

# Information about our processing of personal data about consumers, customers and business contacts

Updated November 2023

This document provides information on the processing of personal data\* carried out by companies in the Orkla Group, including The European Pizza Company. Together, they are referred to below as "Orkla", "we" or "us".

\*"Personal data" means information that can be linked to you as an individual.

## **1. The purposes of our processing of personal data, types of personal data, legal basis, and storage period.**

1.1 Our processing of personal data takes place within relevant legislation, including the Personal Data Act and the General Data Protection Regulation (GDPR). In brief, the purposes for Orkla's processing of personal data are to handle enquiries from consumers and others, to provide services or products, to manage or adapt communication and marketing, to adapt and improve product development and production of services or products, or to manage cooperation and communication with business contacts. Below is a more detailed description.

1.2 The purpose of using personal data and the types of personal data we use will

- either be described in provided information;
- be clear from the context of your contact with us (for example, you provide your name and e-mail address when signing up for a newsletter);
- or be described in sections 1.4 – 1.10 below.

1.3 In sections 1.4 – 1.10 below you will find more information about our personal data processing in different situations where you have been in contact with us. The information describes the specific purposes for which your personal data is processed, which categories of personal data Orkla processes, on what legal basis Orkla supports the processing, and how long Orkla stores the personal data.

Please note that several of the points with information may be relevant to you at the same time, for example if you visit our website (point 1.4) and purchase goods (1.7) and in connection with the purchase create a profile in our customer club (1.6).

## **1.4 Visits on our websites - Cookies and similar technologies ("cookies")**

1.4.1 Orkla's websites use cookies and similar technologies (hereinafter collectively referred to as "cookies") that are stored on your computer, mobile phone or tablet, usually through the use of a web browser. Cookies are used, among other things, to ensure secure login, provide visitors with a

better user experience, provide access to various website functions, distinguish visitors to the website from each other, analyze how well our website and online services work, and to be able to conduct customized, interest-based advertising. This involves a greater or lesser degree of use of the personal data of website users – as described below – and helps us to improve the website and make our digital communication more relevant to the recipients.

1.4.2 Visitors may voluntarily choose to approve the use of cookies, through settings on our website or in their browser. You can change the settings in your browser so that you either block cookies from being downloaded automatically or that you are given a choice to download each cookie. You can also delete cookies at any time by going to the settings in your browser. How this is done depends on which browser you are using. Please refer to the "Internet/Privacy Options" or equivalent menu in your browser for further instructions on how your browser works. Please note that if you say no to cookies, it may affect the functionality of our, as well as other, websites.

1.4.3

<b>Type of personal data processed with cookies:</b> IP address, type of device and operating system, location, website behavior, clicks, time on website, etc		
<b>Purpose</b>	<b>Legal basis</b>	<b>Storage time</b>
<u>Performance-based cookies</u> : These allow us to count visits and the sources of traffic so that we can measure and improve the performance of our website. They help us know which pages are the most and least popular and see how visitors navigate around the site. All information that these cookies collect is aggregated and therefore anonymous. If you do not allow these cookies, we will not know when you have visited our website.	Your consent.	See 1.4.4 (below the table).
<u>Functional cookies</u> : These enable the website to offer improved functionality and personalization. They may be set by us or by third party service providers whose services we have added to our sites. If you do not allow these cookies, some or all of these services may not function properly.	Your consent.	See 1.4.4 (below the table).
<u>Necessary cookies</u> : These are necessary for the website to function and cannot be switched off in our systems. They are usually only set in response to actions made by you, which constitute a request for services, such as setting privacy settings, logging in or filling in forms. You can set your browser to block or alert you about these cookies, but it will likely lead to lack of function for parts of the website. These cookies do not store any personally identifiable information.	Orkla's legitimate interest in ensuring that our websites function for visitors.	See 1.4.4 (below the table).

<p><u>Targeting cookies:</u> These are set by our advertising partners. They may be used by these companies to build a profile of your interests and show you relevant advertisements on other websites. They do not store personal information directly, but are based on uniquely identifying your browser and internet device. If you do not allow these cookies, you will experience less targeted advertising.</p>	<p>Your consent</p>	<p>See 1.4.4 (below the table)</p>
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1.4.4 If you would like more details about the cookies that may be used by this website, what they are used for, third party access to information collected by cookies and how long they are used, you can find a list of specifications in the cookie information box that is accessed when you access the website, under "Cookie settings", or in the form of a clickable shield icon, usually available in the bottom left, when you visit our website.

