

# GLOBAL PRIVACY NOTICE\*

# This Notice explains how, when and why we collect and use your personal data when you interact with Fragrance Oils.

'Personal data' is any information or set of information that can identify you as an individual such as your name, address, telephone number, email address as well as any other information about you that Fragrance Oils may obtain from you directly or indirectly.

We are committed to being transparent in the way we collect and use your personal data and how we protect it. We also recognise your need for reasonable control of your personal data.

This is why this Notice explains you in details:

- Who is responsible
- Application of this Notice
- What personal data we collect and how we use it
- How we protect it
- Your rights
- Other important information you need to know

# WHO IS RESPONSIBLE?

The Data Controller is the legal entity which is responsible for the personal data collected from you. It determines the means and the purposes of the processing of your personal data, that is how, when and why it collects and uses your personal data. Fragrance Oils ("we", "us") is a multinational company operating around the globe. The Data Controller for your personal data will depend on who you are:

If you are a visitor of this website or an investor, the Data Controller is Fragrance Oils Limited with its registered office at Eton Hill Industrial Estate, Eton Hill Road, Radcliffe, Manchester, M26 2FR ("Fragrance Oils").

If you are a customer or a supplier, the Data Controller is the legal entity that manages your business relationship with Fragrance Oils. This information can be found on the invoice or purchase order you receive or in the agreement you have entered into with Fragrance Oils.

For any other individuals, with the exception of employees and contractors working on Fragrance Oils sites, the Data Controller is the legal entity that manages your relationship with Fragrance Oils. This information can be found in the agreement you have entered into with Fragrance Oils or can be obtained from your contact person at Fragrance Oils.

We are registered with the Information Commissioners Office, the UK's Data Protection Authority.

For any question with respect to this Notice, please contact jamie@fragrance-oils.com

# APPLICATION OF THIS NOTICE



This Notice applies to you when you interact with Fragrance Oils in the course of a prospective or ongoing business relationship, when you visit our websites, when you use the technology we make available to you (e.g. when you visit a Fragrance Oils site) or when you connect to certain platforms, applications or other solutions under our control or when you join any offline or online events organized by us or lastly when you apply for a position with Fragrance Oils. For any other individuals, the collection and use of your personal data may be subject to a specific privacy notice. Please reach out to your Fragrance Oils contact jamie@fragrance-oils.com

# WHAT INFORMATION DO WE COLLECT AND WHAT DO WE DO WITH IT?

We collect personal data in two ways:

Directly from you

Indirectly, through other sources

#### **Directly from you**

We may collect and use personal data that you provide us when you interact with us.

For example, your business contact details, including your full name, contact details, your role within your company and your work experience, the country where you work, the products and services that are of interest to you and your company, your opinion and preferences about a product, your communication preferences, your feedback about our services or our organisation.

We also collect the information that you provide to us when you use the contact forms on our website or when you contact our media relations or on paper forms that we ask you to fill during events such as fairs or other marketing events you participate in.

If you contact us for recruitment purposes, we may also collect and process other personal data, including: qualifications, employment history, interview notes and any other information you have provided to us in your curriculum vitae and covering letter and any other information you provide to us during an interview.

During the recruitment process, we will use this information to: assess your skills, qualifications, and suitability for the role you are applying for; keep records related to our hiring processes; and comply with legal or regulatory requirements.

#### Indirectly, through other sources

We also collect information about you indirectly, for example when you browse Fragrance Oils websites, subscribe to our feeds on social media, or otherwise use our network infrastructure and the technology we make available to you. We collect logs about your use of the network, our website (e.g. your view or click on specific content or links or when you click on social media plugins) or the platforms, applications or other solutions we ask you to connect to. We may also collect information such as your IP address, device browser and operating system when you connect to our network infrastructure. We also use cookies to enhance your browsing experience on our websites. Please visit our <u>cookies policy</u> for more information about how to manage your online privacy.

