policy, that information can be found here: <https://policies.google.com/privacy?hl=en>.

These processing operations are based on Article 6(1)(f) of the GDPR. Our interest is the ongoing optimization and usability of our website.

Links or Plugins for Social Media

This page may offer external links and/or plugins, generally for social media. When you click on this, your personal data will be shared with the relevant external site. Once you leave this website, the processing of your personal data is no longer regulated by us nor governed by this Notice. Where you click on a social media plugin (indicated by the relevant symbol), personal data is shared with that entity. It is generally your IP address, information about the directing site, and, where you remain automatically logged-in on your device to the social media site, they will collect information about your profile. Clicking on external links and plugins is entirely voluntary; therefore, if you do not wish for your personal data to be processed in this way, you do not have to click on these links.

INFORMATION FOR CUSTOMERS AND SUPPLIERS

Purpose and Legal Basis

Below you will find information regarding our processing of personal data from suppliers and customers. This information is intended for customers and suppliers who are natural persons and/or employees of customers and suppliers.

Managing the contractual relationship

We will process your personal data in order to manage your contact details, our communications and contact with you, as well as to provide you with the relevant customer care.

This processing is based on Article 6(1)(b) of the GDPR. The provision of personal data is not required by law or by contract, however, without the personal data, the purpose cannot be achieved.

Marketing

We may process your personal data for the purpose of sending you or contacting you with marketing materials, advertising materials, newsletters, technical information and/or legal updates.

This processing may be based on Article 6(1)(a) of the GDPR, if explicitly so requested. Your consent be withdrawn

Alternatively, this processing may be based on Article 6(1)(f) of the GDPR. Our legitimate interest being that where your electronic contact details were obtained details were obtained in connection with the sale of a good or service, we may use it for promotional purposes for similar goods or services. You can object to receiving this material at any time.

Storage

We only store your personal information for a period reasonable for our purposes of processing and/or for a period of time as required by law.

If you would like more information about our retention periods, please contact our Data Protection Officer with the contact details that we provided above.

Recipients

We only share your personal data with further recipients where it is necessary for the relevant purpose. Below are recipients with whom we may share your personal data. We will never share your personal data unnecessarily.

Internal

We may share your personal data with our affiliates and/or subsidiaries where it is necessary for the purposes as stated above. This includes internally at Olenex, or with our affiliates Archer Daniels Midland and Wilmar.

Service Providers

Where your personal data is managed in a CRM system, your personal data will be passed on to those service providers and processed accordingly. Where we hire external service providers to assist us in advertising and/or promotional activities, your personal data will be shared and processed accordingly.

Authorities

We may be required to disclose personal information by law or legal process. We reserve the right to contact appropriate authorities when activities that are illegal or violate our policies occur on our website.

Transfer to third countries and/or international organisations

Your personal data is generally not transferred to third countries outside of the EU/EEA. In individual cases, due to the global nature of many business relationships, a transfer to such third countries may be required. For such processing, we will make appropriate arrangements to ensure the protection of your personal data by means of recognised EU standards, generally by EU standard contractual clauses for the transfer of personal data. You can obtain more information about a transfer of personal data by contacting our Data Protection Officer.

YOUR RIGHTS

You have the following legal rights over your personal data. You can contact our Data Protection Officer if you would like to exercise these rights, or if you would like further information.

Access to your data - Article 15 GDPR

You have the right to request information as to whether we process your personal data, and access to this personal data.

Rectification of your data - Article 16 GDPR

You have the right to the rectification of your personal data that is inaccurate or incomplete, this includes by means of a supplementary statement.

Erasure of your data - Article 17 GDPR

You have the right to ask us for the erasure of your personal data, where no exemption for retaining the personal data applies.

Restriction of our processing of your data - Article 18 GDPR

You have the right to request a restriction on the processing of your personal data in particular circumstances;

Data Portability - Article 20 GDPR

In some circumstances, you may be entitled to request that your personal data be provided to you in machine readable format. This is applicable where the processing of your personal data is based on consent (Article 6(1)(a)), where special categories of personal data are being processed based on consent (Article 9(2)(a)), or where your personal data is processed on the basis of Article 6(1)(b). This right to data portability includes the right to have your personal data transferred directly to another controller.

Data Subject Rights: Objection

Objection to our processing of your data - Article 21 GDPR

Where your personal data is processed for the purpose of performing tasks carried out in the public interest (Article 6(1)(e)), for the purpose of legitimate interests of the controller (Article 6(1)(f)), or for the purpose of direct marketing and profiling related to this (Article 21(2)), you are able, based on the grounds relating to your particular situation, to object to the processing of your personal data.

Complaints

You always maintain the right to submit a complaint to the relevant supervisory authority regarding our processing of your personal data.