



# PRIVACY NOTICE



**Olenex Sarl**  
5-24-2018

# 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

Dr. Thomas Balzer (Contractor)  
EMEA Compliance  
privacyeu@adm.com  
+0049 (0) 40 3013 774

#### **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 these instances 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 required 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)(b) of the GDPR. The provision of personal data is not required by law or by contract, however, without the personal data, achieving the purpose of the processing will be effected.

#### **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 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.

## **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**

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 countries 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.

## **Google Analytics and Cookies**

Whilst we do not interfere with any cookies preferences you have submitted with your browser, this website does use Google Analytics - a web analysis service provided by Google Inc. ('Google'). If you have consented to the processing of third party cookies in your browser settings, your personal information will be processed in this way by our site. Cookies will process information about your visit (pages clicked, session details etc.), as well as technical information that distinguish you as a user.

Google Analytics uses "cookies"; these are text files which are stored on your computer to analyse the way you use the website. The information about the way you use this website created by the cookie is sent to and stored on a Google server in the USA.

If the IP anonymization is activated on this website, Google will first truncate your IP address in Member States of the European Union or in other state parties to the Agreement on the European Economic Area. Only in exceptional cases is the full IP address sent to and truncated on a Google server in the USA. 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.

In addition, we use Google Conversion Tracking in conjunction with Google Analytics. This will allow us to measure the behaviour of our website users. For example, we can see how many PDFs have been downloaded or how many times our contact form has been used. Likewise, we can ascertain how many clicks on advertisements from external sources (AdWords, LinkedIn, Xing, Bing) have led to our website.

The IP address sent by your browser as part of Google Analytics is not combined with other data held by Google. You can change your browser settings to prevent cookies from being stored; however, we draw your attention to the fact that, in these circumstances, you may find that you are unable to make full use of functions on the website. You can also prevent the data (including your IP address) relating to your use of the website which is captured by the cookie being sent to or processed by Google by downloading and installing the browser plug-in from the following link:

<https://tools.google.com/dlpage/gaoptout?hl=en>.

You can refuse the use of Google Analytics by clicking on the following link. An opt-out cookie will be set on the computer, which prevents the future collection of your data when visiting this website: Disable Google Analytics

For further information please visit:

<https://www.google.com/analytics/terms/us.html> or <https://www.google.de/intl/en/policies/>

### **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.

### **Newsletter**

If you have granted your consent pursuant to Article 6(1)(a) GDPR to the receipt of our newsletter, we will use your e-mail address to regularly send you our newsletter. For the receipt of the newsletter the provision of an e-mail address is sufficient. Unsubscribing is possible at any time, for example via a link at the end of each newsletter. Alternatively you can also send your unsubscribe request to us using the contact details provided above.

## **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.

## **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.

## 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.

### **1. 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.

### **2. 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.

### **3. 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.

### **4. 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;

### **5. 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.

## **6. 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.