

Privacy Policy & GDPR

This Privacy Policy (hereinafter referred to as "the Policy") is intended to inform users (hereinafter referred to as "Users") of the website <http://ajinomoto-fingerfood.eu> (hereinafter referred to as "the Site") about how AJINOMOTO FOOD EUROPE (hereinafter referred to as "the Company" or "Organizing Company" or "we") collects, uses, and shares the personal data provided by Users through the Site.

1- APPLICABLE LEGISLATION

This Policy is established in accordance with the provisions of the General Data Protection Regulation (Regulation EU 2016/679 of April 27, 2016) (hereinafter "GDPR") as well as any French regulations relating to the protection of personal data.

This Policy governs the methods of collection, processing, hosting, and retention of personal data. AJINOMOTO FOODS EUROPE undertakes to collect, process, use, and transfer any personal data in compliance with the applicable provisions and, in particular, the GDPR.

2- WHAT IS PERSONAL DATA?

Personal data refers to any information relating to an identified or identifiable natural person; an "identifiable natural person" is one who can be identified, directly or indirectly, in particular by reference to an identifier such as a name, an identification number, location data, an online identifier, or to one or more factors specific to their physical, physiological, genetic, mental, economic, cultural, or social identity.

3- WHO IS THE DATA CONTROLLER?

The Company, whose registered office is located at 32 rue Guersant, 75017 Paris, registered with the Paris Trade and Companies Register under number 572233955, acts as the data controller for the personal data of the User of the Site, which is published and operated by the Company as part of the operation (hereinafter referred to as "Operation") implemented and managed for Users.

4- WHAT DATA IS COLLECTED?

The personal data of the User that we collect includes:

- **When browsing the Site:** connection data
- **When ordering product samples:** connection data, first name, last name, postal address, mobile phone number, email address

- **When requesting co-financing for the creation/design and printing of new menus:**
connection data, first name, last name, postal address, mobile phone number, email address

All information provided by the User during their visit to the Site is strictly confidential.

5- WHO ARE THE DATA RECIPIENTS?

Your personal data is transmitted:

- To our internal services, to individuals who need access to it. Processing conditions are strictly regulated, and each employee is regularly trained on handling personal data;
- To our clients, partners, or subcontractors within the meaning of the GDPR, particularly for processing product sample orders and/or co-financing (hereinafter "the Operation"), conducting communication campaigns, and providing hosting services for data flows generated as part of the Operation.

We only provide them with the information necessary to perform the service and request that they do not use Users' personal data for other purposes.

We always take all necessary steps to ensure that all third parties we work with maintain the confidentiality and security of Users' data.

6. WHAT ARE THE PURPOSES OF DATA PROCESSING?

The purpose of data processing corresponds to the main objective that justifies the use of your data.

The User's personal data is required for the following purposes:

- Authentication for access to the Site
 - Authentication to receive product samples
 - Authentication to register, process, and deliver product sample orders
 - Authentication to receive email, SMS, or postal communications from the Company or one of its partners
 - Authentication in the context of a co-financing request for the creation/design and paper printing of new menus
 - Management of pre-litigation and litigation
 - Compliance with legal obligations
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7. WHAT IS THE LEGAL BASIS FOR PROCESSING?

The legal basis for processing corresponds to the foundation on which the use of your data is lawful.

- The User concerned has consented to the processing of their personal data.
- Processing is necessary:

- As part of the Operation and management of the Site
 - For the pursuit of the legitimate interest of the Data Controller to establish proof of a right or contract
 - To comply with a legal obligation
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8. HOW LONG IS THE DATA RETAINED?

The retention period for data corresponds to the time during which your data must be used in relation to the intended purpose, unless the law allows or requires it to be kept longer.

Personal data collected via the Site is retained for as long as the site is active (at least 12 months), plus 24 months from the closure or deletion of the online site, unless other legal obligations require a longer period.

The data collected will be communicated only to the Company's staff and will be retained for the following periods:

- Data necessary for commercial prospecting operations for individuals who have agreed to share their data: three (3) years from the date of collection
- Data concerning opt-out lists for prospecting: three (3) years

At the end of these retention periods, your data may be kept longer to comply with a legal obligation or to prevent any litigation. In this case, your data will be archived in a separate database with secure access limited to strictly authorized personnel, for legal prescription periods in accordance with the provisions of the Civil Code or Commercial Code (e.g., 5 years for commercial matters or 10 years for accounting matters), before being permanently deleted or anonymized.

9. WHAT ARE THE DATA STORAGE METHODS?

The data we collect from Users is stored in France by us or by our trusted service providers. However, it may be transferred, accessed, and stored at any time in a country located within the European Economic Area ("EEA") and the United Kingdom. It may also be processed by a staff member operating within the EEA who works for us or one of our service providers.