We also collect information about you from third parties when we acquire other companies for example or from publicly available sources such as information about you made available on your company's



website, or from public registries if such is required to ensure compliance with applicable laws.

When your company wishes to enter into a business relationship with Fragrance Oils, we may perform a third party due diligence during which your company may provide us with information about you such as general background information, your business experience and qualifications, your curriculum vitae, financial interests you may have as a director or officer of your company, any relationship with public officials you may have as well as information about actual criminal convictions, if any, and subject to any restrictions under applicable data protection law.

# WHAT DO WE DO WITH YOUR PERSONAL DATA?

We collect and use your personal data for our legitimate interest to:

Our purpose is to	You are	The places we collect and process your data at are	The collected data is
Manage and maintain our business relationship including to create and maintain an account in our systems (such as systems for order and payment management, customer relationship management, sample management or for any other services supporting our business relationship) or to designate you as the contact person for specific business interactions. We may deploy different measures in some countries to be aligned with local regulation. (Please see deviations in the relevant Annexes).	The contact person for specific business interactions (e.g., when you are designated as the person responsible for commercial questions, payments)	We collect your data through various sources, including but not limited to: - You are appointed as a contact person of your company in the purchase agreement - You visit our websites - You meet our representatives at conferences or any other events and meetings - Your data is publicly available - You get connected to our representative on social media (e.q. LinkedIn or Facebook) - Our distributors connect us with you - We acquire a company you were in contact with	Your business contact details
<b>Manage your orders:</b> for example, to ship and process samples or final products and inform you about the status of your order	The contact person for specific business interactions	The same as in the case of 'Manage and maintain our business relationship'.	Your business contact details
Deliver with excellence through our customer care, for example to address any queries you may have and record and share internally such queries to better answer them and improve our products and services in the future	The contact person for specific business interactions	The same as in the case of 'Manage and maintain our business relationship'.	Your business contact details
<b>Analyse your feedback and</b> <b>opinion</b> about our products in order to always improve them or develop new	The contact person for specific business interactions	The same as in the case of 'Manage and maintain our business relationship'.	Your business contact details



ones			
<b>Recruitment</b> , when you apply for a position with us we need to process some personal data to see if you are a suitable candidate.	Candidate	<ul> <li>We collect data via External recruitment agencies or through direct submission from candidates.</li> <li>Your data will be stored electronically and if unsuccessful in the process destroyed after 6 months.</li> <li>During the process the data is shared only with people involved in the recruitment process, the process usually including a recruitment agent, a member of the HR team and the hiring managers</li> </ul>	Qualifications, employment history, interview notes and any other information you have provided to us in your curriculum vitae and covering letter and any other information you provide to us during an interview.

We collect and use your personal data once we obtain your consent to:

Our purpose is to	You are	The places we collect your data at are	The collected data is
<b>Manage your inquiries</b> when contacting our media or investors relations or when contacting us	The person who initiates the contact with us	The contact form on our website or when using one of our channels for raising complaints	Your business contact details and any other personal data requested through the contact form
Send you marketing communications and newsletters about our activities and products that may be of interest to you in the course of our business relationship or when you so requested	The person who subscribes to our newsletters and other communication channels	Any Fragrance Oils form which serve for subscription	Your business contact details and any other personal data requested through the contact form
Enable your participation at any Fragrance Oils event (both online and offline)	The person who expresses their intent in any way to participate at Fragrance Oils event(s)	Any Fragrance Oils form which serve for subscription	Your business contact details and any other personal data requested through the contact form

We may also share your personal data with:

Fragrance Oils affiliates in order to deliver you better services. As a global company, our employees in



various sites may need access to your personal data in order to deliver you better services through streamlined processes.

**Third party service providers** that provide solutions and services for our organisation to help us delivering with excellence. For example, these services providers may help us to (i) deliver emails or other communications, (ii) develop and host some of our solutions (iii) provide customer services or payment services or (iv) assist us in background checks, fraud prevention and risk assessment, (v) enable your subscription to our newsletter, face-to-face or online events or other marketing channels, (vi) provide CRM solutions to facilitate contact and to support you in your choice of our products and services (delivering product samples), (vii) provide recruitment services.

