



REMINGTON DATA PRIVACY POLICY

English Version, last update dated October 5, 2023

Remington Holding Company, LLC and its subsidiaries, and joint ventures (all collectively, “**Remington**”, “**we**”, “**us**” or “**our**”) are committed to compliance with applicable data protection laws in all locations they operate.

The data controller of your Personal Data is the Remington entity with whom you have a relationship and/or interactions.

In particular, this Data Privacy Policy (the “**Policy**”) is directed at:

1. Individuals working within Remington Group (e.g. employees, contractors, temporary workers, interns);
2. Job applicants applying to an open position within Remington Group;
3. The web users accessing and using our websites, web portals, mobile applications or other digital services (all collectively, our “**Sites**”);
4. The business contacts within our clients, vendors and prospects.

This Policy explains how and why we collect and use Personal Data about you depending on your relationship and/or interactions with Remington, and how exercise your rights about your Personal Data.

As you read this Policy, please keep in mind the following important notes about how this Policy applies:

1. This Policy contains specific notices that may not be applicable to you because of where you are located or the type of Personal Data we collect about you depending on your relationship and/or interactions with Remington.
2. This Policy may be completed or supplanted by other data privacy policies or information notices about specific personal data processing not covered by this Policy.
3. Our Sites may contain links to third-party websites that we do not operate, control or endorse. We are not responsible for the personal data processing operated by these third-party websites. We suggest that you read the documentation of these third-party websites for information about the collection and use of your personal data.
4. We aim to review and update this Policy to reflect our actual practices. Therefore, we recommend you to regularly review this Policy.

I. PERSONAL DATA

“**Personal Data**” shall mean, without limitation, any information that, either directly or when combined with other data, identifies a specific individual or household, and any other information Remington

associates with it.

A. What are the Sources of Personal Data

Depending on your relationship and/or interactions with Remington, we may collect Personal Data about you from a few different sources:

- 1. Directly from you;
- 2. From third parties but only when authorized by the applicable law.

B. What Personal Data is Collected by Remington

The provision of certain Personal Data may be necessary or optional, depending on your relationship and/or interaction with Remington. Mandatory data will be marked as such at the moment of collection. If you refuse to provide mandatory data, Remington may not be able to process your request or comply with its obligations.

Unless we expressly disclose in this Policy as collection permitted by the applicable law, we ask that you not send or disclose to us any other sensitive Personal Data (e.g., information related to racial or ethnic origin, political opinions, religion or other beliefs, health, biometrics or genetic characteristics, trade union membership, etc.) on or through the Sites or otherwise to us.

- 1. **If you are working within Remington Group (e.g. employees, contractors, temporary workers, interns)**, Remington may collect and process the following Personal Data about you:

Categories	Examples
Identification data	Gender, first name, last name, date and place of birth, nationality, internal number, photograph
Contact details (professional and personal)	Email address, phone number, street address
Information about your marital and family status	Family and marital status, dependents (name and date of birth), contact details of individuals to contact in case of an emergency
Professional data	Resume, education history, work history, background check details, any other relevant information collected during the recruitment process, copy of the ID documents required by the labor law (i.e. driver’s license, identity card, passport, etc.)
Information necessary for the administrative management of your working relationship with Remington	HR records (including your status, position and seniority, place of work, working hours, information regarding your salary), nature of your contract with Remington and its content, your work products, data related to your performance, data related to the management of your career, data related to your professional training, data regarding your professional evaluation, data related to your days’ leave/absence,

	any information required to comply with the legal obligations imposed to Remington as employer, information related to disciplinary measures and grievances, date of departure and reasons for your departure
Information necessary for the payment of your salary	Salary, payslip, tax number, banking details, any financial or banking information required to comply with the legal obligations imposed to Remington as employer
Information about your health condition (only when authorized by the applicable law)	Data related to a disability where relevant for adjusting your workplace, data related to sickness leave, data related to accidents at work
Electronic activity information	Information related to your use of the professional IT resources, including in particular messages, emails, files, documents or information available in your professional electronic mailbox

