

SODRUGESTVO GROUP S.A.

ADOPTED BY
the Board of Directors
of Sodrugestvo Group S.A.
on 23rd of October 2019

Global Privacy Policy



 SODRUGESTVO GROUP OF COMPANIES Company Sodrugestvo Group S.A.	Document type Policy	Reg. number	Page
	Document name Global Privacy Policy	Version 1	2 / 29

Table of Contents

I.	Purpose of the policy	3
II.	Definitions of key terms	5
III.	Basic Principles and Purposes of Processing	7
IV.	Accountability	10
V.	Data Subject Rights	15
VI.	Third Party Management	19
VII.	Governance	22
VIII.	Data Breach Handling	23
IX.	Data Lifecycle	25
X.	Final Provisions	27
XI.	List of Annexes	28


 GROUP OF COMPANIES SODRUGESTVO Company Sodrugestvo Group S.A.	Document type Policy	Reg. number	Page 3 / 29
	Document name Global Privacy Policy	Version 1	

I. Purpose of the Policy


Sodrugestvo is a fast-growing agro-industrial company with business partners across the globe. Data privacy and confidentiality have always been taken seriously by the Group as one of core values of its culture. Sodrugestvo is committed to ensure that data of its customers, partners, and employees is being kept safe and fully protected. The Global Privacy Policy reflects the privacy vision of Sodrugestvo and clearly defines ongoing commitment to the GDPR compliance and sets forth the way Sodrugestvo collects, uses and discloses personal data in respect of which it acts as a data controller (i.e. the undertaking that determines why and how to process personal data) or a data processor (i.e. the undertaking that carries out the data processing on behalf of a controller).

As a data controller Sodrugestvo processes basic personal data needed in order to be able to manage HR, to comply with its legal obligations, to ensure the performance of contracts signed with a third parties (suppliers or customers), to invoice customers and third parties, and to contact individuals. Sodrugestvo mostly processes: basic identification data and financial data for employees, external consultants and customer's persons of contacts, etc.; basic information data, financial data and KYC checks related data for individuals related to customers when required; and basic information data and financial data for service providers.

The goal of the Global Privacy Policy is to depict in one summarising document all aspects of protection of personal data in the Group of Companies Sodrugestvo, its global privacy strategy and structure. It can also be used as the basis for statutory data protection inspections, e.g. by the customer within the scope of commissioned processing. This is not only to ensure compliance with the European General Data Protection Regulation (the GDPR) but also to provide proof of such compliance.

 GROUP OF COMPANIES SODRUGESTVO Company Sodruestvo Group S.A.	Document type Policy	Reg. number	Page 4 / 29
	Document name Global Privacy Policy	Version 1	

The Global Privacy Policy consists of the following sections: I. ‘Purpose of the Policy’. This part of the policy describes why this Policy is being used, and why it is important for Sodruestvo. II. ‘Definitions of key terms’. This part of the Policy defines key terms like personal data, data processor, data controller, etc., in the context of Sodruestvo. III. ‘Basic Principles and Purposes of Processing’. This part of the Policy defines the guiding principles for the processing of personal data, and the activities for which personal data can be processed. In the section IV. ‘Accountability’ Sodruestvo demonstrates the way how it actually achieves compliance with the principles of the GDPR in its conduct of business and how it applies various measures of data protection. Section V. ‘Data Subject Rights’ demonstrates how such rights are addressed in Sodruestvo’s practices. Section VI. ‘Third Party Management’ relates to Sodruestvo’s obligations to ensure that (i) third parties that process data in relation to which Sodruestvo is a data controller do so in compliance with the rights of the data subjects and that (ii) transfers of data are made in compliance with applicable obligations. Section VII. ‘Governance’ relates to the wide range of resources and measures implemented by Sodruestvo to maintain a clear privacy framework defining roles and responsibilities, to monitor compliance, to educate its staff, to make sure processes are being rolled out and followed, in order to reduce the risk of the GDPR breaches. Section VIII. ‘Data Breach Handling’ relates to the actions that must be taken by Sodruestvo to identify, prevent and to react to a data breach. This includes taking steps to comply with the general personal data breach notification regime put in place under by the GDPR. The Section IX. ‘Data Lifecycle’ demonstrates the commitment of Sodruestvo to fulfil its obligation to understand the data landscape and types of data processed in order to follow the flows of data, the risks associated with the processing of such data and manage its accuracy and retention. The parts X. Final Provisions and XI. List of Annexes conclude this Policy.

