

## Privacy Notice to new customer applicants and existing account holders

**At Lantmännen Group we value your privacy and are committed to protecting your personal information. This Privacy Notice explains how we collect, use, store, and protect your personal data in compliance with applicable privacy laws, such as the European General Data Protection Regulation (GDPR) and our Internal Policies. It also outlines your rights and the measures we take to ensure transparency and security in handling your information.**

This notice applies to all new customer applicants and existing account holders of Lantmännen ekonomisk förening. We encourage you to read this document carefully and reach out to us via [cf.ssc.kundregister@lantmannen.com](mailto:cf.ssc.kundregister@lantmannen.com) or Lantmännen's general data privacy email, [dataprotectionofficer@lantmannen.com](mailto:dataprotectionofficer@lantmannen.com), if you have any questions or concerns.

We may come to amend this privacy notice as part of Lantmännen's annual governance process, but you will always find the most recent version on our website. Targeted or additional information regarding specific personal data processing activities may be given through other channels and such information take precedence over this policy. Your trust is important to us, and we are dedicated to maintaining a workplace that respects and safeguards your personal data.

### What personal data do we process?

As part of your customer relationship and/or account holding with Lantmännen, we may process the following categories of personal data about you:

Category	Personal Data
<b>Contact details</b>	such as your full name, home address, delivery address, unloading location, production site (including coordinates), private/work-related email address, and private/work-related telephone number
<b>Personal information</b>	such as type of national ID, personal identity number, driver's license information, passport details, and BankID
<b>Financial information</b>	such as bank account number, bankgiro-number, direct debit details, incoming and outgoing payments, information about your estimated and actual turnover with Lantmännen, credit information, and credit reports
<b>Organizational data</b>	such as organization number/company ID (for sole proprietorships in Sweden this consists of a personal identity number), beneficial owner, ownership structure/ownership shares, VAT registration number, and production profile (production focus and acreage)
<b>Customer information</b>	such as customer number, customer group, customer category, customer segment, pricing area, and consumer status (active, blocked, protected, etc.)
<b>Special categories of personal data</b>	information about PEP status (to the extent required or permitted under applicable data protection legislation).

Some of this information may be collected directly from you, while other information may be obtained from third parties (for example, credit reference agencies or through background checks where this is legally permitted).

## Why do we process your personal data?

Most of the personal data we process about you during your customer relationship with us is necessary for purposes related to fulfilling our agreement with you. Certain processing activities are based on our legitimate interest, for example in the marketing of Lantmännen and our group companies. In the rare event that we carry out processing that requires your prior consent, we will obtain this before the processing begins. When we process special categories of personal data about you, such as your PEP status, we do so in order to fulfil our rights and/or obligations under anti-money laundering legislation. This applies, for example, when we carry out identity checks and customer due diligence risk assessments in connection with invoice management via Lantmännen Finans AB, whose operations are subject to the Swedish Anti-Money Laundering and Terrorist Financing Act (2017:630).

Purpose of processing	Category of personal data	Legal basis for processing
General account administration – to fulfil the account agreement with you, e.g., regarding deliveries, account changes, and invoicing/payment	Contact details, Personal information, Financial information, Organizational data, and Customer information	To fulfil our contract with you
To fulfil our obligations to carry out adequate due diligence of counterparties in accordance with anti-corruption, bribery, and anti-money laundering laws and regulations	All categories (especially Personal information, Organizational data, and PEP status)	Our legitimate interest / Legal obligation
To be able to conduct credit checks	Contact details and Organizational data	Our legitimate interest
To offer services from other group companies (e.g., financing services via our Finance Company)	Contact details, Personal information, Financial information, Organizational data, and Customer information	To fulfil our contract with you
To communicate with you, not for marketing purposes, but for example regarding information/questions about your account, returns, defects, complaints, or other inquiries	Contact details and Customer information	Our legitimate interest
To maintain traceability in deliveries or in the case of complaints and quality issues	Contact details, Financial information, and Customer information	Legal obligation
To communicate with you and market products/services provided by Lantmännen or any of our companies/partners	Contact details, Organizational data, and Customer information	Our legitimate interest