2. **If you are a job applicant**, Remington may collect and process the following Personal Data about you:

Categories	Examples
Identification data	Gender, first name, last name, date of birth, nationality, photograph (optional)
Contact details	Email address, phone number, street address
Professional data	Job position to which you are applying, resume, cover letter, education history, work history, background check details, desired salary type, any other relevant information provided by you in your job application
Internet or other electronic network activity information (if you apply online)	IP address, device type, browser type, browsing history, information about your interaction with our Sites

3. **If you access and use our Sites**, Remington may collect and processing the following Personal Data about you:

Categories	Examples
Identification data	First name, last name
Contact details	Email address, phone number
Information related to your exchanges with Remington	Date and hour of your online request, subject and content of your online request, your exchanges with the relevant Remington's services, follow-up to your online request

Internet or other electronic network activity information	IP address, device type, browser type, browsing history, information about your interaction with our Sites
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4. **If you are a business contact within our clients, vendors and prospects**, Remington may collect and process the following Personal Data about you:

Categories	Examples
Identification data	Gender, first name, last name, client number (where applicable), company, position
Professional contact details	Email address, phone number, postal address
Commercial information	Nature of your contract with Remington and its content, products or services provided, or considered
Information related to your exchanges with Remington	Date and hour of your request, subject and content of your request, your exchanges with the relevant Remington’s services, follow-up to your request

C. **How Remington May Use Personal Data**

1. **If you are working within Remington Group (e.g. employees, contractors, temporary workers, interns)**, Remington may use Personal Data for the following purposes:

Purposes	Examples of use of your Personal Data	Legal bases
Working relationship management	<ul style="list-style-type: none"> to prepare and sign the contract between you and Remington 	Steps prior to entering into a contract
	<ul style="list-style-type: none"> to manage the contractual relationship with you to ensure that you fully comply with your contractual obligations to pay you to check and make decisions about your suitability for work to take necessary steps to terminate your working relationship with Remington (where applicable) 	Performance of the contract
	<ul style="list-style-type: none"> to manage internal directories and organization charts to carry out performance reviews 	Legitimate interest of Remington to manage its personnel

	<ul style="list-style-type: none"> to perform internal project in order to enhance your well-being at work 	
Managing the professional IT resources	<ul style="list-style-type: none"> to monitor and ensure maintenance of the professional IT resources to define policies and procedures applicable to the professional IT resources, including the access rights of the users to ensure the security of the professional IT resources (including the prevention of non-authorized access and the prevention of the distribution of malicious software) 	Legitimate interest of Remington to manage and monitor the professional IT resources
Pre-litigation or litigation management	<ul style="list-style-type: none"> to conduct internal investigations, collecting evidence for future or ongoing preliminary or disciplinary hearings, which may involve accessing and using any item in you professional electronic mailbox even after your departure from Remington to take action against any identified breach to manage any dispute or litigation 	Legitimate interest of Remington in defending its rights and interests
Compliance with legal and regulatory obligations	<ul style="list-style-type: none"> to comply with applicable legal and regulatory obligations, in particular regarding health and security obligations to check that you are legally entitled to work to manage your requests when you exercise your rights 	Legal and regulatory obligations to which Remington is subject

2. **If you are a job applicant**, Remington may use Personal Data for the following purposes:

Purposes	Examples of use of your Personal Data	Legal bases
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<p>Managing your job application</p>	<ul style="list-style-type: none"> • to communicate your job application to the Remington entity concerned • to examine your job application • if you are a successful applicant, to organize an interview in order to assess your suitability and professional skills for the open position • to recontact you if needed 	<p>To take steps prior to entering into a contract</p>
<p>Pre-litigation or litigation management</p>	<ul style="list-style-type: none"> • to take action against any identified breach • to manage any dispute or litigation 	<p>Legitimate interest of Remington in defending its rights and interests</p>
<p>Compliance with legal and regulatory obligations</p>	<ul style="list-style-type: none"> • to comply with applicable legal and regulatory obligations • to manage your requests when you exercise your rights 	<p>Legal and regulatory obligations to which Remington is subject</p>

