



# Global Privacy Policy



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This Privacy Policy (“Policy”) describes how and when McCain Foods Limited, a company organized under the laws of New Brunswick, Canada, with its global headquarters located at 8800 Main Street, Florenceville-Bristol, New Brunswick E7L 1B2, Canada, and its affiliates (together and individually, “McCain”) collect, use, and share personally identifiable information (“Personal Data”).

## What Personal Data Do We Collect?

We collect Personal Data to operate effectively and provide you with the best services and user experiences we can, but collect only the least amount necessary to provide those services. In particular we use:

- **Contests, Inquiry and Loyalty Card Programme Information** – To enter contests or sweepstakes, make an inquiry or participate in a loyalty card programme, you must provide your full name and email address. You may also be asked to provide your mailing address, phone number, age, area of residence, family composition, background, interests, social media particulars, profiles and contact information, and information about your use of our products. For loyalty programmes specifically, we may also process company information (e.g. market segment or target clientele) and the country from which you operate. You may also voluntarily provide other limited information when making an inquiry. If you participate in any contests or sweepstakes, we may request a photo and description of your participation. In some cases, we may collect information related to frequency of purchases, albeit always on an anonymous and aggregated basis, for us to gauge our marketing initiatives.
- **Website Information** – When you access our website (or special purpose portals), we automatically collect your computer’s internet protocol (IP) address and other technical information about your computer and website usage, such as your browser type and version, time zone setting, and operating system and platform. When conducting extended market research, we may also collect the pages you accessed on a McCain website, the links you clicked, the sites visited prior to visiting a McCain website, emails from McCain that are opened, forwarded or clicked through to the McCain website, etc. We also use cookies on our websites; for more information, please see the Cookies and Other Technologies section of this Policy below or read our [Global Cookie Policy](#).
- **Portal Subscriber Information** – When you decide or are invited to access a McCain special purpose portal, such as a portal for specific suppliers, you must provide your full name, mailing address and email address. You may also be asked to provide information specific to the nature of the special purpose portal, such as non real-time geolocation data, supplier quality results and statistics, photographs and video and opinions. In certain limited cases, you may also be asked to provide social security numbers, tax identification numbers and similar.
- **Passwords** – When setting up an online account on one of McCain’s websites or portals, as applicable, we will process your password and, in some cases, process a password aide-memoire question and answer.



- **CCTV Footage** – When accessing our manufacturing facilities and work areas, we may process footage of you obtained through our use of CCTV surveillance systems, in accordance with applicable law.
- **Information Collected on Social Media Accounts** – When interacting with your social media accounts, we may collect your email address, Twitter handle, contact information displayed on your Facebook profile, etc.
- **R&D and Market Research Information** – When taping the in-home or in-business usage of our products, we may process your name, address, phone number, salary range, level of education, employer, opinion on business matters or products, number of children, video-taped images of all research subjects and participating family members and, where applicable, their domestic situation. When processing your feedback through our in-store or online market research, we may process your contact details.
- **Agronomy Information** – We process certain Personal Data e.g. names, contact details, possibly information related to the grower's family or his/her birthday, invoicing details, crop statistics, photographs of vehicles, homes and individuals, etc. to manage our relationships with our growers. We may collect GPS coordinates to map the fields of our growers. When necessary for us to comply with legal obligations, we collect national registry numbers or social security numbers. Our contract with growers or suppliers may provide further detail.
- **Visitor Information** – When accessing our buildings, we may collect your name, contact details, car plate number, identification, etc. for security reasons. We may also ask you to disclose information about your health (including information related to open wounds, flu, etc.) for food safety reasons.
- **Photos and Videos** – When participating at our internal or external events, meetings (with government officials, customers, etc.), conferences, etc., we may take photos or videos of yourself, as part of a crowd or on individual/portrait basis. We may also gather some of your Personal Data, such as your name, email address, or professional details. If you are a government official, we may also process data revealing your political opinions.
- **CV/Resumes and Relevant Information for Recruitment** – We collect your CV/resume and other relevant information (such as your photograph, the languages you speak, your training records, etc.) for recruitment purposes, whether you are applying for a permanent or a temporary job (as an employee, independent contractor, volunteer, agent, or temporary worker). We may also ask you to perform psychometric tests as part of the recruitment process and collect information about aspects of your personality which are relevant to the workplace. If your CV/resume is incomplete or imprecise, we may ask you to provide us with further information about your education and work background, your address, your contact details, your certifications, your driver license, your gender, etc. We may also ask you to provide us with your bank details and credit card number if we need to pay back travel or accommodation costs that you incurred to attend the interview. In some jurisdictions, we may ask you for your passport, your identity card or some extracts of your criminal records, if and to the extent permitted by applicable law. During the interview, we may ask you to provide us with information about your hobbies, personal interests, family composition, salary expectations, driving experience, etc. At McCain, we value diversity within our workforce. As such, we may collect limited diversity attributes about you only for the purpose of encouraging further diversity within our workforce. We will not ask you any information that we are not allowed to ask you under applicable laws. If you are hired, the McCain Employee Privacy Policy will describe the handling of your Personal Data in the employment context.