### 1.5 Competitions and other promotional campaigns

<p><b>Type of personal data:</b> Full name, email address, phone number, date of birth, response or other entry in competition, such as photo of yourself, etc.</p>		
Purpose	Legal basis	Storage time
<p>Managing your participation in the promotional campaign, including contacting you if you win.</p>	<p>Necessary to perform an agreement with you (participation in promotional campaign).</p>	<p>Data will be deleted within a reasonable time after the promotional campaign has been completed. The time for deletion may be specified in the campaign terms.</p>
<p>Publication of winners in promotional campaign /competition on website or in social media</p>	<p>Your consent.</p>	<p>Data will remain published for as long as the publication is deemed relevant to the Orkla company's marketing of the competition, but we will also stop publishing the information if you withdraw your consent.</p>

### 1.6 Loyalty programs or customer clubs, and subscriptions to newsletters and offers from us

<p><b>Type of personal data:</b> Full name, age, gender, e-mail address, address, telephone number, date of birth, information about what goods or services you have purchased in our online shops and time of purchase, your consent to communication from us and history of this.</p>		
Purpose	Legal basis	Storage time
<p>Administering membership in customer clubs, loyalty programs or subscriptions to newsletters and offers, which provide access to offers and other information about our products.</p>	<p>Necessary to perform an agreement with you.</p>	<p>Information is used until you terminate your subscription or membership.</p>

<p>Sending newsletters and offers to members of customer clubs or loyalty programs, or subscribers to newsletters and offers.</p>	<p>Necessary to perform an agreement with you.</p> <p>In certain cases, you have also given consent when registering.</p>	<p>Information is used until you terminate your subscription or membership.</p>
<p>Personalization of the content of newsletters and offers, in order for the advertising to match your assumed preferences with regard to our products and offers.</p> <p>The adaptation is based on information you have provided to us in connection with registration, etc., as well as which products you have purchased in our online stores and the times of purchase.</p>	<p>Orkla's legitimate interest in effective marketing.</p>	<p>Information is used until you terminate your subscription or membership.</p>
<p>Personalization of the content of newsletters and offers from Orkla, in order for the advertising to match your assumed preferences with regard to our products and offers.</p> <p>The adaptation is based on information you have provided to us in connection with registration, etc., as well as what you have purchased in our online shops and the times of purchase, <i>and in addition</i> information from third parties, which better enables us to predict which products you may be interested in, such as (i) assumed income, interests and family situation, (ii) which web pages you have visited and advertisements you have clicked on, (iii) your clicks in our newsletters</p>	<p>Your consent.</p>	<p>Information is used until you terminate your subscription or membership or you withdraw your consent.</p>
<p>Your accumulation of bonus points or similar, in order to provide you with various benefits.</p>	<p>Necessary to perform an agreement with you.</p>	<p>Deleted when you cancel your subscription or membership.</p>
<p>Based on your purchase of products in our online store, we can show advertisements</p>	<p>Orkla's legitimate interest in</p>	<p>Deleted when you terminate your subscription or membership, or when you</p>

on the internet to other people with similar characteristics/interests as you.	effective marketing.	request that the use of your data in this way be terminated.
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### 1.7 Purchasing goods or services from us in online shops or by telemarketing

<b>Type of personal data:</b> Full name, email address, address, telephone number, purchase and delivery history, date of birth, location of product in shopping cart on website		
<b>Purpose</b>	<b>Legal basis</b>	<b>Storage time</b>
Administration of user account in the online store, which entails storage of contact information and your orders.	Necessary to perform an agreement with you.  Orkla's legitimate interest in providing good customer care.	Information is stored until you delete your user account.
Handling orders for the purchase of goods or services and their delivery, sending an order confirmation to you and following up any complaints/complaints.	Necessary to perform an agreement with you, and to fulfil your rights under the law of purchase and our obligations.	For customers with a registered customer profile/account: Data about ongoing and previous purchases is retained until you request that they be deleted, or 730 days after your last login.  For customers without a registered profile (single purchase): 12 months.
Storage of accounting information about delivery	That Orkla must fulfil a legal obligation.	The storage period follows from accounting legislation.
If you have logged in as a user to one of Orkla's online stores and have products in your shopping cart without completing your shopping or checking out, we may save your basket information so that we can send you an e-mail reminding you of your shopping cart at a later date. This will only happen if you are a member of a customer club or loyalty program, or subscribe to our newsletters and offers, see 1.6.	Legitimate interest in the sale and marketing of our products.	Deleted within three months.
Use of purchase intelligence in analysis of purchase trends, for personalization of communications, advertising and inventory.	Orkla's legitimate interest in effective communication with consumers.	Only anonymised data is used (see 2.2).