3. **If you access and use our Sites**, Remington may use Personal Data for the following purposes:

Purposes	Examples of use of your Personal Data	Legal bases
<p>Managing your online request</p>	<ul style="list-style-type: none"> • to manage your online request • to recontact you if needed 	<p>Legitimate interest of Remington to manage online requests on our Site</p>
<p>Improving our Sites and your user experience</p>	<ul style="list-style-type: none"> • to evaluate and improve our Sites • to facilitate your navigation on our Sites • to take steps designed to protect the security of our Sites 	<p>Legitimate interest of Remington to improve our Sites and your user experience</p>
<p>Pre-litigation or litigation management</p>	<ul style="list-style-type: none"> • to take action against any identified breach • to manage any dispute or litigation 	<p>Legitimate interest of Remington in defending its rights and interests</p>

Compliance with legal and regulatory obligations	<ul style="list-style-type: none"> to comply with applicable legal and regulatory obligations to manage your requests when you exercise your rights 	Legal and regulatory obligations to which Remington is subject
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4. **If you are a business contact within our clients, vendors and prospects, Remington may use Personal Data** for the following purposes:

Purposes	Examples of use of your personal data	Legal bases
Managing our business relationship	<ul style="list-style-type: none"> to carry out Remington’s business, including but not limited to contract / orders management, invoicing, payment, providing products and service to manage the contractual relationship with you to manage any request or complaint 	Performance of contract
Improving our products and services	<ul style="list-style-type: none"> to obtain your feedback about our services 	Legitimate interest of Remington to improve its products and services
Pre-litigation or litigation management	<ul style="list-style-type: none"> to take action against any identified breach to manage any dispute or litigation 	Legitimate interest of Remington in defending its rights and interests
Compliance with legal and regulatory obligations	<ul style="list-style-type: none"> to comply with applicable legal and regulatory obligations to manage your requests when you exercise your rights 	Legal and regulatory obligations to which Remington is subject

D. How Personal Data May Be Disclosed:

To the extent permitted by the applicable law, all categories of Personal Data described above may be disclosed to the following categories of unaffiliated parties:

- a. to entities within the Remington Group for the global management of the Remington Group’s business activities;
- b. to Remington’s service providers which provide services such as website hosting, data analysis, payment processing, order fulfillment, infrastructure provision, IT services, payroll processing,

benefits enrollment, customer service, email delivery services, auditing services and other services, and only to the extent to enable them to provide such services;

- c. to a successor-in-interest in the event of any reorganization, merger, sale, joint venture, assignment, transfer or other disposition of all or any portion of Remington's business, assets or membership interests (including in connection with any bankruptcy or similar proceedings);
- d. to lawyers and all interested parties but exclusively in the case of the management of possible disputes and other legal matters where appropriate;
- e. to the extent permitted by the applicable laws in response to an express request of any governmental authority, regulator or a court of competent jurisdiction only where such disclosure cannot reasonably be withheld.

II. SECURITY

Remington is transparent about its Personal Data collection practices and uses appropriate security physical, technical and administrative measures to reduce the risk of unauthorized or unlawful processing, accidental loss, modification, destruction of, or damage to the Personal Data that is entrusted to us. Please notify Remington immediately should you believe that any collected Personal Data is no longer secure by sending an email at data.privacy@remingtonseeds.com.

III. TRANSFER OF PERSONAL DATA

As far as possible, your Personal Data is processed within your country. Since we are active globally and we use service providers located around the world, your Personal Data can be transferred to other countries, which may have data protection rules that are different from those of your country.