- **Information relating to Sourcing and Procurement** – When you are rendering services to us (e.g. maintenance services, IT services, consultancy services, etc.) as a third-party contractor or selling products to us, we collect the Personal Data necessary for the performance of the services or the delivery of the products (and the payment of any related invoices). Such Personal Data may include your contact details, financial details, billing and invoicing information, credit check information, Personal Data about your staff, certifications, driver licenses, car plate numbers, safety records, etc. Our contract with specific suppliers, vendors or contractors may provide further detail.
- **Information relating to Representatives of our B2B Customers** – In view of managing and developing our customer and sales relationships, we may collect certain Personal Data relating to representatives of prospective, current and former B2B customers, e.g. name, address, contact details, job function, birthday, family composition, personal interests and vacation plans. For us to comply with our invoicing and accounting obligations, we may collect certain Personal Data relating to representatives of current and former B2B customers, e.g. name, address, contact details, job function, bank account numbers & invoicing details, tax identification numbers, etc.
- **Information relating to Individual Consumers of our Products** – We may collect e.g. your name, phone number, email address, physical address, mobile phone, preferred language, and the McCain products you consume or are interested in.
- **User-generated Content received through our Online Presence** – If you post any materials (e.g. pictures, videos, etc.) or any other information (e.g. comments) on a feed or a page of a McCain website or on a feed or a page of a social media account held by McCain, we may use any Personal Data contained in (or relating to) such materials or information for the purposes listed below.
- **Information about Inventors** – When McCain applies for patents or similar registered intellectual property rights, we collect the names, addresses, contact details and full resumes of the individuals that invented or developed such McCain intellectual property. We also process Personal Data for the purpose of producing and submitting certain documentation (such as affidavits) which may contain additional Personal Data about these individuals.
- **ID Information** – When exercising your rights as to our use of your Personal Data, we may, in some circumstances, ask for a copy of your identity card or another proof of your identity (e.g. driver's license) to verify your identity.

## Why Do We Use Your Personal Data?

We use your Personal Data for the purposes listed below:

- **Contests, Inquiry and Loyalty Card Programme Information** to allow us to be in contact with you in relation to your inquiry or your participation in the contests or sweepstakes, to manage your loyalty card programme, to personalize our services for you, to provide you with customer service, and to monitor our provision of customer service. In some cases, we may use some of your Personal Data for external communications purposes, e.g. by making a press release about a contest winner.
- **Website Information** to monitor and administer the contests and sweepstakes you may enter and your inquiries, to analyze trends, usage and activities with users on our website, to ensure

its technological compatibility, to help us create websites that best suit our users' interests and preferences and to help identify products, site features, recipes, advertisements, and offers that may be of particular interest to you (for example as part of an extended market research). We also use website information to monitor and control the security of our website and prevent cyber security incidents. We may also use website information to collect feedback on the website usage, provide IT support to online visitors and gauge success of our marketing initiatives.

- **Portal Subscriber Information** to administer the specific relationship, fulfill contractual obligations, deal with quality issues, assist with business planning and development, assist suppliers or other portal subscribers to achieve goals, and administer incentive programmes. In certain limited cases, we also use Personal Data to facilitate billing and invoicing or for the purpose of product traceability or compliance with regulatory requirements or contractual requirements.
- **Passwords** and password aide-memoire questions and answers to register yourself online in a secure way and help you registering if you forget your password. Please choose a password that is unique to every account and do not use sensitive information or financial information as an aide-memoire (e.g. your bank account credentials).
- **CCTV Footage** to maintain a safe and secure environment for our people, visitors, products and processes; for more information about our use of CCTV surveillance systems, please request our CCTV Surveillance Policy.
- **Information Collected on Social Media Accounts** to contact you via your social media accounts, to answer your inquiries and to better engage with our customers.
- **R&D and Market Research Information** to perform market research, improve our products and services, for R&D purposes and for the study and understanding of the business and preferences of consumers or operators.
- **Agronomy Information** to perform demand planning and improve our products and services, to process and fulfil orders (including shipping and distribution of goods), to pay invoices, and generally to manage our relationships with growers.
- **Visitor Information** to comply with building safety obligations, to identify the people that are entering our premises, and for food safety reasons.
- **Photos and Videos** to communicate about our events, meetings, conferences, etc., on our websites, via our social media accounts, via press releases and other corporate communications and marketing materials. In some cases, we may ask you to provide us with your email address to send you the pictures and videos, we may collect your professional details to contact you back about our products and services, or, if you are a government official, we may collect and use data revealing your political opinions for corporate communications purposes and public affairs purposes.
- **CV/Resumes and Relevant Information for Recruitment** to enable us to recruit the right people.
- **Information relating to Sourcing and Procurement** to set up the contractual terms with our suppliers, to pay for our suppliers' products or services, to perform recalls and to call

