



# Data and Privacy Protection Policy



## Introduction

At Strauss, we take very seriously the issue of Data Privacy and Security in relation to our customers, our employees and other parties we engage with. When we collect and process personal data, we will do so in compliance with the applicable data protection and privacy legislations including the Israeli Data Privacy law and regulations and the European General Data Protection Regulations (GDPR), as applicable.

Our basic belief is that personal data is a private asset to be safeguarded and treated respectfully.

This Data and Privacy Protection Policy stipulates the basic principles, goals and expectations from our employees that reflect the approach of Strauss to data protection and privacy in eight principles and provides transparency to the data subjects with regards to these principles.

This Data and Privacy Protection Policy will help us to enhance the trust and reassure our customers, employees and partners of our privacy and data protection compliance efforts.

## Eight principles

These 8 principles are intended to inform data subjects about the key data principles that the Strauss Group adheres to.

### Principle 1: Strauss business and data protection go hand-in-hand

Strauss is aware of the legal framework concerning the processing of personal data of its consumers, customers, employees, suppliers and relevant third parties, and commits to the data subjects to take into account privacy protection whenever personal data is processed by Strauss.

Strauss is committed to respect and to reflect data privacy principles in its activity, using all required internal means required to structure our business activity in accordance with our principles and the law.

### Principle 2: Strauss will act transparently regarding data protection

Strauss will make efforts to ensure that the data subjects will be able to understand which information is collected, for what purposes it is collected, with which categories of recipients it is shared and all other data protection requirements to which Strauss strictly adheres, such the rights to access, correct, and delete personal data that Strauss holds on data subjects.

### Principle 3: Data protection and security

Security remains one of the most important aspects in relation to data privacy. The new Israeli data security regulations and the new European privacy legislation impose several additional requirements in relation to data security.

Our internal policies and procedures will be based on the recognized and acceptable standards for data security.

Our internal policies and procedures will detail the processes to be followed when security incidents occur, in line with legal requirements and standard industry practices. Our level of security will be adapted to the nature of our processing activities and will be updated as technology evolves. The Strauss level of security includes, at a minimum, the storage of personal data in a secure environment and asking third parties who process personal data on our behalf, to apply the same level of security measures when processing personal data.

### Principle 4: Strauss respects the rights of data subjects

Strauss remains attentive to its consumers, customers and employees and will process the personal data that they provide to it taking into account their rights in full.

Strauss will fully cooperate with data subjects' requests regarding their rights.

### **Principle 5: Legal basis, proportionality, legitimacy and purpose limitation**

Strauss is aware of and adheres to additional data privacy principles when collecting and processing personal data, such as the need for a legal basis, legitimacy and proportionality and keeping the processing activities coherent with the purpose for which data has been collected. All in accordance and as required by the applicable legislation.

### **Principle 6: Strauss Marketing activities adhere to data privacy principles**

When Strauss uses the personal data of its customers for marketing purposes, it does so with transparency and adherence to relevant data privacy principles. For example, applying the rules and principles around direct marketing activities, allowing customers to easily opt-out of direct marketing messages.

Accordingly, all the digital assets operated by Strauss will adhere to principles of transparency towards the data subjects.

### **Principle 7: Working with third parties**

Strauss will carefully manage all sharing of personal data with third parties. Strauss will not unnecessarily share personal data with third parties but will only do so to fulfill legal obligations or for purposes such as the adequate operations of its activities and provision of its products and services.

Strauss will also carefully choose providers whose information systems are adequately secured, and will ensure, through contractual means, that the provider will only use the personal data for the purposes of the engagement with Strauss and that the provider applies the same level of security measures implemented by Strauss.

Strauss, as a group of companies, is required, at times, to share personal data within the group. When such sharing occurs, Strauss will adhere to the same principles and restrictions of sharing data with external third parties as specified above.

### **Principle 8: Cross-border transfer of personal data**

Strauss, as a global group, may need to share personal data outside the country where the data was collected, and, may also share data with a third-party service provider which involves the transfer of personal data to a third country. Strauss is aware of and will adhere to the strict legal framework concerning the cross-border transfer of data to third countries, under the Israeli legislation and the European legislation, as applicable.

Strauss will verify with third-party service providers, to which country personal data might be transferred and will take appropriate measures to guarantee security when sharing or transferring the personal data.

## **Compliance**

We constantly work to comply, and exceed when possible, with all applicable Data Privacy laws and regulations in all the markets in which we operate. We establish and maintain appropriate compliance programs to ensure management and employees' involvement in, and oversight of Data Privacy, and allocate appropriate resources to address required actions.

As part of compliance programs, all stakeholders within Strauss will be made aware of these principles. This will help identify data protection issues (e.g. when setting up a new activity) and support our ability to respond to internal and external requests for information. Our intention is to make our employees increasingly aware of data privacy related issues and how those impact their role within Strauss.

Data protection legislation requires companies not only to act in line with the law, but to proactively document this through internal records. Strauss is therefore working towards accountability which involves all business units with the program. We are keeping all required documents and proactively documenting our privacy efforts.

Strauss will act to enforce this Data and Privacy Protection Policy, including taking disciplinary measures and/or other appropriate action against anyone acting on its behalf who is found to be in breach of any of its terms. If you believe that you encountered any breach of this Policy, kindly address to the Strauss Legal Department.

## Contact

Questions about this Policy can be addressed to Strauss Legal Department.

## Communication

This Policy is available to Strauss Group employees through our internal internet portal and externally on our corporate website.