 GROUP OF COMPANIES SODRUGESTVO Company Sodrugestvo Group S.A.	Document type Policy	Reg. number	Page 5 / 29
	Document name Global Privacy Policy	Version 1	

II. Definitions of Key Terms

In the context of the Global Privacy Policy:


‘The GDPR’ means Regulation (EU) 2016/679 of the European Parliament and of the Council of 27 April 2016 on the protection of natural persons with regard to the processing of personal data and on the free movement of such data, as potentially amended or re-enacted in the future, and repealing Directive 95/46/EC (General Data Protection Regulation).

‘Personal data’ means any information relating to an identified or identifiable natural person (‘data subject’); 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 the physical, physiological, genetic, mental, economic, cultural or social identity of that natural person (Article 4 of the GDPR).


‘Processing’ means any operation or set of operations which is performed on personal data or on sets of personal data, whether or not by automated means, such as collection, recording, organization, structuring, storage, adaptation or alteration, retrieval, consultation, use, disclosure by transmission, dissemination or otherwise making available, alignment or combination, restriction, erasure or destruction (Article 4 of the GDPR).

‘Data controller’ means the natural or legal person, public authority, agency or other body which, alone or jointly with others, determines the purposes and means of the processing of personal data (Article 4 of the GDPR). Sodrugestvo may act as a data controller.

‘Data processor’ means a natural or legal person, public authority, agency or other body which processes personal data on behalf of the controller (Article 4 of the GDPR). Data processors have access to or receive personal data from the data controller in order to provide their services to the data controller. As for instance, a company, a service provider, to which Sodrugestvo outsources some of its processes and functions (payroll, IT etc.) has access to the personal data controlled by

 SODRUGESTVO <small>GROUP OF COMPANIES</small>	Document type Policy	Reg. number	Page
Company Sodrugestvo Group S.A.	Document name Global Privacy Policy	Version 1	6 / 29

Sodrugestvo, and, thus, is the data processor in respect of such data. Sodrugestvo also may act as a data processor.

 SODRUGESTVO GROUP OF COMPANIES Company Sodrugestvo Group S.A.	Document type Policy	Reg. number	Page
	Document name Global Privacy Policy	Version 1	7 / 29

III. Basic Principles and Purposes of Processing


This part of the policy defines the guiding principles for the processing of personal data by Sodrugestvo, and the activities for which personal data can be processed.

Basic Principles

Sodrugestvo implements its activities concerning personal data following the Basic Principles, such as:

- Lawfulness of processing which means that data should be obtained only by lawful and fair means;
- Data Minimization and Avoidance which means that data should be adequate, relevant to the purposes that they are to be used, and not excessive (the proportionality principle). The Minimization Principle should thoroughly apply to all aspects of data processing including collection, use, sharing, linkability, retention, etc. To facilitate Data Minimization different tools and measures including anonymity, unlinkability, pseudonymity, etc., should be implemented;
- Purpose Specification and Purpose Binding which means that processing of personal data is allowed only for specific legitimate purposes and is limited to what is necessary in relation to the purposes. The sensitivity of data is influenced by purpose and context of use;
- Transparency and Intervenability which means openness and facilitation of individual participation including the right to intervene;
- Appropriate Security which means the protection of confidentiality, integrity and availability of the data.

Sources of Information

 GROUP OF COMPANIES SODRUGESTVO Company Sodrugestvo Group S.A.	Document type Policy	Reg. number	Page 8 / 29
	Document name Global Privacy Policy	Version 1	

Most of the personal data processed by Sodrugestvo is the information that is knowingly provided to the company by data subjects. In some instances, however, Sodrugestvo may process personal data received from a third party or public registers.


Purposes of Processing

Overall Sodrugestvo processes basic personal data needed in order to be able to: manage HR; comply with its legal obligations; ensure the performance of contracts signed with a third party (suppliers or customers); invoice customers and third parties; and contact individuals.

The personal data collected and stored by Sodrugestvo notably includes the following: (i) basic identification data and financial data for employees, external consultants and customer's persons of contacts, etc.; (ii) basic information data, financial data and KYC checks related data for individuals related to customers when required; and (iii) basic information data and financial data for service providers. This basic information normally includes: Identification data, such as your name, family name, date and place of birth, gender; contact details data, such as professional or personal postal address, e-mail address, phone and fax numbers, country of (tax) residence, nationality, company you work for; government identification numbers such as tax number, copy of ID card and of passport; types of products and services received; financial and banking data notably linked to bank account number; and other relevant personal data reasonably related to the conduct of our business.