Purpose of processing	Category of personal data	Legal basis for processing
<i>You can opt out of such communications via a link in the email/SMS you receive from us or by contacting us at <a href="mailto:dataprotectionofficer@lantmannen.com">dataprotectionofficer@lantmannen.com</a></i>		
To provide, maintain, test, improve, and develop Lantmännen's products and services and the technical platforms that support them	Contact details, Organizational data, and Customer information	Our legitimate interest

## With whom may we come to share your personal data?

### Other companies within the Lantmännen Group

Lantmännen may share your information with other companies within the Group in order to fulfil the purposes of processing described above. For example, roles within Group Functions at Lantmännen Group may have access to your personal data as part of providing and developing group-wide IT systems/applications, or for internal controls, compliance support, preparation of internal/external reports (e.g., for financial purposes), etc. Your personal data is also shared with Lantmännen's Finance Company, Lantmännen Finans AB, when they handle invoicing in relation to your account. Your contact details may also be shared with other group companies to communicate with you and market relevant products/services provided by Lantmännen. You can opt out of such communications via a link in the email/SMS you receive from us or by contacting us at [dataprotectionofficer@lantmannen.com](mailto:dataprotectionofficer@lantmannen.com).

To ensure that your personal data is adequately safeguarded when it is shared, disclosed or transmitted between Group companies, Lantmännen has established a so-called Intra-Group Transfer Agreement (IGTA). It includes detailed descriptions of the personal data transfers taking place within our Group, what roles the Lantmännen Group companies have in such transfers, standard contractual clauses issued by the EU to ensure appropriate safeguards are taken by Group companies in non-EU countries when receiving personal data, etc. The IGTA is coordinated and signed by representatives for Lantmännen ek för, on behalf of all other Lantmännen Group companies, owned more than 50%, based on Power of Attorneys.

### External parties providing products/services to Lantmännen

We may also share your personal data with external parties that provide services to Lantmännen, for example companies that supply us with IT systems and applications to fulfil the purposes of personal data processing described above.

When personal data is disclosed or shared with external parties acting as data processors on behalf of Lantmännen, we enter into agreements with these parties to regulate how they may process personal data on our behalf. If personal data is to be transferred outside the EU/EEA in connection with disclosure or sharing with external parties, we ensure that an adequate level of protection for personal data can be achieved in the recipient country, for example by entering into an agreement with the recipient containing standard clauses issued by the European Commission. You can read more about this further down in this privacy notice.

### **Other external parties (acting as data controllers)**

Lantmännen may also disclose your personal data to other external parties acting as data controllers when it is necessary to administer your account with us, or when we have another legitimate interest in doing so. For example, when you sign your new customer application using BankID, your personal data is shared with the bank you use for identification. Your personal data will also be disclosed to authorities if required by law and/or administrative decisions, for example under legislation regarding traceability control for deliveries, complaints, and quality issues.

### **When may your personal data be transferred outside of the EU/EEA and how do we protect it in such cases?**

We always strive to process your personal data within the EU/EEA, when you are a European citizen. However, personal data may in some cases be shared with external parties established outside of the EU/EEA who provide us with IT-systems/services, for example as part of IT-support matters. Your rights in connection to our processing of your personal data are not affected by such transfers.