warranties, to comply with accounting obligations applicable to us, to conduct demand planning and generally to facilitate the relationship with our suppliers.

- **Information relating to Representatives of our B2B Customers** to manage our customer relationships and to develop our business, to deliver our products and services online or offline, to better understand our customer's needs, to invoice our products and services, for corporate governance purposes and to comply with accounting obligations applicable to us.
- **Information relating to Individual Consumers of our Products** to, if and to the extent permitted by applicable law, provide individual consumers of our products with marketing communications promoting our products and services (or those of third parties), to better understand our consumers' needs, to address complaints on our products, and more generally to improve our relationships with individual consumers.
- **User-generated Content received through our Online Presence** to better engage with our customers or individual consumers of our products, to interact with our customers and to address complaints.
- **Information about Inventors** to apply for or assign patents or similar registered intellectual property rights for the benefit of McCain.
- **ID Information** to help us prevent unauthorized individuals from accessing, changing or deleting your Personal Data.
- **Internal Administrative Purposes** including for purposes of audit, data analysis, sustainable cost advantage, compliance, governance & legal, corporate social responsibility (CSR), security, accounts payable and receivable validation, and database records.

Depending on the circumstances, we may also use your Personal Data for the following purposes:

- For corporate communications purposes and for public affairs purposes (including, if necessary, to issue a public response to specific complaints);
- To respond to your comments and questions (problem resolution);
- To provide customer service (e.g. product recalls);
- To conduct sales and market research (e.g. through surveys);
- To conduct research and development (e.g. through product concept correspondence);
- To register yourself when we organize events;
- If and to the extent permitted by applicable law, for direct marketing purposes;
- To improve business relations;
- For public affairs purposes;
- To protect against and prevent fraud, unauthorized transactions, claims and other liabilities, and to manage risk exposure;
- To handle legal disputes;
- To conduct corporate transactions (including mergers, acquisitions and divestments); and
- To improve and enhance our products and services, in general.

We will not use Personal Data for any purposes that are incompatible with those outlined in this Policy, unless you give us your free and informed consent for additional specific purposes.

## On What Basis Do We Use Your Personal Data?

We collect and use your Personal Data when:

- This is in our legitimate interest. This is the case, for example, when we collect and use your Personal Data to:
  - Improve our products and service offering;
  - Better understand our customers and their changing needs;
  - Tailoring our marketing activities to customers' needs and aspirations;
  - Manage our supplier and customer relationships;
- This is necessary to:
  - Perform our contract with you (e.g. use of portal subscriber information for contract fulfilment purposes);
  - Comply with regulatory requirements (e.g. when we must use Personal Data in order to comply with food safety regulations); or
- You have given your prior consent to us processing your Personal Data. For example, in certain circumstances we will ask your prior consent before using your electronic contact details (e.g. email address) to send you electronic communications to promote our products or services.

If we collect your Personal Data while you are visiting or using any of McCain's websites, apps or social media pages, then you will be deemed to have read and accepted this Policy if and where such deemed acceptance is valid under applicable law.

We may collect some of your Personal Data when available from public sources (e.g. your social media profiles) during e.g. our recruitment process.

## What Happens if You Do Not Provide Us with the Personal Data We Request or Ask That We Stop Processing Your Personal Data?

The quality of our services and products, as well as our ability to comply with our legal and contractual obligations, sometimes depend on McCain having access to and being able to use certain Personal Data.

Therefore, and depending on the circumstances, if you do not provide us with the Personal Data we request or if you ask that we stop processing your Personal Data, the quality of our products or services may be affected or we would be in breach of one or more legal or contractual obligations applicable to us. In some cases, if we are not allowed to process your Personal Data, this may result in us being required to cease to provide you with our products or services or to terminate our relationship with you.