Sodrugestvo only processes personal data for one of the following legitimate basis and purposes:

- (i) The processing is necessary for the performance of an agreement or for entering into an agreement with a data subject;
- (ii) The processing is necessary for Sodrugestvo to comply with a legal obligation, including but not limited to, compliance with applicable commercial law, tax identification and reporting (where appropriate), as well as compliance with requests from or requirements of regulatory and enforcement authorities;

 SODRUGESTVO <small>GROUP OF COMPANIES</small>	Document type Policy	Reg. number	Page
Company Sodrugestvo Group S.A.	Document name Global Privacy Policy	Version 1	9 / 29

(iii) The processing is necessary for our or a third party’s legitimate interest, for example to provide Sodrugestvo’s products or services, to manage our relationships with Sodrugestvo’s clients (existing and prospective), suppliers, service providers, contacts and subcontractors, to prevent fraud, to manage litigation and to protect the rights, property, or safety of Sodrugestvo, as well as to send data subjects commercial communications in accordance with applicable law;

(iv) A data subject has given prior consent, for example, to receive commercial communications from Sodrugestvo or third parties, when required under applicable laws; and Sodrugestvo makes sure that only the personal data that are necessary to achieve the above-listed purposes are processed.

 SODRUGESTVO GROUP OF COMPANIES Company Sodrugestvo Group S.A.	Document type Policy	Reg. number	Page 10 / 29
	Document name Global Privacy Policy	Version 1	


IV. Accountability

This Section refers to Sodrugestvo's responsibility for ensuring that all data protection obligations are complied with.

Data Processing Register

In order to comply with its obligations under the GDPR Sodrugestvo establishes and maintains the Data Processing Register (Annex #1) covering the mandatory information of Sodrugestvo acting as a data controller or processor. The register includes:

- 1) Identification of processing including a service/department; a name of processing; a reference number; a description of the categories of personal data processed (e.g. name, email, address, banking data, personal characteristics, profession and job, image and photo, salaries, etc.), the type of data (sensitive/not sensitive data); data subjects;
- 2) Reasons for processing, namely: a purpose of processing and a legal basis for processing;
- 3) Stakeholders (Controller/Processor, a contact persons/contact department);
- 4) Location of data including a list of places where personal data is kept;
- 5) Security measures (a general description of the technical and organizational security measures including encryption, access control, and password protection);
- 6) Categories of data recipients (the parties this personal information is shared with);
- 7) The information concerning data transfer outside the EEA (i.e. EU + Norway, Iceland and Lichtenstein) if the data have been or will be disclosed to recipients in third countries or international organizations; the information about potential transfers of personal data to a third country or an

 GROUP OF COMPANIES SODRUGESTVO Company Sodrugestvo Group S.A.	Document type Policy	Reg. number	Page 11 / 29
	Document name Global Privacy Policy	Version 1	

international organization, including the identification of that third country or international organization;

8) Legal basis for data transfer outside the EU including the documentation of suitable safeguards;

9) The information concerning automated decision-making (e.g. profiling) if such a practice exists;

10) Retention period (the duration for which the department will keep this information).


Data Privacy Impact Assessment (DPIA)

In order to comply with its obligations under the GDPR Sodrugestvo creates a template the Data Privacy Impact Assessment Questionnaire (Annex #2) and the DPIA Register (Annex #3) to record all the results from Sodrugestvo DPIA.

Where a type of processing in particular using new technologies, and taking into account the nature, scope, context and purposes of the processing, is likely to result in a high risk to the rights and freedoms of natural persons, Sodrugestvo as a controller shall, prior to the processing, carry out an assessment of the impact of the envisaged processing operations on the protection of personal data (Article 35 of the GDPR). A single assessment may address a set of similar processing operations that present similar high risks (e.g. a badge system, CCTV, etc.).

The assessment shall contain at least: (a) a systematic description of the envisaged processing operations and the purposes of the processing, including, where applicable, the legitimate interest pursued by the Sodrugestvo; (b) an assessment of the necessity and proportionality of the processing operations in relation to the purposes; (c) an assessment of the risks to the rights and freedoms of data subjects; and (d) the measures envisaged to address the risks, including safeguards, security measures and mechanisms to ensure the protection of personal data and to demonstrate compliance with the GDPR taking into account the rights and legitimate interests of data subjects and other persons concerned (Article 35 of the GDPR).

Privacy by Design and Privacy by Default

 GROUP OF COMPANIES SODRUGESTVO Company Sodrugestvo Group S.A.	Document type Policy	Reg. number	Page 12 / 29
	Document name Global Privacy Policy	Version 1	

Sodrugestvo embraces the concept of Privacy by Design and Privacy by Default, and expresses its commitments to its principles that the approach towards the protection of personal data should be characterized by proactive rather than reactive measures that personal data have to be automatically protected in any given IT system or business practice, privacy safeguards should be embedded in such system and practice, that privacy should not be built at the expense of security and vice versa, that personal information must be protected throughout the entire lifecycle of the data involved, that when it comes to data subjects, there should be transparency, fair treatment and empowering user-friendly options.