In such cases, we will transfer personal data outside the EEA only in a secure manner and in compliance with applicable legislation. Some countries may not have laws governing the use and transfer of personal data; therefore, we undertake to take all necessary measures to ensure that, where applicable, the third parties concerned comply with the conditions set out in this Policy. These measures may include verifying the standards applied by these third parties regarding personal data protection and security and/or signing appropriate contracts (based on the model adopted by the European Commission). For further information, please refer to the "Contact" section below.

10. DATA SECURITY POLICY

We attach great importance to the protection of Users' personal data and take all reasonable precautions for this purpose. We require trusted third parties who manage this data on our behalf to do the same, contractually.

We constantly do everything possible to protect Users' personal data. Upon receipt, we apply strict security procedures and measures to prevent any unauthorized access.

Since data transmission via the Internet is not completely secure, we cannot guarantee the security of personal data transmitted to our Site through this channel. Therefore, any transmission is at your own risk.

11. LINKS TO THIRD-PARTY SITES

The Site may occasionally contain links to websites belonging to our networks, advertisers, and affiliate partners. These sites have their own personal data protection policies, the application of which cannot, under any circumstances, engage the responsibility of the Company. We invite Users to read the terms of these policies before sending any personal data to these websites.

12. SPECIFIC USER RIGHTS

In accordance with the provisions of the GDPR, the User has the right of access, rectification, or erasure, restriction of processing of their personal data, the right to object to the processing of their personal data, the right to data portability, as well as the right to define directives regarding the fate of their personal data after their death.

The User may exercise their rights:

- By sending their request by email to the following address: **GDPR_contact@afe-emea.eu**
- Or by postal mail addressed to: **Ajinomoto Foods Europe, 32 rue Guersant, 75017 Paris, FRANCE**

13. DATA PROTECTION OFFICER / CONTACT

For any request for information or to exercise their rights under the GDPR, the User is invited to contact:

- **Bertrand Vigna**
- **DPO AJINOMOTO FOOD EUROPE**
- **Ajinomoto Foods Europe, 32 rue Guersant, 75017 Paris, FRANCE**
- **GDPR_contact@afe-emea.eu**

COOKIES INFORMATION NOTICE

The Site also uses cookies necessary for its proper functioning and for the provision of the services offered.

The Company has prepared this Cookies Information Notice to clearly inform you about the different cookies used on the Site and the processing carried out on the data collected through them.

What is a cookie?

A “cookie” is a connection marker that refers to a text file that may be stored, subject to the choice expressed by the User, in a dedicated space on the hard drive of their device when visiting the Site. A cookie file allows its issuer to identify the device in which it is stored during the validity or storage period of the cookie and must therefore be considered as Personal Data.

The User may oppose the placement of these cookies by using their browser settings. However, without these cookies, the User will not be able to use the Site normally, and their experience may be degraded.

Which cookies are used on the Site?

• Navigation cookies:

These are cookies essential for browsing the Site and allow the User to use the main functionalities of the Site and secure their connection.

Since these cookies are necessary for the proper functioning of the Site, their placement is not subject to the User’s prior consent.

The User may oppose the placement of these cookies by using their browser settings. However, without these cookies, the User will not be able to use the Site normally, and their experience may be degraded.

Types of cookies:

Cookie Name	Purpose	Lifetime	Issuer
user_locale	Display the user’s default language	12 months	https://www.ajinomoto-fingerfood.eu

▪ Analytics and audience measurement cookies

These cookies are used on the Site to allow statistics to be compiled regarding visits to our Site, for example by determining the number of visits and which pages are most or least visited, by evaluating the navigation of Users and identifying any technical malfunctions. These cookies are limited to the sole measurement of the Site’s audience on our behalf and only produce anonymous statistical data. Their use is therefore not subject, in application of the applicable regulations, to obtaining prior consent from the User.

Type of cookies:

Cookie name	Purpose	Lifetime	Issuer
_gat	This cookie name is associated with Google Universal Analytics. It is used to limit the rate of requests, which limits the collection of data on high-traffic sites.	1 min	https://www.ajinomoto-fingerfood.eu
_ga	This cookie name is associated with Google Universal Analytics, which is an important update of the most used Google analytics service. This cookie is used to distinguish unique users by assigning a randomly generated number as a customer ID. It is included in every page request within a site and used to calculate visitor, session, and campaign data for site analysis reports.	2 years	https://www.ajinomoto-fingerfood.eu
_gid	This cookie name is associated with Google Universal Analytics. It stores and updates a unique value for each page visited.	1 day	https://www.ajinomoto-fingerfood.eu

How to manage cookie storage:

The User has the option to manage and modify the storage of cookies through the configuration settings of the browser software on the computer used to connect to the Site, so that they are systematically stored or rejected, either globally or according to their issuer.

Deleting stored cookies may prevent access to certain functionalities that are necessary for browsing some areas of the Site, such as:

- Access to content or services offered on the Site that require an identification protocol
- Recognition of the type of browser, as well as language and display settings used by the computer to connect to the Site

In such cases, we disclaim any responsibility for the consequences related to the refusal or deletion of cookies from the Site.