

Ornua Co-operative Limited and its subsidiaries

Data Protection Notice for Candidates

This Data Protection Fair Processing Notice for Candidates (“**Notice**”) provides guidance and information to Ornua employees and external candidates (collectively “**Candidate/s**”) regarding the personal data We collect from you or through our systems during your recruitment process.

In this Notice, references to “**Ornua**”, “**we**”, “**us**” and “**our**” will mean the hiring Ornua company (as specified in the job description or as the context of the job description provides). Ornua and its affiliated companies will be referred to collectively as “**Ornua Group**”.

Most of your personal data is processed via Our centralized and consolidated Applicant Tracking System (“**ATS**”). The ATS allows Ornua Group to organize and manage the recruitment process. Ornua Group has chosen SAP SuccessFactors as the service provider for the Ornua ATS. SAP SuccessFactors (a SAP company) provides its products and services as a cloud-based solution. However, the data (including personal data) will solely be hosted on servers in St.Leon/Rot in Germany with back-up servers in Amsterdam, the Netherlands. We may also process your personal data through other electronic and paper-based systems for the purpose of carrying out the recruitment process.

We seek to maintain the privacy, accuracy, and confidentiality of personal information (including your personal data) that We collect and use concerning Our Candidates. European privacy laws require that the following information is provided to you:

1. **Identity of the controller.** The controller is the hiring Ornua company. For contact details, please refer to the job description or www.ornua.com/our-locations.
2. **The categories of personal data We may collect:** If provided to us, we process the following categories of personal data about you:
 - identification data, including first name and surname;
 - contact information, including name, home address, phone/mobile/fax number, e-mail address;
 - gender, date of birth, citizenship;
 - data regarding responses to screening questions (where applicable);
 - background check information (where applicable);
 - previous employment information, including date of hire, job title, department and business unit, work location, work status (full-time, part-time), data pertaining to work preferences and abilities;
 - resume/CV, including education and qualifications, past work experience and references;
 - information on certain health conditions (only where required by law);
 - job interview notes;
 - assessment results.

Most of the personal data We process is obtained from you when you file your application with Ornua (or when a recruitment agency or a friend files an application with Ornua on your behalf), but we also obtain personal data about you in the course of the application process (for example, during interviews or via job assessments). Other data types may be obtained from third parties, including for example, recruitment agencies.

In most cases, you will be required to set up an Ornua candidate online account to be able to file your application. You have the opportunity to use your external social media account, such as LinkedIn, to facilitate the set-up of your Ornua candidate online account. In that event, Ornua will be provided with the latest information from your social media account. Additional privacy terms of the social media service providers may apply.

3. ***Purposes for which the processing of the personal data is intended; legal basis for the processing; and Our legitimate interests:*** Ornua will process your personal data for job recruiting and placement purposes, including notification of future job opportunities, and, for successful candidates, for employment purposes.

Processing of this personal data is required to enable Ornua to administer the recruiting process, including the set-up of an electronic job applicant HR file, managing your application, organizing interviews – in short, the processing is necessary for us to consider entering into a contract with you or, if your application is successful, to enter into a contract with you (legal basis: Article 6 (1) b) GDPR).

In case of legal proceedings, we will need to process your personal data to establish, exercise or defend Ornua/Ornua Group against the legal claim (legal basis: Article 6 (1) f) GDPR).

We may also share your personal data with other Ornua Group companies and, for the purpose of considering you for future job openings, we will retain your data for a maximum period of 12 months beyond an unsuccessful application (legal basis: Article 6 (1) a) and/or f) GDPR). You can object to such use of your data at any time.

The provision of personal data is voluntarily. However, your failure to provide personal data may have an impact on the recruiting process.

4. ***Recipients or categories of recipients of the personal data:***
a. ***Sharing within Ornua Group***

Personal data will only be shared across the Ornua Group in certain circumstances and where lawful to do so, for example with limited members of the Human Resources (HR) department or the ICT (Information and Communications Technology) department, both of which may be working for different Ornua Group entities. Whenever We need to share your personal data, We will only do so on a need-to-know basis and with selected employees for tasks within their job responsibilities. Ornua takes appropriate steps to ensure that such personnel are bound by duties of confidentiality with respect to your personal data.

Your personal data will in particular be shared with Ornua Co-operative Limited for the central management and maintenance of the recruitment databases, including management of the recruitment process.

International transfers: Due to the global nature of the Ornua Group, your personal data may be transferred to Ornua Group entities located in other countries, including outside the European Economic Area (EEA). For example, the hiring manager may be located and employed by the Ornua Group entity in the US with access to personal data of Employees of the Ornua Group entity in Ireland. These other countries will either have different data protection laws than your country of residence or they may not have data protection laws. Steps will however be taken to put in place safeguards (including around security) to protect your personal data when it is in other countries. For example, in respect of transfers outside the EEA, this includes use of European Model Clause contracts. (You can find out what these are online at the following address: http://ec.europa.eu/justice/data-protection/international-transfers/transfer/index_en.htm.)