Based on the above principles, Sodrugestvo issues the Internal Rules and Procedures for the GDPR Compliance (Annex #4) that is a document dedicated to provide detailed information and practical guidance to all Sodrugestvo's employees on the obligations it has in terms of protection of personal data and on how to comply with such requirements. The Internal Rules include a procedure/mechanism to integrate data protection within any new projects (new processing, new activity, use of a new IT tool, etc.) to comply with the Privacy by Design obligation under the GDPR.

Such procedure should contain:

- a communication channel between the initiator of the project (usually IT or HR) and the legal team;
- a list of criteria and information to be taken into consideration for each project to make sure it is compliant with the GDPR and protects the rights of data subjects;
- a process to update documents and inform concerned data subjects, if necessary, etc.

Security Measures

Based on the type of processing and activity of the company, each company must decide internally on the security measures that they deem appropriate to cover any potential risk. In assessing the appropriate level of security, a special consideration shall be given in particular on implementing


 GROUP OF COMPANIES SODRUGESTVO Company Sodrugestvo Group S.A.	Document type Policy	Reg. number	Page 13 / 29
	Document name Global Privacy Policy	Version 1	

measures to prevent the risks of accidental or unlawful destruction, loss, alteration, unauthorized disclosure of, or access to personal data transmitted, stored or otherwise processed.

Taking into account the state of the art, the costs of implementation and the nature, scope, context and purposes of processing as well as the risk of varying likelihood and severity for the rights and freedoms of natural persons, the controller and the processor shall implement appropriate technical and organizational measures to ensure a level of security appropriate to the risk, including inter alia as appropriate: (a) the pseudonymisation and encryption of personal data; (b) the ability to ensure the ongoing confidentiality, integrity, availability and resilience of processing systems and services; (c) the ability to restore the availability and access to personal data in a timely manner in the event of a physical or technical incident; (d) a process for regularly testing, assessing and evaluating the effectiveness of technical and organizational measures for ensuring the security of the processing (Article 32 of the GDPR).


In order to comply with its obligations under the GDPR Sodrugestvo establishes the General IT Guide (Annex #5) that includes an IT usage policy, an access control policy, encryption and password solutions (notably to protect documents), and practical guidelines on how to use and apply such measures, especially for restricted documents.

Sodrugestvo has a clear guidance how to manage access and some written policies related to the control of access to information resources are available to all employees (PRV001-006). Access to corporate information environment (CIE) has a clear framework and a procedure has been defined in order to describe general tasks and controls for the administration of access rights (through 'DIRECTUM'). Starter, leaver or change in function processes are well defined and managed by IT depending on the type of subject (guest, employee, trainee, auditor and subcontractor). Employees have different access rights levels, managed by IT, based on unique personal accounts. Users accounts protection is based on password protection. Enhanced two-factors authentication is used for protection of information system key users (privileged accounts with key media and a PIN).

 GROUP OF COMPANIES SODRUGESTVO Company Sodrugestvo Group S.A.	Document type Policy	Reg. number	Page
	Document name Global Privacy Policy	Version 1	14 / 29

Remote access to CIE from personal devices is protected and secured through the use of a certificate with an encrypted VPN connection. There is a clear exit procedure to make sure that access to the system and applications from former employees have been disabled. Servers for the SharePoint are hosted in Luxembourg.

Sodrugestvo implements security measures regarding the ability to restore the availability and access to personal data in a timely manner in the event of a physical or technical incident. Sodrugestvo has the Backups and Disaster Recovery plans/Redundancy procedures in place. Sodrugestvo is committed to undertake regularly testing, assessing and evaluating procedures including external audits, security assessment aiming at detecting vulnerabilities etc., in order to keep the effectiveness of technical and organizational measures for ensuring the security of the processing at the appropriate level.


 GROUP OF COMPANIES SODRUGESTVO Company Sodrugestvo Group S.A.	Document type Policy	Reg. number	Page 15 / 29
	Document name Global Privacy Policy	Version 1	

V. Data Subject Rights

This Section relates to the Sodrugestvo's obligation to take all measures necessary to allow data subjects to exercise the rights granted to them by the GDPR efficiently. This includes Sodrugestvo's obligation to consider all aspects of its processing activities in light of the rights afforded to data subjects.


