

PRIVACY POLICY

1. Introduction

2. If you are a business partner, including supplier and customer

2.1 Processing of personal data about our business relations

2.2 Types of personal data

2.3 Purpose of the processing

2.4 Legal basis

2.5 Retention period

3. If you visit our websites

3.1 Processing of personal data about visitors on our websites

3.2 Types of personal data

3.3 Cookies

3.4 Purpose of the processing

3.5 Legal basis

3.6 Retention period

4. If you visit our LinkedIn pages

4.1 Use of personal data

4.2 Legal basis for processing your personal data

4.3 Sharing of your personal data

4.4 Rights towards the social medias

5. If you are applying for a job in a Geia Group entity

5.1 Processing of personal data about job applicants

5.2 Retention period

6. General information applicable for all individuals covered by this privacy policy

6.1 Disclosure to other data controllers and transfer to data processors

6.2 Security

6.3 Your rights

6.4 Questions or complaints

7. Changes to the privacy policy

1. Introduction

At Geia Group confidentiality and data protection are high priorities. This privacy policy applies for the processing of your personal data by the companies within Geia Group when you visit our websites, engage with us via our LinkedIn pages or otherwise interact with us as a business partner (e.g. customers, suppliers or other business partners).

This policy sets out the guidelines for our processing of your personal data and provides you with the information you have the right to receive according to applicable data protection law. You must read the privacy policy before submitting your personal data to us.

This privacy policy applies to the following Geia Group entities:

- Geia Food A/S
- Geia Food AS
- Geia Food AB
- Food Partners World ApS
- Bake&Take A/S
- Topfoods OY
- OY Delice Plus Ab

Unless otherwise stated in the description of a specific processing activity, GEIA FOOD A/S acts as the data controller for the processing of personal data described in this privacy policy.

References to “GEIA” in this privacy policy refer to GEIA FOOD A/S as the data controller:

GEIA FOOD A/S

Address: Fuglevænget 9, 9000 Aalborg

Company registration no.: 14983007

Email: info@geiafood.com

Telephone: +45 96 34 04 14

The Geia Group entity Lupa Foods Ltd. has a separate privacy policy that applies to its processing of personal data. This privacy policy is available on its website.

2. If you are a business partner, including supplier and customer

The Geia Group entity with which you are engaging, acts as the data controller for the processing of your personal data described in this section. In addition, Geia Food A/S may act as data controller where it processes your personal data for its own purposes, such as group-wide customer and supplier administration, reporting and analysis

2.1 Processing of personal data about our business relations

The Geia Group entity may collect, process and store personal data about you in the following instances:

- When your company or the company you are employed with enters into an agreement with a Geia Group entity, including for the purchase or supply of products or service
- When you collaborate and communicate with a Geia Group entity.

2.2 Types of personal data

The Geia Group entity may collect, process, and store the following personal data:

- Work title name, email, and telephone number)
- Information about the company you are working for / own
- Communication with you (content of inquiries)

2.3 Purpose of the processing

Your personal data may be processed for the following purposes:

- To enter into a contract with the company you work for / own
- To administrate complaints and returns
- Generally, to plan, perform and manage the business relationship
- Customer service and general communication
- Compliance with requirements according to applicable law
- For the establishment, exercise, or defense of legal claims
- Enforcing contractual terms and conditions

2.4 Legal basis

The Geia Group entity will mainly process your personal data based on the following legal bases

- The processing of your personal data will in some cases be necessary for the performance of a contract (Article 6(1)(b) of the GDPR)
- Legitimate interest in being able to establish, exercise or defend legal claims (Article 6(1)(f) and Article 9(2)(f) of the GDPR)
- Compliance with legal obligations to which the company is subject, for example bookkeeping and accounting obligations (Article 6(1)(c) of the GDPR)
- The entity's legitimate interest in managing and maintaining business relationships, communicating with business partners and ensuring efficient operations (Article 6(1)(f) of the GDPR)

2.5 Retention period

Your personal data will be deleted when it is no longer needed for one or more of the purposes mentioned above.

Subject to other requirements under local law, the following retention periods apply:

- Contact information relating to a business relationship (customers, suppliers and other business partners) is kept for up to 3 years after the cooperation ends, provided it remains commercially relevant or needed to handle rights and obligations arising from the relationship. We assess the need for continued storage when a cooperation ends.
- Personal data included in accounting records is kept for 5 years from the end of the financial year to which the records relate
- Personal data collected in connection with business support or other activities will be stored as long as such data is relevant for the handling and monitoring of the issue in question

However, the data may be processed and stored for a longer period in anonymized form.

3 If you visit our websites

The websites www.geiagroup.com, www.geiafood.com, www.foodpartners.dk, www.bakeandtake.dk, www.topfoods.fi, www.delice.fi and www.vildmedand.com are operated by GEIA and GEIA acts as the data controller for the processing of personal data carried out through these websites.

