

Document title: Dairy Crest Privacy Notice – Shareholders		
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Dairy Crest Privacy Notice - Shareholders

1. What is the purpose of this document?

- 1.1 Dairy Crest is a "data controller". This means that we are responsible for deciding how we hold and use personal information about you. If you have any questions about this privacy notice, please contact us as set out under paragraph 14.
- 1.2 This privacy notice is relevant where you are an individual and are a current or former registered shareholder of Dairy Crest Group plc ("**Dairy Crest**"). It makes you aware of how and why your personal data will be used, namely for the purposes of managing your shareholding in Dairy Crest, and how long it will usually be retained for. It provides you with certain information that must be provided under data protection laws.

2. Your duty to inform us of changes

- 2.1 It is important that the personal data we hold about you is accurate and current. Please keep us informed if your personal data changes during your relationship with us.

3. Data protection principles

- 3.1 We will comply with data protection law, which means that your data will be:
 - Used lawfully, fairly and in a transparent way.
 - Collected only for valid purposes that we have clearly explained to you and not used in any way that is incompatible with those purposes.
 - Relevant to the purposes we have told you about and limited only to those purposes.
 - Accurate and kept up to date.
 - Kept only as long as necessary for the purposes we have told you about.
 - Kept securely.

4. The kind of information we hold about you

- 4.1 In connection with your shareholding in Dairy Crest we will collect, store, transfer, and use the following categories of personal information about you:
 - Name
 - Address
 - Contact details such as your phone and email address
 - Bank account details
 - Details of shares held
 - Shareholder reference number
 - Voting instructions

4.2 We do not knowingly collect any "special categories" of more sensitive personal information or information about criminal convictions and offences.

4.3 We may also aggregate and/or anonymise your personal data (so that it can no longer be associated with you) for research or statistical purposes in which case we may use this information indefinitely without further notice to you.

5. How is your personal information collected?

5.1 We collect personal information from you, the shareholder:

- when you provide it to Dairy Crest, Link or other third parties engaged to carry out services on our behalf (see paragraph 9 for more details of third parties engaged by Dairy Crest to process your personal data);
- when you provide it to an agent which you use to trade in Dairy Crest shares;
- when you exercise rights attached to your shares, e.g. voting;
- if you register for any of Dairy Crest's or Link's online services.

5.2 We may also collect information about you from public registers, such as the electoral roll or register of county court judgements, or from databases managed by credit reference agencies.

6. How we will use information about you

6.1 We will use the personal information we collect about you when the law allows us to. We have set out below a description of the ways we plan to use your data and the legal bases we rely on to do so:

Purpose / Activity	Lawful basis for processing
Manage your shareholding in Dairy Crest and keep your record on the shareholder register up-to-date;	Necessary to comply with a legal obligation
Make shareholder communications and shareholder meeting materials available to you, such as the Annual Report and the Notice of Annual General Meeting;	Necessary to comply with a legal obligation Necessary for our legitimate interests (to communicate effectively and engage with our shareholders)
Pay dividends to you;	Necessary for our legitimate interests (to engage with our shareholders)
Allow you to exercise your rights as a shareholder, such as the right to vote at shareholder meetings;	Necessary to comply with a legal obligation
Respond to any correspondence you send to us	Necessary for our legitimate interests (to communicate effectively and engage with our shareholders)

To help us prevent and detect fraud and fight financial crime, to verify your identity and carry out tracing activities	<p>Necessary to comply with a legal obligation.</p> <p>Necessary for our legitimate interests (to meet our regulatory obligations)</p>
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7. If you do not provide personal information

7.1 If you do not provide information when requested, which is necessary for us to register or maintain your shareholding, you may not be able to hold shares in Dairy Crest.

8. Automated decision-making

8.1 We do not use automated decision-making.

9. Data sharing

9.1 We will only share your personal information with third parties where required by law, where it is necessary for the purposes of managing your shareholding or where we have another legitimate interest in doing so including:

- Link Market Services Limited, who are engaged as our ordinary share registrar. Link Market Services Limited and other Link Group entities (“**Link**”) maintain the Dairy Crest shareholder register and processes shareholders’ personal information on our behalf.
- Third party service providers which provide our IT software and systems.
- Payment providers who help us manage dividend and other payments to our shareholders.
- Professional advisors, e.g. solicitors.
- Regulatory agencies or government bodies, such as the Financial Conduct Authority, the London Stock Exchange, HMRC etc.