Data Subject Rights regarding the processing of personal data by Sodrugestvo, subject to applicable exemptions, include:

- 1) Right to information regarding the treatment of data subjects' personal data. As a data controller, Sodrugestvo has the obligation to provide to data subjects prior information on the way it processes their personal data.
- 2) Right to access the personal data and receive additional information about how it is processed. Data subjects shall have the right to obtain from Sodrugestvo confirmation as to whether or not personal data concerning them are being processed, and, where that is the case, access to the personal data and the following information: (a) the purposes of the processing; (b) the categories of personal data concerned; (c) the recipients or categories of recipient to whom the personal data have been or will be disclosed, in particular recipients in third countries or international organizations; (d) where possible, the envisaged period for which the personal data will be stored, or, if not possible, the criteria used to determine that period; (e) the existence of the right to request from the controller rectification or erasure of personal data or restriction of processing of personal data concerning the data subject or to object to such processing; (f) the right to lodge a complaint with a supervisory authority; (g) where the personal data are not collected from the data subject, any available information as to their source;
- 3) Right to rectification. Data subjects have the right to obtain from Sodrugestvo without undue delay the rectification of inaccurate personal data concerning them;

 GROUP OF COMPANIES SODRUGESTVO Company Sodrugestvo Group S.A.	Document type Policy	Reg. number	Page 16 / 29
	Document name Global Privacy Policy	Version 1	

- 4) Right to request erasure of personal data from the systems. – In some limitative cases listed under the GDPR (e.g. where the personal data is no longer necessary in relation to the specified purposes), data subjects have the right to obtain from Sodrugestvo the erasure of personal data concerning them without undue delay and the controller shall have the obligation to erase personal data without undue delay;
- 5) Right to restrict processing of personal data. In some specific limitative cases listed by the GDPR, data subjects have the right to obtain from Sodrugestvo restriction of processing of their personal data;
- 6) Right to receive your personal data in an interoperable format, or have it directly transmitted to another organization. Data subjects have the right to receive the personal data concerning them, which they have provided to Sodrugestvo, in a structured, commonly used and machine-readable format and have the right to transmit those data to another controller without hindrance from the controller to which the personal data have been provided;
- 7) Right to withdraw consent at any time where you have provided Sodrugestvo with your consent to the processing of personal data;
- 8) Right to object the processing of personal data. Data subjects have the right to object, on grounds relating to their particular situation, at any time to a specific type of processing of personal data concerning them; and
- 9) Right to lodge a complaint with the competent European Union Data Protection Authority.

Sodrugestvo is committed to respond to individual complaints and questions relating to privacy protection and use of personal data, and to investigate in order to resolve all such complaints. Sodrugestvo answers favorably to any of the above requests related to the right to oppose, right of erasure and right of restriction provided that it does not interfere with or contradict Sodrugestvo's legal obligations (e.g. a legal obligation to keep the related personal data) or due to any other

 GROUP OF COMPANIES SODRUGESTVO Company Sodrugestvo Group S.A.	Document type Policy	Reg. number	Page 17 / 29
	Document name Global Privacy Policy	Version 1	


impediment that would justify that Sodrugestvo would not be able to grant such requests.

Sodrugestvo undertakes to handle each request within a reasonable timeframe of 1 month.

Sodrugestvo is committed to abstain from solely automated processing and decision-making based upon such processing in relation to the personal data.


In order to comply with the GDPR obligations and facilitate the above mentioned rights and interests of data subjects Sodrugestvo:

- 1) establishes and maintains the Data Processing Register (Annex #1) covering the mandatory information of Sodrugestvo acting as a data controller or processor;
- 2) establishes and maintains the Complaint Handling Policy (Annex #6) that provides the mechanism for receiving complains/requests from data subjects with regard to access, rectification, erasure, restriction of processing, data portability, objection etc.;
- 3) provides the dedicated email address which is available and clearly visible on the corporate website of Sodrugestvo and on any data protection related policies issues by Sodrugestvo;
- 4) establishes a template for confirmation that personal data concerning the data subject are being processed and information about the data subjects' rights under the GDPR;
- 5) establishes a template for the auto-reply email that will be sent to any candidate sending their CVs and any other personal data by email with a short wording including a link to the HR Privacy Policy;
- 6) revises all the existing policies/procedures/codes referring to data protection and monitoring and adapts them under the GDPR, in particular:
 - the Employee Handbook (clauses 1.5 and 3.13);
 - the Provisions on communication and telecommunication (PRV-001-008);
 - the Provisions on the control in the corporate information environment (POL-001-004);
 - the Internal Working Regulations (REG-SGSA-04-205) (clause 6);
 - the Code of Ethics, Conduct and behavior (Clause 13));

 GROUP OF COMPANIES SODRUGESTVO Company Sodrugestvo Group S.A.	Document type Policy	Reg. number	Page 18 / 29
	Document name Global Privacy Policy	Version 1	

- the HR Policy with regard to the processing of personal data (Annex #7).
- 7) in agreements with customers and suppliers and/or create a template of the GDPR wording to include in emails in case no contract is signed
- 8) establishes and maintains the Website Privacy Policy (Annex #8);
- 9) establishes a template for the opt-out in any commercial communication for existing clients, and a template for a prior consent for prospective clients (direct marketing).