3.1 Processing of personal data about visitors on our websites

GEIA may collect, process and store personal data about you in the following instances:

- When you visit and browse our websites
- When you communicate with us through our websites

3.2 Types of personal data

GEIA may collect, process, and store the following personal data about you:

- Name, email address, telephone number and similar identification data
- Company name
- Branch/business area
- Content of inquiries
- IP address and browser settings
- Information about your usage of our websites

3.3 Cookies

Our websites use cookies. Most of our websites use only strictly necessary cookies, which enable basic functions such as navigation and access to secure areas, and which are always active as the websites cannot work properly without them.

Any cookies that are not strictly necessary, such as statistics cookies, are only placed with your consent, which you can withdraw at any time. Please refer to the cookie information on the relevant website for details about the specific cookies and their expiry.

3.4 Purpose of the processing

Your personal data may be processed for the following purposes:

- Completion of requests received by you
- General communication
- Functional and secure websites
- Development of sites, products and services

3.5 Legal basis

GEIA will mainly process your personal data based on the following legal basis:

- Legitimate interests: The processing of your personal data will be based on our legitimate interest in maintaining a functional and secure website (Article 6(1)(f) of the GDPR).
- Necessary for the performance of a contract (Article 6(1)(b) GDPR) or based on GEIA's legitimate interest in responding to such inquiries (Article 6(1)(f) GDPR).
- Where we place cookies that are not strictly necessary, the processing is based on your consent (Article 6(1)(a) of the GDPR), given through the cookie banner on the relevant website.

3.6 Retention period

Your personal data will be deleted when it is no longer needed for one or more of the purposes mentioned above. Please refer to our cookie information for information about the expiry of cookies placed on your device.

The personal data may, however, be processed and stored for a longer period of time if anonymized.

4 If you visit our LinkedIn pages

GEIA and LinkedIn are joint data controllers in the processing of your personal data. GEIA complies with the guidelines of the European supervisory authorities concerning joint controllership and GEIA seeks to ensure that you receive information on the processing of your personal data when you visit our LinkedIn pages.

This section applies to GEIA's processing of personal data which you leave behind and/or provide when you visit GEIA's LinkedIn page. This section is a supplement to the general privacy policy issued by LinkedIn.

4.1 Use of personal data

Your personal data may be processed for the following purposes:

- Recruitment
- Performance of research activities and statistics

LinkedIn collects statistical data on the visitors' behavior for their own purposes through cookies and pixels on your device when you visit the sites. Each cookie contains a unique identification code which remains active for a certain period, unless it is deleted prior to expiry of such period.

You can read more about LinkedIn's processing of personal data by visiting their privacy policy ([link](#)) and cookie policies ([link](#)).

4.2 Legal basis for processing your personal data

GEIA will mainly process your personal data based on the following legal basis:

- Legitimate interests: We process your personal data pursuant to our legitimate interest in finding suitable job candidates (Article 6(1)(f) of the GDPR).

4.3 Sharing of your personal data

GEIA will at no point disclose your personal data collected via LinkedIn to third parties.

LinkedIn may share your personal data internally among its subsidiaries and externally among its partners using analytical services, advertisers, other individuals, surveying partners and researchers and academics. Such transfers may include transfers to countries outside EU. For more information, please refer to LinkedIn's terms and conditions and privacy policy linked to above.

4.4 Rights towards social media

LinkedIn's general set-up dictates that you must contact LinkedIn if you wish to exercise your rights. This is owing to the fact that only LinkedIn are, in purely functional terms, capable of taking the steps necessary to comply with most of your requests. If, however, you are of the opinion that GEIA is capable of complying with your request, please do not hesitate to contact us.

Click here ([link](#)) to change your settings or here ([link](#)) to exercise your rights.

5 If you are applying for a job in Geia Group

The Geia Group entity to which you submit your application is the data controller for the processing of your personal data in connection with the recruitment process.

5.1 Processing of personal data about job applicants

In order to evaluate your application, the Geia Group entity will process the personal data, which you have disclosed in your job application and CV as well as any attachments and store it in our database. Your performance and competencies during potential interviews may also be assessed. In addition information may be used for statistical purposes.

The legal basis for our processing of your personal data is your application for execution of an employment contract with the Geia Group entity to which you are applying, cf. Article 6(1)(b) of the General Data Protection Regulation (“GDPR”) and the entity's legitimate interest in processing the information you have provided, cf. Article 6(1)(f) of the GDPR.

Further, the Geia Group entity may search the internet for relevant and available information, including content from social media. Such searches will typically focus on information regarding your previous employment, professional activities, qualifications and competencies.

If the job position requires you to complete personality tests or similar you will be informed hereof when we have processed your application. The results of such tests will be treated confidentially but will be included in our evaluation of your application. The legal basis for such processing of personal data is Article 6(1)(b) and (f) of the GDPR.

Depending on the position, you might be asked to provide a copy of your criminal record. Such information will also be treated confidentially. Personal data relating to criminal convictions and offences is subject to Article 10 of the GDPR and is only processed where, and to the extent that, this is authorised under the applicable national law governing the relevant company. The company will only collect and process such information where it has a valid legal basis to do so under that national law.