Countries outside the EU/EEA, however, may have local laws which mean that public authorities have the right to request access to personal data stored within the country for the purpose of fighting crime or defending national security. Lantmännen always ensures that an adequate level of protection of personal data can be achieved in the receiving country if personal data are to be transferred outside of the EU/EEA, and that appropriate safeguards, in accordance with applicable data privacy legislation, are in place to protect the data in such cases. Such safeguards include:

- Determining whether the receiving country is on the list provided by the EU Commission of non-EU countries determined by the Commission to have an adequate level of data protection or, if it is not;
- Ensuring that standard contractual clauses issued by the EU Commission are entered into between Lantmännen and the receiver of the data outside of the EU/EEA. This means the receiver guarantees that the protection of your personal data under the GDPR still applies. In these cases, we also perform an assessment of the legislation in the receiving country to see how such can affect the protection of your personal data. Where it is required, we ensure that appropriate technical and organizational security measures are in place to maintain the level of protection for your personal data when it is transferred to the receiving country in question.

### **For how long do we keep your personal data?**

Lantmännen will only process your personal data for as long as necessary to fulfil our purposes of processing (as outlined in the table above). This means that when we stop processing your data for one of the specific purposes listed above, we may still retain it to fulfil one of the other stated purposes, but not for any purposes other than those specified above. In normal circumstances, most personal data that Lantmännen processes about you does not need to be retained after your customer relationship or account holding has ended. We have procedures in place to ensure that your data is deleted when it is no longer needed, usually through automatic retention routines in

our IT systems and applications. Data that forms part of accounting records or that may be subject to future claims is generally retained for 7–10 years in accordance with accounting legislation and statute of limitations rules.

## Security for and protection of your personal data

Lantmännen safeguards your personal data, and we have implemented appropriate technical and organizational security measures to protect it from unauthorized access, amendments, dissemination or destruction.

## Your rights in connection to your personal data

You have several rights in connection to Lantmännen's processing of your personal data according to applicable data protection legislation. You may read more about those rights below. You also have the right to file a complaint with a supervisory authority if you believe your personal data has been processed in violation to applicable data protection regulation. If you want to exercise any of these rights, please send a written request to [dataprotectionofficer@lantmannen.com](mailto:dataprotectionofficer@lantmannen.com). Your rights:

- **Right to be informed:** You have the right to receive information about how we process your personal data. We do so through this Privacy Notice or through targeted or additional information regarding specific personal data processing activities given through other channels (such information takes precedence over this policy)
- **Right of access (right to a 'register transcript'):** You have the right know whether Lantmännen processes any of your personal data and to gain access to such data, for example in a register transcript
- **Right to rectification:** You have the right to have your personal data corrected or completed if it's inaccurate or incomplete
- **Right to erasure ('right to be forgotten'):** In some cases, you have the right to have personal data processed about you deleted/anonymized, for example if your personal data is no longer necessary to fulfill the purpose for which it is being processed or if you withdraw your consent, where such applies, to the processing of your personal data. Note that Lantmännen, under certain circumstances, will not be able to fully delete or anonymize your personal data. Such circumstances include, for example, where the data is still necessary to fulfill the purpose for which it is being processed, where Lantmännen's interest in processing the data outbalances your interest in having it erased or where we are obliged, by law, to retain the data.
- **Right to restriction of processing:** If you think that the personal data we process about you is not correct, that our processing is in violation with applicable law or that we do not need the personal data to fulfill our specified purposes, you have the right to request us to limit the processing of your personal data. You may also request that we do not process your data during the time we investigate your request to exercise this right or if you have requested to exercise your right to object to our processing (read more about that right below).

- **Right to data portability:** In cases where we process your personal data for the performance of our contract with you, or based on your consent, you have the right to gain access to your personal data in a simple and transferrable format in order for you to be able to move your personal data to another data controller, where technically feasible.
- **Right to object to the processing:** You may object to our processing of your personal data when such processing is based on our legitimate interest (in accordance with GDPR Article 6.1f). You always have the right to object to our use of your personal data for direct marketing purposes. We will stop sending you marketing as soon as you opt-out from such.
- **Right to withdraw your consent:** In cases where we process your personal data based on your consent, you always have the right to withdraw such consent. When you withdraw your consent, we will stop processing your personal data for purposes based on the consent.