Data subjects can exercise the rights mentioned above or challenge compliance with this Policy, by contacting Sodrugestvo at the following dedicated email address for the GDPR questions, claims etc.: privacy@sodru.com. Data subjects also can contact the IT department of Sodrugestvo in Luxembourg, if they have questions related to the GDPR compliance from IT perspective (e.g. IT usage policy) using following email address: it@lu.sodru.com. They as well can contact the secretaries at the Sodrugestvo's main office in Luxembourg for common questions related to the GDPR at working hours or by using following email address: info@lu.sodru.com.


 GROUP OF COMPANIES SODRUGESTVO Company Sodrugestvo Group S.A.	Document type Policy	Reg. number	Page
	Document name Global Privacy Policy	Version 1	19 / 29

VI. Third Party Management

Third Party Management relates to Sodrugestvo's obligations to ensure that (i) third parties that process data in relation to which Sodrugestvo is a data controller do so in compliance with the rights of the data subjects and that (ii) transfers of data are made in compliance with applicable obligations. Where processing of personal data is to be carried out on behalf of Sodrugestvo, Sodrugestvo shall use only processors providing sufficient guarantees to implement appropriate technical and organizational measures in such a manner that processing will meet the requirements of the GDPR and ensure the protection of the rights of the data subject (Article 28 of the GDPR). Processing by a processor shall be governed by a contract which includes the provisions required under the GDPR. Personal data transfers to third parties located outside the European Economic Area (the EEA) in countries not deemed to provide an adequate level of protection by the European Commission (Third Countries) must either be: (i) subject to appropriate safeguards or (ii) be covered a derogation found under article 49 of the GDPR. The appropriate safeguards under the GDPR consist in:

- the country to which the personal data are sent is considered by the European Commission as offering an adequate level of protection of personal data (Switzerland, Jersey, Guernsey, Isle of Man, Israel, Argentina, Canada, etc.); or
- the conclusion of standard contractual clauses approved by the European Commission between the entity(ies) transferring or giving access to the data to a Third Country and the entity(ies) receiving or having access to such data in that country (the so-called Model Clauses); The derogations under the GDPR consist in an exhaustive list of situations that would justify data transfers to Third Countries.


Sodrugestvo uses some outsourcing services which may imply a transfer of the personal data controlled by the company to the service providers. The Sodrugestvo Group is comprised of

 GROUP OF COMPANIES SODRUGESTVO Company Sodrugestvo Group S.A.	Document type Policy	Reg. number	Page 20 / 29
	Document name Global Privacy Policy	Version 1	


numerous entities outside the European Economic Area. Some documents containing personal data and emails may be shared/sent by employees to recipients outside the EEA to such entities.

In order to comply with its obligations under the GDPR Sodrugestvo:

- 1) on a regular basis evaluates the necessity of personal data transfers to third parties including intra group transfers and, especially, the transfers to third countries;
- 2) establishes and maintains the List of Current Data Processors (Annex #9);
- 3) establishes a template for the Data Processing Agreement (Annex #10) to regulate data protection with a processor or any other supplier;
- 4) establishes the Standard Contractual Clauses for the Transfer of Personal Data to Controllers (Annex #11) and applies them in case of transferring personal data to a controller outside the European Economic Area (EEA) when Sodrugestvo is relying on model clauses as lawful grounds for cross-border data;
- 5) establishes the Standard Contractual Clauses for the Transfer of Personal Data to Processors (Annex #12) and applies them in case of transferring personal data to a controller outside the European Economic Area (EEA) when Sodrugestvo is relying on model clauses as lawful grounds for cross-border data;
- 6) establishes the Intra-Group Data Processing and Data Transfer Agreement covering data processing when the data processor is an entity of the Group (for intra-group contracts) (Annex #13);
- 7) establishes the Data protection guidelines and red flags for the validation of agreements with third party data processors (it is an internal guideline for the onboarding of a new data processor) (Annex #14);
- 8) integrates checks on the GDPR provisions in the validation system performed by the legal team for contracts (Directum);

 GROUP OF COMPANIES SODRUGESTVO Company Sodrugestvo Group S.A.	Document type Policy	Reg. number	Page 21 / 29
	Document name Global Privacy Policy	Version 1	

9) establishes the Data Subject Consent Form (Annex #15) to be used only when no other safeguards or derogations can be applied. When it comes to data transfers to Third Countries, in order to comply with the GDPR, Sodrugestvo has to obtain the explicit consent of the data subjects to the proposed transfers provided that such consent is informed (including as to the possible risks of such transfers), specific, freely given and unambiguous. Very importantly, such consent can be withdrawn at any time by the data subjects. Also, Sodrugestvo can make such a transfer of personal data without filling out the Data Subject Consent Form where the transfer is necessary: for the performance of a contract between the data subject and Sodrugestvo or the implementation of pre-contractual measures taken at the customer's request (the Contract Derogation), for the conclusion or performance of a contract concluded in the interest of the customer between Sodrugestvo and another individual or entity or for the establishment, exercise or defense of legal claims.