Telephone call about marketing and sales of our products.	Orkla's legitimate interest in the sale of products.	<p>For loyalty club members and newsletter subscribers, until you unsubscribe, unsubscribe or request that we stop contacting you with telemarketing.</p> <p>For other persons, telephone numbers are retrieved from the registers of third parties and are not stored by Orkla.</p>
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**1.8 Enquiries to us about our products, services or business**

<b>Type of personal data:</b> Full name, e-mail address, telephone number, content of inquiry to Orkla		
<b>Purpose</b>	<b>Legal basis</b>	<b>Storage time</b>
To process inquiries about information, guidance, complaints, complaints, claims etc.	<p>Orkla's legitimate interest in good customer care.</p> <p>To execute an agreement with the consumer who inquires.</p> <p>In certain cases, the processing of personal data may be necessary to fulfil a legal obligation to which the Orkla company is subject, for example to fulfil a complaint or to post payment information pursuant to the Accounting Act.</p>	<p>We delete personal data in cases concerning complaints six months after the last contact.</p> <p>In cases related to complaint claims, we keep the information for three years.</p> <p>In cases concerning sponsorship, the information is deleted within two months of the last contact.</p>
Use of inquiries to adapt Orkla's products, services or marketing.	Orkla's legitimate interest in providing good products, services and marketing.	Deleted within six months of last contact.
Use of inquiries in connection with product recalls.	<p>Orkla's legitimate interest in providing good products.</p> <p>In certain cases, the processing may be necessary for safety reasons, in particular to protect human life and health.</p>	Deleted within six months of last contact.
Processing of other inquiries	Orkla's legitimate interest in good customer care.	Deleted within six months of last contact.

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## 1.9 Participation in market research

<b>Type of personal data:</b> Full name, email address, telephone number, age, your market research responses		
<b>Purpose</b>	<b>Legal basis</b>	<b>Storage time</b>
Market research by email or other electronic channels.  The purpose is to improve our products and marketing.	Consent or agreement with you (membership) gives us the basis for the inquiry.  The processing of your responses is based on our legitimate interest in improving our own products and marketing	The responses are immediately anonymised (see 2.2).

## 1.10 Other processing of personal data about our business contacts

<b>Type of personal data:</b> Full name, e-mail address, telephone number, job title, communication, participation in meetings with us, input given at meetings, business observations and reviews, image, sound and film recordings, allergies		
<b>Purpose</b>	<b>Legal basis</b>	<b>Storage time</b>
Management of dialogue, inquiries and meetings, as well as minutes, notes, recordings and transcriptions from contact and communication, such as meetings.	The processing may be necessary to fulfil an agreement with your company or to perform tasks prior to such agreement.  The basis may also be our legitimate interest, such as in order to: (i) improve our goods, services, production or other parts of our business (ii) conduct strategic business assessments and decisions; (iii) ensure good cooperation and customer care.  The basis for processing recordings from Teams meetings and the like will usually be consent.  Information about allergies will be handled with consent.	As long as there is a business need for storage.

## **2. Deletion and anonymization**

2.1 Personal data will be deleted after the storage period specified in the tables in sections 1.4 – 1.10.

2.2 Alternatively to deletion, we may remove identifying data from the personal data so that the data can no longer be linked to you (anonymisation). This may, for example, be relevant when using the information in our experience archive and to compile analyses and statistics, and to adapt and develop Orkla's marketing and products in relation to consumers' wishes and needs.

## **3. Processing of personal data via third parties**

3.1 Orkla may use third parties (data processors) to process your personal data. Our use of data processors is regulated in data processing agreements we enter into with such parties, in accordance with applicable legislation.