IV. RETENTION PERIOD

Remington will retain your Personal Data for as long as needed in light of the purpose(s) for which it was obtained and consistent with the applicable law.

If you are working within Remington Group (e.g. employees, contractors, temporary workers, interns):

Unless otherwise required by the applicable law, your Personal Data will be kept until the end of your relationship with Remington.

Beyond this retention period, your Personal Data can be kept during the legal retention periods imposed by the applicable law or during the applicable statute of limitation for evidence purposes (only where relevant).

If you are a job applicant:

Unless otherwise required by the applicable law, your Personal Data will be kept:

1. In the event of recruitment further to your job application: during the retention periods applicable to Remington Group's employees.

2. In the event of unsuccessful job application: during three (3) months from the refusal decision so that you can obtain an explanation about this decision.

Beyond these retention periods, your Personal Data can be kept during the legal retention periods imposed by the applicable law or during the applicable statute of limitation for evidence purposes (only where relevant).

If you access and use our Sites:

Unless otherwise required by the applicable law:

- the data collected through an online request form will be kept until the complete processing of your online request;
- your traffic data will be kept for a period of thirteen (13) months from the collection date.

Beyond these retention periods, your Personal Data can be kept during the legal retention periods imposed by the applicable law or during the applicable statute of limitation for evidence purposes (only where relevant).

If you are a business contact within our clients, vendor and prospects:

Unless otherwise required by the applicable law, your Personal Data will be kept:

- until the end of your business relationship with Remington; or
- during twelve (12) months after your last contact with Remington if you do not have a business relationship with Remington.

Beyond these retention periods, your Personal Data can be kept during the legal retention periods imposed by the applicable law or during the applicable statute of limitation for evidence purposes (only where relevant).

V. UPDATES TO THIS POLICY

Remington may periodically update this Policy in order to reflect our actual practices. Please reference the “Last Updated” legend at the top of this page to see when this Policy was last revised. Any changes to this Policy will become effective on such “Last Updated” date and any use of our Sites following these changes is deemed to be acceptance of the revised Policy.

VI. CONTACTING REMINGTON

For any questions about this Policy, you may contact us at: data.privacy@remingtonseeds.com or 1-877-443-1663.

Please do not include any financial or other sensitive information or any other information that is not necessary in any such communications.

VII. SPECIAL NOTICES (DEPENDING ON YOUR LOCATION)

A. Special Notice for US Residents

You have the right to get access to and obtain for your own use any of your Personal Data. Applicable laws may afford you some or all of the following privacy rights:

- **Right to Receive Information on Privacy Practices:** You have the right to receive certain legally required information at or before the point of Collection or in response to your request.
- **Right to Deletion:** You may request that we delete any Personal Information about you that we Collected from you, subject to certain exceptions.
- **Right to Correction:** You may request that we correct any inaccurate Personal Information we maintain about you.
- **Right to Know:** You may request that we provide you with specific information about how we have handled your Personal Information, including providing you with a copy of the specific pieces of Personal Information we have Collected about you in a portable format.
- **Right to Non-Discrimination:** You have the right not to be discriminated against for exercising your data subject rights. That means not denying goods or services to you, charging you different prices or rates, or providing a different level of quality for products or services as a result of you exercising your data subject rights.
- **Rights to Opt-Out:** You may request to opt-out of the Sale and Sharing of your Personal Information, cross-context behavioral or targeted advertising, automated decision making or profiling, to the extent such activities are defined and restricted under applicable laws.
- **Right to Restrict or Object to Processing:** You may request us to suppress or cease the processing of some of your Personal Information but we may still store your Personal Information.
- **Right to Limit the Use of Your Sensitive Personal Information:** You may request to limit the use of your Sensitive Personal Information to only the purposes authorized by applicable laws.
- **Right to Lodge a Complaint:** You have the right to file a complaint with your local data protection authority if you consider that the processing of Personal Information relating to you infringes upon your rights.
- **Right to Withdraw Consent:** To the extent that our processing of your Personal Information is solely based on your consent, you may withdraw that consent at any time.