## To Whom Do We Disclose Personal Data?

We do not sell or rent your Personal Data to others. We only share Personal Data with third parties who are bound by terms at least as restrictive as this Policy and only in the following ways:

- **Affiliates** – We may share Personal Data with any of our affiliates or subsidiaries, e.g. for the purpose of providing customer service, administering our contests, sweepstakes and loyalty programmes, or improving our products and services. We may also share your Personal Data with affiliates or subsidiaries that provide shared services within McCain, e.g. in connection with the purchase and sale of products, financial and accounting support, recordkeeping, customer billing and collections, order processing, accounts payable processing, and preparing and reporting estimates and results. For further information, please contact our Privacy Officer at [McCainPrivacy@mccain.com](mailto:McCainPrivacy@mccain.com).
- **Service Providers** – We share Personal Data with third-party providers of services relating to, for example, our website, the administration of our contests, sweepstakes and loyalty programmes, the provision of our customer service, our CCTV surveillance, our market research and sales, our R&D activities or our public relations. These service providers only have access to the Personal Data necessary to perform their functions, only act on our behalf and under our instructions, and may not use it for purposes other than to perform such functions. For further information, please contact our Privacy Officer at [McCainPrivacy@mccain.com](mailto:McCainPrivacy@mccain.com).
- **Customers** – We may share Personal Data (e.g. when collected through special purpose portals) with our customers to address traceability and other regulatory or contractual requirements or to facilitate problem resolution.
- **Legal** – We may disclose Personal Data to courts, law enforcement agencies, and other government bodies where we believe that doing so is in accordance with or required by any applicable law, regulation or legal process. We may also disclose Personal Data to external legal counsel to assist us with the establishment and defence of legal claims or to assist us on transactions (e.g. to provide assistance in connection with mergers, acquisitions or divestments) or to other third parties also engaged in such legal matters (e.g. to the adverse party in court proceedings, to judicial experts, to other stakeholders involved in the claim, etc.).
- **Business Transfers** – In the event of a reorganization, merger or sale, we may transfer any and all Personal Data we collect to the relevant third party involved in the reorganization, merger or sale, with the consent of data subjects if and as required under applicable privacy laws.
- **With Your Consent** – We may also share Personal Data with other third parties subject to your prior consent.

## How Do We Protect Your Personal Data?

We maintain reasonable administrative, technical and physical safeguards to protect Personal Data against loss, theft, misuse and unauthorized access, disclosure, alteration and destruction as required by applicable law.

Unfortunately, the transmission of information via the Internet is not completely secure. Despite our safeguards, we cannot guarantee the security of information transmitted to us via the Internet. Once we have received your information, we will maintain reasonable safeguards to protect it.



## Where is Your Personal Data Stored?

McCain operates globally, and your Personal Data may be stored and processed by it or its service providers in multiple jurisdictions, including outside your home jurisdiction.

McCain stores Personal Data at our facilities in Florenceville, New Brunswick, Canada. Personal Data may also be stored at our local or regional offices.

McCain has policies and procedures in place to ensure that we comply with all applicable laws in the event of a security incident leading to the accidental or unlawful destruction, loss, alteration, unauthorised disclosure of, or access to, your Personal Data.

In the event that we do transfer any Personal Data internationally, we will only do so in line with applicable law, and we will ensure that there is an adequate level of protection for the Personal Data, and that appropriate security measures are in place.

Personal Data may be transferred from countries located within the European Economic Area (EEA) to countries located outside of the EEA such as Canada and the United States in particular. In such cases, we will ensure that the following safeguards are taken:

- The laws of the country to which Personal Data is transferred ensure an adequate level of data protection under article 45.1 of the EU General Data Protection Regulation (2016/679). For Canada, the adequacy decision is available [here](#); or
- The transfer is subject to the [EU-US Privacy Shield](#) under article 45.1 of the EU General Data Protection Regulation (2016/679); or
- The transfer is subject to data protection clauses approved by the European Commission under article 46.2.d) of the EU General Data Protection Regulation (2016/679). More information about those data protection clauses is available [here](#); or
- Any other applicable appropriate safeguards under article 46 of the EU General Data Protection Regulation (2016/679).

For more information about the safeguards relating to Personal Data transfers outside of the EEA, please contact our Privacy Officer at [McCainPrivacy@mccain.com](mailto:McCainPrivacy@mccain.com).

