

Privacy Notice

JACOBS DOUWE EGBERTS RTL SFM MY SDN. BHD. (Company No.: 199901006336 (481236-P)) (Formerly known as Super Food Marketing Sdn. Bhd.) (“JDE”) is committed to respecting and safeguarding your privacy and the security of your personal information in compliance with the Personal Data Protection Act 2010 and General Data Protection Regulation (GDPR).

In the event of any conflict between the English and other language versions of our Privacy Notice, the English version shall prevail.

In this Privacy Notice, we explain which personal information we collect, how we collect it, and for what purposes. This means, among other things, that we:

- explain in detail the categories of personal information we collect and how we collect it;
- clearly state for what purposes and on what legal basis we process personal information;
- strive to limit the collection of personal information to those needed for legitimate purposes only;
- first request your express consent to the processing of your personal information in cases where your consent is required;
- implement appropriate security measures to protect your personal information, and demand the same of parties processing personal information on our instructions;
- respect your right to request access to and a copy of your personal information and have it corrected or deleted, among other rights you have as further described below.

Please note that we also process personal information through the use of cookies and similar technologies. Please read our Cookie Policy if you would like to know more about this. We recommend that you read these policies and notice carefully. This Privacy Notice was most recently revised in May 2018.

Why do we collect your personal information?

When you choose to register an account, purchase products online, or otherwise contact us, we will ask you for some personal information about you, as well as some optional information about your use of products. The main purposes for which we use your personal information are:

- to communicate with you in a personal way, such as responding to your feedback or service requests and register and settle complaints;
- to keep you up to date about our commercial developments and personalized offers based on your order history and onsite behavior, by means of our newsletter;
- to perform market research to understand your needs and improve our business;
- to administer your participation in any contests, promotions, surveys or website features;
- to administer your account for our website;
- to execute an agreement, such as completing transactions, administering and fulfilling your purchases and services related thereto;
- to send status updates and service communications;
- to send out notifications when changes are made to our policies and other (legal) documents which might concern you; and
- to comply with legal obligations.

What legal grounds apply for processing your information?

We will only process your personal information where we have a legal basis to do so. The corresponding legal grounds for the processing of personal information for the above purposes are:

- You have given us consent to process your personal information (for example if you have subscribed to our newsletter or registered for an account,);
- Processing is necessary for the performance of a contract with you, or to prepare entering into a contract with you at your request (for example if you place an order on our website);
- Processing is necessary for other legitimate interests pursued by us (such as processing IP-addresses in order to prevent, detect and/or respond to abuse of our website and/or storing additional information to be able to identify you when losing access to your account); and
- Processing is necessary to comply with a legal obligation (for example, due to fiscal regulation we need to retain certain customer data).

How we collect your personal information

You can share your personal information with us in a number of ways, for instance by:

- subscribing to our newsletter;
- communicating with our Consumer Care Center by e-mail, phone, social media or in writing;
- registering your product (either online or by sending back the filled-in reply card that comes with the product);
- participating in a promotion, event, contest or online forum, or by filling out a questionnaire or survey related to products;
- purchasing a product or service directly from our website;
- registering for an account;
- participating in a social media activity related to products or services by clicking "like" or "share";
- asking to receive messages on your mobile phone/device;
- participating in product testing or surveys;
- social sign-on: by using your Facebook, LinkedIn or other social media credentials to create an account or log on;
- social listening: we may search the Internet for relevant and publicly available content and use it to improve its products or services resolve consumer issues;
- cookies placed by JDE or third parties on your computer or mobile device when you visit our websites and accept the cookies, on which we provide information in our Cookie Policy.

The personal information we process

By using the products, you leave certain data with us or our service providers or agents, which may include personal information. We only store and use personal information that are provided directly by you or which are clearly provided to us for processing purposes as mentioned above or as mentioned when you provide us with personal information. We will not use the personal information for any other purposes unless you have given your prior consent. The following categories of personal information can be processed by us:

- Contact details (e.g. first and last name, postal address, e-mail address, telephone number);
- Other personal details (e.g. gender, date of birth (optional), nationality, language);
- Financial and transaction data (e.g. bank account information, credit- or debit card number);
- Account details (e.g. username, password);
- Information about your product.

How do we share your personal information?

We may share your personal information with third party service providers or agents (called ‘processors’) to perform certain processing activities on our behalf, such as parties involved in executing a purchase agreement (such as payment service providers and parcel delivery services). We will not sell, rent, lease, or provide your personal information to third parties allowing them to use your personal information for their own purposes. We use third party service providers for website hosting, for payment processing, for parcel delivery services, for third party advertising.