If you have any questions or wish to be provided with a copy of a European Model Clause contract please see “**Contact Us**” for further contact information. Please note commercially sensitive information may be removed/blanked out from copies supplied to you.)

b. Service Providers:

We use third party service providers (e.g. SAP or work agencies) who provide technical and support services in connection with the application and recruitment process (such as hosting or “Software as a Service”). In providing these services, your personal data will, where applicable, be processed by the service provider on Ornua’s behalf.

We will confirm with any third party service provider we use that they can provide sufficient guarantees regarding the confidentiality and security of your data. We will ensure that any such third party complies with our data security standards and international transfer restrictions.

c. Disclosure to third parties:

In certain circumstances, we share and/or are obliged to share your personal data with third parties outside Ornua Group, for the purposes described above and in accordance with applicable data protection laws. These parties will act as controllers of your personal data in their own right, and they will be responsible for compliance with applicable data protection laws. These third parties are:

- administrative authorities (tax or social security authorities);
- financial institutions;
- insurance providers;
- police, public prosecutors;
- external advisors (such as legal advisors, accountants, auditors).

5. Period for which the personal data will be stored, or if it is not possible to state a specific period, the criteria used to determine that period: If your application for employment is successful and you commence employment with Ornua, your personal data will be transferred to your personnel file and will be processed for employment purposes.

If your application for employment is not successful, we will keep your personal data for a limited period upon notification that your application was not successful for the purposes of (i) contacting you (with your consent, where required) for future job vacancies and (ii) the establishment, exercise or defense of legal claims.

6. Your rights: You have various rights under data privacy laws in your country (where applicable). These include (as relevant): the right to request access to the personal data We hold about you; the right to rectification including to require Us to correct inaccurate personal data; the right to request restriction of processing concerning you or to object to processing of your personal data; the right to request the erasure of your personal data where it is no longer necessary for Us to retain it; the right to data portability including to obtain personal data in a commonly used machine readable format in certain circumstances such as where Our processing of it is based on a consent; the right to object to automated decision making including profiling (if any) that has a legal or significant effect on you as an individual; and the right to withdraw your consent to any processing for which you have previously given that consent.

7. Your right to lodge a complaint with a supervisory authority: Without prejudice to any other administrative or judicial remedy you may have, you have the right under data

privacy laws in your country (where applicable) to lodge a complaint with the relevant data protection supervisory authority in your country if you consider that We have infringed applicable data privacy laws when processing your personal data. This means the country where you are habitually resident, where you work or where the alleged infringement took place.

8. **Security:** We maintain physical, electronic and procedural safeguards to protect the confidentiality, integrity and availability of your personal data. We have in particular taken appropriate security measures against unlawful or unauthorised processing of personal data, and against the accidental loss of, or damage to, personal data.
9. **Cookies:** Our online application platform uses the following cookies on the basis of Article 6 (1) f GDPR (legitimate interest to provide you a tailored and easy platform experience):

SuccessFactors HCM suite Cookie Name	Purpose	When Set
zsessionid	Used with cross applications global session management.	Created as a browser session cookie whenever a new user visits a SuccessFactors site. The value is not updated unless the current session ends, in which case a completely new zsessionid cookie is set.
JSESSIONID	Used with J2EE session management.	Created as a browser session cookie whenever a new user visits a SuccessFactors site. The value is not updated unless the current session ends, in which case a completely new JSESSIONID cookie is set.
OptierRQUUID	User for troubleshooting and analysis.	Created when a browser session is created.
loginMethodCookieKey	Determine login method if partial enterprise SSO is enabled. The cookie improves suability for the end in case the wrong login-method is approached.	Depending on the instance configuration this cookie might be a session cookie or a persistent cookie in case "partial enterprise Single Sign On (SSO) is enabled."
deeplinkCookieKey	Support deep link to pages with SSO	Cookie is created in case of a direct access of a page in a module but authentication is required. The cookie is only valid for the second of the redirection.
Fontstyle	Support of user settings and disability support	Created as a Browser session cookie depending on the instance configuration.
BIGipServerP_<label>-80	Web Server Session management	Created as a browser session cookie whenever a new user visits a SuccessFactors site. The value is not updated unless the current session ends, in which case a completely new cookie is set.
AssertingPartyCookieKey	Used to keep SAML asserting party name	Created when SAML SSO is used. The assertion party name is configured by customer. It is a persistent cookie.
ms_cookie_set	Used for Media Service.	Created when Media service widget is rendered. It is a session cookie.
bizxCompanyId	Used to remember the company ID that a user used to login with. So when they go back to the Login page, the page doesn't need to ask for the company ID anymore.	Only company ID information is persistent. Created when a valid company is provided by user. This is a persistent cookie.

10. **Changes:** We may decide to change this Notice. If the change is fundamental or may significantly affect you, we will provide you with the updated Notice in advance of the change actually taking effect.

If you have any questions or would like further information about your data protection rights, please contact your hiring Ornua entity.