B. Special Notice for California Residents

Sale or Sharing of Personal Data. Remington has not sold or shared your Personal Data in the past twelve months and does not have actual knowledge that it sells or shares the Personal Data of minors under 16 years of age. For the purpose of this section, the California Consumer Privacy Act (as amended by the California Privacy Rights Act, collectively the “CCPA”) broadly defines “sell” as “selling, renting, releasing, disclosing, disseminating, making available, transferring, or otherwise communicating orally, in writing, or by electronic or other means, a consumer’s personal information by the business to a third party for monetary or other valuable consideration.” CCPA defines “share” as “sharing, renting, releasing, disclosing, disseminating, making available, transferring, or otherwise communicating orally, in writing, or by electronic or other means, a consumer’s personal information by the business to a third party for cross-context behavioral advertising, whether or not for monetary or other valuable consideration, including transactions between a business and a third party for cross-context behavioral advertising for the benefit of a business in which no money is exchanged.”

Children’s privacy. Remington does not intend to knowingly collect or solicit, by us directly or through use of the Sites, any information from anyone under the age of 13 or knowingly allow minors under the age of 13 to disclose their Personal Data. Remington directs information request to individuals who are permitted to share their Personal Data without parental consent.

Your rights. Please fill out [this web form](#) or use one of the methods at the [contact us section below](#) to exercise the following rights under the CCPA:

- Right to Receive Information on Privacy Practices
- Right to Know the following:
 - The categories of Personal Information we collected about you.
 - The categories of sources for the Personal Information we collected about you.
 - Our business or commercial purpose for collecting that Personal Information.
 - The categories of third parties with whom we share that Personal Information.
 - The specific pieces of Personal Information we collected about you (also called a data portability request) and provide a copy to you in an electronic or paper format.
 - If we disclosed your Personal Information for a business purpose, a list disclosing disclosures for a business purpose, identifying the Personal Information categories that each category of recipient obtained.
- Right to Deletion
- Right to Correction
- Right to Non-Discrimination.
- Right to Opt-Out of cross-context behavioral advertising, the sale or sharing of Personal Information, the processing of Personal Information for profiling, and automated decision making. Please note that we do not use your Personal Information for these purposes.
- Right to Limit the Use of Your Sensitive Personal Information. Please note that we do not use Sensitive Personal Information about you for purposes not authorized by the CCPA.

Once we receive your request, we may ask you to provide information that will help us verify your identity. In particular, if you authorize an agent to make a request on your behalf, we may require the agent to provide proof of signed permission from you to submit the request, or we may require you to verify your own identity to us or confirm with us that you provided the agent with permission to submit the request. In some instances, we may decline to honor your request if an exception applies under the CCPA. We will respond to your request consistent with applicable law.

C. Special Notice for European Union and United Kingdom Residents

Personal Data transfers. If your Personal Data is transferred outside the EU/EEA/UK, Remington implements appropriate safeguards in accordance with your local data protection laws (e.g. appropriate standard contractual clauses) in absence of an adequacy decision and after having carried out an assessment of the level of protection of your rights in third country. The list of the recipients located outside the EU/EEA/UK and the associated appropriate safeguards are available upon request by sending an email directly to Remington at: data.privacy@remingtonseeds.com.

Beyond these recipients and depending on the location of Remington entity(ies) to which you interact with, your Personal Data can also be transferred to another third country.