We conclude so-called ‘data processing agreements’ with all parties who process your personal information on our behalf, so that they are legally bound to keep your data confidential, to implement appropriate security measures, to notify us if the security of your data has been breached, and other obligations to protect your privacy.

We sometimes sell (part of) a business to another company. Where such business relates to products, such transfer of ownership may include the transfer of your personal information to the new owner.

Furthermore, we will release your personal information if so required by law, where necessary for preventing or combating fraud, where necessary for dispute resolution, or for any other pressing legitimate need which under the circumstances must outweigh your privacy interests, which may include the security of our business and the safety of our staff.

We share personal information between JDE affiliates according to our Binding Corporate Rules that are registered with the Dutch Data Protection Authority. We also share personal information with third-party advertisers.

Commercial communications

We would like to send you information about products and related services that may interest you, based on your order history and onsite behavior, by means of, e.g., e-mail or other communication channels, but we will only do so if (i) you specifically consent to receive such communications from us; or (ii) you have purchased a product or service from us which is similar to the product or service which we would like to inform you about and you did not, at the time of purchase, make use of your right to object to receiving such communications.

You will always have the opportunity to unsubscribe from any further communication from us with respect to products and services by clicking the unsubscribe option on the footer of the emails sent by us, or by accessing your profile online and changing your communication preferences.

How do we protect your information?

We protect your personal information with a variety of security measures. This may include using secure registration forms, encryption of data, and restricting access to your personal information.

What are the retention periods?

Personal information collected will be retained no longer than necessary in order to fulfil the purposes as outlined in this Privacy Notice, unless a longer retention period is required and justifiable or permitted by law. A few examples:

- **Your purchase.** All personal information regarding your purchase will be retained until the order has been fulfilled, and two years after the legal warranty period has lapsed - unless you have registered for an account. In that case, the data will be retained for a period as specified below. Please note that some personal information must be retained for a longer period to comply with legal (fiscal) obligations.
- **Your account.** Personal information regarding your account (such as your username, password, invoices and all other personal information which is stored within your account) will be retained until the moment you decide to delete your account, and three months after.
- **When you reach out to us.** If you decide to communicate with us, we will retain any personal information received for as long as necessary to handle your request, and three months after.
- **Your subscription to our commercial communications.** If you signed up for our newsletter or other forms of commercial communication, all personal information which is processed for this purpose, such as your name and e-mail address, will be retained until the moment you decide to unsubscribe. If you unsubscribe, we might retain your (e-mail) address and add it to a list of parties who unsubscribed. If that's the case, this data will be retained for three months after you unsubscribed, solely for the purposes of indicating that you do not want to receive commercial communications.
- **If you participate in contests, surveys, and product testing.** All personal information that might be processed during contests, surveys and your participation in product testing will be retained for two years after the data has been gathered.

We store your personal information in a Cloud

We may store your personal information in a cloud. As a result, your personal information can be processed by a cloud service provider on our behalf and stored in different locations across the world. We have entered into contractual arrangements with such cloud service providers and have taken the necessary organizational measures to protect your personal information and to ensure that your personal information will be used exclusively for the purposes stated in this Privacy Notice.

Children

We do not target children below 16 years old.

Your rights

Each commercial communication you receive offers the option to unsubscribe from receiving further commercial communications (i.e., object to this use of your personal information). We will try to comply with your unsubscription request as soon as reasonably practicable. Please note that if you unsubscribe from commercial communications, we may still send you important administrative messages, from which you cannot unsubscribe.

You can also request to review, correct, update, suppress, restrict or delete personal information that you have previously provided to us, or request to receive an electronic copy of your personal information for purposes of transmitting it to another company (to the extent this right to data portability is provided to you by applicable law), by contacting office@first-privacy.com or privacy@jdecOFFEE.com mentioning your name, (company) and address. We will respond to your request consistent with applicable law.

In your request, please make clear what personal information you would like to have changed, whether you would like to have your personal information suppressed from our database. For

your protection, we may only implement requests with respect to the personal information associated with the particular email address that you use to send us your request, and we may need to verify your identity before implementing your request. We will try to comply with your request as soon as reasonably practicable.

Please note that we may need to retain certain information for recordkeeping purposes and/or to complete any transactions that you began prior to requesting a change or deletion (e.g., when you make a purchase or enter a promotion, you may not be able to change or delete the personal information provided until after the completion of such purchase or promotion).

Role of data protection authorities

If you have any complaints about the way we process your personal information, we are glad to help you out. Nevertheless, you have the right to lodge a complaint with the relevant regulatory authority in Malaysia.

Contact and company details

Please send us your questions and comments about privacy to privacy@jdecoffee.com. Or contact us via one of our social media channels.