As part of the evaluation of you and your application, the Geia Group entity may wish to take references from your previous and/or current employers. References will only be obtained from persons you have explicitly stated in your job application. The legal basis is the legitimate interests pursued by the relevant Geia Group entity in assessing your qualifications, experience and suitability for the position, pursuant to Article 6(1)(f) of the GDPR.

We recommend that you do not disclose sensitive personal data, such as information revealing racial or ethnic origin, religion, trade union membership, sexual orientation, health, etc. in your application. In the unlikely event that a certain health condition is required for the ability to perform the duties related to the position in question, we might – after a concrete assessment

– request health information from you. In such case we will ask for your consent, whereas our legal basis for such processing of personal data is Article 6(1)(a) and Article 9(2)(a) of the GDPR.

5.2 Retention period

If you are offered a position, your application and additional relevant personal data obtained during the recruitment procedure will be stored in your employee file.

If you are not offered a position, your application and any additional personal data obtained during the recruitment procedure will be stored for a period of 6 months following rejection, unless you have provided your consent to the storage hereof for a longer period.

Any consent that you may have provided during the recruitment procedure may be withdrawn at any time. The withdrawal of your consent will affect the future processing of your personal data but will not affect the lawfulness of processing based on consent before its withdrawal. If you wish to withdraw a consent, please contact the Geia Group entity with which you applied for employment or use the contact details provided in this privacy policy.

6 General information applicable for all individuals covered by this privacy policy

6.1 Disclosure to other data controllers and transfer to data processors

To fulfil the above purposes, we may provide access to your personal data for third parties that provide services to the relevant Geia Group entity under a contractual relationship, such as IT providers and affiliated companies. Such service providers will only process personal data in accordance with our instructions pursuant to the data processor agreements entered into.

In connection with Geia Groups development, the company structure may change, e.g., through a full or partial sale of Geia Group. In case of a partial hand over of assets containing personal data, the legal basis for the related disclosure of personal data is, as a general rule, Article 6(1)(f) of the GDPR, as the relevant data controller has a legitimate interest in handing over part of its assets as well as making commercial changes.

Aside from above, it is a general rule that your personal data is not disclosed to a third party without your permission. However, under certain circumstances and in accordance with applicable law, we may need to disclose your personal data to:

- Police
- Lawyers
- Auditors
- Courts
- Public authorities
- Utility companies

- Prospective buyers

In certain cases, your personal data may be transferred to countries outside the EU/EEA, for example in connection with the use of IT-systems or social media platforms. In such cases, the relevant data controller (GEIA group entity) ensures that appropriate safeguards are in place in accordance with applicable data protection law, including including appropriate safeguards.

Such transfers take place to the United States. They occur in connection with our use of IT systems and cloud services (for example Microsoft and Amazon Web Services), certain recruitment tools (including Predictive Index), and, on some of our websites, analytics and social media services provided by Google, Meta and LinkedIn.

Depending on the recipient, these transfers are based on the European Commission's Standard Contractual Clauses and/or the EU–US Data Privacy Framework, where the recipient is certified under it.

For more information about these transfers, please contact GEIA using the contact details in this privacy policy.

6.2 Security

We protect the confidentiality, integrity and accessibility of your personal data. Hence, we have implemented security measures to ensure that our internal procedures meet the established security standards and applicable legal requirements.

We have internal rules on information security that contain instructions and measures to protect your personal data from being destroyed, lost or altered, against unauthorized disclosure, and unauthorized access to and knowledge of them.

6.3 Your rights

- You have the right to access the personal data we process about you
- You have the right to object to our collection and further processing of your personal data
- You have the right to have your personal data rectified and deleted, with certain statutory exceptions
- You have the right to request us to restrict the processing of your personal data
- Under certain circumstances you may also request to receive a copy of your personal data as well as the transmission of your personal data which you have provided us with to another data controller (data portability)
- You may, at all times, withdraw any consent you may have given. We will then delete your personal data, unless we can continue the processing on another basis.

6.4 Questions or complaints

If you have any questions in relation to this privacy policy, wish to exercise any right under clause 6.3 or if you wish to make a complaint in connection to our processing of your personal data, you are welcome to contact us. Enquiries can be directed to GEIA, which will ensure that your request reaches the Geia Group entity that acts as the data controller for the processing in question:

GEIA FOOD A/S

Address: Fuglevænget 9, 9000 Aalborg

Email: info@geiagroup.com

Telephone: +45 96 34 04 14

If your complaint is not resolved by us and you wish to proceed with the case, you can send your complaint to the supervisory authority in your country. A list of European supervisory authorities is available [here](#).

7 Changes to the privacy policy

We reserve the right to make changes to this privacy policy from time to time. The, at all times, applicable privacy policy will be available on our websites.

In the event of significant changes, you will be notified via email.