## Your Rights

Depending on and subject to applicable laws, you have certain rights regarding the Personal Data that we hold about you. These rights may include the following:

- the right to access the Personal Data we hold about you;
- the right, under certain circumstances, to block or suppress further use of your Personal Data;
- the right to request the rectification of the Personal Data that we hold about you if that information is inaccurate or incomplete;
- the right to object to certain types of processing;
- the right, under certain circumstances, to request the deletion or removal of your Personal Data;
- the right to lodge a complaint with the competent data protection supervisory authority (such as, in Europe, in the EU Member State of your usual residence) about the way we handle or process your Personal Data;
- if our processing of your Personal Data is based specifically on your consent, you have the

- right to withdraw that consent at any time;
- you have the right to obtain from us, under certain circumstances, the Personal Data that we hold about you in a structured, commonly used and machine-readable form so you can reuse it for your own purposes across different services.

These rights can be exercised by contacting our Privacy Officer at [McCainPrivacy@mccain.com](mailto:McCainPrivacy@mccain.com). However, please note that we may, if and to the extent permitted by applicable law, need to retain or continue processing certain information, for example for legal or administrative purposes (e.g. keeping of accounting records).

For all requests set out above, please send us an email with “data privacy request” in the subject line and include a copy of your identity card or another proof of your identity (e.g. driver’s license) to help us prevent unauthorized individuals from accessing, changing or deleting your Personal Data.

We will respond to your request as soon as practically possible and always within the timeframes set forth by applicable law.

## Your Right to Object to Processing for Direct Marketing Purposes

You have the right to object at any time and free of charge to our processing of your personal data for direct marketing purposes (including profiling to the extent that it is related to such direct marketing).

This right can be exercised by contacting our Privacy Officer at [McCainPrivacy@mccain.com](mailto:McCainPrivacy@mccain.com) or may be exercised by other electronic means, such as via a link to unsubscribe from email subscriptions.

## Children

### ***Important Note to Children***

Before providing your name, address, e-mail address or any other information to anyone on the Internet, be sure to ask your parents if it's OK.

### ***Important Note to Parents***

Although some parts of the website may appear to be directed at children under the age of 13, children under the age of 13 are only permitted to enter contests or sweepstakes and share any Personal Data with us with the permission of a parent or legal guardian. When communicating with us by e-mail, to enter contests or promotions, or to receive newsletters, your child will be asked to only provide the email address of his or her parent or legal guardian. A child that under applicable local laws is not legally authorized to give consent to the processing of his or her Personal Data must seek the permission from a parent or legal guardian before sharing any of his or her Personal Data with us. In the event that we discover or reasonably believe that the Personal Data of a child has been collected in a manner that is inconsistent with this Policy, we will immediately seek to verify that the child’s parent or legal guardian has provided permission, or else delete the Personal Data.

## Cookies and Other Technologies

Cookies and other, similar technologies are used when you visit our websites. For more information about the cookies and other, similar technologies that are used when you visit our websites, please



read the cookie information notice available on the relevant McCain website or read our [Global Cookie Policy](#).

## External Links

This Policy does not apply to the collection, processing and use of Personal Data by companies that we do not own or control, or to people that we do not employ or manage ("External Parties"). Although some of our websites may link to the websites and services of External Parties, such as those of our business partners and social media companies, we do not exercise control over the activities of External Parties. For more information about what Personal Data External Parties collect and how they use such Personal Data, please refer to their privacy policies.

## How Long Do We Keep Personal Data?

McCain has internal retention policies and procedures that build upon the following criteria to determine the retention periods of Personal Data in the context of the above mentioned purposes:

- Time elapsed since your last interaction with a McCain website;
- End of the contractual relationship with a grower, a supplier, or a third party provider of products or services;
- End of a recall period for a product or of a warranty on products or services;
- Sensitivity of the Personal Data;
- Security reasons;
- Applicable statutes of limitation;
- On-going or potential litigation or dispute;
- Regulatory or legal obligation to retain the Personal Data (e.g. for accounting purposes or in the context of CCTV surveillance).

## Revisions to the Policy

We may update this Policy from time to time. Changes to this Policy will not necessarily be preceded by a notice posted on the website, and we encourage you to check the Policy periodically for changes. Your continued use of the McCain website following the posting of changes to the Policy will mean you accept those changes.

## Conflicts or Inconsistencies between Policies

If there is any conflict or inconsistency between a provision of this Policy and a provision of any other McCain policy that is referred to in this Policy, this Policy will prevail.