We may also share your personal data:

- in connection or in the course of a merger or a sale or acquisition of a business
- when we are legally required to do so by a competent authority.

We may use third party provided tools such as Hootsuite to manage our social media interactions. If you send us a private or direct message via social media the message may be stored by Hootsuite. Like other personal data, these direct messages will not be shared with any other organisations.

We **do not sell** your personal data to third parties.

#### YOUR RIGHT

You are in control of your personal data.

**Right to access and to correct.** You have the right to request a copy of the personal data we hold about you by <u>contacting us</u>. We make regular checks to ensure we keep your personal data up-to-date. However, we need your help in doing this, so please contact us at <u>jamie@fragrance-oils.com</u> if you want to correct personal data that you have provided us with.

**Right to object and to restrict.** You have the right at any time to object to the processing of your personal data (e.g. when you do not wish to receive direct marketing communications or newsletters from us). Under certain circumstances, you also have the right to obtain the restriction of the processing of your personal data (e.g. until an inaccuracy in your personal data is corrected by us following your request).

**Right to erasure.** If you no longer wish us to process your personal data, you may contact us at <u>jamie@fragrance-oils.com</u>. We may however retain certain of your personal data for compliance with applicable laws and regulations and in accordance with our data retention rules.

**Right to lodge a complaint.** We make our best to be transparent, protect your personal data and offer you as much control as we can. If however you deem that we did not do it in compliance with applicable privacy and data protection laws, you can contact us at <u>jamie@fragrance-oils.com</u>. You also have the right to lodge a complaint with the data protection supervisory authority in your country or in



the country where your Data Controller is located. In the UK, the competent data protection authority is the Information Commissioner's Office (ICO) and they can be contacted by following this <u>link</u>.

**Right to control Cookies and other technologies on our websites.** When you first visit our websites, you are asked to consent to the use of cookies and other technologies. You can manage your choice at any time. Please visit our <u>cookies policy</u> to learn how to keep control of your online activity.

**Right to withdraw your consent**. If our processing of your personal information is based specifically on your consent, you have the right to withdraw that consent at any time.

# OTHER IMPORTANT INFORMATION

#### **Data retention**

We retain your personal data for as long as it is necessary for each of the purposes outlined above. We may however retain certain of your personal data for compliance with applicable laws and regulations (e.g. for tax and audit purposes) and in accordance with our data retention rules. Where it is no longer required to retain data that can still identify you, we will either erase, anonymise or aggregate it so that you may no longer be identifiable as a single individual.

In determining the relevant retention periods, we will consider the following factors:

- our contractual obligations and rights in relation to the information concerned;
- legal obligation(s) under applicable law to retain data for a certain period of time;
- limitation periods in accordance with applicable law(s);
- our legitimate interests;
- (potential) disputes; and
- guidelines issued by the relevant data protection authorities.

#### International data transfers

We operate as a global company and rely on service providers to support our global solutions. Therefore, we may transfer your personal data outside of the European Economic Area ("EEA") if that is appropriate to achieve any of the purposes set out above.

If we transfer your personal data outside of the EEA or the UK, we will make sure that your personal data is protected by the following safeguards:

- the laws of the country to which your information is transferred ensure an adequate level of data protection; or
- the transfer is subject to data protection clauses approved by the European Commission or any relevant government authority.

#### CHANGES TO THIS NOTICE

The most recent version of this Notice is on this page. We may modify this Notice at any time without



notice, except if such modifications contain substantial changes that may affect individuals' rights under applicable privacy and data protection laws, in which case you will be notified of such changes at the beginning of this page.

# CONTACT

In case you have further questions about this Notice, please get in touch with. You can also write to us at:

Fragrance Oils Eton Hill Road Manchester M26 2FR United Kingdom

\* Does not apply to employees

Approved: A.Stedman, Head of Fragrance Oils Last updated: 16.08.21