3.2 Personal data will normally be stored in, and processed from, countries within the European Economic Area (EEA).

3.3 In certain cases, Orkla may enter into agreements with data processors in third countries (countries outside the EEA). In such cases, the basis for transfer will be one of the following:

- i. The country is approved by the European Commission pursuant to an adequacy decision, which means that the country safeguards privacy in a manner equivalent to that required for countries in the EEA; or
- ii. Orkla has entered into an agreement with the data processor on the basis of standard data protection clauses adopted by the European Commission (please contact us using the form in section 4.1 if you would like a copy of these); or
- iii. Other approved transfer basis.

3.4 When processing pursuant to points ii) or iii) above, Orkla conducts assessments of the level of protection in third countries where personal data is processed. Where this proves necessary, Orkla will implement additional measures to ensure that the level of protection for personal data is equivalent to that required by processors in the EEA.

## **4. Your rights – Contact points at Orkla.**

### **4.1 Introduction – and contact points for exercising your rights**

If you wish to update or withdraw your consents, or wish to view, correct or delete your personal information in connection with a service from us, such as newsletter by e-mail, user on an online store, or customer club, you can make such changes on "my page" etc., or click on the link at the bottom of the newsletter.

If you wish to exercise other rights you have in connection with our processing of your personal data - see sections 4.2 to 4.8 below - please contact us by filling in [this form](#).



#### **4.2 Right to rectification**

You have the right to have inaccurate personal data about you corrected without undue delay, and to have incomplete personal data completed.

#### **4.3 Right to erasure**

You have the right to have personal data about you deleted without undue delay, in the following cases:

- a. the personal data are no longer necessary for the purposes for which they were collected or processed,
- b. if you withdraw the consent on which the processing is based and there is no other legal basis for the processing,
- c. you object to the processing, and Orkla has no legitimate interests in the processing that outweigh your interest in its termination (see section 4.7 below), or
- d. the personal data has been processed unlawfully.

However, Orkla is not obliged to delete your personal data if it is necessary for Orkla to continue processing your personal data in order to fulfil obligations under national law, or to establish, exercise or defend legal claims.

#### **4.4 Right to withdraw consent**

You have the right to withdraw your consent where this is Orkla's legal basis for processing your personal data. In such a case, Orkla will terminate such processing of personal data.

#### **4.5 The right to access and data portability**

You have the right to be informed whether Orkla is processing personal data about you. Then you have the right to information about the processing, including what personal data is stored and how it is processed. You will receive this information free of charge, unless the request is repeated. In that case, Orkla may demand reasonable remuneration for processing the request.

You have the right to receive personal data that you have provided to Orkla in a structured, commonly used and machine-readable format and have the right to have that data transferred to another controller, provided that the processing is based on consent or agreement and the processing is carried out automatically.

#### **4.6 The right to restriction of processing**

You have the right to demand that the processing of your personal data be restricted, in the following cases:

- a. you contest the correctness of the personal data, and the restriction will then apply for a period enabling Orkla to verify the accuracy of the personal data,
- b. the processing is unlawful, and you oppose the erasure of your personal data and instead request that the use of your personal data be restricted;
- c. Orkla no longer needs the personal data for the purpose of the processing, but you need these to establish, exercise or defend legal claims, or
- d. you have objected to the processing of personal data pending the verification of whether Orkla's legitimate interest in the processing outweighs your interest in its termination.

If the processing of your personal data has been restricted, such personal data, apart from storage, shall only be processed with your consent or for the establishment, exercise or defence of legal

claims or to protect the rights of anyone else. If you have had the processing of your personal data restricted, Orkla shall notify you before that restriction of processing is lifted.

#### **4.7 Right to object**

You have the right to object to the processing of personal data about you that is based on Orkla's legitimate interests. In such a case, Orkla will cease the processing of your personal data, unless Orkla's legitimate interest in the processing outweighs your interest in its termination or the processing is necessary for the establishment, exercise or defence of legal claims.

You also have the right to object to Orkla's use of your personal data for direct marketing purposes. If you exercise this right, Orkla shall cease such use of your personal data.

#### **4.8 The right to complain about our processing of your personal data**

If you believe that we have not complied with the rights you have in relation to the personal data we process about you, we would appreciate it if you contacted us via the form in section 4.1. You may request to have your request assessed by Orkla's Data Protection Officer by specifying this in your enquiry to us.

You also have the right to complain about Orkla's processing of your personal data to the relevant supervisory authority.

### **5. Changes to the Privacy Notice**

Orkla may revise this Privacy Notice. You can visit this page yourself at any time and verify whether updates have been made. This Privacy Notice was last updated as posted at the top of the page.