 GROUP OF COMPANIES SODRUGESTVO Company Sodrugestvo Group S.A.	Document type Policy	Reg. number	Page 22 / 29
	Document name Global Privacy Policy	Version 1	

VII. Governance


Governance relates to the wide range of resources and measures implemented by Sodrugestvo to maintain a clear privacy framework defining roles and responsibilities, to monitor compliance, to educate, to make sure processes are being rolled out and followed, in order to reduce the risk of the GDPR breaches.

After conducting a thorough analysis, Sodrugestvo has decided not appoint a Data Protection Officer (DPO) due to the following reasons:

The analysis of various factors such as the number of data subjects concerned, the volume of data and range of data items, the duration of the processing, the geographical extent of the processing etc., reveals that the activities of Sodrugestvo and the processing performed by Sodrugestvo do not fall within the scope of the obligation to designate a Data Protection Officer. In fact, the core activities of Sodrugestvo do not imply any processing operations which require regular and systematic processing of data subjects on a large and Sodrugestvo do not undertake any processing on a large scale of sensitive data. However, the absence of a DPO post does not diminish Sodrugestvo's commitment to full compliance with the GDPR and to ensuring the diligent protection of personal data.

In order to comply with its obligations under the GDPR Sodrugestvo:

- 1) issues the Internal the GDPR Compliance Audit Plan (Annex #16);
- 2) holds the GDPR awareness sessions, quick trainings and meetings with employees which are used to remind them basic data protection procedures for sending email, protection of confidential information, management of access to files, storage of documents, etc.;
- 3) issues the Annual Plan for the GDPR awareness session (Annex #17) and data protection guidelines (e.g. the Employee Handbook).

 GROUP OF COMPANIES SODRUGESTVO Company Sodrugestvo Group S.A.	Document type Policy	Reg. number	Page 23 / 29
	Document name Global Privacy Policy	Version 1	


VIII. Data Breach Handling

Data Breach Handling relates to the actions that must be taken by Sodrugestvo to identify, prevent and to react to a data breach. This includes taking steps to comply with the general personal data breach notification regime put in place under by the GDPR.

Sodrugestvo has implemented some procedures with respect to the protection and security of information (i.e. the Information Security Policy POL-SGSA-01- 2015).


In order to comply with its obligations under the GDPR Sodrugestvo:

- 1) establishes the Internal Data Breach Response and Notification Procedure (Annex #18). This document includes:
 - the criteria which have to be taken into account in order to assess whether the breach should be notified to the data protection authority or to data subjects;
 - the indication that any data breach should be notified by Sodrugestvo, if acting as data processor (e.g. for another entity of the Group), to the data controller;
 - the description of decision-making process and the rationale behind the decision to notify or not;
 - the indication that Sodrugestvo has 72 hours as of the moment it becomes aware of the breach to notify the data protection authority, if necessary;
 - persons responsible for deciding whether a notification should be made or not;
 - a format of the notification to the data protection authority;
 - a format of the notification to data subjects;
- 2) implements a test of Internal Data Breach Notification Procedure on a regular basis;
- 3) establishes the Data Breach Notification Form to the Supervisory Authority (the CNPD) (Annex #20);
- 4) establishes the Data Breach Notification Form to Data Subjects (Annex #21);

 SODRUGESTVO GROUP OF COMPANIES Company Sodrugestvo Group S.A.	Document type Policy	Reg. number	Page 24 / 29
	Document name Global Privacy Policy	Version 1	

5) establishes and maintains the Data Incident Repository (Annex #19) which includes a register for the records of all of data breaches and a common folder with limited access in order to store any element evidencing the decision and action process for each breach;

6) makes sure that all agreements with data processors used by Sodrugestvo contains a contractual clause with the obligation of the processor to send data breach notifications within a specified timeframe (in any case no later than 72 hours after discovering the breach) and to mitigate consequences of the breach.


 GROUP OF COMPANIES SODRUGESTVO Company Sodrugestvo Group S.A.	Document type Policy	Reg. number	Page 25 / 29
	Document name Global Privacy Policy	Version 1	

IX. Data Lifecycle


Data Lifecycle relates to the obligation to understand the data landscape and types of data processed in order to follow the flows of data, the risks associated with the processing of such data and manage its accuracy and retention.