Your rights. In accordance with your local data protection laws, you have the following rights in relation with your Personal Data:

Your rights	Scope of you rights
Right to access your Personal Data	You have the right to request: <ul style="list-style-type: none"> • the confirmation on whether Remington processes your

	<p>Personal Data or not;</p> <ul style="list-style-type: none"> ● a copy of such Personal Data; and ● information on the use of your Personal Data by Remington in a clear, transparent and understandable way (as provided in this Policy).
Right to rectify your Personal Data	You have the right to request the rectification of your Personal Data, in order to obtain the modification of your Personal Data if your Personal Data is obsolete, inaccurate or incomplete.
Right to delete your Personal Data	<p>You have the right to request the deletion of your Personal Data (or right to be forgotten), when one of the following conditions applies:</p> <ul style="list-style-type: none"> ● you object to the processing of your Personal Data and there are no overriding legitimate reasons justifying to maintain the processing of your Personal Data (e.g. legal obligation involving the retention of your Personal Data); ● you object to marketing activities; ● you decide to withdraw your consent on which the processing is based; ● your Personal Data are no longer useful for the original purposes for which it was collected or for any other type of processing; ● the use that is made of your data does not comply with the applicable legal or regulatory provisions.
Right to restrict the processing of your Personal Data	<p>You have the right to request the restriction of the processing during a limited period of time, in particular in order to carry out some verifications, where one of the following conditions applies:</p> <ul style="list-style-type: none"> ● you contest the accuracy of your Personal Data, the processing of which is thus restricted for the period necessary for Remington to verify the accuracy of such Personal Data; ● the processing is unlawful and, rather than requesting their deletion, you prefer to restrict their use; ● Remington no longer needs your Personal Data for the purposes of the processing, but you need them for the establishment, exercise or defense of legal claims; ● you have objected to the processing, which is thus restricted pending the verification of whether the compelling legitimate grounds of Remington may override your interests, rights and freedoms.
Right to the portability of your Personal Data	<p>You have the right to request a copy of your Personal Data in a structured, commonly used and machine-readable format and also can request their transmission to another data controller where technically feasible. This right is not exercised in all circumstances, it applies only if it fulfils all the following conditions:</p> <ul style="list-style-type: none"> ● your request is only related to your Personal Data (excluding anonymous or third-party data); ● your request does not adversely affect the rights or freedoms of others, in particular those of Remington (including trade

	secrets or intellectual property); <ul style="list-style-type: none"> the processing is carried out by automated means (paper files are therefore not included); the processing is based on consent or the performance of a contract.
Right to object to the processing of your Personal Data	You have the right to object to our processing of your Personal Data at any time if the processing is based on our legitimate interest. Remington will no longer process your Personal Data, unless they demonstrate compelling legitimate grounds for the processing which override your interests, rights and freedoms, such as the respect of a legal obligation (e.g. legal obligation involving the retention of personal data), or for the establishment, exercise or defense of legal claims.
Right to withdraw your consent for processing your Personal Data	You have the right to withdraw your consent when it has been obtained, without this withdrawal affecting the lawfulness of the personal data processing operations previously carried out.

It is specified that the exercise of these rights is based on the legal basis of the processing, as follows:

	Access	Rectification	Erasure	Restriction	Data portability	Objection
Consent	Yes	Yes	Yes	Yes	Yes	Withdrawal of consent
Steps prior to entering into a contract			Yes		No	
Contract			Yes		No	
Legitimate interest			Yes		Yes	
Legal obligation			No		No	

Depending on your country of residence, you may have additional local rights with respect to our processing of your Personal Data.

Under certain circumstances, Remington may ask you for specific information in order to confirm your identity and ensure the exercise of your rights. This is another appropriate security measure to ensure that Personal Data is not disclosed to an individual who does not have the right to receive it.

If you have any questions or wish to exercise your rights, you may directly contact Remington by sending an email at: data.privacy@remingtonseeds.com.

If needed, you may also lodge a complaint with your national data protection authority. This right may be exercised at any time and free of charge, at the exclusion of potential postal fees or expenses related to legal representation or assistance should you choose to engage third party assistance for the procedure.