9.2 All our third-party service providers and other entities in the Dairy Crest group are required to take appropriate security measures to protect your personal information in line with our policies. We do not allow our third-party service providers to use your personal data for their own purposes. We only permit them to process your personal data for specified purposes and in accordance with our instructions.

Transferring information outside the EEA

9.3 Some of our IT service providers process electronic personal data held in our software and systems in the following countries outside the European Economic Area (EEA): US and India. There is not an adequacy decision by the European Commission in respect of those countries. This means that the countries to which we transfer your data are not deemed to provide an adequate level of protection for your personal information.

9.4 However, to ensure that your personal information does receive an adequate level of protection we have put in place the following appropriate measures to ensure that your personal information is treated by those third parties in a way that is consistent with and which respects the EU and UK laws on data protection:

- (1) standard contractual clauses approved by the European Commission decision for the transfer of personal data to processors established in third countries from time to time; or
- (2) when sending data to the United States of America, the US-EU Privacy Shield.

9.5 If you require further information about these protective measures, please contact the Data Privacy Manager.

10. Data security

- 10.1 We have put in place appropriate security measures to prevent your personal information from being accidentally lost, used or accessed in an unauthorised way, altered or disclosed. In addition, we limit access to your personal information to those employees, agents, contractors and other third parties who have a business need-to-know. They will only process your personal information on our instructions and they are subject to a duty of confidentiality.
- 10.2 We have put in place procedures to deal with any suspected data security breach and will notify you and any applicable regulator of a suspected breach where we are legally required to do so.

11. Data retention

- 11.1 We will retain your personal information for as long as reasonably required to achieve the purposes for which it was collected. Your record in the shareholder register will be maintained while you are a shareholder of Dairy Crest.
- 11.2 If you cease to hold Dairy Crest shares, your information will be kept for a period of up to 6 years following the last update to your record on the shareholder register, or for as long as is necessary to resolve any outstanding matters relating to your shareholding or to meet legal, regulatory or tax requirements.

12. Rights of access, correction, erasure, and restriction

Your rights in connection with personal information

- 12.1 Under certain circumstances, by law you have the right to:
- **Request correction** of the personal information that we hold about you. This enables you to have any incomplete or inaccurate information we hold about you corrected.
 - **Request access** to your personal information (commonly known as a "data subject access request"). This enables you to receive a copy of the personal information we hold about you and to check that we are lawfully processing it.
 - **Request erasure** of your personal information. This enables you to ask us to delete or remove personal information where there is no good reason for us continuing to process it. You also have the right to ask us to delete or remove your personal information where you have exercised your right to object to processing (see below).
 - **Object to processing** of your personal information where we are relying on a legitimate interest (or those of a third party) and there is something about your particular situation which makes you want to object to processing on this ground. You also have the right to object where we are processing your personal information for direct marketing purposes.

- **Request the restriction of processing** of your personal information. This enables you to ask us to suspend the processing of personal information about you, for example if you want us to establish its accuracy or the reason for processing it.
- **Request the transfer** of your personal information to another party.
- **Object to automated processing** of your personal information.
- **Withdraw consent** where we are relying on consent as a lawful basis to process your personal information.

12.2 In some circumstances there may be specific legal reasons why we are not able to comply with your request to exercise your rights. Where this is the case, we will inform you of this.

12.3 If you want to review, verify, correct or request erasure of your personal information, object to the processing or automated processing of your personal data, or request that we transfer a copy of your personal information to another party, please contact datacontroller@dairycrest.co.uk in writing. We will endeavour to respond to you within one month of receipt of your request.

13. Changes to this privacy notice

13.1 We reserve the right to update this privacy notice at any time.

13.2 This document was last updated on 6 December 2018.

14. Data privacy manager

14.1 We have appointed a data privacy manager to oversee compliance with this privacy notice. If you have any questions about this privacy notice or how we handle your personal information, please contact the Data Privacy Manager as follows:

Full name of legal entity:	Dairy Crest Limited
Contact:	Data Privacy Manager
Email address:	datacontroller@dairycrest.co.uk
Postal address:	Data Privacy Manager Dairy Crest Group plc Claygate House, Littleworth Road, Esher, Surrey, KT10 9PN

14.2 You have the right to make a complaint at any time to the Information Commissioner's Office (ICO), the UK supervisory authority for data protection issues.

If you have any questions about this privacy notice, please contact the Data Privacy Manager at datacontroller@dairycrest.co.uk