In order to comply with its obligations under the GDPR Sodrugestvo:

- 1) creates and maintains the Data Processing Register (Annex #1);
- 2) creates and maintains the Data Retention and Deletion Policy (a general data retention scheme) (Annex #22) which includes:
 - specificities per departments and types of documents;
 - the description of a process to be followed for erasure (or anonymization if necessary) of the data at the end of the retention period: 1) for all electronic documents and data in applications/software and set up IT tools to do so; 2) for paper documents at the end of the retention period;
 - the specific guideline for Sodrugestvo's staff to implement a yearly check in all departments for reviewing accuracy of personal data stored and erasure day;
 - the Data Retention Schedule (lists all of the personal data Sodrugestvo and description how long each type of data will be kept).
- 3) creates, maintains and develops general guidelines in strict accordance with the GDPR which are related to the saving, storage, archiving of electronic documents and of paper documents (including systematic digitalization (scanning) of some documents);
- 4) communicates with its IT providers of the software/apps currently used in order to implement the tools on such software/apps which help Sodrugestvo to manage the saving, storage, archiving and erasure (or anonymization) of personal data, and to keep such tools up to date.

 GROUP OF COMPANIES SODRUGESTVO Company Sodrugestvo Group S.A.	Document type Policy	Reg. number	Page 26 / 29
	Document name Global Privacy Policy	Version 1	

5) Ensures appropriate security of the personal data (integrity and confidentiality). Sodrugestvo has implemented the procedure for labelling of information assets and guidelines on access to documents. In particular, there is a classification and labelling procedure for the data used in the Group's information systems and assets as set out under the Policy PLC-001-002 on information classification and handling. Personally identifiable information are classified as "restricted" in this Policy. Furthermore, Sodrugestvo establishes the General IT Guide (Annex #4) that includes an IT usage policy, an access control policy, encryption and password solutions (notably to protect documents), and practical guidelines on how to use and apply such measures, especially for restricted documents.

 GROUP OF COMPANIES SODRUGESTVO Company Sodrugestvo Group S.A.	Document type Policy	Reg. number	Page 27 / 29
	Document name Global Privacy Policy	Version 1	

X. Final Provisions

1. Severability


If any provision of this Policy is found to be invalid, that provision will be deemed severed from the balance of this Policy and will not affect the validity and enforceability of the remaining provisions, which will continue in full force and effect.

2. Amendment

This Policy may be subject to changes from time to time. We will notify you of changes to this Policy by email or any other methods allowed by applicable data protection laws.


3. Contact

For any question or queries you may have regarding this Policy, please use the following email address: privacy@sodru.com.

 GROUP OF COMPANIES SODRUGESTVO Company Sodrugestvo Group S.A.	Document type Policy	Reg. number	Page
	Document name Global Privacy Policy	Version 1	28 / 29

XI. List of Annexes

- 1) the Data Processing Register;
- 2) the Template the Data Privacy Impact Assessment Questionnaire;
- 3) the DPIA Register
- 4) the Internal Rules and Procedures for the GDPR Compliance;
- 5) the General IT Guide;
- 6) the Complaint Handling Policy;
- 7) the HR Policy with Regard to the Processing of Personal Data;
- 8) the Website Privacy Policy;
- 9) the List of Current Data Processors;
- 10) the Standard Contractual Clauses for the Transfer of Personal Data to Controllers;
- 11) the Standard Contractual Clauses for the Transfer of Personal Data to Processors;
- 12) the Template for a Data Processing Agreement;
- 13) the Intra-Group Data Processing and Data Transfer Agreement;
- 14) the Data Protection Guidelines and Red Flags for the Validation of Agreements with Third Party Data Processors;
- 15) the Data Subject Consent Form
- 16) the Internal the GDPR Compliance Audit Plan;
- 17) the Annual Plan for the GDPR Awareness Session with Employees, Quick Trainings, Guidelines;
- 18) the Internal Data Breach Response and Notifications Procedure;
- 19) the Data Incident Repository
- 20) the Data Breach Notification Form to the Supervisory Authority (the CNPD);
- 21) the Data Breach Notification Form to Data Subjects;
- 22) the Data Retention and Deletion Policy.

 GROUP OF COMPANIES SODRUGESTVO Company Sodrugestvo Group S.A.	Document type Policy	Reg. number	Page 29 / 29
	Document name Global Privacy Policy	Version 1	

Other company's policies that contain rules and instructions with regard to processing of personal data:

- the Employee Handbook (clauses 1.5 and 3.13);
- the Provisions on communication and telecommunication (PRV-001-008);
- the Provisions on the control in the corporate information environment (POL-001-004);
- the Internal Working Regulations (REG-SGSA-04-205) (clause 6);
- the Code of Ethics, Conduct and behavior (Clause 13));
- the Policy PLC-001-002 on information classification and handling.